

NATIONAL RISK ASSESSMENT TOOL GUIDANCE MANUAL

MODULE 8 TERRORISM FINANCING RISK ASSESSMENT

JUNE 2015

[A more recent and comprehensive TF risk assessment tool is available on the World Bank website as of June 2022. Please consider using the new TF Risk Assessment Tool.]

World Bank Group's National Money Laundering and Terrorist Financing Risk Assessment Toolkit

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Important reminders for the Working Group

- Base your assessments on group discussions to ensure the inclusion of a wide array of perspectives. All the members of the Working Group should contribute to discussions, as well as to the overall assessment, as the inclusion of all viewpoints and perspectives will contribute to a higher-quality report.
- Keep a record of the key arguments, findings, and conclusions of your discussions. These notes will be important in documenting the analysis and support for the conclusions and findings that will feature in the final report. Assign a note-taker for this task.
- The quality of the output depends on the quality of the input. An unrealistic assessment will reduce the credibility of the assessment and will limit the benefits the jurisdiction can derive from the assessment.
- During the assessment, please clearly identify any problems, weaknesses, or gaps by determining what is missing and what is not working. Such an approach will help you draw up the action plans following your assessment.
- Support all your findings and conclusions with clear analysis and documented evidence, in order to demonstrate the basis for each rating.
- Prepare team reports on the key findings and conclusions that are clearly based on references from underlying sources. These reports will become the building blocks of the overall National Risk Assessment report.

1. OBJECTIVES OF THE TERRORISM FINANCING RISK ASSESSMENT MODULE

The main objectives of the Terrorism Financing Risk Assessment Module (the module) are to:

- Identify the terrorism financing threat based on the terrorism threat
- Identify the main terrorism financing threats by identifying the direction of the financial flows, as well as its sources and channels
- Assess vulnerability, based on the available terrorism financing controls and country context factors.

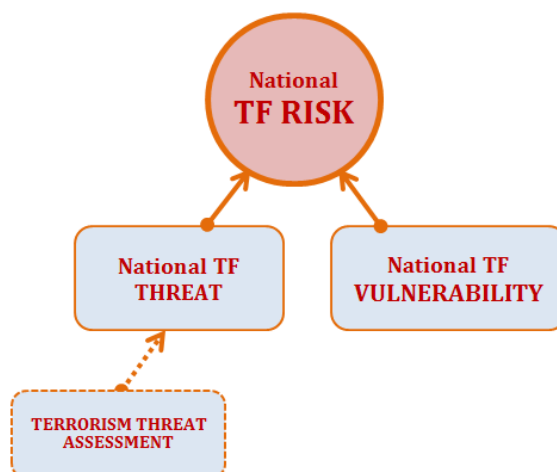
The outcome of the Terrorism Financing Risk Assessment should be used to inform policy measures and improve data collection.

2. UNDERSTANDING THE TERRORISM FINANCING RISK ASSESSMENT MODULE

Figure 1 shows the structure of the Terrorism Financing Risk Assessment Module. The module consists of three parts, and the Excel file for this module contains three corresponding tabs:

- **Terrorism threat** aims to determine the extent of the terrorism financing threat, based on the sources of terrorist threats. These are identified through enforcement and intelligence data from the jurisdiction on terrorism, as well as related financial information.
- **TF threat** aims to identify the direction of terrorism financing funds, and the sources and channels that are being used for terrorism financing. These are identified using enforcement data and typology information as indicators.
- **Vulnerability** aims to determine the strength of terrorism financing controls within the country context.

Figure 1: The Structure of the TF Risk Assessment Module



3. FLEXIBILITY OF THE MODULE

The module includes various tables as well as a large number of indicators. This gives assessors a wide range of options, which they may find useful in making the assessment. Having so many options may seem somewhat daunting, especially for jurisdictions that find it difficult to collect appropriate data in sufficient quantities. However, this apparent complexity is actually specious: compared to the other modules, this present module is less sophisticated, containing no macros. This means that it offers assessors a large measure of flexibility, making it easy for them to adapt it to their own situation. Assessors can skip indicators that are less relevant in the context of their country, and choose ones that are more meaningful, or more convenient, in terms of data and information collection.

4. DECIDING THE PERIOD FOR WHICH DATA NEEDS TO BE COLLECTED

The World Bank's National Risk Assessment methodology is based on informed, expert judgment. The purpose of data and information collection is to inform and facilitate sound judgment. This judgment should also be applied in determining the most appropriate period over which data information should be collected. For some indicators, data from the previous year can provide the most meaningful insight. In other cases, however, it may be necessary to collect data and information from the previous five years, as only then may it be possible to discern relevant trends and cumulative amounts.

Terrorism financing cases may take a long time to investigate, prosecute, and adjudicate. Furthermore, the number of terrorist financing convictions is often low in many jurisdictions. The Working Group is therefore advised to use, if possible, data from the past ten years in their analysis. If this is not available, however, data from the past five years or past three years may be used instead. (See the table below for detailed guidance regarding different types of indicators.) Considering that in many countries counter-terrorism financing regimes have only recently been adopted, data collection periods will also depend on the availability of the data.

Table 1: Guidance on the Data Collection Period

INDICATORS	DATA COLLECTION PERIOD
Quantitative indicators of threats and vulnerabilities	Depending on the availability of data, between three, five, or ten years
Qualitative indicators of threats and vulnerabilities	This is mostly qualitative information and does not require a strict timeframe. The most meaningful information is the most recent information, so try to obtain as much information from the past five years as possible.

Since this is not a statistical model, there are no strict conditions on having identical data collection periods that need to be applied to all indicators. Using different data collection periods in different sections is not problematic for the overall model. The indicators are analyzed per jurisdiction, and the present situation within the jurisdiction is assessed on that basis. However, it is important that there is consistency across the rows and columns relating to a given indicator. For example, if one wishes to compare the amount of mutual legal assistance offered across various jurisdictions, then it is necessary that the data used was collected in the jurisdictions over the same time period (e.g., five years).

5. SOURCES FOR DATA AND INFORMATION

The following table provides guidance about which data and information sources can be used for completing the assessment.

Table 2: Guidance on Data and Information Sources

INDICATORS	POSSIBLE SOURCES OF DATA AND INFORMATION
Quantitative indicators	<ul style="list-style-type: none"> • Judicial system database • Prosecutor's Office database • Law enforcement database • FIU database • Research reports and academic studies
Qualitative indicators	<ul style="list-style-type: none"> • Intelligence • Reports by government agencies • Academic studies and publications • Publications by international organizations • Open sources (e.g. Internet, and public news) • Surveys with focus groups or the general public • Interviews with focus groups or experts

6. DETAILED INSTRUCTIONS ON HOW TO USE THE EXCEL TEMPLATE

6.1 Terrorism Threat Tab

The tab for terrorism threats in the Excel spreadsheet collects data about organizations and individuals who pose a terrorist threat to the jurisdiction. The purpose of this data collection is to help the WG establish the potential extent of terrorism financing within the jurisdiction, using the sources of terrorism (i.e. terrorist organizations and individuals) as the main starting point.

Vertical axis (column A): Sources of terrorism threats

On the vertical axis, the WG should insert the names of known terrorist organizations and individuals, or categories of terrorists, that have a nexus within the jurisdiction and are active domestically, regionally, and/or globally. Since this information may be derived from intelligence data, the WG is permitted to list the groups anonymously, e.g., by using aliases. In addition to intelligence and enforcement data, the WG can supplement its knowledge on the operations of terrorist organizations or individuals with open source information, including reports from civil society organizations and credible news agencies.

Columns B–F: Enforcement data on terrorism

In these columns, the WG should make a list of the enforcement data from terrorism cases. This should include the number of reported or investigated cases, the number of convictions, and the number of convicted persons. Also, it is important to make a record of the number of requests for mutual legal assistance that the jurisdiction received or sent. This may include requests from/to intelligence, law enforcement, or financial intelligence authorities. If this type of data is not yet being collected, please make a note of this. The data will be organized according to the terrorist organizations that have been listed in column A. This data should help to establish the extent of active terrorism within the jurisdiction, which in turn should contribute to an awareness of the extent of terrorism financing.

Columns G–H: Consequences of terrorist acts

These columns aim to collect information on the consequences of terrorist acts by the organizations or persons listed in column A. As with enforcement data, this information should contribute to the understanding of the extent of terrorism within the jurisdiction.

Columns I–K: Qualitative information on terrorism

Qualitative information on the activity of terrorist organizations and persons can be listed here. This should include a description of future trends, the extent and nature of the (suspected) activity, the size and characteristics of the organizations, and the threat that emerges from them. In addition to information from intelligence authorities, information can be taken from sources that are deemed to be credible by the jurisdiction. This may include open source information, such as reports from government agencies (including those from other jurisdictions), international organizations, civil society organizations, and academic literature or credible news sources.

Columns L–P: The level of the terrorist threat for the jurisdiction

Considering the data and information collected in earlier columns, the WG should determine the level of the terrorism threat in, or to, the jurisdiction. The threat level can be assessed as being low, medium/low, medium, medium/high, or high. The assessment should be supported by the collected data and information. By establishing the level of the terrorism threat in the jurisdiction, the next step will be to evaluate the threat of related terrorism financing within the jurisdiction.

Columns Q–U: Information on the financing needs of terrorist organizations or persons

The aim of these columns is to help assess the financial needs of the terrorist organizations, or persons. This is based on the level of sophistication of their operations and their organizational structure. By determining these details, further insight may be gained into the size and extent of terrorism financing, which has a direct relationship to the organizations and persons active within the jurisdiction.

Columns V–X: Information about the sources, channels, and destinations/origin of terrorism financing

Using the breakdown of organizations and persons, the WG should list the main sources of income, how funds are channeled, which sectors are abused in the process, and where the funds originate from/are destined to go. The WG can use enforcement data, intelligence information, and any other credible sources of information for this purpose. This may include open source information, such as reports from government agencies (including those from other jurisdictions), international organizations, civil society organizations, academic literature, and credible news sources.

Columns Y–AC: The impact of the terrorism threat on the level of terrorism financing

The WG should assess how the impact of the domestic terrorism threat on the level of terrorism financing may be affecting the jurisdiction (based on the information collected in the Excel spreadsheet). Taking into account the extent of terrorism in the jurisdiction, as well as the related financial needs of each of the organizations and individuals, the impact can be determined as being low, medium/low, medium, medium/high, or high. These ratings will contribute to the overall assessment of the terrorism financing threat, which will be examined in the next tab of the Excel spreadsheet.

6.2 TF Threat Tab

The tab “TF threat” in the Excel spreadsheet aims to analyze the financial flows related to terrorism financing. The analysis is based on enforcement data and information from typologies and examines the direction of TF funds, their sources, and the channels that are used to move the funds. This section focuses solely on the threat emerging from terrorism financing (TF), not on terrorism itself.

Note that cell A3 (“Total”) asks the Working Group to list the total number of cases, which should be entered in columns B to I.

Column A: Direction, sources, and channels

Column A is made up of three parts: (i) direction of funds, (ii) sources, and (iii) channels. These three categories are used for analyzing the enforcement data on terrorism financing, which will need to be inserted in the other columns.

- *Direction of funds*

Financial flows related to terrorism financing can be distinguished by their direction. The funds might be generated in the home jurisdiction, but used for operations elsewhere. Conversely, the funds might be generated in another jurisdiction, but used to fund terrorist operations in the home jurisdiction. Or, the funds may simply pass through the home jurisdiction, using it as a point of transit. It is useful to establish the direction of the flows, as this information is relevant in determining which controls need to be adopted or strengthened.

- *Sources*

The aim of this category is to help determine the source of terrorism financing. Financing may come from legitimate sources (such as non-profit organizations or import/export activities), or from sources that involve criminal activity (such as natural resource theft or drug trafficking). The items that are listed in the Excel template are suggestions; the WG should amend this list according to its relevance to the jurisdiction by adding sources that are missing and deleting items that are not relevant. Since the Excel spreadsheet does not contain any macros or built-in formulas, this will not have any consequences on the tool.

- *Channels*

In this section, the WG should examine which channels are being used, or are suspected of being used, for moving terrorist funds. For example, if funds are deposited into a bank account and then wired to an account in another jurisdiction, the channel being used is the banking sector. Alternatively, funds may have been raised in cash and carried by individuals to or from another jurisdiction. In that case, the WG should amend this list depending on their jurisdiction, and by adding or deleting relevant channels.

Column B: Input from the Terrorism Threat tab

In this column, the WG should record the rating from the tab for terrorism threats, and should organize the rating for each organization and individual according to the categories in column A. By organizing the information in this manner, the WG can distinguish terrorism cases from TF cases using typological information.

Columns C–K: Enforcement data on terrorism financing

The WG should compile data on the enforcement of terrorism financing, and separate the data according to the categorization in column A; for example, the number of investigations, prosecutions, convictions, suspicious transaction reports, mutual legal assistance requests (including requests for international cooperation to/from intelligence agencies), and seized/frozen TF funds.

For example, if – in terms of the direction of funds – there have been investigations in ten TF cases, the WG should enter “10” in cell C3, which is the cell for the total number of investigations. If, out of these ten cases, two cases involved funds being generated domestically for acts of terrorism abroad, and the remaining eight cases related to funds generated domestically for acts of terrorism in the home jurisdiction, “2” should be entered in cell C7 and “8” in C6.

Similarly, if, out of the ten cases, two cases involved funds raised through drug trafficking, and eight through non-profit organizations, then the WG should enter “2” in cell C20, and “8” in C12.

Additionally (with regard to the channels that have been used to move the TF funds), if, out of the ten cases, nine involved money being wired through a bank transfer and one involved physical movement of cash, “9” should be entered in C26 and “1” in C28.

Columns L–N: Qualitative data on TF typologies and estimating undetected TF

These columns aim to capture indicators of TF that go beyond the scope of enforcement data, since enforcement data cannot capture the actual TF incidence comprehensively. The analysis of the indicators depends on the availability of information and data from terrorism financing typologies. Information about the extent and nature of TF within the jurisdiction should be collected from intelligence authorities (including the FIU). Information may also be taken from mutual legal assistance requests (or other information requests) sent/received by intelligence services, law enforcement, or financial intelligence units, if they are related to terrorism financing. The WG can also rely on reports by academics, international organizations, and (other) government and civil society organizations. FATF Mutual Evaluation Reports that cover TF methods within the jurisdiction can also offer relevant insights. Alternatively, FATF typology reports can be referenced if typologies occur within the jurisdiction. Lastly, the WG should provide an estimate of the amount of undetected TF funds or flows within the jurisdiction. As far as possible, this estimate should be supported by data. In this case, the WG is allowed to rely on open source information (such as reports from civil society organizations) that discusses undetected cases of terrorism and TF.

Columns O–V: Assessment of TF threat and its trend

Based on information in the previous columns, the WG should make an assessment of the TF threat within the jurisdiction. The TF threat can be assessed as being low, medium/low, medium, medium/high, or high. Mark the cell that corresponds to the assessment of the TF threat accordingly. Also assess the trend of each item and mark the appropriate cell.

By assessing the TF threat by the categories in column A, the WG should use this analysis to prioritize the areas that have been identified as facing the highest TF threat.

6.3 TF Vulnerability Tab

The tab for TF vulnerabilities in the Excel tool aims to support analysis about the strength of the defense mechanisms of the country, or alternately, the strength of the controls that have been adopted to detect and counter TF.

Rows 4–6: Quality of legislation

The WG should (1) assess whether the jurisdiction has effectively and comprehensively criminalized terrorism financing in its laws, and (2) assess the strengths/weaknesses within the jurisdiction’s legal capacity to prosecute and apply criminal sanctions to the persons that finance terrorism.

The WG should also assess whether the jurisdiction has effective and comprehensive laws and regulations in place that implement targeted financial sanctions that comply with the UN Security Council’s resolutions. This specifically refers to the resolution that requires countries to freeze, without delay, all funds or assets related to terrorism, and to ensure that no assets are made available to, or for, the benefit

of persons and entities designated by the UN Security Council under Chapter VII of the Chapter of UN resolutions, 1267 (1999) and its successor, 1373 (2001).

If there are other laws that impact the level of TF vulnerability, the WG should list them here.

For this assessment, the Working Group should consult:

- Relevant laws, regulations, and enforceable directions
- Findings from supervisory authorities
- Reports from governments and/or international organizations
- Reports from academia and/or civil society organizations.

Rows 8–9: Quality of intelligence

The WG should determine if the country's intelligence authorities gather intelligence on TF and terrorism effectively; if intelligence processing produces quality analysis; and if they cooperate with other enforcement agencies, including the FIU, fully.

Intelligence authorities are able to carry out their functions effectively when they have adequate capacity, resources, independence, and autonomy to perform their functions without fear or favor. Capacities include the skills, experience, and powers to conduct investigations on TF and terrorism. The WG can also consider whether there is a specialized unit for TF and terrorism; the number of dedicated staff and their level of training and knowledge on TF; and any reports on the integrity and independence of the intelligence authorities and their staff.

For the assessment of the effectiveness of domestic cooperation on counter-terrorism financing, the WG can take into account any data about the number of intelligence reports that have been filed with the enforcement authorities, the number of enforcement actions that were initiated based on intelligence work, and any reports on the cooperation between different relevant authorities.

Rows 11–13: Effectiveness of TF-related Suspicious Transaction Reporting, monitoring and analysis

This section assesses the effectiveness of the reporting, monitoring and analysis of Suspicious Transaction Reports (STRs) related to TF.

The WG can consider data on STRs related to TF that have been reported to the FIU, and the case files that have been analyzed and disseminated by the FIU to enforcement agencies. This may include analysis that is based on Currency Transaction Reports and other threshold-based reports. Take into account the number of STRs that have led to investigations or enforcement actions regarding TF. Consider the type of data with which the FIU supports its analysis, such as the databases of other authorities, information exchange arrangements with intelligence authorities, or additional (financial) information from the reporting entity. Feedback from enforcement and supervisory authorities, as well as reporting institutions, can also provide support for the WG's assessment.

In row 13, assess the capacity and commitment of reporting institutions in complying with the screening requirements under the UN Security Council resolutions. Consider the sanctions policy and programs that reporting institutions have in place. The supervisory authority may provide useful information for the assessment of this variable.

Rows 15–16: Adequacy of resources

The WG should assess the adequacy of human, financial, and other resources (such as technical and IT resources, especially analytical software) that are available for counter-terrorism financing (CTF). The availability of adequate resources across the various authorities that have a CTF mandate should allow the authorities to implement an effective CTF regime.

Useful sources of information for this assessment are the annual reports of the relevant authorities, national budget laws, reports from international organizations, and civil society organizations.

Rows 18–21: Effectiveness of international cooperation

This section assesses the effectiveness of international cooperation: whether the jurisdiction actively and effectively renders and requests international (legal) assistance in relation to TF.

The WG should consider:

- Laws and treaties concerning international cooperation for TF and the exchange of information with foreign counterparts
- Reports on any experiences with international cooperation regarding TF
- Feedback from foreign counterparts as to the quality and timeliness of any responses to their requests and their experience in responding to requests from the jurisdiction
- Statistics on TF-related international legal assistance requests made and received by the jurisdiction, and responses from other jurisdictions (e.g., number of requests, with country breakdown)
- Statistics on TF-related assistance requests denied, as well as the reason for denial
- Data about the length of time it takes the country to respond to informal and formal requests for assistance
- The WG discussion regarding the problems faced during international cooperation, including reasons why mutual legal assistance was denied or was unable to be provided
- Information on the jurisdiction's use of the Egmont Group (if a member) and Interpol as channels for informal information/intelligence sharing, and any other participation in international or regional networks by law enforcement and/or prosecutors
- Information on any constraints or limitations found during informal international exchanges.

Rows 23–24: Awareness and commitment in fighting TF

The WG should determine the level of political commitment and the awareness and commitment among policy makers, law enforcement authorities, FIUs, and intelligence agencies authorized to fight TF and terrorism. In addition to governmental reports, reports by civil society organizations and credible news sources, the WG can take their own discussions into consideration.

Rows 26–27: Geographic and demographic factors

The WG should assess whether there are geographic and/or demographic factors that may facilitate TF, and increase/decrease the jurisdiction's vulnerability to TF. These variables may also relate to terrorism through which the incidence of TF might increase or decrease.

Row 29 (and following): Other factors

This section relies on the findings of the National Vulnerability Working Group. The strength of the anti-money laundering framework takes into consideration underlying factors such as the quality of criminal investigations, prosecutions, adjudication, asset forfeiture, and cross-border controls of cash, as well as the strength of AML supervision. These controls are relevant for CTF and should therefore be taken into consideration.

The main findings of the National Vulnerability Working Group should be discussed, along with the factors that impact the country's vulnerability to money laundering and the potential impact on TF. The WG should determine how each factor makes an impact on a country's vulnerability to TF. Additional rows should be added to capture the relevant factors.

Columns B–E: Information

Columns B to E facilitate the systematic documentation of information that is requested in rows 1 to 20. In columns B and C, list the issues that may be regarded as strengths or weaknesses. In column D, list the findings that are supported through statistics or data and make a reference to the sources (this column can be left blank if no sources are available). Information that has been obtained from FATF or FSRB reports can be listed in column D.

Columns F–H: Assessment of negative impacts on vulnerability

For each of the variables in column A, the WG will have determined whether the variable has a high, medium-high, medium, medium-low, or low negative impact on vulnerability. In determining the overall vulnerability to TF, the WG should take the ratings of all the variables into account.

7. ASSESSING THE OVERALL TF RISK

The overall TF risk is determined by the assessment of TF threat and vulnerability within a country. Unlike some of the modules in the National Risk Assessment Tool, this module is not based on an automated formula that combines different variables and their predetermined weight in the overall calculation. Instead, the members of the WG must make an assessment for overall vulnerability and overall threat then determine the overall terrorism financing risk by using the matrix in Figure 1. The results of the discussion and on-the-spot surveys during the first session of the workshop can prove useful as an input for this assessment. Moreover, the WG should ensure that the assessment result is supported by evidentiary data and information, as well as documentation from the underlying discussion.

Figure 2: Overall terrorism financing risk in the jurisdiction

OVERALL TERRORISM FINANCING RISK IN THE JURISDICTION

OVERALL THREAT	H	M	M	MH	H	H
	MH	M	M	MH	MH	H
	M	ML	M	M	MH	MH
	ML	ML	ML	M	M	M
	L	L	ML	ML	M	M
		L	ML	M	MH	H
		OVERALL VULNERABILITY				

ANNEX - SCREENSHOTS OF THE EXCEL MODULE

Terrorism Threat Assessment Tab

TERRORISM THREAT		TERRORISM CASES								QUALITATIVE INFORMATION			TERRORISM THREAT			
SOURCES OF TERRORISM THREAT		Number of cases reported or investigated	Number of convictions	Number of convicted persons	Number of international Assistance requests received	Number of international Assistance requests sent	Property damage	Casualties	Future trends	Other intelligence	Other open source information	High	Medium / High	Medium	Medium /Low	Low
Domestic (targeting home or foreign jurisdictions)																
Terrorist organization A																
Terrorist organization B																
Self-radicalized (lone wolf) terrorists																
Unknown																
...																
Regional (targeting the home jurisdictions)																
...																
...																
Global (targeting the home jurisdictions)																
...																
...																
Home jurisdiction is used as a transit point																
...																
...																
...																
OVERALL TERRORISM THREAT:																

Terrorism Threat Assessment Tab (Continued)

[illegible]

Terrorism Financing Threat Assessment Tab

TERRORISM FINANCING THREAT		INPUT FROM TERRORISM DATA	TERRORISM FINANCING CASES									
		Level of terrorist financing threat implied by terrorism data (based on the terrorism threat tab)	Number of TF cases investigated	Number of TF cases prosecuted	Number of TF cases convictions	Number of persons convicted for TF	Number of case files on TF sent to LEAs	Number of International Assistance requests received	Number of International Assistance requests sent	Amount of TF funds seized or frozen	Amount of TF funds confiscated	
1. DIRECTION OF FUNDS												
A. Funds generated in the home jurisdiction, for operations within the home jurisdiction.												
B. Funds generated in the home jurisdiction, for operations in a foreign jurisdiction.												
C. Funds generated in a foreign jurisdiction, for operations in the home jurisdiction.												
D. Funds generated in a foreign jurisdiction, for operations in foreign jurisdictions (transit point).												
E. Origin and destination cannot be identified.												
2. SOURCES (the list below should be modified by the Working Group)												
Legitimate sources												
Non-profit organizations (NPOs)												
Import/Export												
Construction												
Agriculture												
Donations												
...												
Criminal activity												
Natural resource theft												
Drug trafficking												
Smuggling												
Extortion												
State sponsoring												
...												
3. CHANNELS (the list below should be modified by the Working Group)												
Banking												
Insurance												
Cash (couriers)												
Money exchange offices												
Money value transfer services (regulated)												
Money value transfer services (unregulated)												
Trade												
Real estate												
Non-profit organizations (NPOs)												
...												
OVERALL TF THREAT			Depending on your analysis above, assess the overall TF threat to the country.									

[illegible]

Terrorism Financing Vulnerability Assessment Tab

TERRORISM FINANCING VULNERABILITY	INFORMATION				NEGATIVE IMPACT ON VULNERABILITY
	Strengths and positive aspects	Weaknesses, gaps, and challenges	Statistics/data (if applicable)	Input from FATF/FSRB Mutual Evaluation Report (if applicable)	
Quality of legislation					
Availability and effectiveness of TF crime definition in penal code or other relevant law(s)					
Availability and effectiveness of laws and regulations regarding targeted financial sanctions regimes to comply with UN Security Council resolutions relating to TF					
Other relevant laws which, through their existence or lack thereof, may create TF vulnerabilities					
Quality of intelligence					
Quality of intelligence gathering and processing (e.g., intelligence office/unit specialized in terrorism and its financial aspect)					
Effectiveness of domestic cooperation on CTF					
Effectiveness of TF-related Suspicious Transaction Reporting, Monitoring and Analysis					
Number of STR related to TF analysis					
Number of cases forwarded to LEAs/investigation related to TF cases					
Capacity and commitment of reporting institutions to comply with UN Security Council resolutions screening requirements					
Adequacy of resources					
Adequacy of human resources for CTF (incl. specialized investigators, FIU and intelligence officers, prosecutors, and judges)					
Adequacy of the financial resources allocated to terrorism financing investigations and broader research on terrorism financing within a country					
Effectiveness of international cooperation					
Legal basis for international cooperation related to TF (e.g., legislation and treaties)					
Number of mutual legal requests received and timeliness of response on TF cases					
Number of mutual legal requests made on TF or terrorism					
Informal cooperation on TF cases (e.g., intelligence to intelligence, police to police, FIU to FIU, supervisor to supervisor)					
Awareness and commitment to fight TF					
Political commitment to fight TF and terrorism					
Awareness and commitment among the policy makers, law enforcement, FIU and intelligence community to fight TF					
Geographic and demographic factors					
Geographic factors that may facilitate TF and increase vulnerability to TF					
Demographic factors that may facilitate TF and increase the vulnerability to TF					
Other factors					
<i>*discuss with the National Vulnerability Working Group if there are money laundering vulnerabilities that impact the TF vulnerability. Add rows to this table to capture relevant factors.</i>					
Overall vulnerability to TF	Depending on your analysis above, assess the overall vulnerability of the country to terrorism financing:				