

17. FINANCIAL INTELLIGENCE UNIT

- 17.1 Set up in 2002, the Financial Intelligence Unit (FIU) is the central agency responsible for requesting, receiving, analysing and disseminating financial information concerning suspected proceeds of crime and alleged money laundering offences as well as the financing of any activity or transaction related to terrorism. By so doing, the FIU protects the integrity of our financial system and contributes to the safety of our citizens through deterrence of money laundering and terrorist financing.
- 17.2 Besides the above functions, the FIU has recently been entrusted with additional responsibilities. It is now the Enforcement Authority regarding asset recovery; the Anti-Money Laundering/Combating the Financing of Terrorism (AML/CFT) regulator for the Real Estate and Jewelry sectors and is also responsible for the AML/CFT supervision of the three branches of the legal profession.
- 17.3 The organisation structure of the FIU comprises a Director at the apex, who is responsible for the smooth running of the Unit and the execution of the policies of the Board. He is supported in his tasks by an Assistant Director as well as an array of technical, professional and support staff at various levels. The total workforce of the FIU consists of some 39 officers who are staffed in the different units of the FIU, namely the Asset Recovery Investigation Division (ARID); Compliance Division; Systems Administration and Security Division; Financial Investigative Analysis Division and Legal/Corporate Affairs/Communications/Training Division.
- 17.4 In our last Report, we reinforced the structure of the FIU with the creation of the grades of IT Manager and Confidential Secretary and merged the grades of Intelligence Officer and Senior Intelligence Officer. Since then, to date, we have provided salaries for the grades of Legal Counsel and Manager, Financial Operations which were created on an *ad hoc* basis and re-assessed a few other grades on the basis of the proposed amendments to schemes of service.
- 17.5 For this review exercise, we received representations from a few individual employees pertaining to a review of their salaries and restyling of their grades. Given that these officers are not unionised and had made request to depone before the Bureau, we deemed it appropriate to hear them. In each case, the officers were lengthily explained as to why their requests for an upgrading of their salaries and restyling could not be considered. They were also provided with ample explanations on issues which do not fall within our purview and were even advised on the most appropriate course of action to be taken in such cases.
- 17.6 In so far as Management is concerned, a first meeting with the latter was held in September 2019 whereupon verbal requests were made for the creation of units and grades. However, given that the agreement of the Board was yet to be obtained, the FIU requested that it be given another opportunity to depone upon approval of its proposals, to which the Bureau agreed.
- 17.7 Thereafter, the only submission that was received concerned a review of salaries of a few grades. During the second meeting with the FIU, verbal proposals were once

again made for the creation of new levels and abolition of a few existing ones. Moreover, it undertook to forward written submission of these proposals as well as the proposed schemes of service for the new levels within a week's time. However, we received the submission after several months.

- 17.8 Despite the late submission, we have carefully examined each of the proposals made. We could not accede to the request for the creation of the grade of Financial Analysis Support Officer as not only the responsibilities that have been proposed for the grade already devolve upon existing ones but the proposed appellation also is in dissonance with the duties to be performed. Further, we could not accede to the request to provide for a level of Head, ARID (Asset-Recovery Investigation Division) as presently there is no dedicated grade on the establishment of the FIU to service the unit, which is mainly staffed by police officers. As regards the creation of the other levels, the Bureau has not been in a position to fathom out the need for these levels as the proposed schemes of service which would have allowed us to make a proper assessment were not submitted. However, should the FIU strongly feel the need to have these grades on its establishment, it may submit the relevant documents through the proper channel for examination by the Bureau on an *ad hoc* basis even after the publication of this Report.
- 17.9 The grade of Analyst (Operations) at the FIU is a polyvalent grade and incumbents are required to service the different Divisions. A representation was made to the effect that, at present, only Analysts (Operations) posted to the Financial Investigative Analysis Division can aspire to join the higher grades of Financial Intelligence Analyst, Senior Financial Intelligence Analyst and eventually Assistant Director. However, upon perusal of the existing scheme of service, we have noted that such is not the case and that all officers in the grade of Analyst (Operations), irrespective of their postings, can aspire for these positions provided they possess the required qualifications.
- 17.10 Overall, we consider the structure of the FIU to be appropriate to enable it to function properly. However, given that Management had stated during consultations that it does not have a proper legal department per se and does not require the grade of Legal Counsel which has remained unfilled since its creation, **we recommend that same be abolished.**

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SALARY SCHEDULE

FIU 1 : Rs 14725 x 250 - 15225 x 260 - 17825 x 275 - 18925 x 300 - 19525 x 325 - 21475 x 375 - 22225 x 400 - 23425 x 525 - 25525

General Assistant

FIU 2 : Rs 15485 x 260 - 17825 x 275 - 18925 x 300 - 19525 x 325 - 21475 x 375 - 22225 x 400 - 23425 x 525 - 26050 x 675 - 27400

Driver/General Assistant

17. FINANCIAL INTELLIGENCE UNIT (Contd)

- FIU 3 : Rs 18375 x 275 - 18925 x 300 - 19525 x 325 - 21475 x 375 - 22225 x 400 - 23425 x 525 - 26050 x 675 - 27400 x 825 - 35650 x 900 - 37450 x 950 - 42200 x 1300 - 43500**
Assistant Office Secretary
Data Processing Assistant
- FIU 4 : Rs 21475 x 375 - 22225 x 400 - 23425 x 525 - 26050 x 675 - 27400 x 825 - 35650 x 900 - 37450 x 950 - 42200 x 1300 - 43500**
Confidential Secretary
- FIU 5 : Rs 19850 x 325 - 21475 x 375 - 22225 x 400 - 23425 x 525 - 26050 x 675 - 27400 x 825 - 35650 x 900 - 37450 x 950 - 42200 x 1300 - 46100 x 1575 - 47675**
Office Secretary
- FIU 6 : Rs 23950 x 525 - 26050 x 675 - 27400 x 825 - 35650 x 900 - 37450 x 950 - 42200 x 1300 - 46100 x 1575 - 49250 x 1650 - 50900**
Accounting Technician (Personal to officer in post as at 31.12.15)
Data Intelligence Assistant
- FIU 7 : Rs 29050 x 825 - 35650 x 900 - 37450 x 950 - 42200 x 1300 - 46100 x 1575 - 49250 x 1650 - 54200 x 1700 - 62700**
Intelligence Officer/Senior Intelligence Officer
- FIU 8 : Rs 40300 x 950 - 42200 x 1300 - 46100 x 1575 - 49250 x 1650 - 54200 x 1700 - 64400 x 1800 - 69800**
Manager, Financial Operations
- FIU 9 : Rs 36550 x 900 - 37450 x 950 - 42200 x 1300 - 46100 x 1575 - 49250 x 1650 - 54200 x 1700 - 64400 x 1800 - 69800 x 2000 - 75800 x 2150 - 77950**
Analyst (Operations)
- FIU 10 : Rs 40300 x 950 - 42200 x 1300 - 46100 x 1575 - 49250 x 1650 - 54200 x 1700 - 64400 x 1800 - 69800 x 2000 - 75800 x 2150 - 80100**
Corporate Affairs Manager
IT Manager
Legal Manager

17. FINANCIAL INTELLIGENCE UNIT (Contd)

**FIU 11 : Rs 52550 x 1650 - 54200 x 1700 - 64400 x 1800 - 69800 x 2000 - 75800
x 2150 - 82250 x 3000 - 88250 x 3125 - 94500**

Financial Intelligence Analyst
Head, Compliance

FIU 12 : Rs 75800 x 2150 - 82250 x 3000 - 88250 x 3125 - 110125

Senior Financial Intelligence Analyst

FIU 13 : Rs 119500

Assistant Director



