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**PROPOSAL FOR RECOMMENDATIONS IN SECURITY MATTERS**

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**Sub-working group for coordination and integration between FIU/LEA**

Pursuant to the request in the last working meeting held in the city of Montevideo (Uruguay), in September 2014, we provide countries with a proposed 5 basic safety recommendations drawn from the analysis of the answers sent by countries to the survey circulated by the Executive Secretary.

From the perspective of the subgroup's coordination, these five recommendations cover different aspects that were surveyed to countries, these are:

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**RECOMMENDATION 1**

*Countries should have special safety standards for officials who are part of the AML / CFT system, mainly officials of the FIU/LEA/SAAU.*

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Criteria:

- A Systemic view of the problem of security officials. The safety regulation should include all officials AML/CFT system and not only to certain institutions.

- There should be clear protocols regarding how to act in the event of a threat occurs, generating security protocols, preventive and reactive.

- The procedures and security measures that are taken should be related to the risk level of the threat. For these effects, it is possible to take into consideration the temporality of the threat (epsisodica / of the medium-term / long-term), the vulnerability of the official (personal attack / to the drive where she or he work / to his or her family / to his or her friends) among others, which can establish each country.

- Clarity about the person or institution responsible for establishing the risk levels, for taking measures, so as to leave no effect.

- Development of a catalogue of protective measures that may be established for officials.

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**RECOMMENDATION 2**

*Countries may limit or restrict the obligations for transparency on the institutions part of the AML / CFT system, when could severely affect the safety of its members.*

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Criteria:

- Countries should weigh or balance the principles of transparency and security.

- Certain institutions may limit the information regarding its officials or who have participated in a particular procedure, when there are reasons to foresee a serious risk to members of the AML/CFT system.

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**RECOMMENDATION 3**

*Countries are encouraged to create mechanisms of cooperation among the institutions that are part of the AML / CFT system in order to comprehensively address a possible security threat. Also, there is requested the instances of international*

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Criteria:

- Countries should encourage interaction among the different members of the AML / CFT system in order to create minimum security protocols common to all institutions.

- Countries should generate instances of international coordination, which allow to know the experience and good practices of different countries, allowing instances of joint training.

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**RECOMMENDATION 4**

*Countries are encouraged to have a broad perspective on the security protocols produced, incorporating various forms of protection (legal protection, insurance policies, standards of self-care, among others,).*

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Criteria:

- Countries should not address the problem of security only from the perspective of the physical security, mechanisms to provide security in other kinds of matter that are sometimes intimidating, such as filing lawsuits or other legal actions against the officials part of the AML/CFT system.

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**RECOMMENDATION 5**

*It is recommended to establish a fund or other form of financing that allows the expedited adoption of some of the security measures in case of threat.*

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Criteria:

- There should be a fund or another mechanism previously established that allow to solve certain security measures immediately, while in effect a threat.

- It is not enough having programmatic policy statements on safety, it is recommended to stablish the way these measures will be funded in the event they need to be adopted.