INTER-GOVERNMENTAL ACTION GROUP AGAINST MONEY LAUNDERING IN WEST AFRICA

COMMUNICATION STRATEGY

MARCH 2012
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<tr>
<th>Acronym</th>
<th>Full Form</th>
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<tbody>
<tr>
<td>AML/CFT</td>
<td>Anti-Money Laundering and Combating the Financing of Terrorism</td>
</tr>
<tr>
<td>CAD</td>
<td>Communication and Advocacy Division</td>
</tr>
<tr>
<td>CDD</td>
<td>Customer Due Diligence</td>
</tr>
<tr>
<td>CENTIF</td>
<td>Cellule Nationale de Traitement des Informations Financières (FIU)</td>
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<tr>
<td>CENTIF</td>
<td>Célula Nacional de Tratamento de Informações Financeiras (FIU)</td>
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<tr>
<td>CFT</td>
<td>Combating the Financing of Terrorism</td>
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<tr>
<td>CSO</td>
<td>Civil Society Organization</td>
</tr>
<tr>
<td>DNFBPs</td>
<td>Designated Non-Financial Businesses and Professions</td>
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<tr>
<td>DNFIs</td>
<td>Designated Non-Financial Institutions</td>
</tr>
<tr>
<td>ECOWAS</td>
<td>Economic Community of West Africa States</td>
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<tr>
<td>FATF</td>
<td>Financial Action Task Force</td>
</tr>
<tr>
<td>FAQ</td>
<td>Frequently Asked Question</td>
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<tr>
<td>FIs</td>
<td>Financial Institutions</td>
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<tr>
<td>FIU</td>
<td>Financial Intelligence Unit</td>
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<tr>
<td>FSRB</td>
<td>FATF - Style Regional Body</td>
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<td>F2F</td>
<td>Face to Face</td>
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<tr>
<td>FUR</td>
<td>Follow Up Report</td>
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<tr>
<td>GIABA</td>
<td>Inter-Governmental Action Group against Money Laundering in West Africa</td>
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<tr>
<td>GMC</td>
<td>GIABA Ministerial Committee</td>
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<tr>
<td>ICTD</td>
<td>Information &amp; Communication Technology Division</td>
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<tr>
<td>IFI</td>
<td>International Financial Institution</td>
</tr>
<tr>
<td>IMF</td>
<td>International Monetary Fund</td>
</tr>
<tr>
<td>KISS</td>
<td>Keep It Short and Simple</td>
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<tr>
<td>LE</td>
<td>Law Enforcement</td>
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<td>ME</td>
<td>Mutual Evaluation</td>
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<td>Mutual Evaluation Report</td>
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<td>ML</td>
<td>Money Laundering</td>
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<td>MS</td>
<td>Member States</td>
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<td>NC</td>
<td>National Correspondent</td>
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<td>NGOs</td>
<td>Non Governmental Organizations</td>
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<tr>
<td>STR</td>
<td>Suspicious Transaction Report</td>
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<tr>
<td>TC</td>
<td>Technical Commission</td>
</tr>
<tr>
<td>TF</td>
<td>Terrorist Financing</td>
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</tbody>
</table>
UNAIDS United Nations Program on AIDS

PREFACE

i. The fight against money laundering (ML) and terrorist financing (TF) remains a global challenge. Unfortunately, the complex nature and international dimension of these crimes impair their understanding by a large segment of the population. Thus, it is of great importance to convey messages on money laundering and terrorist financing and their negative consequences in a way that is understandable and convincing. In other words, communication has emerged as a priority issue in the global crusade against ML and TF.

ii. In an effort to support the implementation of anti-money laundering (AML) and combating the financing of terrorism (CFT) measures in West Africa, this Communication Strategy (ComStrat) has been developed to institute a culture change that values communication. Thus, the ComStrat will facilitate better understanding of the roles of GIABA and complement program implementation for the actualization of the mandate of GIABA in a concise and coordinated platform.

iii. The ComStrat provides the fundamental principles and tools required to lead a best practice communication process. In addition, the Strategy will facilitate advocacy, social mobilization and behavioral change/development communication. The ComStrat presents a generic framework for GIABA communication process and detailed/specific Communication Plan for the dissemination of the Revised FATF Standards.

iv. The Communication Strategy, a product of consultation and collaboration with AML/CFT stakeholders is designed to offer guidelines to improve, in a strategic manner, the communication process of GIABA. I wish to express my sincere gratitude to several people who served as sounding boards, editors and sources for this document. In particular, special thanks go Macaria Barai, Timothy Melaye and Dr. Buno Nduka who coordinated the process. I also thank the IMF and the FATF whose Communication Strategy documents provided motivation for the development of the GIABA Communication Strategy.

Dr. Abdullahi SHEHU
Director General, GIABA
March 2012
I. INTRODUCTION

1. Money laundering and terrorist financing are worldwide phenomena and their consequences are devastating, including bad governance, financial sector instability, compromised economy, and other social effects. Large segments of countries susceptible to money laundering and other forms of organized crime are highly impoverished. The last two decades have witnessed increased efforts and collaboration to address the issues of these twin evils. International initiatives in the form of Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT) frameworks have been designed by the FATF, and over 180 countries and/or jurisdictions have subscribed to these measures, apart from other United Nations and regional initiatives.

2. In recognition of the deleterious effects of money laundering, the Authority of Heads of State and Government of the Economic Community of West African States (ECOWAS) in year 2000 established the Inter-Governmental Action Group against Money Laundering in West Africa (GIABA) as a specialized institution of the Community.

3. The core mandates of GIABA are to implement the FATF Standards on AML/CFT and to assist member States protect their economies from the laundering of the proceeds of crime. Since its establishment, GIABA has undertaken actions to meet these mandates. Intervention programs have been designed and delivered to member States.

4. Crucial to the development and delivery of programs and projects is effective communication. In 2009, GIABA carried out a thorough review of its communication process to ascertain its effectiveness with a view to developing a comprehensive communication strategy. The report revealed among others that the GIABA communication process is not strong enough to support its mandate delivery and thus, recommended the following actions:
   i. Maximization of media potential to meet AML/CFT challenges;
   ii. Acquisition of a more media holistic and culture centred approach to enhance the delivery of GIABA mandate;
   iii. Usage of appropriate media technologies for the production and dissemination of communication materials; and
   iv. Engagement with GIABA member States in on-going dialogue to bridge the practice gap in all media.

5. In 2010, an independent evaluation of GIABA 2007-2009 Strategic Plan was conducted. One of the major recommendations of the evaluation was the need to strengthen the communication machinery of GIABA to ensure that the right message is delivered to the right audience at the right time through the right channels. In particular, the report noted as follows:

   “A surprisingly large number of people in virtually all the member States, including senior decision makers still have a limited level of awareness and comprehension of the magnitude and effects of money laundering menace. Most people could not understand why anyone should be concerned over what they considered a beneficial development for the national
economic as illicit funds flowed in (they do not know that money laundering is a dual way phenomenon)’.”

6. The report noted further that the relatively low level of awareness about AML/CFT issues at high decision making quarters led to the slow pace in enacting legislations on TF by national parliaments in some member States, despite the fact that such legislations testify to a concrete demonstration of commitment to fighting ML and TF.

7. The independent report therefore recommended that nothing else can better illustrate the urgent case for GIABA to revamp its communication process than taking the message to where it would have the greatest impact – people in position of authority, and other critical stakeholders.

8. In line with the above recommendations, GIABA in its 2011 – 2014 Strategic Plan adopted a collaborative and all-inclusive approach to raising awareness on the negative effects of money laundering and terrorist financing.

9. GIABA is therefore determined to organize regional programs to sensitize policy and decision-makers, both in the public and private sectors, whose knowledge of AML/CFT matters would make a big difference in the fight against money laundering and terrorist financing in the region. Information dissemination, training and capacity enhancement are important planks of the GIABA 2011 – 2014 Strategic Plan. This further buttressed the strong case for GIABA to develop a robust, comprehensive and targeted sensitization program aimed at these specific and important audiences as a matter of priority.

10. To strengthen communication efforts of the institution, the ECOWAS Council of Ministers in 2010 approved the establishment of GIABA Information Centres in Abidjan, Cote D’Ivoire and Lagos, Nigeria.

11. The timely and accurate communication of carefully chosen messages to specific audiences and/or stakeholder groups through appropriate and effective channels remain archetypal and a key success factor for any change process envisaged by GIABA. This objective can better be achieved through a well designed Communication Strategy. This Strategy is developed to address the communication requirements for the implementation of effective AML/CFT measures in West Africa.

12. The strategy is developed based on the following essential elements: Review/Audit, Objectives, Audience, Message, Tools and Products, Channels, Resources, Timing, Activities and Evaluation.

13. The review/audit is covered in paragraph 4 to 8 above while the remaining elements are presented below.
II. OBJECTIVES OF THE GIABA COMMUNICATION STRATEGY

14. In line with the vision, mission and mandate of GIABA and the ECOWAS Vision 2020, the objective of the GIABA communication strategy is to strengthen GIABA’s effectiveness by:
   - raising awareness, and promoting understanding and support for GIABA’s mission among key stakeholders;
   - increasing member States’ involvement in GIABA’s activities, thereby enabling them to take ownership;
   - strengthening teamwork in GIABA; and
   - using communication as a tool in the delivery of GIABA’s mandate, especially its operational activities through:
     - General awareness raising and deployment of advocacy as a component of AML/CFT programs and projects implementation, for all sectors of society, including government organs and officials, the organized private sector, civil society, and the general populace;
     - Promotion and sustenance of strategic partnerships with the civil society and development partners; and
     - Ensuring that the technical and strategic reports, and other outputs of GIABA such as research, evaluation and other accountability reports are adequately disseminated to relevant stakeholders and other target populations to keep them well informed and elicit desirable responses from them as necessary.

15. In achieving the above objectives, the main components of the Communication Strategy are presented in box 1 below;
Box 1: The Operational Components of the Strategy

The communication strategy shall consist of the following components:

- Facilitating better understanding and support for GIABA’s role as the regional leader in the fight against money laundering and terrorist financing;
- Integrating effective communication into all GIABA operations and programs;
- Increasing the impact of communication through proper utilization of the tools and the deployment of an effective feedback system; and
- Rebalancing outreach efforts to ensure that all stakeholders are mainstreamed into the AML/CFT agenda.

The realization of the above components will enhance the visibility of GIABA as:

- The key regional pillar in combating money laundering and terrorist financing;
- A provider of public good that helps its member States to protect their economies against the negative effects of money laundering and terrorist financing activities;
- A major partner in the global network and efforts to address the negative effects of money laundering and terrorist financing; and
- A learning organization that places emphasis on two-way communication.

III. VISION AND MISSION OF GIABA

<table>
<thead>
<tr>
<th>VISION</th>
<th>GIABA is committed to be a leader in promoting a regional alliance against money laundering and terrorist financing.</th>
</tr>
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<tbody>
<tr>
<td>MISSION STATEMENT</td>
<td>To promote concerted actions in the design and diligent implementation of harmonized AML/CFT regimes in West Africa, consistent with international standards.</td>
</tr>
</tbody>
</table>

IV. THE PRINCIPLES OF COMMUNICATION STRATEGY

16. The following principles shall guide the way communication is developed, delivered and managed by GIABA:
   a. Needs Analysis: Tailor communication to appropriate audiences based on the need-to-know.
   b. Consistency: Ensure communications contain consistent messages relevant to the occasion.
c. **Sustainability**: Continually put messages across to stakeholders and the general public that will reinforce the focus and direction of GIABA from time to time.

d. **Reliability and validity**: Design communication using factual, reliable information and deliver it openly, simply and in a straight forward understandable manner.

e. **Clarity of channels**: Develop and ensure communication channel charts are available and followed within/outside GIABA (Internal and external communication process)

f. **Integration**: Pursue communication opportunities at all GIABA events (Focus groups, meetings, workshops, trainings, seminars and plenary).

g. **Feedback**: Evaluate at determined points that messages are well delivered and understood, and continually ask for feedback and involvement that will help improve the reach, and acknowledge same.

h. **Collaboration**: Through various consultations, ensure that all communications related decisions are in line with GIABA’s mandates and fall within ECOWAS vision.

17. The above principles will be driven by the following five primary characteristics in box 2 below.

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**Box 2: Five Primary Characteristics for Effective Communication**

- **Two-Way**: Contributions and/or discussions between the provider and receiver of information;

- **Accessibility**: Communication messages must be provided physically, mentally and stylistically to the right audiences;

- **Timeliness**: Messages should be delivered at the right time for the right audiences;

- **Accuracy**: The correct and approved information must be provided; and

- **Planned**: The communication activities must be planned to permit reinforcement of messages, testing of processes and evaluation of success.

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V. **TARGET AUDIENCES**
18. GIABA has a wide array of stakeholders, thus, understanding the audience is fundamental for the effectiveness of communication. The better GIABA understands its audiences and what they need to understand about GIABA, the higher the probability of influencing them. Thus, knowledge of the right audiences facilitates the principle of ‘broadcasting the difference’ – what makes GIABA unique and successful. In other words, it is important to have good knowledge of the audiences so as to enhance the development of appropriate messages for each segment. Audience identification is the process of determining groups of people who have similar roles/responsibilities regarding achieving GIABA’s mandate and have similar needs for information and communication.

19. Consistent with the overarching objective and vision of the ECOWAS to transform from an ECOWAS of States to an ECOWAS of Peoples by the year 2020, one of the core objectives of GIABA is to promote strategic partnerships with civil society organizations, and the mass media.

20. Audiences for the purpose of GIABA’s operations are categorized into the following two broad groups.
   a. **Internal audience**: are all staff of the GIABA Secretariat and the National Correspondents who are permanent partners and are key to GIABA’s program delivery in their respective countries; and
   b. **External audience**: will consist of different groups of people outside GIABA, who will be the receivers of the information and whose feedback will be of immense benefit for the overall implementation of the Communication Strategy.

21. To this end, the following external groups are the target audiences for the GIABA communication programs:
   - Government officials in GIABA member States
   - Parliamentarians;
   - Competent Authorities responsible for the implementation of AML/CFT regimes;
   - Accountable/Reporting Entities (Banks, NBFIs, DNFBPs, others)
   - Members of the FATF Global Network (FATF member countries/jurisdictions, FATF Secretariat, FSRBs, IFIs, Development Partners; etc)
   - Professional associations whose members are largely involved in the implementation of AML/CF measures;
   - The Organized Private Sector
   - Civil society organizations (NGOs, CBOs, Youths; etc)
   - Academic and the Think-Tank Community
   - Mass Media (Print; electronic; etc)
   - The General Public

**VI. KEY MESSAGES**

22. The messages to put across to each of the identified audience shall be delivered to facilitate EFFECTIVENESS of GIABA programs. Therefore, the development of messages will be guided by the following posers in line with the principles in section IV.

   (i) **What is the message?** – The message should be kept short, simple and accessible to the target audience.
(ii) **Is one message adequate for multiple audiences or multiple messages for multiple audiences?** In this Strategy, there will be one central message, but it is important that this message is modified for the several audiences. In particular, in line with one of its core values – respect for diversity – GIABA will strive to develop messages that take into account the diversity of its stakeholders.

(iii) **Do the messages convey the right information about GIABA?** Experience shows that enquiries about GIABA are mainly on provision of technical assistance. Thus, GIABA messages must be clear about its vision, mission and mandate. Messages developed must be tested and subjected to quality control to ensure that GIABA’s intentions are not misconstrued.

23. In developing messages, it must be recognized that some of the audiences are not familiar with the issues of money laundering and terrorist financing. Thus, GIABA messages must be:

(i) Simple, clear and short. The principle of KISS (Keep It Short and Simple) will be adopted.

(ii) Devoid of unnecessary technical jargon, though the AML/CFT terminologies and flair will be retained; and

(iii) Transparent. The messages must convey the truth about GIABA’s goals, and shall emphasize issues at stake in an open and accurate manner.

**VII. COMMUNICATION TOOLS, PRODUCTS AND CHANNELS**

24. GIABA will communicate to its varied audiences using several tools through a wide range of channels. The rapid changes in technology as well as the way people receive information, have implications for communication. In particular, the web has become a primary communication tool. Its use has accelerated the news cycle and significantly facilitated access to information. These developments have reduced delivery and response times to messages. Box 3 below is the summary of tools and channels in the GIABA communication strategy.
25. To ensure effective communication, the GIABA Communication Strategy will address the following:

**Identity Definition- Logo:**

26. The GIABA Logo is a core identity of the institution. The graphics and colours are communication tools which convey ownership, mandate, coverage and uniqueness of the organization. Following several reviews and consultations, GIABA has developed an enduring logo. The logo is suitable, adjustable, adaptable and compatible with all media of choices.

**In-House Style Approach**

27. A major component of the communication tools is the development of in-house elements. For effective communication and to facilitate GIABA’s broadcast of its difference, there is the need for proper definition of in-house style with respect to the following:

- Layout of outputs (Font style, pagination, line spacing, colours, margins, numbering system, paragraphing; etc)
- Report Templates (Colour, number of pages, etc)
28. The above in-house style definition will be contained in the manual of operations.

Communication Technologies and Practice

GIABA Website (www.giaba.org)

29. The use of website-based communication tools has assumed a centre stage in communicating the right messages to appropriate audiences. The GIABA website will be organized to provide the necessary navigation around the needs of the different audiences. There will be constant monitoring of the website to ensure that the content is easily accessible. Also, the layout will facilitate understanding of concepts by each audience. The publication of any document on the website shall be guided by the question – “why is this being posted on the website?” – its relevance.

Online Outreach Tools

30. The GIABA Communication Strategy shall pay attention to the dynamic media landscape. The news curve is rapidly changing, consequently, the following online outreach tools will be integrated into the Strategy:

- Facebook
- LinkedIn
- Micro Blogging (a.k.a. Twitter)
- Hi 5, Glee, Faithbase, BBM
- RSS Feed (Really Simple Syndication)
- My Space
- Video Sharing (YouTube, Vimeo; etc)
- Podcasts/Audio Sharing
- Blogs (Blogger, Blogspot)
- Flickr (Photo Sharing)
- Mashups
- Web Casting
- Wikis (PBWorks, Wikispaces, Wetpaint)

Management of GIABA Website

31. The website Committee shall be responsible for the management of the website. The day-to-day management of the content shall be the responsibility of the Communication and Advocacy Unit (CAU) while the technical management (structural design; etc) shall be handled by the Information and Communication Technology Unit (ICTU).
32. To facilitate proper management of the website, website visitors statistics shall be collected and analyzed with the aim of ensuring that information are organized in a user-friendly manner. The website will have provisions for the incorporation of web 2.0 features. The management of the website shall involve the following:

<table>
<thead>
<tr>
<th>S/N</th>
<th>Activity</th>
<th>Timeline</th>
<th>Responsibility</th>
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</thead>
<tbody>
<tr>
<td>1</td>
<td>Design, review and implementation of website</td>
<td>Annually</td>
<td>Website Committee</td>
</tr>
<tr>
<td>2</td>
<td>Structure of Website including uploading, posting and removal of document</td>
<td>As required</td>
<td>ICTU</td>
</tr>
<tr>
<td>3</td>
<td>Content Management (Quality control of information, determination of information to be uploaded, posted, removed; etc)</td>
<td>As required</td>
<td>CAU</td>
</tr>
<tr>
<td>4</td>
<td>Website visitors statistics</td>
<td>Bi-annually</td>
<td>CAU</td>
</tr>
<tr>
<td>5</td>
<td>Website visitors queries</td>
<td>Monthly</td>
<td>ICTU</td>
</tr>
</tbody>
</table>

33. The audience type, their characteristics, communication needs and preferred channels/media are presented in Annex 1.

**GIABA Publications and Products**

34. As a knowledge-based organization, GIABA produces a number of publications (see Box 4) in line with its mandate. From the outset the publications are subjected to sufficient quality control mechanism to ensure that the readers’ expectations are met. Also, GIABA strives to ensure coherence and professionalism in the presentation of the publications, such that each document has its unique format and colour that facilitate readers ‘ability to distinguish the reports easily.
Box 4: Publications and Information Products

- Mutual Evaluation Reports (MERs)
- Follow-Up Reports (FURs)
- Typologies Reports
- Research/Survey Reports
- Annual Reports
- Journal
- Mutual Evaluation Processes and Procedure
- FATF Publications
- Monitoring and Evaluation Reports
- Newsletters
- Press Releases
- Bulletins
- Annual Work Plans
- Brochures
- Flyers
- Frequently Asked Questions (FAQ)
- Mission Reports
- Communique
- In-House Policy Documents

35. Each of the above publication has its specific audience, and GIABA will continue to fine tune the process of publication to enable readers to maximize the use of the documents. Annex 2 shows each publication, summary of content, timeline on publication, frequency of publication, channel of dissemination, expected users, and lifespan on website.

ENHANCING GIABA PRODUCTS AND PUBLICATION POTENTIALS

36. To facilitate effective utilization of GIABA publications, the following actions will be undertaken:

- The roles of the information centres in Lagos and Abidjan will be expanded to improve communication impact.
- Visibility of GIABA publications will be enhanced through online linkages to the websites of the FATF Secretariat and other FSRBs.
- Greater use of print on demand technology will be explored so as to align print runs with actual demand.
- Effective distribution and dissemination channels will be determined and utilized on continuous basis.
STRENGTHENING INTERNAL COMMUNICATION

37. The communication strategy is designed to ensure that all staff of GIABA have a clear and shared understanding of the overall direction of the organization. To realize this objective, the following should be in place:

- The intranet homepage will be revamped to enable staff to keep abreast of GIABA strategic priorities, and to serve as a continuous knowledge sharing platform about ongoing activities. The use of podcast, video interviews, social media and public communication channels such as Skype will complement written information;
- Email news bulletin – *the GIABA Focus* will be introduced to highlight major issues, publications and events to the attention of staff;
- A scaled-up program of contacts between management and staff will be established to facilitate two-way communication and greater understanding of institutional matters;
- A survey on internal communication will be conducted to gauge the level of staff satisfaction with the communication activities; and
- Seminars will be organized on regular basis as means of updating staff on emerging regional AML/CFT issues, development on the global level such as changes in the FATF Recommendation and other matters of interest.

VIII: RESOURCES

38. The creation of communication materials requires expertise and finance. Thus, effective delivery of communication activities is a function of the professional competence of the assigned personnel and availability of dedicated budget. To this extent, planned activities must be aligned with available resources both human and financial. In view of budgetary constraints, the GIABA Communication Strategy shall lay emphasis on high-impact cum low-cost activities. Consequently, within the 2011 – 2014 Strategy Plan, the annual work plan on communication activities will be developed.

IX: TIMING

39. The determination of realistic timelines for communication activities is a major challenge particularly if consideration is given to the issues of listening, learning and adapting, and being reactive and responsive from the receivers’ point of view. The approach of ‘staged-strategy’ approach which permits the build-up of GIABA core messages (from simple to complex) as a time bound will be utilized as appropriate. This approach will help in sequencing and/or phasing the delivery of key messages to intended audiences (influence cascading). Thus, efforts will be made to set key milestones and deadlines.

40. The delivery of key messages will seize the opportunities presented by events (workshops, conferences, seminars, meetings; etc) that bring together key stakeholders.
X: EVALUATION

41. There will be in place a mechanism to track progress with respect to communication activities. Monitoring of both inputs and outputs will be key to establishing the level of performance on the implementation of the Communication Strategy and its value-added for GIABA. It should be noted that communication is a complex area, and to measure its implementation and success require careful choice of evaluation tools and mechanisms. The methods to be explored in assessing the impact of communication activities of GIABA are presented in Annex 3.

XI: COMMUNICATION AND ADVOCACY KEY DELIVERABLES

42. The key deliverables in the implementation of this Strategy are indicated in Annex 4.

XII: COMMUNICATION PLAN FOR THE DISSEMINATION OF REVISED FATF RECOMMENDATIONS

43. The fight against money laundering and terrorist financing remains a daunting challenge. The last twenty years have witnessed increased global cooperation, coordination and collaboration in combating these crimes. Unfortunately the criminals are not relenting. At the fore of the fight is the Financial Action Task Force (FATF). The FATF has championed the implementation of international AML/CFT Standards. A global network of stakeholders (the FATF, FSRBs, IFIs, etc) has undertaken evaluations of countries and or jurisdictions compliance levels to the international AML/CFT Standards. The process provided the benchmark to gauge the process and fashion follow-up actions to address vulnerabilities in the AML/CFT regimes. On its part, FATF member countries have undergone three rounds of the mutual evaluation process while on the other, the FSRBs have or are about to conclude the first round of the process. A major challenge of the mutual evaluation methodology is the establishment of the effectiveness of the process.

44. In other to address the effectiveness issue, the FATF Standards have been revised and the new Standards were formally approved and endorsed at the FATF February 2012 Plenary in Paris, France. To ensure that all stakeholders are abreast with this development, all implementing agencies including the FSRBs are enjoined to disseminate the information across to its target constituencies. GIABA, mindful of the peculiarities of its region therefore, will undertake the awareness creation, education and dissemination through varied channels and methods. Consequently, GIABA will deploy the following communication plan to meet this objective.

Objectives

45. The objective of this communication plan is to identify the appropriate channels that will enable the GIABA membership network to be acquainted with the revised FATF Recommendations. Also, the plan will facilitate change in perception, attitude modification and taking of ownership of the new Standards.
Institutionalizing the Communication Plan

46. Institutionalizing effective communication of current and future GIABA’s output, as a specialized ECOWAS institution, an associate membership to FATF and an FSRB, is a major platform for keeping abreast of emerging AML/CFT issues. The medium is expected to ensure greater impact on the dissemination of the revised FATF Recommendations.

47. Considering the challenges of cultural diversity, language differences, low level of literacy and poor access to advanced technology, electricity shortage and other constraints, special emphasis will be given to:

   a) The Target Audiences and channels;
   b) The Channels;
   c) The dissemination phases

Target Audience and channels

48. The main target audiences are as stated in paragraph 21. The summary of the channels for disseminating the Revised FATF Standards is presented in Annex 5.

The messages

49. Messages are most persuasive when they are simple, consistent, aligned with the audiences’ needs, concerns, and interests, and repeated over time, using multiple means of delivery. Therefore, positive impact of the implementation of the revised Recommendations will be outlined versus the devastating consequences of money laundering and terrorist financing in the region. Clear messages, in the three ECOWAS languages (English, French and Portuguese) and other mostly spoken national languages in the 15 Member States, including Sao Tome and Principe, would be developed, making the citizens part of the process and empowering them to act individually and collectively against ML/TF, on the following themes:

   a) Role of GIABA as ECOWAS specialized institution, an associate membership to FATF and FSRB
   b) FATF revised Recommendations
   c) Negative effects of ML/TF
   d) Gains of AML/CFT measures

XIII: MANAGEMENT OF THE COMMUNICATION STRATEGY

50. The Communication and Advocacy Unit (CAU) under the Programs and Projects Directorate at GIABA Secretariat, in close collaboration and coordination with the two information centres, shall have the overall responsibility for driving the implementation of the GIABA Communication Strategy.
# Annex 1: Communication Needs of GIABA Audiences

<table>
<thead>
<tr>
<th>AUDIENCE</th>
<th>CHARACTERISTICS</th>
<th>COMMUNICATION NEEDS</th>
<th>PREFERRED MEANS / MEDIA</th>
</tr>
</thead>
<tbody>
<tr>
<td>INTERNAL AUDIENCE – (GIABA Staff)</td>
<td>Team responsible for the day-to-day running of activities; program planning and implementation or support services</td>
<td>Sharing of reports, contribute to development of publicity messages and to keep all informed about all communications</td>
<td>Telephone, Mails, Memos, Newsletters, reports and F2F communication</td>
</tr>
<tr>
<td>GIABA Ministerial Comm. (GMC)/Technical Commission (TC)/Network of National Correspondents (NC)</td>
<td>Responsible for Policy decisions, Knowledge based analysis of Secretariat report and work as foot soldiers/implementers at MS’ level</td>
<td>Regular update through reports and advocacies. Input from secretariat. Newsletters with highlight of activities. Media catch, milestones and GIABA publications</td>
<td>Advocacy Visits.</td>
</tr>
<tr>
<td>National Governments (Ministries, Dept. and agencies) and Parliaments</td>
<td>MS national officers responsible for policy drive and implementation and making /amending AML/CFT laws in each state</td>
<td>New International perspectives (FATF Updates and reports) Newsletters, media reports, GIABA annual report and other publications</td>
<td>Through NC, Posting, Mails, official reporting, advocacy visit, Print and electronic media reporting and all GIABA Publications</td>
</tr>
<tr>
<td>International Development Partners</td>
<td>Offer technical and moral assistance, partner in delivering programs and participate in specific events</td>
<td>Update of progress of GIABA and ECOWAS MS. Challenges faced in program implementation. Periodic report of activities particularly achievements and lesson learnt</td>
<td>Through NC, Posting, Mails, official reporting, advocacy visit, Print and electronic media reporting and all GIABA Publications</td>
</tr>
<tr>
<td><strong>Financial Institutions</strong>&lt;br&gt;DNFI&lt;br&gt;DNFBP</td>
<td>Responsible for implementation of recommendations on CDD and submission of required report (STR). Ensure compliance in line with recommended standards to protect the financial and business community</td>
<td>Regular updates on activities in the AML/CFT laws and regulations, MER, Media reports on AML/CFT regulations and all GIABA publications</td>
<td>Print and electronic media reports. Attendance of events, direct posting of publication through newsletters and network of compliance officers</td>
</tr>
<tr>
<td><strong>Judiciary, Security Agencies/Law Enforcement Agencies</strong></td>
<td>Responsible for trailing, arresting and prosecution of offenders. Custodians and enforcers of the laws</td>
<td>Regular updates on activities in the AML/CFT laws and regulations and all GIABA publications</td>
<td>Sharing all reports, Newsletters, Media reports and update from FATF recommendations. GIABA Publications</td>
</tr>
<tr>
<td><strong>Media, Youths/Students and Civil Society Organizations</strong></td>
<td>Vanguard in the spread of the AML/CFT messages, mobilize the populace in support of the fight</td>
<td>Regular update on developments in the AML/CFT World, Press &amp; Sensitization events</td>
<td>Leaflets, Media reports, newsletter, Face to face and GIABA Publications</td>
</tr>
<tr>
<td><strong>General Public</strong></td>
<td>Raise alarm, whistle blowing on any suspicion, mobilize support against the ML/TF scourges</td>
<td>General information on the subject matter. Kept informed on a consistent basis.</td>
<td>AML/CFT broadcast, Social Media (Facebook, twitter, my space, Hi 5, BBM etc) fliers, leaflets, Media publications and all GIABA publications</td>
</tr>
</tbody>
</table>
### Annex 2: Management of GIABA Publications

<table>
<thead>
<tr>
<th>S/N</th>
<th>TITLE OF PUBLICATION</th>
<th>CONTENT</th>
<th>PUBLICATION TIMEFRAME</th>
<th>FREQUENCY OF PUBLICATION</th>
<th>CHANNEL OF DISSEMINATION</th>
<th>EXPECTED USERS</th>
<th>LIFESPAN ON GIABA WEBSITE</th>
</tr>
</thead>
</table>
| 1.  | Mutual Evaluation Report (MER) | * Current AML/CFT situation in assessed country  
* Ratings on FATF Recommendations  
* Recommendations for addressing identified vulnerabilities | 2 weeks upon adopted by GIABA Technical Commission/Plenary | Once within the round of the mutual evaluation | * In print copy  
* GIABA website  
* Link to FATF website  
* GIABA Training programs  
* GIABA National Correspondents | *Member States  
* AML/CFT Global Network  
* Investors  
* Researchers | Throughout the particular round of evaluation, thereafter archived |
| 2.  | MER Follow-Up Report (FUR) | *Identified deficiencies in the MER  
*Actions being taken to address the deficiencies  
*Technical assistance required. | As Per GIABA ME P&P | Once within the round of the mutual evaluation | * In print copy  
* GIABA website  
* Link to FATF website | *Member States  
* AML/CFT Global Network  
* Investors  
* Researchers | Throughout the particular round of evaluation, thereafter archived |
| 3.  | Typologies and other research reports | *Trends, methods, channels, techniques and vulnerabilities of ML and TF. | 1 week upon adopted by GIABA Technical Commission/Plenary | Once | * In print copy  
* GIABA website  
* Link to FATF website | *Member States  
* AML/CFT Global Network  
* Academic and Think-Tank Community | As long as permitted by space. (Min 5 yrs) |
<p>| | | | | |</p>
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</table>
| **4.** | **Annual Report** | *General overview of AML/CFT situation in Member States in the year under review*  
*General economic conditions impacting on AML/CFT regimes in Member States.*  
*Actions and activities undertaken by GIABA in the reporting year as per the annual work plan derived from the subsisting strategic plan.*  
*Financial Management including the current audited account.* | **End March of the succeeding year** | **Annual** | * Investors  
* In print copy  
* GIABA website  
* Link to FATF website  
*Plenary; Training programs; etc* | *All identified audiences* | As long as permitted by space. (Min 5 yrs) |
| **5.** | **Keynote addresses/Speeches by DG** | *Contemporary AML/CFT issues relating to events* | **Same day after delivery** | **Demand-driven (event dependent)** | *Website  
*Email to the media  
*In-print form for delegates at events* | *Media  
*Delegates to event  
*Other AML/CFT stakeholders* | *Max 6 months, then archived* |
| **6.** | **Newsletter** | *Current events by GIABA  
*Emerging AML/CFT news both regional and international* | **3rd week of 1st month of the succeeding quarter** | **Quarterly** | *Website  
*e-newsletter  
*In-print  
*Training* | *All identified audiences* | *Max 6 months, then archived* |
<table>
<thead>
<tr>
<th></th>
<th>Pre Event Press Release</th>
<th>*Objectives, date, venue, participation and expected outcome</th>
<th>At least two weeks to commencement of event</th>
<th>Demand-driven (event dependent)</th>
<th>*Website</th>
<th>*Media</th>
<th>*Delegates to event</th>
<th>*Other AML/CFT stakeholders</th>
<th>Close of event</th>
</tr>
</thead>
<tbody>
<tr>
<td>7.</td>
<td>Post Event Press Release and/or communiqué</td>
<td>*Outcomes, resolutions, directives, recommendations; etc.</td>
<td>Immediately upon completion of the event</td>
<td>Demand-driven (event dependent)</td>
<td>*Website</td>
<td>*Media</td>
<td>*Delegates to event</td>
<td>*Other AML/CFT stakeholders</td>
<td>Max one month after closing of event, then archived.</td>
</tr>
</tbody>
</table>

*Others
programs
*Plenary; etc

Demand-driven (event dependent)
## Annex 3: Methods for Evaluating the GIABA Communication Strategy

<table>
<thead>
<tr>
<th>S/N</th>
<th>EVALUATION PROCESS</th>
<th>Description</th>
<th>TIMEFRAME</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Impact Log</td>
<td>An informal record compiled in-house that captures how the organization’s communication have been received.</td>
<td>Quarterly</td>
</tr>
<tr>
<td>2.</td>
<td>Public Opinion Research</td>
<td>Formal survey of a sample with responses aimed at providing the organization with the type of information that will assist to improve the communication strategy</td>
<td>Biennially</td>
</tr>
<tr>
<td>3.</td>
<td>Survey of external demand for GIABA publications and information products</td>
<td>A tracer survey of users of products. The responses will be used in the design and overall packaging of the publications including preferred source of dissemination.</td>
<td>Annually</td>
</tr>
<tr>
<td>4.</td>
<td>Website User Survey</td>
<td>A survey designed to capture website visitors’ statistics.</td>
<td>Bi-annually</td>
</tr>
<tr>
<td>5.</td>
<td>Internal Communication Survey</td>
<td>Survey of GIABA staff designed to ascertain the effectiveness of the internal communication process.</td>
<td>Annually</td>
</tr>
<tr>
<td>6.</td>
<td>Key-informant Interviews</td>
<td>A technique for collecting more in-depth information from stakeholders with particular insight into GIABA communications. This could conducted through focus groups.</td>
<td>Biennially</td>
</tr>
</tbody>
</table>
### Annex 4: Communication and Advocacy Key Deliverables

<table>
<thead>
<tr>
<th>ACTIVITY</th>
<th>OUTPUT AND OUTCOMES</th>
<th>REMARKS</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Advocacy</strong></td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>Management increased visits to mobilize and sensitize GMC members and other influencers.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Sensitize MS’ Legislatures regarding AML/CFT legal framework</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Sensitization of stakeholders (FI, DNFI, DNFBP, NC, Customs, Immigration Officers, Law enforcement officers and Judiciary) on GIABA activities and to highlight to them in particular, the important role they have to play in curbing the menace.</td>
<td></td>
</tr>
<tr>
<td><strong>Trainings / Lectures and Workshops</strong></td>
<td>Training of Media Practitioners on investigative journalism and flag up reporting of ML / TF cases, Sensitization workshop for relevant Civil Society Organizations (CSOs) across the region that will better place them to lead the fight against ML/TF in the region.</td>
<td></td>
</tr>
<tr>
<td><strong>Awareness Creation / Media Relations and developing Publicity materials</strong></td>
<td>Regular and targeted press conferences Pre and post event press release to pass information to the public for awareness. Build and work with Journalist network Feature road shows on specific GIABA events Interviews for DG or his delegate that will reach large population of West Africa (TV, Radio and print media) Website updates and building highly interactive website Design regular broadcast of AML/CFT agreed messages on airwaves Production and distribution of quality, effective and efficient publicity material: Souvenirs such as, T-shirts, P-caps, Pens, ties, mugs, key holders, note pads, cuff links, roll up banners, bill boards and signage, pamphlets, brochures etc</td>
<td></td>
</tr>
</tbody>
</table>
| Networking and building rewarding Partnerships. | - Ensure the establishment and sustainability of Journalists and CSO’s networks on AML/CFT across the region  
- Promote partnership to increase visibility |
Annex 5: Communication Plan for Disseminating the Revised FATF Standards in West Africa

<table>
<thead>
<tr>
<th>STAKEHOLDERS</th>
<th>MEANS OF COMMUNICATION</th>
<th>CHANNELS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executive Decision Makers</td>
<td>Verbal; Written</td>
<td>Advocacy visits; brochures; newsletter</td>
</tr>
<tr>
<td>Parliamentarians</td>
<td>Verbal; Written</td>
<td>Advocacy visits; meetings; presentations; brochures; newsletter</td>
</tr>
<tr>
<td>Political Leaders</td>
<td>Verbal; Written; Internet</td>
<td>Interactive sessions; meetings; presentations; brochures; newsletter; GIABA website</td>
</tr>
<tr>
<td>Opinion Leaders, including religious and traditional leaders</td>
<td>Verbal; Written; Internet</td>
<td>Interactive sessions; meetings; presentations; brochures; newsletter; GIABA website</td>
</tr>
<tr>
<td>Partners intervening in AML/CFT</td>
<td>Verbal; Written; Internet; products</td>
<td>meetings; presentations; training; workshops; brochures; newsletter; conference paper folders with revised Recommendations printed on them; and other literatures; GIABA website</td>
</tr>
<tr>
<td>Financial Institutions</td>
<td>Verbal; Written; Internet; products</td>
<td>meetings; presentations; training; workshops; brochures; newsletter; conference paper folders with revised Recommendations printed on them; and other literatures; GIABA website.</td>
</tr>
<tr>
<td>Designated Non Financial Institutions</td>
<td>Verbal; Written; Internet; products</td>
<td>meetings; presentations; training; workshops; brochures; newsletter; conference paper folders with revised Recommendations printed on them; and other literatures; GIABA website.</td>
</tr>
<tr>
<td>Non Designated Financial Businesses and Professions</td>
<td>Verbal; Written; Internet; products</td>
<td>meetings; presentations; training; workshops; brochures; newsletter; conference paper folders with revised Recommendations printed on them; and other literatures; GIABA website.</td>
</tr>
<tr>
<td>Professional Associations of Lawyers, Accountants, etc.</td>
<td>Verbal; Written; Internet; products</td>
<td>meetings; presentations; training; workshops; brochures; newsletter; conference paper folders with revised Recommendations printed on them; and other literatures; GIABA website.</td>
</tr>
<tr>
<td>Private Sector Organizations</td>
<td>Verbal; Written; Internet; products</td>
<td>Interactive sessions; meetings; presentations; brochures; newsletter; GIABA website promotion items</td>
</tr>
<tr>
<td>Economic</td>
<td>Verbal; Written</td>
<td>meetings; presentations; brochures; newsletter</td>
</tr>
<tr>
<td>Stakeholders</td>
<td>Communication Channels</td>
<td>Activities</td>
</tr>
<tr>
<td>-----------------------------------------------------------------------------</td>
<td>---------------------------------</td>
<td>-----------------------------------------------------------------------------</td>
</tr>
<tr>
<td>operators, including the informal sector and market women</td>
<td>Internet; products</td>
<td>newsletter; GIABA website promotion items</td>
</tr>
<tr>
<td>Civil Society Organizations, including youths, women and the media</td>
<td>Verbal; Written; Internet; products</td>
<td>Interactive sessions; meetings; presentations; brochures; newsletter; GIABA website promotion items; advocacy visits to leading media executives and CSOs; press conferences; sponsor media programmes</td>
</tr>
<tr>
<td>Academics and Researchers</td>
<td>Verbal; Written; Internet; products</td>
<td>Interactive sessions; meetings; presentations; brochures; newsletter; GIABA website promotion items</td>
</tr>
<tr>
<td>General Public</td>
<td>Verbal; Written; Internet; products and visual</td>
<td>Billboards; posters; stickers; banners; media interviews, debates and spots, branded promotion items; sponsoring of social and cultural events</td>
</tr>
</tbody>
</table>