# THE EFFORTS TO COMBAT MONEY LAUNDERING IN GHANA: AN EVALUATION OF THE ROLE OF THE FINANCIAL INTELLIGENCE CENTRE

**ABA JACQUELINE OPOKU**



**A LONG ESSAY SUBMITTED TO THE DEPARTMENT OF CRIMINOLOGY, INSTITUTE FOR SECURITY, DISASTER AND EMERGENCY STUDIES (ISDES) IN PARTIAL FULFILLMENT OF THE REQUIREMENT FOR THE DEGREE OF MASTER OF SCIENCE IN CRIMINOLOGY**

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**LONG ESSAY**

**NOVEMBER 2023**

## DECLARATION

**Candidate's Declaration**

I, Aba Jacqueline Opoku, hereby declare that this study is my original work and that it has not been submitted for award in the Institute for Security, Disaster and Emergency Studies or any other tertiary institution. I bear sole responsibility for any shortcomings.

Name: ABA JACQUELINE OPOKU

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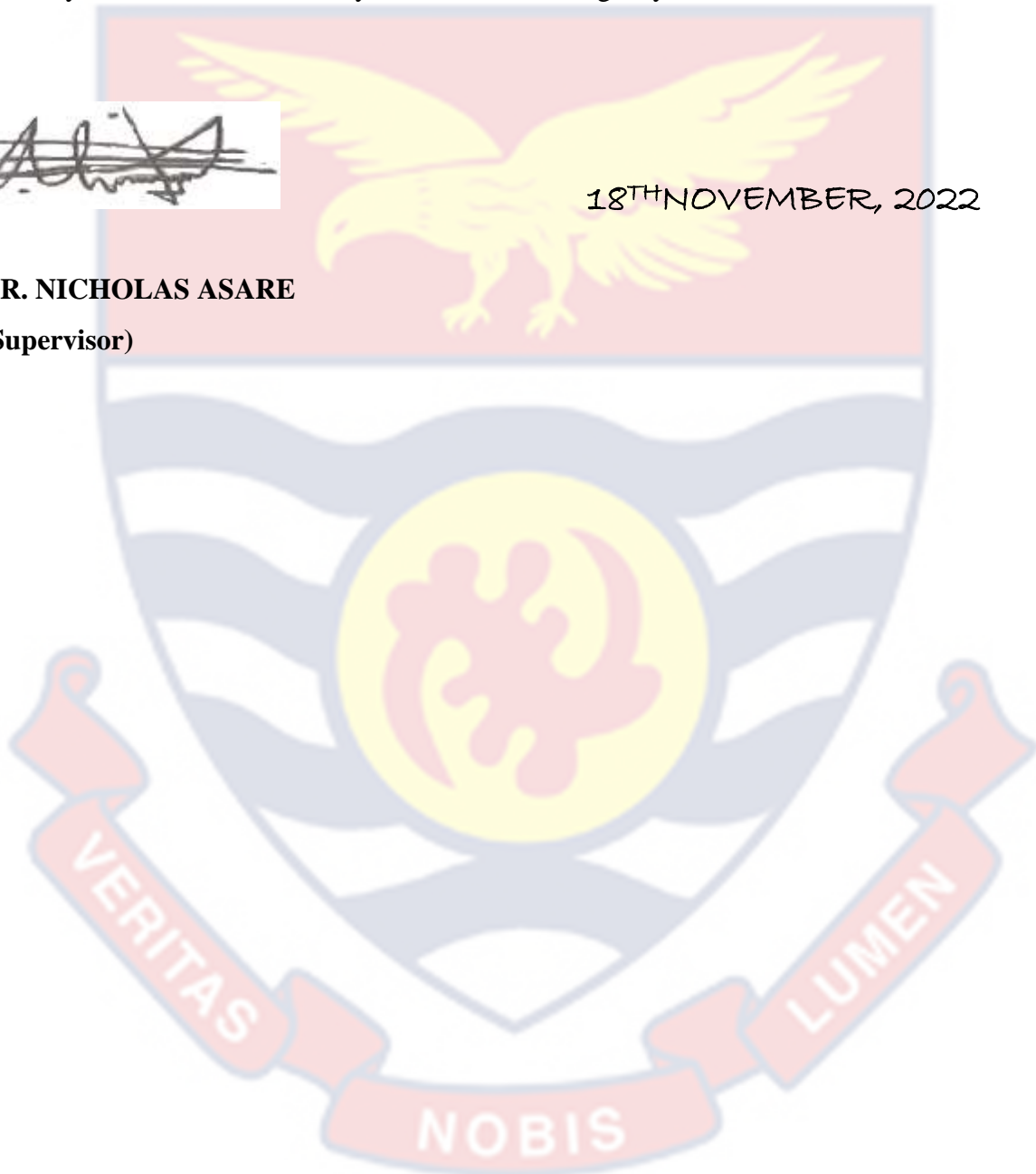
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# CERTIFICATION

I hereby certify that this long essay was supervised in accordance with the procedures laid down by the Institute for Security, Disaster and Emergency Studies.

18TH NOVEMBER, 2022

**DR. NICHOLAS ASARE**

**(Supervisor)**

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## DEDICATION

I dedicate this piece of research to my Precious Gifts who supported me through thick and

thin.

I appreciate you Selkita, Norpe, Ewura and Kwasi.

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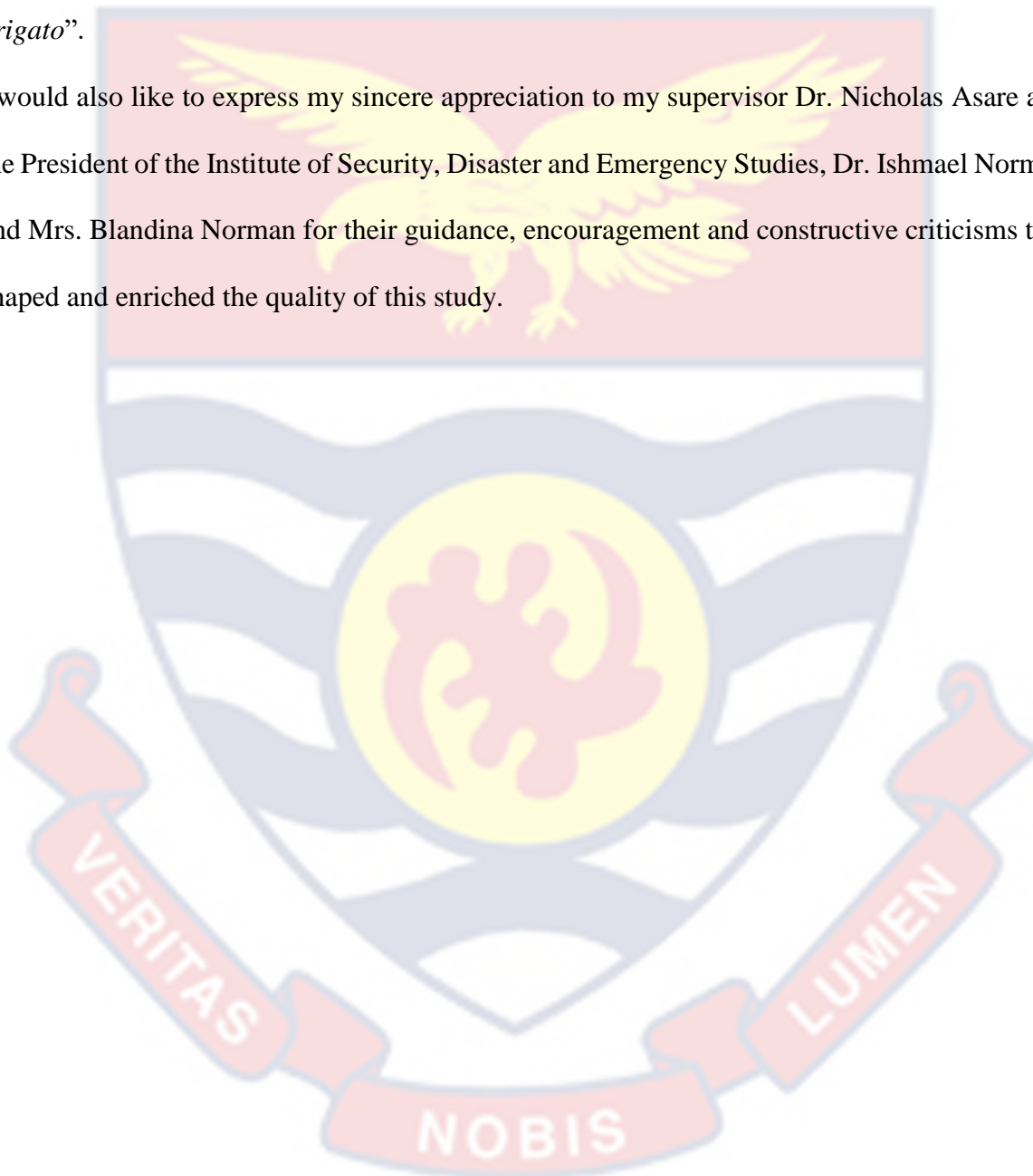
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# ABSTRACT

In recent years, the twin threats of money laundering and terrorism financing (ML/TF) have attained alarming dimensions, putting the global financial system at risk. The above situation is further exacerbated by poor money laundering detection rates. Even though 91.1 percent of people who commit the crime of money laundering are sent to prison, 90 percent of money laundering crimes are never discovered. An evaluation of the role of the Financial Intelligence Centre is essential in that regard. The study, thus, sought to evaluate the role of the Financial Intelligence Centre in Ghana in combating money laundering. The study adopted a qualitative research approach. Seventeen key respondents were purposively sampled from across law enforcement institutions, reporting institutions and regulatory institutions in Ghana. The results of the study revealed that the current sources of money laundering in Ghana were found to be fraud, public sector-based money laundering, criminal activity-based money laundering, legitimate business-based money laundering, bank-based money laundering, and unconventionality-based money laundering. Arguably, these classifications represent a paradigm shift in how money laundering is conceptualized in many jurisdictions. The findings also showed that the full functioning of FIC is primarily affected by information – that is, appropriate and timely – public education, employee empowerment, and politics. Confiscation of property or funds was found to be the most common way law enforcement agencies punished ML perpetrators, in fulfilment of sections 7 and 8 of Act 1044, (2020). This seems to suggest that confiscation of funds or property may be the primary way ML perpetrators are punished or the most effective way, although there are other forms of punishment. Since money laundering perpetrators appear to fear confiscation of funds or properties because of the ability of this form of punishment to restrict organized criminal organizations, disrupt them, or impede the flow of funds derived from illicit activity, it is strongly advised that law enforcement agencies "double down" on this form of punishment.

# CHAPTER ONE

# INTRODUCTION

## 1.1 Background

Money Laundering is a global epidemic that has had and continues to have a corrosive effect on a country's economy, government and social wellbeing. The International Monetary Fund stated in 1996 that the aggregated size of money laundering in the world is approximately between 2-5% of the world's domestic gross national product (Westhuizen, 2011) which is equal to between $800 billion and $2 trillion (UNODC, 2021).

Organized crime and other criminal elements have over the years used money laundering techniques to filter monies generated from illegal activities into legal activities to "clean up" the origins of the funds. In general, the illegal monies have often time been generated from such criminal activities as drug, arms, child trafficking, and political corruption and bribes. The filtering of these illegal funds, has led to the distortion of business decisions, increases the risk of business failures, takes control of economic policy away from government, harms a country's reputation and increases the exposure of the nation to increased drug trafficking, smuggling and other criminal activity.

Money laundering is the processing of criminal proceeds in order to disguise their illegal origin. This process is critical as it allows the criminal to enjoy the fruit of his ill-gotten gains without identifying their source. The primary purpose of using money laundering techniques is to ensure the availability of illegal funds in another context that would have been otherwise unavailable and to fund ongoing cycle of the illegal activity of drugs, arms, gambling etc. The best way to accomplish this is through a series of intricate transactions that aim to hide the fact that the funds came from illegal activity. This is backed by the definition given by the United

Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances, which specifies that money laundering involves the ownership of illegal funds as well as their acquisition, use, conversion, transfer, and disguise.

Money laundering is viewed as an essential component for the successful operation of transnational and organized crime by criminal elements seeking to profit from their illicit operations (McDowell & Novis, 2001). Money laundering, on the other hand, has repercussions for a nation's economy, government, and social well-being. In the most severe instances, money laundering can result in an entire coup d'état against a legal government. The fight against the illegal monetary activity known as money laundering is an integral and productive part of the fight against crime. Money laundering is a challenge that is both complex and constantly evolving all around the world. Because of the truly global character of money laundering, global norms and improved international collaboration are needed in order to restrict criminals' opportunities to launder their earnings and engage in illegal activity (McDowell & Novis, 2001).

Ghana like most developing countries has had a fair share of money laundering issues over the years where it was alleged that a top government official was involved. The cash, which was about 26 million pounds sterling, was reported to have been transported in a chartered plane from Ghana to the United Kingdom – a classic case of money laundering via physical transportation of cash (FATF, 2015). This and previous related incidence of money laundering led to the promulgation of the Anti-Money Laundering Act of 2008 which was repealed and replaced with Act 1044, (2020) to combat money laundering, terrorism financing, and proliferation of weapons of mass destruction. The Act 1044 in an effort to operationalize activities and to achieve its purpose established the Financial Intelligence Center (FIC).

Ghana's Financial Intelligence Centre (FIC) was established with the mandate of receiving and analyzing suspicious transaction reports and other information relevant to predicate offences of money laundering and terrorism financing, to disseminate actionable intelligence to competent authorities. It is the Ghanaian counterpart for global efforts on Anti-Money Laundering/ Combating the Financing of Terrorism (AML/CFT), ensuring that the country complies with standards set by the intergovernmental Financial Action Task Force (FATF) and reviewed by its West African associate member GIABA.

The FIC is not only crucial for implementing AML/CFT measures domestically, but also for ensuring that Ghana remains in compliance with international requirements and avoid being placed on the 'greylist' for non-compliance.

Ghana's compliance with international AML/CFT requirements were first reviewed by GIABA in 2009, and tested again in 2017, when AML laws were found to be inadequately enforced. This put Ghana at risk of being 'blacklisted' by FATF and other international actors, a process that can have devastating impact on exchange rates, financial flows, and international trade. Ghana was subject to a second round of mutual evaluation by GIABA in 2016. While this showed some progress over the previous evaluation in 2009, there were still significant gaps that needed to be addressed which led to Ghana being placed under observation by the International Co-operation Review Group (ICRG) that oversees the process of monitoring high-risk jurisdictions under FATF.

While the establishment of the FIC has over the years made significant impact in combatting money laundering, there still remains a lot to be done to bring this problem to a minimal level. The study therefore seeks to analyze efforts undertaken by FIC in combatting money laundering in Ghana.

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**1.2 Problem Statement**

In recent years, the twin threats of money laundering and terrorism financing (ML/TF) have attained alarming dimensions, putting the global financial system at risk. ML/TF stands for money laundering and terrorism financing. In addition, the scope of financial crimes is notoriously difficult to track and measure due to the very nature of the crimes themselves (Napier, 2022). Through the years, criminals have hidden the proceeds of their illegal activities by investing in legal businesses through a variety of schemes in bank financial institutions (BFIs), non-bank financial institutions (FIs), and designated non-financial businesses and professions (DNFBPs). These investments have been made in BFIs, FIs, and designated non-financial businesses and professions (DNFBPs) including accountants, lawyers, real estate professionals and others.

The above situation is further exacerbated by poor money laundering detection rates. Even though 91.1 percent of people who commit the crime of money laundering are sent to prison, 90 percent of money laundering crimes are never discovered (Kolmar, 2022). Although a 91.1 percent imprisonment rate is quite high, it fails to consider the fact that there are extremely few instances of money laundering offences discovered and prosecuted. In point of fact, there were only 990 cases in 2019, as the great majority of instances of money laundering are never brought to light (Kolmar, 2022). An evaluation of the role of the FIC is essential in that regard.

Prevention of money laundering crimes, and enforcement of punishment for money laundering crimes continues to be a problem globally, and Ghana is no exception (BASEL Institute on Governance, 2021). The findings from a survey by BASEL Institute on Governance (2021) indicate that when it comes to the issue of money laundering, it appears that jurisdictions are more successful at detection and prosecution than they are in prevention. The same survey showed that, on average, prevention was only 27 percent effective around the world, while enforcement was 31 percent effective. For Sub-Saharan Africa, and for that matter, Ghana, it

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was found that prevention was only 5 percent effective, with enforcement effectiveness being found to be a meagre 8 percent (BASEL Institute on Governance, 2021).

The anti-money laundering (AML) status of Ghana's financial system recently suffered a dip. On 18 October 2020, the European Union in a press release added Ghana to their list of high-risk jurisdictions with strategic deficiencies in their Anti-Money Laundering/Combating the Financing of Terrorism (AML/CFT) regimes because Ghana was on the FATF grey list. In response to the above, on 29 December 2020, Ghana passed a new Anti-Money Laundering Act, 2020 (Act 1044). The new piece of legislation brings together all of the existing regulations that ban the laundering of money. Act 1044 attempts to rectify the shortcomings of the repealed Anti-Money Laundering Act, 2008 (Act 749), which was in effect prior to Act 1044 and brings Ghana's anti-money laundering regulations in line with worldwide norms. Persons who help in the commission of any of the illegal activities listed in Act 1044 are now considered accomplices in the crime of money laundering, which is an important development. The offences of bribery and corruption, fraud, counterfeiting currencies, human trafficking, environmental crimes, insider trading, piracy, robbery and smuggling are all included in this category of activities.

Act 1044 modifies the governance and administrative structure of the Financial Intelligence Centre (FIC); it broadens the scope of illegal activities and the oversight of accountable institutions; and it imposes stringent sanctions for tax evasion, the financing of terrorism, and other such activities. The FIC is required to work closely with investigative institutions, security agencies, and intelligence organizations as well as to international equivalent agencies that carry out comparable functions. But how well is the FIC performing with regards to individuals who engage in the practice of money laundering? It is now anticipated that the FIC will fulfil its task. Additionally, the Centre is permitted to exchange information with institutions that will contribute to an acceleration of the battle against illegal activities such as

money laundering. Until now, there has been no study that has sought to evaluate the role of FIC in its efforts to combat money laundering in Ghana. The present study attempts to fill that gap.

## 1.3 Research Objectives

The main aim of the present study was to evaluate the role of the Financial Intelligence Centre in Ghana in combating money laundering.

The specific study objectives were to:

i.    Analyze the current forms or current sources of money laundering in Ghana.

ii.   Examine the major factors affecting efforts to combat money laundering in Ghana.

iii.  Assess the efficacy of the present measures taken by the Government of Ghana through the FIC to combat money laundering in Ghana.

iv.   Assess the forms of punishment applied to money laundering perpetrators by the enforcement agencies through the efforts of the FIC.

## 1.4    Research Questions

The research questions underpinning the study are as follows:

i.    What are the current forms or sources of money laundering in Ghana?

ii.   What and how are the major factors affecting money laundering in Ghana?

iii.  What and how is the effectiveness of the actions put in place by the government through the FIC to control money laundering in Ghana presently?

iv.   How does FIC's efforts to combat ML translate into the punishment of perpetrators of ML through the law enforcement institutions?

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**1.5 Significance of Study**

The role of the FIC is crucial in the fight against money laundering and terrorism financing. The result of this study would help stakeholders appreciate the relative value of the role of FIC in combating money laundering. Furthermore, the present study would also help unearth current forms or sources of money laundering in Ghana, so that the appropriate detection mechanisms can be put in place to counter them.

The push and pull factors impacting money laundering cannot be taken for granted. The findings from this long essay would help bring to the attention of policymakers and other key stakeholders which factors are either positively or negatively affecting efforts to combat money laundering. This would provide essential insights as to which factors to encourage and which to discourage, as FIC, law enforcement agencies, reporting institutions, and other key stakeholders 'dig in their heels' as they combat money laundering.

It is not adequate to put in measures to carry out punitive action against money laundering perpetrators. Occasionally, it is vital to assess whether such actions are yielding the desired results so that the necessary adjustments can be made if they are not. The findings from the present study would help in addressing that.

**1.6 Organization of Chapters**

The study is structured into five chapters. Chapter one (1) gives the general introduction to the study and it includes the background, problem statement, project objectives, the project significance, the project outline and scope and limitation of the study. The second chapter is devoted to the review of theoretical and empirical literature. Chapter three (3) covers the methodology of the study. This includes research method, research strategy, research data, analytical tools, ethical issues addressed and a summary of the chapter. The analysis and presentation of data collected as well as discussion of findings, constitute Chapter four (4).

Chapter five (5) concludes the entire study with a summary and recommendations for further study.

# CHAPTER TWO

# LITERATURE REVIEW

## 2.1 Introduction

This Chapter reviews literature relevant to the study. The chapter is broadly structured into three sections namely theoretical review, empirical review and review of related studies, and conceptual framework.

## 2.2 Theoretical Review

## 2.2.1 Theoretical Framework

Several schools of thought are involved in the investigation of money laundering (ML). Under this section, various theoretical frameworks are presented and discussed. This section, thus, discusses the economic theory, crying wolf theory, and transparency-stability theory, with the end goal of identifying specific elements that contribute to money laundering.

## 2.2.1.1 Economic Theory

Smith, A. (1776) traditional economic theory recognizes two essential elements that govern the conduct of humans. These aspects are competition and individual choice. On the one hand, every person behaves logically and tries to maximize his or her own personal utility, which is a principle that is taken into consideration for most of the decision making that is carried out by the individual. As a corollary, this principle also controls illegal endeavors that are carried out with the intention of amassing personal gain. On the other hand, the projected expenditures and revenues of an economic enterprise are the primary factors that define the personal usefulness of the venture, and these factors are governed by the rules of demand and supply.

In Smith's classical framework, the status of a nation is not in the control of a person or a company. Rather, it is in the hands of society. Since the individual is just concerned with

ensuring his own safety, he does not intend to advance the public interest, and he is not even aware of the extent to which he is doing so. In other instances, individuals or businesses are driven by an unseen hand toward a goal that was not the original objective; hence, the government ought to safeguard people against violent and unfair treatment. Smith put up the idea of natural liberty, which is a system that may be observed and is not pretentious. In such a society, an individual has the ability to be left alone to pursue his interests in accordance with his ways, provided that he does not violate the laws of justice and may use his industry and capital to compete with any other individual. Because it involves the unethical acquisition of funds, money laundering is a behaviour that is harmful to the general population. Hopton, T. (2018).

However, in order for these ideals to be put into practice, activities must be conducted within the confines of the law. The rules of AML do not have the effect of diminishing competition because the economic laws and how they are implemented differ from country to country. In addition, AML legislation and other types of restrictions have varying effects on economies. On the other hand, the premise that underpins economic classical theory is open to debate. The active setting of competitive incentives by state legislation helps to foster the development of institutional structures. This condition is hazardous because it has the potential to retard, rather than speed up, the advancement of society toward genuine riches and greatness; in addition, it lessens the real value of the annual produce of the land and the work of its people (Geiger & Wuensch, 2007).

**2.2.1.2 Crying Wolf Theory**

Excessive reporting, sometimes known as "crying wolf", can dilute the significance of the data contained in reports. An excessive amount of reporting serves as the impetus for the first formal investigation into ML practice. Transactions are monitored, and any suspicious activity is reported to the appropriate government agencies. These agencies make use of the data to

identify potential investigation targets, and financial institutions face penalties if they fail to report instances of money laundering. However, to stay out of legal "hot water", financial institutions have begun to report transactions that are significantly less "fishy". This has the effect of watering down the quality of the information. Keller, J. and Krieg, J. (2019)

The informational value of the reports is diminished when there is an excessive amount of reporting. It is therefore impossible to identify the data that should be prioritized. One of the greatest ways to get a grasp on intuition is to compare it to the classic fairy tale, "The Boy Who Cried Wolf". In the story, the boy's pleas were rendered pointless since he tried to get the attention of the villagers far too frequently, even though he was unable to determine whether the wolf was present. In a similar vein, excessive reporting, also known as "crying wolf", fails in locating truly useful facts. In general, the phenomenon known as "crying wolf" refers to the fact that information does not only relate to data but rather can identify relevant data. The locus of this problem that this theoretical model uncovers is between the banks and the formal institutions required to act on such information via the FIC and regulatory institutions.

The formal model is constructed based on five primary economic constraints. The banks' and governments' inability to communicate effectively is the first hurdle. However, the issue is not with the verification of the information; rather, it is with the accuracy of the data. The lack of sophistication in the reporting incentives offered by banks is the second challenge. It is only illegal for banks to conceal potential money laundering information; failing to report transactions that are ultimately prosecuted as money laundering does not result in a financial penalty for the bank. As a result of the fact that banks never know the exact nature of a transaction, each transaction is a possible candidate for ML, which constitutes the third challenge. The fourth challenge is that banks have taken on the twin responsibility of needing to monitor all transactions to report any cases that appear to be suspicious.

The fifth difficulty relates to the information that is held by banks, namely the signal that is attached to the transaction. This signal cannot be verified ex-post since the local information that was used during the judgement cannot be replicated later. The model demonstrates that the potentially damaging practice of over reporting, also known as "crying wolf," is still a possibility. Because banks are unable to provide their signals to the regulatory institutions, the latter is forced to base its decisions on the information provided by banks (Takáts, 2007).

**2.2.1.3 Transparency-Stability Theory**

The binary opposition of public power vs private interests is no longer used to frame discussions over regulation (Hancher& Moran, 1989). It is obvious that the disparities that exist between the various national regulatory standards led to distorted outcomes. As a result, rules all over the world make use of multi-level governance by means of specialized discourse. This discourse comprises specialist epistemic communities, broad financial policies, and advocacy networks. Actions taken by regulators can lead to practices by helping participants develop mutually agreeable understandings of the issues at hand and potential solutions. According to Van der Zahn *et al.'s* (2007) research, countries that have more stringently regulated disclosures and transparency standards have a lower risk of experiencing banking crises. According to the transparency-stability theory, increasing the amount of information that is disclosed and the level of transparency helps to make resource allocation more efficient by lowering the amount of informational inequality (Tadesse, 2006).

If we assume that accounting information is a public good (Watts & Zimmerman, 2006) and that central banks are funded by conscripted taxpayers and investors, then it is reasonable to assume that central banks could produce extensive disclosures to satisfy the informational needs of the public. This idea completely contradicts the transparency-fragility theory, which suggests that increased transparency can point to broad flaws in the financial system if there

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are those problems. As a direct result of this, the scenario may give rise to unfavourable externalities, such as panic about the availability of funds and worries about the fragility of the financial system. As was pointed out by Smellie (2004), it is a universally held belief that the battle against organized crime cannot be won until enforcement mechanism is put into place. The enforcement should be included in the contribution that central banks make toward extensive disclosure policies (Murithi, 2013).

Based on the above, the present study shall adopt all three discussed theories as they touch on different aspects of the ML issue. As such, the use of all three in the explanation of the results of this study would help provide a bird's-eye view of the money laundering landscape in Ghana.

### 2.2.2 Financial Intelligence Centre and Financial Action Task Force

Anti-Money Laundering and Countering Financing of Terrorism (AML/CFT) guidelines are defined by the Financial Action Task Force (FATF), an international organization (FIC, 2019). According to FATF guidelines, countries must follow forty (40) recommendations to keep criminals out of the international financial system. FATF Recommendation No. 29 urges countries to establish a Financial Intelligence Unit (FIU) as a national centre for the collection, analysis, dissemination, and reporting of information related to money laundering, associated predicate offences, and terrorist financing. This includes receiving and analyzing suspicious transaction reports (STRs) and any other relevant information about these issues. The FIC obtains additional information from reporting businesses, and the FIU should have prompt access to the administrative, financial, and law enforcement information it needs to carry out its duties.

In addition to this, the Interpretative Note that accompanies the recommendation states that Financial Intelligence Units (FIUs) should add value to the information that they receive from reporting entities and conduct strategic analysis in order to identify trends and patterns related to money laundering and terrorism financing (ML/TF). The Financial Intelligence Unit (FIU)

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and other state agencies can utilize this information to identify the dangers and exposures associated with money laundering and terrorism financing. The findings of this analysis might also contribute to the formulation of policies and objectives for the Financial Intelligence Unit (FIU), or more generally, for other institutions operating under the AML/CFT system. In light of the aforementioned information, Section 6 of the Anti-Money Laundering Act of 2020 (Act 1044), mandated the establishment of the Financial Intelligence Centre (FIC), which serves as the national centre for the collection, analysis, and dissemination of financial intelligence.

According to Section 7 of the Act 1044, the objects of the Centre is as follows: (a.) assist in identifying the proceeds of illegal activity; (b.) assist in the combat of i. money laundering activities; ii. financing of terrorism; iii. financing of the proliferation of weapons of mass destruction; iv. tax evasion; and v. other unlawful activity; (c.) facilitating the administration and enforcement of the Republic's laws by providing information to revenue authorities, security and intelligence agencies, and other investigating authorities; and (d.) exchanging information with similar organizations in other countries about money laundering activities and similar offenses.

It is the mission of the FIC to guard against the evils of money laundering and financing of terrorism in Ghana. Accordingly, the FIC conducts typology studies so that stakeholders may appreciate worldwide efforts on AML/CFT norms while also better understanding common schemes in Ghana. The study's findings also offer policymakers a framework for developing strategies to combat money laundering. In 2019, one such typology study was conducted. The findings are summarised and discussed in the next section.

## 2.2.3 Money Laundering Techniques

This section would draw heavily on FIC's (2019) typology report. Between 2014 and 2018, law enforcement agencies collected, analysed, disseminated, and provided input on suspicious transaction reports (STRs), which were the basis for this typology study. During the period

under consideration, the FIC detected new patterns and methods of money laundering. A few of the methods are listed as follows: Remittance services and wire transfers are used to receive money that has been stolen; illicit funds are transferred through third-party intermediaries; financial transactions involving currency trades; fraud procured by providing fictitious information in order to satisfy customer identification criteria, and; legal, accounting, and notary services can be used to hide the identity of the recipients and the source of unlawful payments.

**2.2.3.1 Money Laundering Typologies / Forms of Fraud**

**Typology 1: Fraud**

One definition of fraud is the intentional and illegal use of deception with the purpose of obtaining some form of financial or personal benefit (FIC, 2019). This pattern of behaviour is frequently carried out by a person or an entity with the intention of deceiving other people, typically using tactics that cannot be justified. The fraud typology comprises inheritance fraud, visa application fraud, fraud associated with the football profession, misrepresentation/ false pretenses, investment frauds, hacking into accounts, procurement fraud, bank employee fraud, collusion between bank employee and customer fraud, cloned cheque, gold scam, and ATM card fraud.

For each of these sub-forms of fraud there are associated red flags. In fact, all the typologies have their own associated red flags. For example, in inheritance fraud, the associated red flags are transferring money from a business account into a personal one using wire transfers, third parties, and inconsistent information during due diligence are all examples of this type of fraud. Other red flags include identifying potential victims using social media and technology, as well as the use of "gatekeepers" including professional service providers such as lawyers, accountants, and brokers. The other example is football-related fraud. Among the red flags of

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football-related fraud are the use of wire transfers, the volume of inflows, and the inability to provide relevant documentation; the use of a high-earning profession, such as a high-earning footballer, to avoid suspicion and bank monitoring; and the opening of a Foreign Currency and Exchange account solely for the purpose of receiving remittances.

**Typology 2: Trade Based Money Laundering (TBML)**

Money laundering through trade is still a significant problem all over the world. Importers and certain employees of financial institutions are increasingly working together to concoct over- and under-invoicing schemes as a means of dodging the obligations of conducting appropriate due diligence (FIC, 2019). This practice is part of a growing trend. Invoice manipulation and the use of trade finance routes and commodities are typical components of this form of money laundering. The goal of these components is to get around the need for financial transparency and paying taxes. When money is laundered through trade, it may take the form of shea butter supply overbilling, or payments for high-value commodities such as gold for export etc. There are red flags associated with the various dimensions of this typology. For example, in the case of payment for high-value commodities, the inability to offer a business agreement to back up a claim, and contradictions in the stated purpose of the remittance are some red flags.

**Typology 3: Drug Trafficking**

Criminals engage in the production, distribution, and trading of psychoactive substances for their own financial gain (FIC, 2019). When authorities apprehend individuals involved in drug trafficking, they are required to locate and seize any assets linked to the illegal activity. Typically, a syndicate is responsible for this type of criminal activity in Ghana, and it is possible that investigations may involve multiple cartels (FIC, 2019). The typology being reviewed includes two dimensions: legitimate businesses used as fronts and involvement with drug traffickers. Red flags associated with this typology include past involvement in cash smuggling cases, association with drug-trafficking hotspots, and the customer's affiliation with individuals

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involved in the illicit drug business.

**Typology 4: Tax Evasion**

Both natural persons and corporate entities have the ability to pursue courses of action that, if successful, will allow them to avoid paying the taxes that are due on their taxable income. Financial institutions have a responsibility to keep track of the transactions that take place on their customers' accounts and report any suspicious activity to the FIC for further investigation and action. The typology under review has three dimensions namely the relationship with a politically exposed individual, the advance payment of taxes on new entities, and the false movement of products as a tax evasion bait (FIC, 2019). Some of the red flags associated with the tax evasion, sub-form, relationship with politically exposed individual, are use of a "Gate Keeper" (legal firm) and inconsistent account transactions. (FIC, 2019)

**Typology 5: Counterfeiting of Currency**

This typology manifests in three forms namely clients of financial institutions depositing counterfeit currency, new bank accounts receiving fake currency, and customers of financial institutions depositing fake currency into their accounts. Some of the red flags associated with this typology are insufficient proof of the origin of funds, and unknown funding source. (FIC, 2019)

**Typology 6: Use of Foreign Bank Accounts**

Criminals continue to find the use of overseas bank accounts to be an appealing route via which they can conceal and transfer the proceeds of their illicit activity to friends located in other jurisdictions. Therefore, financial institutions are responsible for ensuring that high-risk customers, including dealers in high-value goods and domestic and foreign politically exposed persons, are subjected to enhanced due diligence regarding the source of funds deposited into financial institutions. This is to prevent money laundering and other illegal activities. The

typology that is currently under review can present itself in a number of different ways. Two of these ways are the transfer of funds through a foreign bank account and the deposit of foreign currencies into a new foreign bank account. The use of forged signatures and stamps of other individuals, as well as connivance with Ghanaian nationals and or staff of financial institutions, are all red flags that are connected with typology 6. The use of the sale of property to mask the source of funds is another red flag. (FIC, 2019)

**Typology 7: Insurance Fraud**

There are several variations of insurance fraud, the most common of which are the false death claim, the fraudulent hospitalization or highly priced medical procedure claims, and the false fire insurance claim (FIC, 2019). Some red flags associated with this typology include the misrepresentation of facts in order to make a claim as well as the use of papers that have been forged.

**Typology 8: Securities Fraud**

Investment fraud, and frequency of funds used for investment are sub-forms of securities fraud. The use of false and deceptive disclosure documents is one red flag linked with this typology, among other red flags (FIC, 2019).

**2.2.3.2 Factors Affecting Money Laundering**

The purpose of this section is to discuss the factors influencing money laundering using findings from literature. Vaithilingam & Nair, (2007) examined the trend of the pervasiveness of money laundering in developed and developing countries through an empirical approach and presented empirical results of five key factors as influencing the pervasiveness of money laundering in developed and developing countries. In this study of the factors affecting money laundering, Vaithilingam and Nair (2007) present an empirical set of factors that seeks to bridge the gap in literature with other literature that critically examine factors (traditional) that influence money laundering. The four key factors found were as follows: technology, quality

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of human capital, companies' ethical conduct and legal framework effectiveness, and innovation. **Technology**: Money laundering is more common in developing nations due to insufficient ICT infrastructure, hence increasing it will offer positive marginal returns by instituting a more transparent anti-money laundering approach. Additionally, a minor boost in ICT will therefore provide good marginal returns for developing countries since the human factor would be diminished. (Vaithilingam, S., & Nair, M. (2007))

**The quality of human capital:** Human capital quality affects money laundering. A study says human capital quality appears to prevent money laundering in countries with a low human capital stock. Because developing countries like Ghana, have insufficient numbers of high-quality human capital in relevant sectors, an increase in human capital will have a greater impact on reducing money laundering than in developed countries. This is because the majority of financial transactions in developed countries at the front end are user-friendly, and as a result, people from various educational backgrounds can participate. (Vaithilingam, S., & Nair, M. (2007))

 **Companies' ethical conduct and legal framework effectiveness**: Vaithilingam and Nair (2007) suggest that an effective legal framework and ethical business practices reduce money laundering. Effective and independent legal and regulatory frameworks, they claim, reduce money laundering. Money laundering would be less common if corporations had solid ethics and a strong legal framework to fight it. **Innovation**: money laundering is negatively impacted by innovation. If new technologies fail to meet consumer demand, this could open up new channels for the laundering of financial assets (Vaithilingam & Nair, 2007).

de Andrés (2008) assessed the current situation in West and Central Africa in relation to the trafficking of drugs, organized crime, and terrorism. de Andrés (2008) found drug trafficking, and organized crime to be key contributory factors to money laundering. Cocaine and heroin are two of the drugs that are included in the illegal drug trade.

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**Criminal Organizations**: these criminal organizations are responsible for activities such as the illegal trade in ivory, the trade in rough diamonds, the trafficking of illegal guns and light weapons, and the trafficking of humans. de Andrés (2008) discovered that the origin of money laundering can vary from continent to continent, but the reason behind it is always the same: to make "dirty" money and then "wash" it.

## 2.3 Empirical Review/ Review of Related Studies

Banks and financial institutions are mandated to follow tight controls and processes to combat money laundering. Simwayi and Wang (2011) found that commercial banks in Zambia mainly followed the Bank of Zambia's AML regulations from 2004 in a bid to construct an effective system. Serial AML regulations, including Know Your Customer (KYC) rules and CDD procedures, have been created in response to calls to increase the capacity to prevent financial sectors from being abused as channels for ML. Although AML research has been ongoing since its inception, the need for policy reform in relation to such foundational AML tools has never ceased to be a constant (Ai, 2012). The primary goal for financial institutions is to maintain a healthy revenue-to-cost ratio and to determine the precise impact of anti-money laundering rules on banks and other financial organizations (Masciandaro & Filotto, 2001). According to Broome (2005), when institutions are motivated by their own self-interest, they are more likely to comply with AML regulations. Increased professional, legal, and ethical standards are needed to effectively implement AML compliance in the financial sector.

A study by Al-Mubark (2003) concluded that banks in Dubai adhere to strict anti-money laundering processes and practices to the letter. To combat ML, Awadallah (2005) urged banks to establish clear regulations and train workers so that they can confront such activities and account for accuracy and prudence in investigating banking and financial operations. There are no exceptions in the Gaza Strip, according to Al-Aijs (2008), where banks are forced to refuse the opening of a new account or the completion of any banking transaction if identification

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requirements are not followed. A study conducted by Shaheen (2009) outlined the scope of this issue and the harm it has done to the banking industry as a whole. In the People's Republic of China, Simwayi and Wang (2011) examined the role of commercial banks in combatting ML (PRC). The People's Bank of China has not examined any of the five banks that responded to the questionnaire between 2006 and 2010. According to Idowu and Obasan (2012), a correlation of 0.881 exists between bank performance and the adoption of sound money laundering policies.

Delston and Walls (2017) put a lot of emphasis on preventative steps that should be taken outside of financial institutions (normally banks). It is true that more could be done to identify money laundering operations outside of the financial sector; nonetheless, implications emerging from bankers' losing track of how that relates to trade-based money laundering (TBML) could be detrimental. According to Scott (2008), who conducted research on the connection between TBML and the banking industry, money laundering is an issue that has to be monitored by banks that finance international trade transactions since it is facilitated by trade financing. Baity (2000) proposed that banks and non-banks share greater responsibility in promoting increased transparency and eliminating practices that encourage criminal activity, undermine financial systems, and damage their own institutions as a result of the growing influence of money laundering. Strengthening the KYC requirement, increasing attention to complex, unusual, and large transactions; enhancing monitoring of cash at the border; improving supervision of banks and other financial institutions; and constructing an effective international financial sub-regime were some of the recommendations made by Zagaris and MacDonald (1992) and the (International Organization of Securities Commission (IOSCO), 2004). Other recommendations included improving the audit trail, increasing regulation of non-bank business sectors, and increasing attention to complex, unusual, and large transactions.

The "know your customer" (KYC) policy has become an important way to prevent money

laundering on both a national and international scale. It is standard practice for governments to mandate that financial institutions in most nations verify the identities of their customers and the legality of the financial dealings they conduct. In light of this, maintaining KYC compliance requires not only the identification of customers but also the compilation of auditable proof of activities related to performing due diligence. In order for financial institutions to demonstrate compliance with KYC regulations, it is necessary for them to verify that their customers are not currently involved in or have ever been involved in illicit activities such as fraud, money laundering, or organised crime  (Arasa, 2015). Know Your Customer checks are adequate to identify money launderers based on their identities and profiles, such as friends (Raweh et al., 2017). However, KYC is not sufficient on its own for continual monitoring of covert motivations for manipulating financial activities to maintain a healthy balance in their bank accounts (Tuba & van der Westhuizen, 2014).

Byrne (2000) suggested that financial institutions might have difficulty to prove or to follow a comprehensive implementation of KYC programs. Due to the lack of a clear endpoint for the information a bank manager could use to prevent ML, KYC is viewed as difficult to execute (Raweh et al., 2017). Money launderers are likely to use all available techniques to conceal the true source of their money or profit. Banking secrecy is one of the main obstacles to anti-money laundering because it is one of the conventional rules applicable to working banks, where clients' secrets and banking operations are protected by the bank's commitment to law and custom, unless there is a provision in the law or in the agreement stating otherwise (Al-Nuemat, 2014). There is no doubt that bank secrecy is used as a vehicle for ML and other financial crimes in offshore financial centres (OFCs) and jurisdictions; Blum, Levi and Naylor (1999) study results confirm that. Criminals employ OFCs and bank secrecy jurisdictions to launder their illicit money, as well as a variety of secrecy types that help to enable ML. Blum, Levi and Naylor (1999) also looked into the various stages of money laundering.

From a regulatory, political, and secrecy (confidentiality) standpoint, Hampton and Levi (1999) looked at ML's expansion and the establishment of OFCs from three angles: the secrecy (confidentiality), regulatory, and political perspectives. Because of the dangers posed by ML, many governments have declared that international cooperation is necessary to combat the threat. As a result, a number of international accords have been negotiated to address this problem. Laws and regulations are being enacted in an increasing number of countries nowadays. So long as ML and terrorism threats continue to develop, banking secrecy should be outweighed by the need to share information from banks in order to effectively prevent them (Rahman, 2013).

Per the findings that Singh and Rajpur (2009) came to, governments need to make greater efforts to eliminate any harmful policies and practices that stand in the way of international cooperation against ML. Economies are wary of compromising the secrecy of their financial transactions. As recommended by Al-Hamadneh (2001), it is necessary to strengthen worldwide cooperation on information sharing and enforcement of the law to implement systems for handling doubtful reports and conformity traditions among financial institutions. There is a need to strike a balance between maintaining financial confidentiality and allowing things to turn into a money-laundering haven. When it comes to combating money laundering, international cooperation must be based on combating both the origins of dirty money and the negative effects that can stem from the high expenses that may be incurred by individuals or institutions. Each of these causes and effects is unique to the particular situation.

To battle money laundering, Johnson (2001) looked into the origins of laundered money such as bribery, corruption "at the top", illicit wildlife trade, and prostitution and found that correspondent banking is riskier for international financial systems than ML combat. Research by Nawaz, McKinnon and Webb (2002) found that informal financial services networks have played an important part in the worldwide movement of funds for terrorism and ML. ML can

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only be minimized if all the loopholes in the global financial system are closed. It is in the financial sector that Bartlett (2002) found that ML has a detrimental effect on the establishment of key financial organizations. Anti-Money Laundering (AML) has been shown to have a positive impact on economic stability and investment funding. When discussing laundering "dirty" money, Reuter and Truman (2005) used both macroeconomic and microeconomic analyses. They concluded that there must be a balance between competing goals at all levels and across all jurisdictions.

Conducting economic analysis of cost-benefit in the fight against money laundering, Geiger and Wuensch (2007) observed that AML has had a negative impact on the financial services business. The authors believe that AML implementation costs are a significant burden on financial institutions, particularly for smaller market participants. For commercial banks in Kenya, Murithi (2013) argues that growing transaction costs and the cost of teaching personnel to recognize suspicious behaviour have a substantial impact on their operational costs. Another recommendation given by the consultants was to provide bank employees with Anti-ML training. Banking system Anti-ML is influenced by employee training, according to Usman (2014). Reviewing efforts in some jurisdictions, Tupman (2015) asserted that political instability has the potential to trigger a rise in criminal activity. In the fight against ML, institutions' cooperation has been found to be effective (Hamin et al., 2016). In that regard, FIC would do well to deepen their liaison with law enforcement agencies, and reporting institutions.

## 2.4 Conceptual Framework

Figure 1 below presents the conceptual framework of the study.
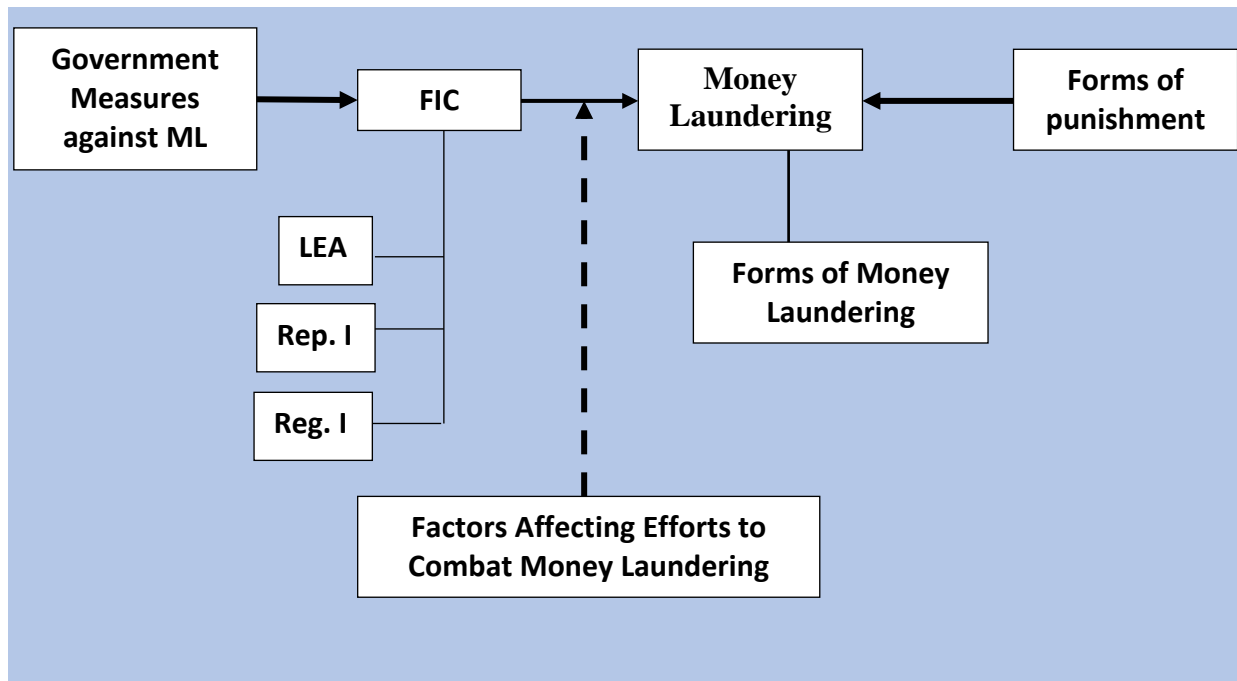


*Figure 1: Conceptual Framework (Author's own construct, 2022)*

(LEA = Law Enforcement Agencies; Rep. I = Reporting Institutions; Reg. I = Regulatory Institutions)

To combat money laundering, the government executes its present anti-money laundering measures through the FIC and its key stakeholders, such as the law enforcement agencies, reporting institutions, and regulatory institutions. But then, there are factors affecting the efforts of the FIC to combat money laundering. Some of these factors are positive and others are negative. The positive factors enhance the fight against ML, contrary to the negative ones. Perpetrators of money laundering, when caught, are not allowed to get off scot-free. Different forms of punishment are meted out to them. The key idea behind these punishments is to deter would-be perpetrators of money laundering.

## CHAPTER THREE

## RESEARCH METHODOLOGY

### 3.1 Introduction

This chapter discusses the methodology employed in achieving the objectives of the study. The study aimed to measure the effort of FIC in combatting money laundering in Ghana. The research approach and strategy were discussed in this chapter. A detailed description of the research process, including the choice of the setting, respondents and the credibility of the data collected is also provided. The ethical considerations of the researcher is also explained in this chapter.

### 3.2 Research Approach and Design

According to Mugenda and Mugenda (2003), research design refers to the structure, plan and strategy to be adopted in order to answer various research questions. In this study, the phenomenon was the effort of Financial Intelligence Center in combatting money laundering. The Researcher employed qualitative approach. The approach nonetheless has some limitations. Generality of qualitative findings is limited. This is due to the assumption underlying the research; the number of respondents, where people who are the unit of analysis may be small in number.

However, a compilation of several qualitative researches on the same phenomenon leads to generalization for that purpose over time. In addition, the role of the researcher in the data collection process cannot be avoided and could have an impact on the responses of participants in the study (Anderson, 2010). Additionally, there may be a problem if the anonymity of respondents as well as the confidentiality of data collected is not properly preserved in presenting the findings. These limitations however, were managed in the conduct of this study, for instance neither the names nor institutions of respondents were stated against their quoted responses.

Despite these limitations, researchers (Creswell, 2014, Yin, 2012) have argued the importance of using a qualitative approach and it was evident in the outcome of this study. For instance, the use of qualitative approach permitted the phenomenon under investigation to be examined in an in-depth manner. Varied forms of data collection were used to ensure triangulation for the validity of data collected. Specifically, interviews following the interview guide was the form through which data was collected. Furthermore, in the case of interviews, questions were guided and redirected by the researcher and ambiguities cleared. This is perhaps the most important step taken in this study to mitigate the limitations of the qualitative research approach.

## 3.3 Research Strategy

This study used the case study strategy to achieve the objectives of the study. According to Creswell (2014) and Yin (2012), case studies are qualitative research designs that investigate a process, an activity, event, an individual or groups of individuals in detail over a period using varying methods in the data collection process.

Yin (2009) argues that the choice of a case study method is influenced by the desire of a researcher to provide explanations and description to a phenomenon. The main objective of this study is to measure the effort of FIC in combatting Money Laundering. Qualitative studies are not concerned with the number of respondents rather the lived experiences of the respondents or the organization in question. Thus, in-depth interviews were conducted for this study to provide rich information needed, to draw out a worthwhile conclusion.

## 3.4 Data Collection

This section explains how data for the study was collected. The processes covered include the characteristics of the respondents and the interview guide. The process of data collection has also been described. The researcher used obtrusive data collection for the study. In obtrusive

data collection, the subjects are aware of the fact that they are being studied, which can influence their responses. Babbie, E. (2016). Examples of obtrusive data collection methods are questionnaires and interview. For the purpose of this research, interview was used to collect the data. Interview was the preferred data collection method since it allowed standard procedure of primary data collection. Structured interview having the same questions in the same order from an interview guide for each respondent was administered. The researcher mostly paid visits to the various respondents to undertake the interview.

### 3.4.1 Data collection process

This study used primary data to collect data using the interview guide. The interviews were conducted for the target population through audio or video phone calls and face to face interactions. Interview through face to face was preferred because it helped the researcher to maximize the contact time with the respondents. The respondents of the study included three regulatory bodies and four law enforcement agencies, five reporting institutions and from the FIC. Descriptive survey was done by collecting data by way of interviews administered on a sample of the target population under study. The design also allowed the researcher to assess the efforts of the FIC in combatting money laundering.

### 3.4.2 Interview guide and means of conducting the interviews

The interview was developed based on the literature reviewed and the objectives of the study. The questions on the interview guide were semi-structured and open-ended. Burnard et al (2008) are of the opinion that semi-structured interviews help the researcher define the area to be explored. The theoretical framework that guided the current research, identified semi-structured questions as more appropriate for the study.

Interviews aid in revealing the true feelings of a person on a particular issue according to Dilshad and Latif (2013) hence brings out the significance of the particular issue being

discussed. The interviews were conducted via audio or video phone calls (20% of respondents) with the interviewees and face to face (80% of the respondents) interactions. The interview lasted between thirty-five (35) and forty-five (45) minutes. Other than expected, the interview took one month to completion against a planned period of twenty-one (21) days.

### 3.4.3 Characteristics of respondents

The main respondents for the study were drawn from groups of policy makers, regulators, supervisors (reporting institutions) and law enforcement agencies.

### 3.5 Population of the Study

Target population refers to the total number of respondents in a field that the researcher is interested in (Kothari, 2004). Mugenda and Mugenda (2003) on the other hand described a target population as the population to which the research findings was generalized. The population of this research consists of all the policy makers, regulatory and supervisory bodies as well as law enforcement agencies in the Anti-Money Laundering Regime.

### 3.6 Sampling Design and Technique

When conducting a study, a sample design is the blueprint that specifies which people are to be included in the study. The participants in this study were drawn from a large pool of regulatory, reporting, and law enforcement institutions. Data was collected through a non-probabilistic sample design. According to Babbie (2016), purposive sampling is "a non-probability sampling technique in which the researcher selects a sample based on their purpose or objective" (p. 208). The author further explains that the sample is chosen deliberately based on specific characteristics or traits that the researcher believes are important to the study. The aim of purposive sampling is to select individuals or groups who can provide the most relevant and valuable information for the research. However, this method was used to choose key respondents and those who had a significant impact on the AML fight, whether directly or

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indirectly, in the study. Individuals with traits relevant to the study are selected using a procedure known as purposeful sampling. A total of twenty (20) key respondents were considered in the study, including people from the regulatory, reporting, and law enforcement sectors. Participants in the study who volunteered to engage in an interview served as the primary sources of information. The participants in the study were subjected to a series of questions meant to elicit fresh viewpoints on the research questions under consideration.

## 3.7 Sampling Frame and Size

Babbie (2005) stated that sample size for descriptive studies should be between 10%-30% of the population. Mugenda and Mugenda (2003) cited a sample size of 10% of the total population as an adequate representative sample for a descriptive study, whereas Neuman (2003) considers 10%-20% as being an adequate sample for a descriptive study. In this study, responses were received from seventeen (17) respondents which is a fair representation of the general population.

### 3.7.1   Validity

According to Ogula (1998), data validity refers to the measure of research instrument's accuracy when measuring variables of the study. Data validity was used to indicate whether the research instrument really measured what it purported to measure. The researchers piloted the research instrument. Piloting was done in order to clarify the wording and grammar of the research instrument; to avoid misinterpretations; to avoid research bias; detect ambiguity in the questions and to pick out any other issues in advance before deploying the instrument to the respondents. Piloting was done by subjecting three interview guides to peer-review. This ensured the validity of the data collected.

### 3.7.2   Reliability

Mugenda and Mugenda (2003) defined data reliability as the consistency of the research findings if the same data was subjected to repeated trials. A research instrument is deemed reliable if it outputs consistent results even after repeated trials. In qualitative research, reliability is often assessed through inter-coder agreement, also known as inter-rater reliability. This involves having two or more researchers independently code or analyze the same data and then comparing their results to see if they are consistent. Another method is member checking, where the researcher presents their findings to the study participants to verify the accuracy and validity of the data. Data reliability is a state that exists when data is sufficiently complete and error free to be convincing for its purpose and context. In addition to being reliable, data must also meet other tests for evidence. It also relates to consistency and repeatability of the results.

### 3.8 Data Analysis

Analyzing responses to the interview questions begun with a set of transcripts of the interview conducted. The transcripts were obtained due to the exceptionally good notes taken during the interview via audio or video phone call and face to face interaction. Overall, the goal of the analysis is to reach some inferences, lessons or conclusions. Inductive research analysis was used for the study. The process begun with utilizing those specific or predefined interests to identify relevant passages and quotes. From there, the researcher elaborated on these preliminary codes, making finer distinctions within each category and to draw conclusions.

### 3.9 Ethical Consideration

Despite the fact that this research sought to elicit information from respondents, no respondent was to be coerced into participating. The privacy, anonymity and confidentiality of respondents were maintained. All sources of information to be used in the study were duly acknowledged.

Respondents were informed about the interview in relation to the subject ahead of time before responding to them.

## 3.10     Summary

This chapter highlights the research methodology of the entire study. The researcher adopted a qualitative research approach where primary data to be collected was done through interview.

## CHAPTER FOUR

## DATA ANALYSIS AND DISCUSSION OF FINDINGS

**4.1 Introduction**

This section entails the results obtained from gathering data from the respondents. The aim is to analyze and discuss in detail responses for the purpose of achieving the objectives of the study. The chapter discusses the findings of the research that seeks to provide answers to the specific objectives of the study. Data obtained for this section are those obtained from responses of the interview. Comparative observations of the study will also be made within each objective and existing verifiable studies of same or similar topics to determine how they confirm or otherwise of similar researches.

**4.2 Data Analysis**

**4.2.1 Current Forms or Sources of Money Laundering in Ghana**

This section of the study tackles the research question, "What are the current forms or sources of money laundering in Ghana?" All the respondents indicated that their institution knew about money laundering. Thematic analysis of the responses of the respondents showed that current sources of money laundering in Ghana are numerous and varied. The analysis revealed five core themes with regards to current sources of ML. This was fraud; public sector-based money laundering; criminal activity-based money laundering; legitimate business-based money laundering; bank-based money laundering; and unconventionality-based money laundering (Figure 2). They further revealed that success of each ML source grouping depends on the **lynchpin** characteristic of that group. For example, one respondent put forth that, laundering money by fraud relies on deception, which makes deception the lynchpin; public sector-based money laundering depends on the systems, loopholes, and bureaucracy within the public sector, which makes the public sector the lynchpin.
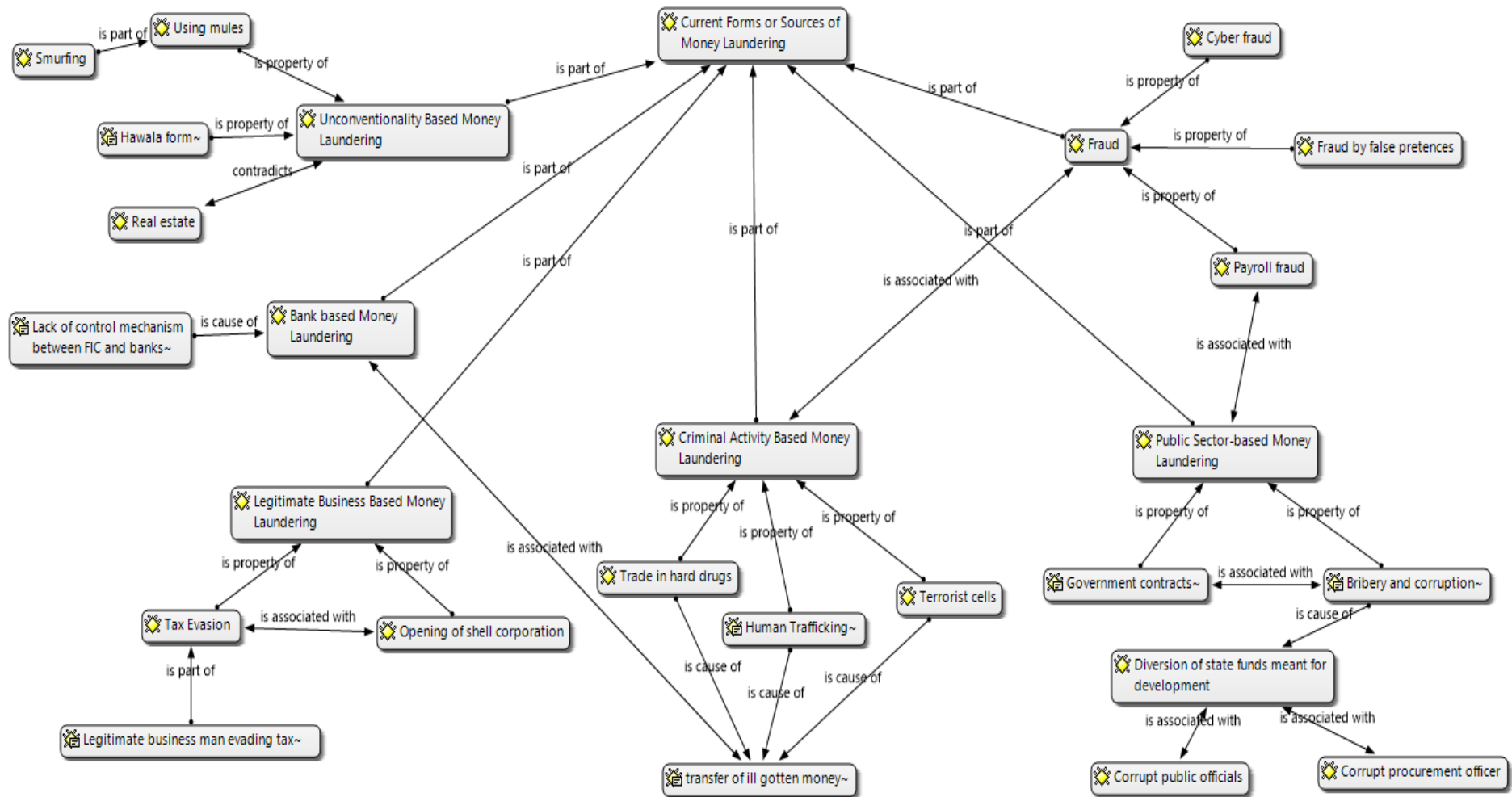
*Figure 2: Network View Analysis of Current Sources of Money Laundering (Source: Primary data)*

Another respondent said that bank-based money laundering, where the bank, coupled with lapses in the financial system, acts as the lynchpin, which makes the money laundering operation successful.

**Fraud:** Per the results of the study, fraud as a source of money laundering comprised cyber fraud, fraud by false pretenses, and payroll fraud. Payroll fraud was observed to be associated with public sector-based money laundering.

**Public sector-based money laundering:** Here respondents revealed that, this type of money laundering source is characterised by bribery and corruption, as well as government contracts. Bribery and corruption, and government contracts were found to be associated with each other. Bribery and corruption were found to be the causes of the diversion of state funds meant for development. Diversion of state funds intended for development was frequently linked to corrupt public officials and corrupt procurement officers (Figure 2).

**Criminal activity-based money laundering**: Trade in hard drugs, human trafficking, and terrorism related activity are the three principal features of this type of ML source as indicated by most of the respondents. The three properties of criminal activity-based money laundering were observed to be the causes of the transfer of ill-gotten money, which was in turn found to be associated with bank-based money laundering (Figure 2).

**Legitimate business-based money laundering**: The properties of this type of ML source were found to be tax evasion and the opening of shell corporations. Both tax evasion and the opening of shell corporations were found to be associated with each other. This form of money laundering involves using a legitimate business as a front and or a channel to launder illicit cash; hence, the name "legitimate business-based money laundering."

**Bank-based money laundering**: Lack of a control mechanism between FIC and the banks was observed to be the cause of the bank-based money laundering.

**Unconventionality-based money laundering**: This form of money laundering relies on the unconventional – the unexpected – to make the money laundering operation a success. The unconventionality-based money laundering was found to comprise the use of (money) mules and the hawala method. Smurfing was observed to be a part of the use of mules. But real estate seems to go against the normality that this type of money laundering is known for.

*Forms of Money Laundering Considered the most Significant in terms of Adverse Impact on Economy*

In order of how much damage they do to the economy, bribery and corruption (Rank 1), cyber fraud (Rank 2), tax evasion (Rank 3), fraud by false pretenses (Rank 4), government contracts (Rank 5), bank-based money laundering (Rank 6), and mules (Rank 7) were found to be the most harmful types of money laundering.

*Forms/sources of Money Laundering Considered Most Difficult to Detect by the Financial Intelligence Centre*

In order of importance, bribery and corruption (Rank 1), cyber fraud (Rank 2), human trafficking (Rank 3), *hawala* forms (Rank 4), legitimate business people avoiding taxes (Rank 5), using mules (Rank 6), and real estate (Rank 7) were found to be the most difficult to detect.

When asked which of the above-mentioned forms/sources of money laundering would you consider the most difficult to detect by the Financial Intelligence Centre, in your view, below are some of the responses provided:

> *"Corruption because we don't delve into political issues."* – Male, 36 years

> *"Well, the government elects all heads of law enforcement making it difficult to go after corruption cases"* - Male, 36 years

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"*Hawala method is difficult to detect because it does not leave a paper trail. formal banking sector is not used. The business thrives on the principles of honesty, secrecy, and trust.*" - Male, 60 years old.

*Human Trafficking because these activities are carried out not necessarily in the financial space.* – Male, 40+ years

Based on the above results, bribery and corruption, and cyber fraud were found to be the top two money laundering sources that simultaneously caused the most damage to the economy and were the most difficult to detect.

### 4.2.2 Factors Affecting Anti-Money Laundering Efforts in Ghana

This section addresses the research question, "What and how are the major factors affecting money laundering in Ghana?"

*Ranking of Current Efforts towards the Combat of Money Laundering in Ghana*

Figure 3 presents a ranking or description of current efforts towards the combat of money laundering in Ghana. The results show that 47.1% of key respondents ranked current AML efforts as "good", 5.9% as "excellent", 29.4% as "fair", and 17.6% as "poor". None of the respondents ranked current efforts as "very poor" or "exceptional".

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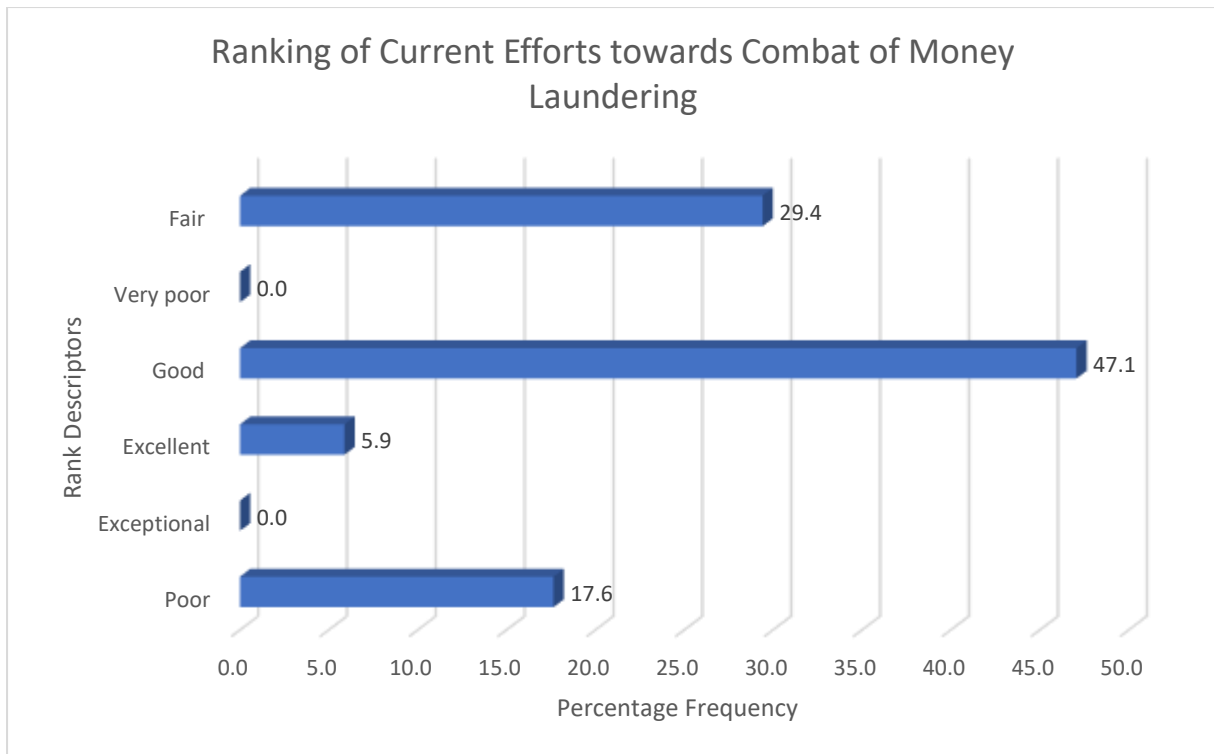
**Figure 3: Ranking of Current Efforts towards the Combat of Money Laundering (primary data)**

*Performance of the FIC in its role in AML Efforts*

This section provides the results for the question item, "In your opinion, how well is the

Financial Intelligence Centre (FIC) playing its role in combating money laundering in Ghana?

Please explain with reasons." Below are some responses:

> *"I think the FIC is doing what they can but have challenges and would need a lot more from the government in power"* – Male, 36 years.

> *They are doing their best in the fact that they are they quickly relay information on suspicious transactions to the appropriate agencies for action to be taken.* – Male, 48 years.

> *Some bank officials are complicit in the use of the financial system for money laundering in that they do not submit suspicious transactions report (STR); as demanded by law.* – Male, 51 years.
> **How can this gap be resolved by FIC & / stakeholders?**
> *"Not satisfactory"* – Male, 30 years.

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*"FIC is basically implementing recommendation 2 of the FATF to help all stakeholders work to combat ML/TF/P"* – Male, 40+ years.

From the above, one gets the sense that the FIC could do much more, but for hindrances within the political sphere and recalcitrant bank employees, challenges, and other factors beyond their control that militate against operational success.

*Presence of Factors Affecting the Full functioning of FIC*

All the respondents indicated that there are indeed factors affecting the full functioning of FIC in Ghana, as evinced in Figure 4. These factors were found to be subsumed under the following core themes: information, public education, employee empowerment, and politics.

**Information**: The information theme covered the prompt report of suspicious transactions, lack of submission of suspicious transaction reports by bank officials, successfully reporting suspicious transaction, limited information flow from accountable institutions, and receiving information on time (Figure 4). The sheer number of codes under the information theme is a testament to the fact that FIC and its work thrives on information. Without appropriate information, FIC will find it most difficult to function.

**Public education**: this theme covers the codes, lack of awareness of ML impact on economy, and poor financial education of the public.

**Employee empowerment**: this covers lack of investment in technology, poor remuneration, and staff strength (reflected as limited staff) (Figure 4).

**Politics**: this theme touches on leadership, turf wars, political influence, operational support, lack of political will, and lack of proper regulatory structures.
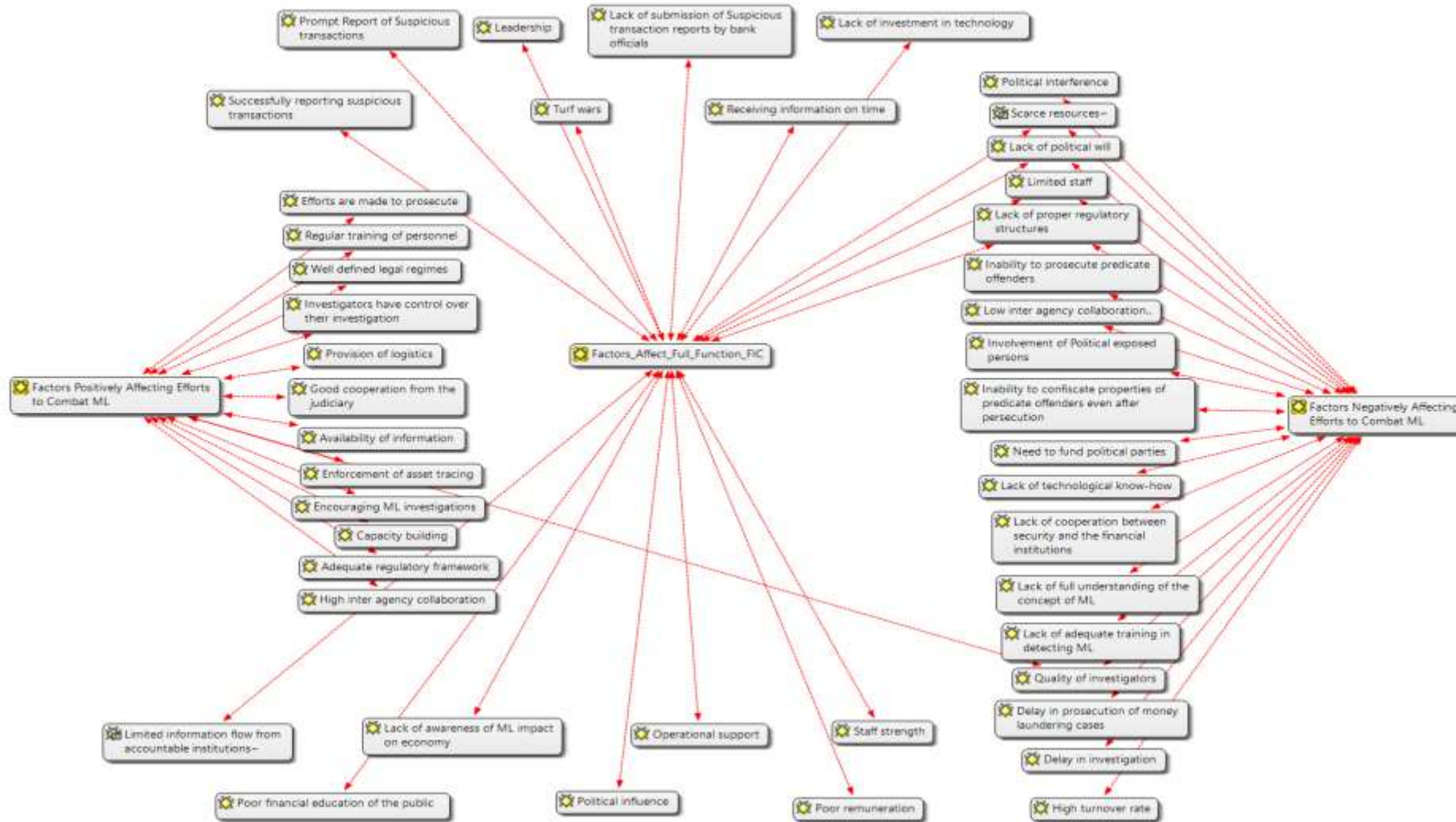
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*Figure 4: Network View of Factors Affecting the Full Functioning of FIC in relation to Partner Organizations tasked with Combating ML (Primary Data)*

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In a nutshell therefore, the full functioning of FIC is affected by information, public education, employee empowerment, and politics.

*Major factors Positively Affecting Efforts to Combat Money Laundering in Ghana*

This section provides the results obtained for the question, "In your view, what are the major factors positively affecting efforts, on the part of your organization, to combat money laundering in Ghana"?

Thematic analysis of responses given by the respondents revealed that the top three major factors positively affecting efforts to combat money laundering in Ghana were found to be as follows: efforts are made to prosecute, regular training of personnel, and well-defined legal regimes. The remaining factors positively affecting AML campaigns are investigators have control over their investigations, provision of logistics, good cooperation from the judiciary, availability of information, enforcement of asset tracing, encouraging ML investigations, capacity building, adequate regulatory framework, high inter-agency collaboration.

*Major factors Negatively Affecting Efforts to Combat Money Laundering in Ghana*

This section provides the results obtained for the question, "In your view, what are the major factors negatively affecting efforts, on the part of FIC to combat money laundering in Ghana?" Content analysis of responses given revealed that the top three major factors negatively affecting efforts to combat money laundering in Ghana were found to be as follows: political interference, scarce resources, and lack of political will. The remaining factors negatively affecting AML campaigns are limited staff, lack of proper regulatory structures, inability to prosecute predicate offenders, low inter-agency collaboration, involvement of politically exposed persons, inability to confiscate properties of predicate offenders even after prosecution, need to fund political parties, lack of technological know-how, lack of cooperation between security and the financial institutions, lack of full understanding of the concept of ML,

lack of adequate training in detecting ML, quality of investigators, delay in prosecution of money laundering cases, delay in investigation, and high turnover rate of staff in some of the institutions mandated by law to deal with ML through engagement with FIC per Act 1044 (2020) the Anti-Money Laundering Act.

*Comparative Analysis of the Influence of Negative Factors and Positive Factors on the Fight Against Money Laundering*

This section analyses the responses to the question, "Would you say that the influence of the negative factors on the fight against money laundering outweighs the influence of the positive factors?" Figure 5 provides the responses to the preceding question item.
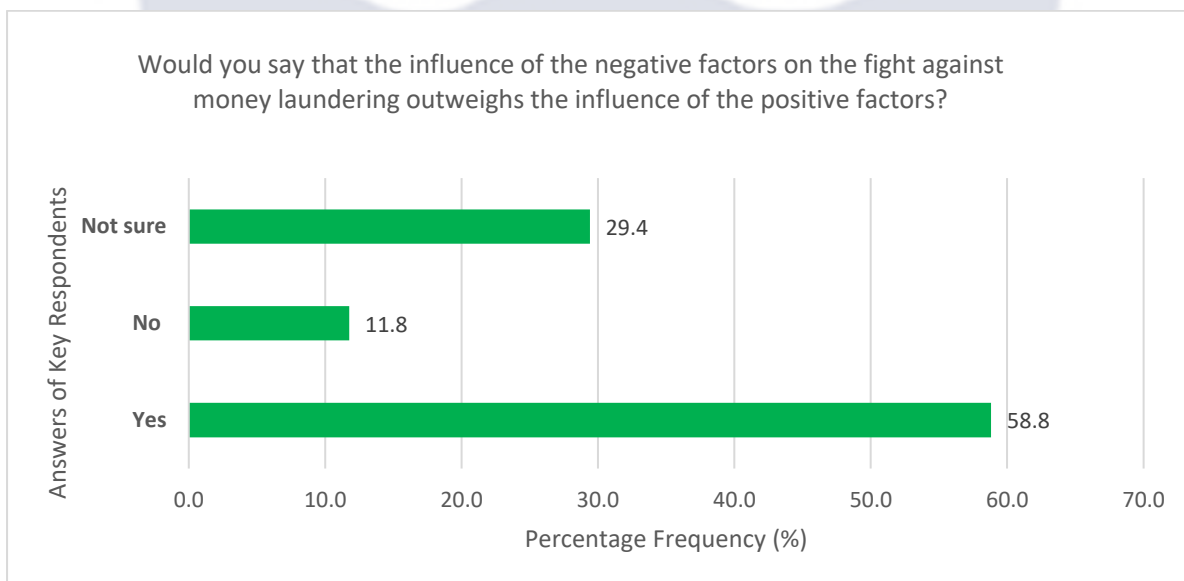


*Figure 5: Comparison of Influence of Negative Factors and Positive Factors on the Fight Against Money Laundering (Primary data)*

58.8% of the respondents said "Yes", implying that the influence of the negative factors on the fight against money laundering outweighs the influence of the positive factors. 29.4 % of the key respondents said they were not sure whether the influence of the negative factors outweigh the influence of the positive factors.

**4.2.3 Effectiveness of Actions by Government through FIC to Control Money Laundering in Ghana**

This section addresses the research question, "What and how is the effectiveness of the actions put in place by the government through the FIC to control money laundering in Ghana presently?" This is a 2-in-1 research question as it covers the actions put in place by the government through the FIC, as well as investigations led by intelligence from FIC into the effectiveness of those actions.

Thematic analysis of the responses provided revealed that the actions put in place by the government through the FIC is multifaceted. The following were revealed as the commonest actions by the FIC: regular training of personnel, well defined legal regimes, report of suspicious transactions, and public education on money laundering. The other actions carried out by FIC were observed to be the tracking of movement of funds, bank compliance with international conventional AML efforts, improved regulatory framework, amending the laws on money laundering, requests for customer due diligence, improved inter-agency collaboration, and sanction of non-complying institutions.

Thirteen (13) out of the seventeen (17) respondents thought that the actions by the government through the FIC were effective. The remaining four did not think so; their reason being that money laundering was still ongoing, despite all the interventions and measures that have been "thrown" at the problem.

**4.2.4 Ways in Which FIC by Section 8 (1) f, g and (i) of Act 1044, (2020) provides for Law Enforcement Agencies to Punish Money Laundering Perpetrators**

This section tackles the research question, "What are some of the ways law enforcement agencies punish money laundering perpetrators?"

Confiscation of property or funds was found to be the commonest way the FIC's engagement

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with stakeholders per Act 1044 has led law enforcement agencies to punish ML perpetrators. This was followed by prison sentence, asset freezing, and payment of taxes on proceeds were found to be the other ways punishment was meted out to ML perpetrators.

**4.3 Discussion of Findings**

The main aim of the study was to measure the role of the Financial Intelligence Centre in Ghana in combating money laundering.

The first objective of the study sought to analyze the current forms or current sources of money laundering in Ghana. The results of the study showed that the current sources of money laundering in Ghana were found to be fraud, public sector-based money laundering, criminal activity-based money laundering, legitimate business-based money laundering, bank-based money laundering, and unconventionality-based money laundering. Arguably, these classifications represent a paradigm shift in how money laundering is conceptualized in many jurisdictions.

Indeed, the above proffered classifications deviates from the FIC's (2019) typology report, except for fraud, which identified eight forms of money laundering vis-à-vis fraud, trade-based money laundering, tax evasion, counterfeiting of currency, use of foreign bank accounts, insurance fraud, and securities fraud. But then, a closer examination would reveal some level of similarities. For instance, using the ML classification proposed by the present study (for ease of reference and simplicity, I shall refer to it as the lynchpin-based form of money laundering classification), insurance fraud and securities fraud would both fall under the fraud classification, whereas tax evasion, trade-based money laundering, and the use of foreign bank accounts may fall under the legitimate business-based money laundering.

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The lynchpin-based form of money laundering classification is novel, except for the fraud classification, and is all based on the lynchpin characteristic of that grouping. For example, laundering money by fraud relies on deception, which makes deception the lynchpin; public sector-based money laundering depends on the public sector - its systems, loopholes, and bureaucracy - which makes the public sector the lynchpin. The concept of the lynchpin being used in the present study can be viewed as the platform or that which makes it possible for the money laundering operation to occur in the first place, or that which powers the money laundering operation to enable it to avoid scrutiny. Surely, a money laundering operation under the umbrella of a legitimate business running a corporate account with cash flow in the hundreds of thousands or even millions of dollars or Ghana cedis is more likely to avoid a deep level of scrutiny if such huge amounts are characteristic of the industry that legitimate business operates in.

The second objective of the study sought to examine the major factors affecting efforts to combat money laundering in Ghana. None of the respondents ranked current efforts as "very poor" or "exceptional". That seems to suggest that current efforts towards combating money laundering in Ghana seem to sway between the two extremes. For example, the blacklisting of Ghana, as happened in May 2020 (Joy Business, 2021) was an indication of very poor AML efforts, that eventually led to steps taken that culminated in the passing of the new anti-money laundering law Act 1044, (2020).

The findings of the study further showed that the full functioning of FIC is primarily affected by three things namely, information – that is, appropriate and timely – public education, employee empowerment, and politics. The work of FIC is heavily dependent on information that is appropriate and timely. This finding ties in with a core approach of the FATF which

requires customer due diligence from financial institutions. The fundamental "know your customer" strategy of the FATF is predicated on information rather than the control of the transactions itself as its lynchpin (International Monetary Fund, 1998). The lack of actionable information is another challenge. The lack of actionable information to the FIC from the reporting institutions is best explained by the crying wolf theory where e*xcessive reporting, also known as "crying wolf," can reduce the usefulness of reports by diluting their content.*

Not many people are aware of money laundering, necessitating the need for public education on the nature, scope, and consequences of ML. The more people become aware of ML, the better placed the public is to spot possible ML perpetrators and report them to authorities. The National Risk Assessment Council of the Virgin Islands (2022) has taken the lead in that regard. In Ghana's AML/ CFT national strategy and action plan, the creation of public awareness of money laundering, terrorism financing and other financial crimes was a key component (Financial Intelligence Centre, 2011).

Employee empowerment of the FIC and their stakeholders will ensure that their staff stay ahead of all the new trends and schemes being used by ML perpetrators to ensure very little or no damage is done to the country. However, as a government agency subject to the political will of the government of the day, FIC and its stakeholders' operations unfortunately have the potential to tend to be influenced by politics. As a result, political interference was found to be the top negative factor affecting efforts to combat money laundering. Meanwhile, money laundering across the board is affected by many factors, both negative and positive. The negative factors affecting money laundering were observed to outweigh the influence of positive factors. The top three negative factors were found to be political interference, lack of resources, and lack of political will, while the top three positive factors were observed to be enhanced prosecutorial efforts, regular training of personnel, and well-defined legal regimes.

The study results seem to suggest that the FIC could do much more, but for hindrances emanating from the political sphere and recalcitrant bank employees, challenges, and other factors beyond their control that militate against operational success.

The third objective looked at assessing the efficacy of the present measures taken by the Government of Ghana through the FIC to combat money laundering in Ghana. The results of the study revealed that the impact of actions by the government through FIC against money laundering was generally considered effective. This is seen in the removal of Ghana from the European Union's ML grey list (Ministry of Finance, 2022; Nettey, 2021). This was achieved through regular training of personnel, well-defined legal regimes, reporting of suspicious transactions, and public education on money laundering.

The fourth objective sought to assess the forms of punishment applied to money laundering perpetrators by the enforcement agencies through the efforts of the FIC indicated in the objects and functions of Act 1044, (2020). The study findings showed that money launderers were punished by having their property or money taken away, going to jail, having their assets frozen, and or having to pay taxes. Confiscation of property or funds was found to be the most common way the impact of FIC through its stakeholders including law enforcement agencies punished ML perpetrators. This seems to suggest that confiscation of funds or property may be the most effective or primary way ML perpetrators are punished, although there are other forms of punishment. Using economic theory as a theoretical framework, it appears that because money laundering, a form of organised crime, is considered a business enterprise by the criminals who perpetrate it, the loss of the proceeds of their crime may be considered more painful than a prison sentence (provided it is not life imprisonment). Before starting their "mission", people who launder money carefully consider how much it will cost and how much it will help them (using a cost-benefit analysis, an aspect of economic theory). When criminal property is confiscated, it prevents it from being laundered or reinvested, either for the purpose

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of facilitating other crimes or concealing unlawful profits. In and of itself, this can considerably restrict organised criminal organisations, disrupt them, or impede the flow of funds derived from illicit activity (FATF, 2012). The preceding, perhaps, further explain why ML perpetrators appear to prefer other forms of punishment compared to confiscation of the proceeds of their crime.

**4.4 Empirical Review of Existing Literature and Its Relevance to Research Findings**

Money laundering is a global phenomenon that poses a significant challenge to the stability and integrity of financial systems worldwide. Various countries have put in place different measures to combat money laundering, including the establishment of financial intelligence centres. This section will review the existing literature on the efforts to combat money laundering in Ghana and the relevance of these findings to the research topic. The Efforts to Combat Money Laundering in Ghana: An Evaluation of the Role of the Financial Intelligence Centre.

Several studies have been conducted on Money Laundering and the role of Financial Intelligence Centres in various countries, the study by A. Opoku (2023) examined the challenges facing the implementation of anti-money laundering policies in Ghana. The study found that although Ghana has made significant progress in implementing anti-money laundering policies, there are still several challenges, including a lack of awareness among the public and limited resources for implementing these policies.

Another point analysed is the effectiveness of Ghana's Anti-Money Laundering Act in combating money laundering. The study found that the Act has been effective in deterring money laundering activities in Ghana, but there are still gaps in its implementation and enforcement.

The study further evaluated the effectiveness of the Financial Intelligence Centre in Ghana in combating money laundering. The study found that the Centre has made significant strides in combating money laundering, but there are still several challenges, including limited resources and inadequate training of personnel.

The findings from these studies are relevant to the research topic because they provide insights into the challenges facing the implementation of anti-money laundering policies in Ghana and the effectiveness of the Financial Intelligence Centre in combating money laundering. These findings can be used to inform the recommendations and conclusions of the current study, which evaluates the role of the Financial Intelligence Centre in combating money laundering in Ghana.

In conclusion, the existing literature on money laundering and the role of financial intelligence centres in Ghana provides relevant insights into the challenges and effectiveness of anti-money laundering policies in the country. These findings can be used to inform the conclusions and recommendations of the current study.

## CHAPTER FIVE

## SUMMARY, CONCLUSION AND RECOMMENDATION

### 5.0 Introduction

This chapter encompasses an overview of the entire study looking specifically at summary of findings, which are presented based on the specific issues analyzed and deduced from the entire study, the conclusion arising from the research work and recommendations. This chapter enables the reader to make meaningful connotations and logical conclusions of the study and recommendations.

### 5.1 Summary

Global efforts are being made to establish appropriate and effective anti-money laundering countermeasures to ensure that criminals are denied access to the proceeds of their crime and make it difficult for them to protect their illegally acquired money from the long arm of anti-money laundering legislation. The governments of different countries have established various anti-money laundering measures for which Ghana is not exception; however, these measures seem not to have been effective as expected. The challenge experienced, especially in developing countries due to their continued high-profile money laundering incidents calls for the regular review of the measures put in place for the desired impact. Money laundering, a serious issue requiring local and international responses, is cloaked in secrecy and linked to drug trafficking and terrorism financing.

This study therefore sought to look into the effort of Ghana's Financial Intelligence Centre in combatting money laundering.

Relevant theoretical and empirical literatures were reviewed, giving credence to existing literature on the subject matter. The study which was qualitative in nature adopted the case study strategy in achieving the objective of the study. A sample size of 20 was purposively

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taken from the population comprising of regulatory, reporting and enforcing institutions. For the purpose of this research, interview was used to collect the data. Interview was preferred data collection method since it allowed standard procedure of primary data collection.

The results of the study revealed the following:

1. The success of each form of ML grouping depends on the lynchpin characteristic of that group. For example, laundering money by fraud relies on deception, making deception the lynchpin; public sector-based money laundering depends on the public sector – its systems, loopholes, and bureaucracy, making the public sector the lynchpin. In order of how much damage they do to the economy, bribery and corruption, cyber fraud, tax evasion, fraud by false pretenses, government contracts, bank-based money laundering, and mules were found to be the most harmful types of money laundering. In order of importance, the forms of money laundering most difficult to detect were found to be bribery and corruption, cyber fraud, human trafficking, hawala forms, legitimate businessmen evading tax, using mules, and real estate. Bribery and corruption, and cyber fraud were found to be the top two money laundering sources that simultaneously caused the most damage to the economy and were the most difficult to detect.

2. The top three major factors negatively affecting efforts to combat money laundering in Ghana were found to be as follows: political interference, scarce resources, and lack of political will. The top three major factors positively affecting efforts to combat money laundering in Ghana were found to be as follows: efforts are made to prosecute, regular training of personnel, and well-defined legal regimes.

3. The FIC in the pursuit of its objects and functions per sections 7 and 8 of Act 1044, (2020) generates multifaceted results. Thematic analysis revealed the following as the commonest actions by the FIC: regular training of personnel, well defined legal

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regimes, reports of suspicious transactions, and public education on money laundering. None of the respondents ranked current efforts as "very poor" or "exceptional." That seems to suggest that current efforts towards combating money laundering in Ghana sway between the two extremes. The FIC could do much more, but for hindrances emanating from the political sphere and recalcitrant bank employees, challenges, and other factors beyond their control that militate against operational success. FIC and its work thrive on information and its communication. Without information, FIC will find it most difficult to function.

4. FIC's engagement per section 8 of Act 1044, (2020) produced the outcome of law enforcement agencies punishment of ML perpetrators by confiscation of property or funds. This seems to suggest that confiscation of funds or property may be the primary way ML perpetrators are punished or the most effective way, although there are other forms of punishment. Since money laundering perpetrators appear to fear confiscation of funds or properties because of the ability of this form of punishment to restrict organised criminal organisations, disrupt them, or impede the flow of funds derived from illicit activity which funds their flamboyant lifestyle, it is strongly advised that law enforcement agencies "double down" on this form of punishment.

## 5.2 Conclusion

Money laundering has attracted international attention due to its tendency to undercut hard work, ethics and honesty while promoting terrorism financing and activities. Corruption has hindered the State's capacity to use current resources efficiently and ethically to meet its population's developmental needs. Consequently, its economic strength erodes, harming its inhabitants, the ultimate victims of crime and national progress. Redress would require a paradigm shift, including civil society organisations' contributions to fighting money

laundering. Money laundering is a long-standing global issue owing to criminals' ongoing efforts to conceal the source of their unlawful funds and legitimise their future use.

Like many country FIUs, Ghana's Financial Intelligence Centre was established in response to international commitments and obligations, without necessarily endowing it with the necessary resources and capabilities for overseeing a burgeoning private sector and responding to law enforcement requests for intelligence regarding increasingly complex criminal behavior.

The FIC have made some progress towards implementing legislative and administrative controls on money laundering but much more still has to be done to ensure full compliance and enforcement of laws. Even if the banking industry is effective in detecting money laundering, the second leg of that process has to be enforcement of civil and or criminal sanctions as deterrents to would-be launderers and as a punishment to launderers. The Center also lacks the capacity and resources to effectively combat money laundering single handed but has to engage and collaborate with other regulatory, reporting and enforcement institutions to achieve this result. There is already an appreciation of the fact that the intricacies of criminal activities like money laundering require specialised skills from institutions that are mandated to address this problem.

The evaluation of actions by the government through FIC was generally considered effective by the study. Regular training of personnel, well-defined legal regimes, reporting of suspicious transactions, and public education on money laundering were found to be the dominant actions by the government through FIC against money laundering.

While government has shown its political commitment to addressing issues of corruption and economic offences through the establishment of the Center, it is hoped that this commitment

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will be carried further by providing the necessary financial and human resources to equip the Center with the capacity to carry out its duties. As the Center is designated by law as the country's Anti-Money Laundering Authority, this requires that the FIC should be augmented with stakeholders and Government institutions with an enhanced variety of skillset such as specialised investigative techniques, forensic auditing, banking practices and prosecution capacity to make them up to the task.

## 5.3 Recommendations

According to the results of the study, the success of money laundering operations seems to depend on a "lynchpin." Because of this, it is recommended that lynchpins like banks, the public sector, criminal activities that deal with especially large amounts of money like the narcotics trade, non-traditional ways of sending money like the hawala method, and even legal businesses that deal with large amounts of money be closely watched for any signs of wrongdoing.

Furthermore, since money laundering perpetrators appear to fear confiscation of funds or properties because of the ability of this form of punishment to restrict organised criminal organisations, disrupt them, or impede the flow of funds derived from illicit activity, it is strongly advised that law enforcement agencies "double down" on this form of punishment to deny the perpetrators of Money Laundering of the proceeds of their crime.

Additionally, from the foregoing, the repercussions of money laundering to individuals, institutions and the nation at large is massive. Therefore, it is highly recommended that individuals and institutions who enter into business relationships involving the exchange and or transfer of funds and or assets must conduct painstaking due diligence to ascertain the source of funds. The due diligence must involve the third party or client by obtaining sufficient

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information on the intended transaction and verifying same through identification and certificates.

Finally, the FIC should continue to observe trends and patterns of money laundering activities and provide guidance through the development of typologies to Accountable Institutions, Law Enforcement Agencies, Policy Makers and the General Public on the future occurrences within the financial sector.

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**APPENDIX 1 – Interview Guide**

We would appreciate it very much if you could freely express your views on the questions below. All information shall be held confidential, and it is strictly for academic purpose only. Thank you for your support and cooperation. No response can be traced back to you.

**SECTION A - Background of Respondents**

1. Representation
   (a) Regulatory institution [  ]
   (b) Reporting institution [  ]
   (c) Law enforcement institution []

2. Designation
   (a) FIC Official []
   (b) Non FIC Official []

3. Sex
   (a) Male []
   (b) Female [ ]

4. Age (years) ……………………………

5. Marital status
   (a) Single      [   ]
   (b) Widowed  [   ]
   (c) Married    [   ]
   (d) Divorced  [   ]
   (e) Separated [   ]

6. Educational background
   (a) Certificate           [   ]
   (b) Diploma              [   ]
   (c) Bachelor's degree [    ]
   (d) Master's degree    [   ]
   (e) PhD                    [   ]
   (f) Other……………………..

7. Work Experience.
   (a) Below 5 years [   ]
   (b) 5-10 years
   (c) Above 10 years.

8. Nature of Work.
   (a) Permanent
   (b) Temporary

9. Department ………………………………………..

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**Section B - Analysis of Current Forms/Sources of Money Laundering in Ghana**

10. Does your institution know about money laundering?
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11. In your view, what are the various forms/sources of money laundering identifiable in Ghana today? Please identify the forms or sources of money laundering in Ghana.
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12. From your perspective, which of the above-mentioned forms of money laundering do you consider the most significant in terms of adverse impact on Ghana's economy?
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13. Based on your response in Q11, which of the above-mentioned forms/sources of money laundering would you consider the most difficult to detect by the Financial Intelligence Centre, in your view? Please indicate with REASONS.
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**Section C - Factors Affecting Efforts to Combat Money Laundering in Ghana**

14. How would you rank current efforts towards the combat of money laundering in Ghana?
(a)     Exceptional [  ]   (b) Excellent [   ]   (c) Good [  ]   (d) Fair  [  ]   (e) Poor
(g) Very poor [  ]

15. In your opinion, how well is the Financial Intelligence Centre (FIC) playing its role in combating money laundering in Ghana? Please explain with reasons.
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16. Are there factors affecting the full functioning of FIC in Ghana? Please, list some.
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17. In your view, what are the major factors NEGATIVELY affecting efforts, **on the part of your organization**, to combat money laundering in Ghana?
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18. In your view, what are the major factors POSITIVELY affecting efforts, **on the part of your organization,** to combat money laundering in Ghana?
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19. Would you say that the influence of the negative factors on the fight against money laundering outweighs the influence of the positive factors?
(a)      Yes [   ]     (b) No  [   ]     (c) Not sure  [    ]

20. Kindly provide a reason for the response provided to Q19 above.
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**Section D -**

**Efficacy of Present Measures taken by the Government of Ghana through the FIC to Combat Money Laundering**

21. What are some of the present measures that have been taken by the Government of Ghana through the Financial Intelligence Centre (FIC) to combat money laundering?
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22. In your view, do you think the above measures stated in Q21 above are effective, and why? Please provide reasons for your answer.
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**Section E - Forms of Punishment Applied to Money Laundering Perpetrators**

23. What forms of punishment are meted out to money laundering offenders by law enforcement agencies through the efforts of the **FIC**?
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24. Would you consider these punishments (as mentioned in Q23) effective or efficacious?
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25. Which of the above punishments mentioned in Q23 do you consider most effective at deterring money laundering perpetrators? ………………………………………….. ……………………………………………………………………………………….