

An Assessment of Financial Monitoring Systems: Ukrainian and Foreign Experience

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Abstract

The study characterizes financial monitoring as part of the system for preventing and counteracting the legalization of income and the financing of terrorism. The purpose of the research is to study the experience of how national financial monitoring systems function (in the UK, USA, China, Georgia, Moldova, Pakistan, Poland and Ukraine) in order to determine development directions and identify implementation opportunities in domestic practice. The research methods include induction, analysis and synthesis, static, comparative and graphical methods. The research methodology is based on the analysis of official static data and information materials from the official websites of international organizations and competent national authorities.



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The article analyzes the statistical data of the state bodies of Ukraine in terms of their activities in the field of combating the financing of terrorism. It also constructs profiles to assess the effectiveness of anti-money laundering systems as well as the handling of proceeds of crime and financing of terrorism in a number of countries, following the FATF (Financial Action Task Force) methodology. The results demonstrate that all national financial monitoring systems must comply with the requirements of the FATF. However, it is also necessary to consider the national characteristics of each country. Directions for further improvement of the financial monitoring system in Ukraine have been identified, i.e., enhance international cooperation, prevent the use of legal entities and organizations for criminal purposes, improve investigation and prosecution procedures for money laundering, especially considering international assistance received in the fight against Russian aggression, review investigation procedures and criminal prosecution in financing terrorism, and apply financial sanctions for the financing of terrorism.

Keywords: FATF, financial monitoring, system for countering money laundering and financing terrorism, terrorism, Ukraine

JEL: D81, E44, F30, G18

Introduction

In the context of intensified international terrorism, one of the threats to state security is the legalization of illegally obtained income and the financing of terrorist activities. An effective financial and legal tool to counteract these risks is financial monitoring. In spite of being a relatively new phenomenon for Ukraine, it has undergone important stages of its formation. In order to assess the changes taking place with financial monitoring today, it is necessary to determine the essence of this concept and its main components.

Currently, many countries are creating their own financial monitoring system in order to counteract the legalization of proceeds from crime and combat the financing of terrorism. In turn, this is due to the challenges of the global fight against money laundering and the financing of terrorism. The first real steps taken by Ukraine in the fight against money laundering and the financing of terrorism began, in fact, in 2002. It was during this period that Ukraine was included in the list of countries with a high level of criminalization of the economy that pose a potential threat to the world community (Bisaga 2016). As Tikhonenko and Radchenko (2019) rightly pointed out, “Ukraine’s blacklisting by the FATF (Financial Action Task Force) has become a catalyst for the development of the regulatory framework in the field of combating money laundering. As a result, this process became productive and led to the exclusion of Ukraine from this list in 2010.”

Literature review

The study of financial monitoring to combat money laundering and terrorist financing is an interdisciplinary task that requires reference to the work of academics who have studied various aspects of this problem. Financial monitoring is the object of research in the fields of financial law, finance, public administration, and national security. That is why academics consider financial monitoring as a form of (financial) control (Klymenko 2005), a set of actions and measures (Berizko 2006; Gavrilishin 2008), and a mechanism for the implementation of state management decisions (Baranov 2018).

In general, academics consider financial monitoring to be part of the system aimed at preventing and combating the legalization (laundering) of incomes and the financing of terrorism, often equating it with these processes. We support the position of researchers (e.g., Kurishko 2012; Vozniakovska 2012), who state that financial monitoring is only part of this system, which also includes the law enforcement unit.

Despite the significant progress made by academics, several problems that require thorough research have received only partial or no attention at all. In particular, it is necessary to study foreign experience in the way national financial monitoring systems function to determine development directions and identify opportunities for implementation in domestic practice.

Data and methodology

The methodological basis for the study of financial monitoring includes general scientific and special methods. To improve the categorical-conceptual apparatus, the methods of induction, analysis and synthesis were used. In the course of the study, the following methods are applied:

- a static method (the statistical data of state bodies were analyzed in terms of their activities to combat the financing of terrorism),
- a comparative method (to analyze existing foreign practices in the way national financial monitoring systems function),
- a graphical method (to build profiles of the effectiveness of anti-money laundering systems and the handling of proceeds of crime and financing of terrorism).

The research methodology is based on the analysis of official static data, information materials from the official websites of international organizations and competent national authorities.

Results and discussion

When considering the issues of financial monitoring, academics typically focus on aspects deemed crucial in the context of their study. In particular, in the realm of financial law, this involves a focus on a collection of legal documents, while finance scholars emphasize operations involving funds, among other considerations. Despite this diversity, most academics adhere to the definition established at the legislative level. This definition encompasses a series of measures taken by entities engaged in financial monitoring to prevent and counteract activities, encompassing both state financial monitoring and primary financial monitoring. Moreover, the role of financial monitoring in the fight against terrorism is also determined: “[...] it makes it possible to punish the perpetrators of crimes and prevent them from using the money received as a result of committing crimes. Financial monitoring is a fairly promising branch of the fight against criminal activity on the territory of Ukraine and beyond” (Semeklit and Ivanov 2019).

In our opinion, when disclosing the essence of financial monitoring, it is advisable not to dwell solely on the subjects; other components should also be covered. Stable and effective functioning of the national system of combating the financing of terrorism requires a comprehensive application of methodological, organizational, legal and institutional measures. Based on the fact that financial monitoring is a set of such measures, we consider it expedient to single out appropriate security in its structure.

We believe that the main component is institutional support, manifested through the entities involved in financial monitoring, their hierarchy, and coordination. These factors affect other components of the financial monitoring system and determine its effectiveness as a whole. Thus, certain bodies, in particular, the State Financial Monitoring Service (SFMS), are engaged in methodological support. This support involves the development of approaches, principles and methods for financial monitoring. In particular, the SFMS has compiled essential international documents, which are the basis for building and evaluating a system for preventing and combating the legalization of income (money laundering) and financing terrorism. The adopted methodological approaches established requirements for organizational security, covering professional personnel and instructive materials for them, as well as legal and regulatory security, which includes a range of documents both at the legislative and by-law levels.

Given the above, when assessing the effectiveness of financial monitoring, considerable attention is paid to institutional support, which is reflected in the performance indicators of the SFMS. In 2018, the investigation of the SFMS recognized it as among the best financial intelligence units in the world. According to the voting results of the financial intelligence units of 150 countries of the world, the SFMS received the “Best Case of the Egmont Group” award. In addition, Ukraine has successfully passed

the assessment of the system for combating money laundering and the financing of terrorism by the Committee of the Council of Europe MONEYVAL (FinPost 2019).

Based on the 2021 results, the SFMS sent 109 materials to law enforcement agencies (of which 83 were generalized materials and 26 were additional generalized materials) regarding financial transactions of people that may be related to financing terrorism, separatism, and/or conducted with the participation of people publicly calling for a violent change or overthrow of the constitutional order or a change in the borders of Ukraine (State Financial Monitoring Service of Ukraine 2021). In 2020, this figure was 75 materials, in 2019 – 106, in 2018 – 100, and in 2017 – 69 (Figure 1).

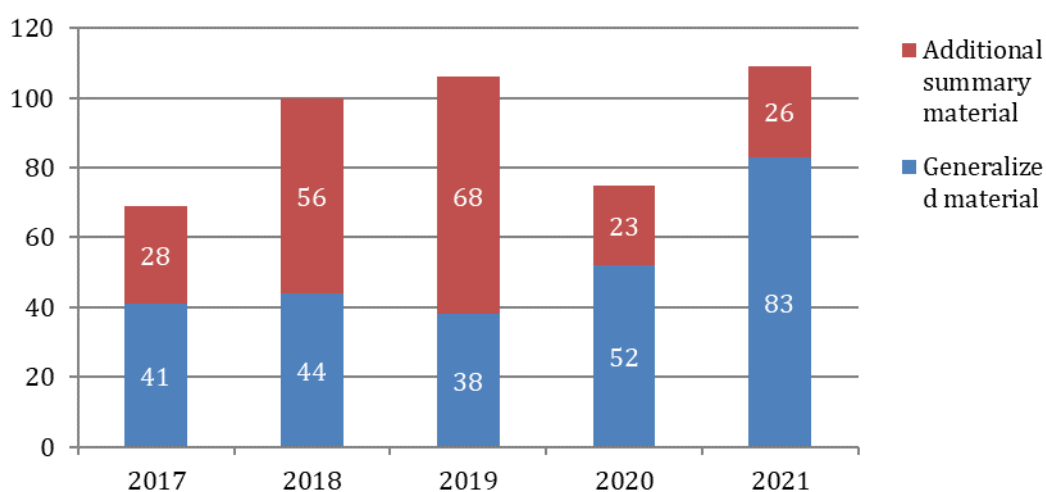


Figure 1. The number of materials on financial transactions of people that may be related to the financing of terrorism sent by the SFMS to law enforcement agencies between 2017 and 2021

Source: based on the State Financial Monitoring Service of Ukraine (2017–2021).

Considering Russia’s open military attack on Ukraine in 2022, as well as the difficult military-political situation in the East of Ukraine for several years before that, it is natural that there has been an increase in the number of materials that the SFMS passes to law enforcement agencies. It indicates proper institutional support and financial monitoring, which makes it possible to identify a large number of terrorist financing schemes. We believe that the decrease in the number of materials in 2020 could be due to more cautious steps taken by people associated with the financing of terrorism due to changes in the rules of financial monitoring in that year. However, the assessment of Ukraine’s financial monitoring system should be compared to foreign practices to be able to identify weaknesses and strengths and determine the directions for its development.

Among the goals of creating an international system to combat the legalization of proceeds from crime and the financing of terrorism, which has developed as a result

of a number of initiatives of international organizations, structures and individual states, one can single out suppression of crimes in this area. They include undermining the financial foundations of transnational organized crime and international terrorism, protecting financial institutions and the entire financial and economic system from the penetration of dirty money into them, and ensuring their stability and security.

Organizationally, the international system to combat the legalization of proceeds from crime and the financing of terrorism is comprised of international and regional organizations, as well as structures that are not formally international organizations, although they play a significant and sometimes leading role in this international system. One such multilateral organization is the FATF (Financial Action Task Force). While performing its main functions, FATF presents results that relate to combating the financing of terrorism. It also provides recommendations intended to guide countries in the fight against money laundering and terrorist financing. It produces three major typology reports detailing trends and challenges in terrorist financing. Additionally, the organization conducts mutual evaluations of the regimes of member countries to combat money laundering and terrorist financing, maintaining a “black list” and “grey list” of members recognized as having deficiencies according to FATF standards.

However, despite the presence of a clearly defined approach to countering the legalization of proceeds from crime and the financing of terrorism at the international level, national systems can differ significantly under the influence of many factors. Therefore, FATF must take into account the culture of the individual country, since cultural reasons are fundamental factors in the rules of a country and the nature of its monetary system. It is clear that the founders of FATF left their cultural imprint on the system of requirements and recommendations of this organization, with developing countries not participating in the development of these recommendations. However, these countries have great cultures and religious values, which can have a significant impact on how a country implements its rules and financial system and, accordingly, its financial monitoring system.

Different systems have significant differences, primarily related to historical and cultural features. Countries treat the crimes of money laundering and financing terrorism with varying degrees of importance, for both legal and political reasons. This inevitably affects the amount of resources spent on the fight and the level of effectiveness and involvement of the country in the system of combating money laundering and financing terrorism. National financial monitoring systems are constantly changing and improving. The reason for this is the new challenges presented by money laundering.

Today, the system of international cooperation on this issue is developing quite rapidly, and the range of subjects and evaluation criteria is expanding. That is why it is impossible to overestimate the study of foreign experience in how the financial monitoring system functions. Its significance is manifested in the possibility

of identifying reserves to improve the effectiveness of national systems, as well as the international system for combating the legalization of proceeds from crime or financing terrorism. This, in turn, fosters the development of effective international cooperation in this area.

The assessment of national systems for combating the financing of terrorism is incomplete without revealing the effectiveness of their analysis, which is advisable, given their compliance with the requirements and recommendations of FATF.

In contrast to assessing technical conformity, evaluating effectiveness is subjective since it is not a statistical task and depends on the decision and the qualifications and interests of experts. While data and statistics are important sources of information for experts, the determination of effectiveness is based on qualitative information. This assessment considers the specific situation of the jurisdiction, making it possible to conclude whether this national system achieves the desired result (Melkumyan 2017).

In turn, the FATF recognizes a direct relationship between effectiveness and the level of technical compliance with the FATF Recommendations: the lower the technical compliance rating, the less effective the system is for combating money laundering and terrorist financing. However, a high technical compliance rating does not guarantee that this system is effective. In exceptional cases, with a low level of technical compliance, there is a certain level of effectiveness due to the unique situation in the country. This includes low risks or other structural or material factors, peculiarities of the legislation and institutions of the country, and the use of compensatory measures to combat money laundering and the financing of terrorism that are not required by the FATF Recommendations (FATF 2013–2021).

Based on the published summary ratings of countries that passed the next round of assessments of the FATF methodology in 2013, we will determine the countries that received the highest rating in 11 results (Table 1).

Table 1. Effectiveness rating of national anti-money laundering and counter-terrorist financing systems based on highly rated results

No.	Result	Highly rated countries and year of rating round
1	Risk, Policy and Interaction (IO1)	Bermuda (2020), UK (2022)
2	International Cooperation (IO2)	New Zealand (2022), Finland (2021), France (2022), Sweden (2020)
3	Supervision (IO3)	–
4	Preventive measures (IO4)	–
5	Legal entities and arrangements (IO5)	–

No.	Result	Highly rated countries and year of rating round
6	Financial Intelligence (IO6)	Israel (2022), Spain (2019), Russian Federation (2019)
7	Investigation and Prosecution of Money Laundering (IO7)	-
8	Confiscation (IO8)	Honduras (2020), Israel (2022), New Zealand (2022), USA (2020), France (2022)
9	Investigate and prosecute terrorist financing (IO9)	UK (2022), Israel (2022), Russian Federation (2019), USA (2020), France (2022)
10	Preventive measures and financial sanctions for terrorist financing (IO10)	UK (2022), US (2020)
11	Financial sanctions for financing the proliferation of weapons of mass destruction (IO11)	UK (2022), US (2020)

Source: compiled from Consolidated table of assessment ratings (2022).

According to this ranking, the most effective anti-money laundering and counter-terrorist financing systems are in place in the United States and the United Kingdom (which had the highest score for four outcomes), as well as Israel and France (which had the highest score for three outcomes).

The USA has created an effective financial monitoring system, with a large number of state bodies and institutions involved. The US Department of the Treasury created the 'world's first financial intelligence agency to identify actors for sanctions and support preventive measures to combat money laundering and terrorist financing. The Intelligence and Analysis Department of the Ministry of Finance is tasked with identifying and undermining the financial system of terrorist groups, as well as identifying vulnerabilities in its financial system that can be exploited by terrorist actors. Financial intelligence in the United States fights against financial crimes, and its main function is to provide information assistance to law enforcement agencies to combat money laundering and the financing of terrorism.

In general, in the United States, supervision in the field of combating money laundering and the financing of terrorism across the banking sector and the securities market is recognized as the most reliable, and the use of special sanctions against entities involved in money laundering and the financing of terrorism is quite effective. Of the 40 FATF recommendations, 31 recommendations in the US were rated compliant or significantly compliant, five were partially compliant, and four were non-compliant (FATF 2020).

However, the system does have shortcomings. Notably, the US does not recognize all entities designated by the UN as undesirable. There is limited coverage of investment advisors, the self-employed, and real estate agents with special requirements for combating

money laundering and terrorist financing. This reflects the vulnerability of this sector to the risks of money laundering and terrorist financing. Furthermore, there is a lack of a unified approach to anti-money laundering efforts at the state level (FATF 2021).

The UK, as the world's largest financial services provider, faces significant risk that funds are closely linked to crime and terrorism. This is reflected in national policies, strategies and systems for combating money laundering and the financing of terrorism. Law enforcement agencies have broad powers to obtain information about the benefits of the acquirers, which effectively affects the results of relevant investigations. The strengths of the UK's national financial monitoring system include its wide range of preventive activities, the supervisory and regulatory authorities, as well as a system of measures to prevent criminals from professional accreditation and gaining control over a financial institution. At the same time, the intensity of the struggle in different sectors is not the same, which can be risky for the national system (FATF 2021). The UK is highly effective in investigating and prosecuting crimes related to financing terrorism. To this end, it has taken on the primary burden of identifying terrorists at the UN and EU levels. The UK contributes to achieving a high level of effectiveness in the introduction of targeted financial sanctions.

The UK has four high scores for compliance with the FATF recommendations, which are found to be highly effective, four are very effective, and three are moderately effective. Out of 40 FATF recommendations, 24 were in full compliance, 15 were in significant compliance, and one was in partial compliance (FATF 2022c).

The national financial monitoring system in Israel is also recognized as effective in many areas. Its anti-money laundering and counter-terrorist financing system includes all relevant competent authorities. However, there are also significant drawbacks. For example, not all financial agents are included in the monitoring of money laundering and terrorist financing (real estate agents, dealers in precious metals, trust and corporate service providers), and those already included are not always properly supervised. In terms of FATF compliance, full compliance was recorded for 17 recommendations, 17 recommendations were in significant compliance, five were in partial compliance, and for recommendation No. 17, compliance is not applied due to national characteristics (FATF 2022b)

France's anti-money laundering and terrorist financing system is complex yet reliable. It is effective in many aspects, in particular, in the involvement of law enforcement agencies. France faces a number of money laundering threats, including tax fraud and drug trafficking, and it has also been characterized by a high level of terrorist threats and terrorist financing since the 2015 attacks. Realizing these risks, the country has taken a number of measures to mitigate them, in particular, the effective organization of cooperation between the prosecutor's office and investigative and intelligence agencies. France has three high scores in compliance with the FATF recommendations, which

are recognized as high performance. Of the 40 FATF recommendations, 19 were in full compliance, 18 were in significant compliance, and three were in partial compliance (FATF 2022a).

The compliance levels of national systems for combating money laundering and financing terrorism with FATF's international standards are as follows: the UK – 97.5% (39 out of 40), France – 92.5% (37 out of 40), Israel – 87.5% (35 out of 40), and the United States – 77.5% (31 out of 40). Thus, the national system of financial monitoring of Great Britain is recognized as the most effective.

It is also necessary to assess the worst system of financial monitoring; it is found in China. Legislation to combat money laundering and the financing of terrorism, unlike the practice of developed countries, was created from the very beginning to take into account the recommendations and standards of the FATF. China has many special economic zones, which leads to a number of financial threats to the country. Despite strict regulations regarding money laundering and the financing of terrorism, China is recognized by the FATF as “a state that takes measures that are exclusively beneficial for itself, and at the same time looks ‘through its fingers’ at the flows of money that are laundered on their territory that are moving from other countries” (FATF 2021).

When analyzing the technical compliance of China's anti-money laundering and counter-terrorist financing systems with the 40 FATF recommendations, the percentage of compliance with international standards is 62.5% (according to the compliance criteria, it “complies” and “substantially complies”). By comparison, the figure for Pakistan is 87.5%. Thus, of the reviewed financial monitoring systems, China is the least in line with international standards regarding combating money laundering and financing terrorism since its compliance with the FATF recommendations was not established in the rating (FATF 2021).

The evaluation of the effectiveness of Ukraine's financial monitoring system requires analysis not only in comparison with the best and worst foreign practices but also in relation to countries in a similar military-political situation. In particular, the choice of such countries is due to the best results based on the results of mutual assessments on many criteria (Great Britain, the United States), low ratings (China), similar provisions regarding the introduction of threats to country security (Georgia, Moldova, Pakistan), and prospects for the convergence of military and economic systems, and in some sectors, a possible merger (Poland).

As a justification for the need to single out the penultimate group of countries, the following facts should be pointed out:

- in 2008, there was also an armed conflict with the Russian Federation in Georgia;
- in Moldova, there is also a quasi-state entity similar to the Donetsk People's Republic and the Luhansk People's Republic – the self-proclaimed Pridnestrovian Moldavian Republic;
- Pakistan is party to an armed conflict with India over Kashmir.

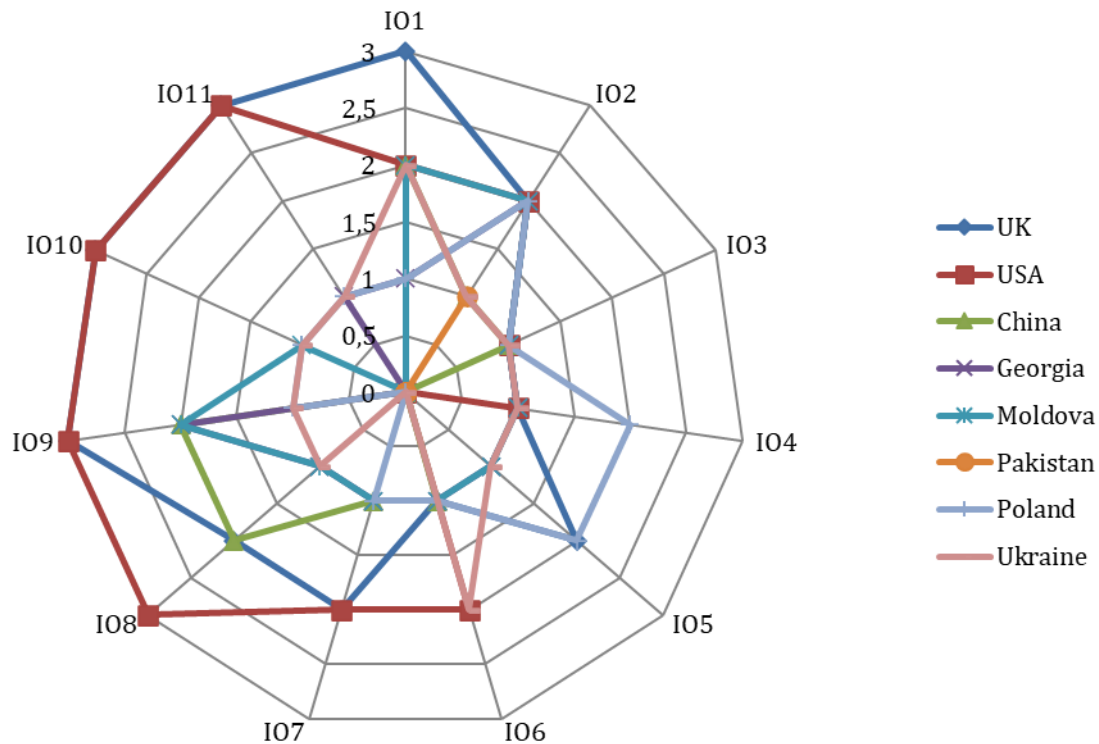
Table 2 has been compiled based on the relevant FATF statistics. It reflects the advantages and strengths of the national systems of Great Britain, the USA, China, Georgia, Moldova, Pakistan, Poland and Ukraine. For the graphical analysis of the data, the qualitative criteria of the compliance ratings were given quantitative values, namely: highly effective (HE) corresponds to 3 (no shortcomings); significantly effective (SE) – 2 (there is a need for minor improvements); moderately effective (ME) – 1 (there is a need for significant improvements); low effectiveness (LE) – 0 (requires fundamental improvements).

The effectiveness profiles of anti-money laundering and anti-terrorist financing systems in the UK, USA, China, Georgia, Moldova, Pakistan, Poland and Ukraine for 11 immediate results are presented in Figure 2.

Table 2. Comparative analysis of the assessments of the effectiveness of national systems for combating money laundering and financing terrorism in the UK, USA, China, Georgia, Moldova, Pakistan, Poland, and Ukraine based on the FATF methodology

№ з/п	Result	Country															
		Great Britain (2022)		USA (2020)		China (2020)		Georgia (2020)		Moldova (2019)		Pakistan (2021)		Poland (2021)		Ukraine (2020)	
		Level	Score	Level	Score	Level	Score	Level	Score	Level	Score	Level	Score	Level	Score	Level	Score
1	IO1	HE	3	SE	2	SE	2	ME	1	SE	2	LE	0	ME	1	SE	2
2	IO2	SE	2	SE	2	ME	1	SE	2	SE	2	ME	1	SE	2	ME	1
3	IO3	ME	1	ME	1	ME	1	ME	1	ME	1	LE	0	ME	1	ME	1
4	IO4	ME	1	ME	1	LE	0	ME	1	ME	1	LE	0	SE	2	ME	1
5	IO5	SE	2	LE	0	LE	0	ME	1	ME	1	LE	0	SE	2	ME	1
6	IO6	ME	1	SE	2	ME	1	ME	1	ME	1	LE	0	ME	1	SE	2
7	IO7	SE	2	SE	2	ME	1	ME	1	ME	1	LE	0	ME	1	LE	0
8	IO8	SE	2	HE	3	SE	2	ME	1	ME	1	LE	0	LE	0	ME	1
9	IO9	HE	3	HE	3	SE	2	SE	2	SE	2	LE	0	ME	1	ME	1
10	IO10	HE	3	HE	3	LE	0	LE	0	ME	1	LE	0	ME	1	ME	1
11	IO11	HE	3	HE	3	LE	0	ME	1	LE	0	LE	0	ME	1	ME	1
Overall score		23		22		10		12		13		1		13		12	
Average score		SE	2.1	SE	2	LE- ME	0.9	ME	1.1	ME	1.2	LE	0	ME	1.2	ME	1.1

Source: based on Consolidated table of assessment ratings (2022).



Legend:

IO1 – Risk, policy and interaction;

IO2 – International cooperation;

IO3 – Surveillance;

IO4 – Preventive measures;

IO5 – Legal entities and arrangements;

IO6 – Financial intelligence;

IO7 – Investigate and prosecute money laundering;

IO8 – Confiscation;

IO9 – Investigate and prosecute terrorist financing;

IO10 – Preventive measures and financial sanctions for terrorist financing;

IO11 – Financial Sanctions for Financing Proliferation of Weapons of Mass Destruction

Figure 2. Effectiveness profile of anti-money laundering and counter-terrorist financing systems in a number of countries according to the FATF methodology

Source: based on summarized data in Table 2.

The analysis of the effectiveness profile of the systems for combating money laundering and terrorist financing in Figure 2 allows us to draw the following conclusions:

- high performance levels were achieved by the UK and the USA in four indicators – IO1, IO9, IO10, IO11 and IO8, IO9, IO10, IO11;
- only in terms of IO2 – international cooperation – did none of the countries need fundamental improvements. Nevertheless, this indicator for Ukraine is lower than for other countries in a similar military-political situation;

- only in terms of IO6 – financial intelligence – does Ukraine have an indicator with a significant level, the same as the United States and higher than that of all other countries studied;
- a moderate level of effectiveness is characteristic of the IO3 indicator for the countries studied, and for Pakistan, it is at a low level.

The evaluation of the effectiveness of national systems for combating money laundering and financing terrorism shows that Ukraine has practically the same indicator values as other countries with similar military situations. However, investigating and prosecuting the laundering of the proceeds from crime has higher indicator values. The values establish directions for further actions for the Ukrainian state.

All national financial monitoring systems must meet the requirements of international standards, taking into account the national characteristics of each country. While variations in detailed legal solutions are acceptable based on specific internal conditions, the implementation of fundamental principles should maintain a high standard. Given the trends in the development of information and computer technologies, in particular, the digitalization of the world economy, it is necessary to pay attention to international cooperation in terms of virtual assets and how they are connected to money laundering and financing terrorism.

Conclusions

A stable and effective national system to combat the financing of terrorism requires the comprehensive use of methodological, organizational, legal and institutional measures. Given that financial monitoring encompasses a range of such measures, it is appropriately integrated into its structure. To ensure an effective international system for combating money laundering and the financing of terrorism, all national financial monitoring systems must comply with the requirements of the FATF international standards, although the national characteristics of each country must be considered.

Based on the results of the research, it can be noted that for most foreign anti-money laundering and counter-terrorism financing systems, risks associated with the use of cash remain relevant. Additionally, there is a lack of sufficient measures to combat the financing of terrorism (except for the USA and the UK), which reduces the effectiveness and efficiency of the financial monitoring system. The study of practices in organizing national anti-money laundering and counter-terrorism financing systems, both in leading countries in this field and in those facing similar issues to Ukraine, has allowed us to identify directions for further improvement of the financial monitoring system in Ukraine. Specifically, the following measures should be taken:

- International cooperation should be enhanced. This is crucial for obtaining necessary information and evidence and coordinating joint actions in the fight against criminals and terrorists. This aspect has higher significance in the UK, the USA, Poland, Georgia, and Moldova.
- Legal entities and organizations should not be exploited for criminal purposes. Ensuring the accessibility of information regarding their beneficial ownership is essential. This aspect is more developed in the UK, the USA, and Poland than in Ukraine.
- Improving investigation and prosecution procedures for money laundering is crucial, particularly in the context of international assistance received in the fight against Russian aggression. Ukraine, in particular, should learn from the experiences of not only the UK and the USA but also Poland, Moldova, Georgia, and even China.
- Investigation and criminal prosecution procedures regarding financing terrorism should be reviewed, as should the use of financial sanctions for financing terrorism. Given the high threats in this area for Ukraine, it is necessary to follow the best practices of the UK and the USA.

Considering international experience, it is essential to improve the Ukrainian anti-money laundering and counter-terrorism financing system by increasing the detail level in the rules. Additionally, efforts should be made to enhance economic transparency and prevent the misuse, misappropriation, and embezzlement of budgetary funds.

The assessment of financial monitoring systems showed that countries are customizing detailed legal solutions to address their internal, specific conditions. However, the implementation of basic principles remains at a high level. Given the trends in the development of information and computer technologies, in particular, the digitalization of the world economy, Ukraine must pay attention to international cooperation in the field of virtual assets and their connection with money laundering and terrorist financing.

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Ocena systemów monitoringu finansowego: doświadczenia ukraińskie i zagraniczne

W artykule scharakteryzowano monitoring finansowy jako element systemu zapobiegania i przeciwdziałania legalizacji dochodów oraz finansowaniu terroryzmu. Celem prowadzonych badań było zbadanie doświadczeń dotyczących funkcjonowania krajowych systemów monitoringu finansowego (w Wielkiej Brytanii, USA, Chinach, Gruzji, Mołdawii, Pakistanie, Polsce i Ukrainie) w celu określenia kierunków rozwoju i zidentyfikowania możliwości ich wdrożenia w praktyce krajowej. Metody badawcze obejmowały indukcję, analizę i syntezę, metody statyczne, porównawcze i graficzne. Metodologia badań opierała się na analizie oficjalnych danych statycznych i materiałów informacyjnych z oficjalnych stron internetowych organizacji międzynarodowych i właściwych organów krajowych. W artykule dokonano analizy danych statystycznych organów państwowych Ukrainy pod kątem ich działalności w zakresie zwalczania finansowania terroryzmu. Skonstruowano również profile służące ocenie skuteczności systemów przeciwdziałania praniu brudnych pieniędzy, a także postępowania z dochodami z przestępczości i finansowania terroryzmu w wielu krajach, zgodnie z metodologią FATF (Financial Action Task Force). Wyniki pokazują, że wszystkie krajowe systemy monitorowania finansowego muszą spełniać wymagania FATF. Konieczne jest jednak również uwzględnienie specyfiki narodowej każdego kraju. Wskazano kierunki dalszego doskonalenia systemu monitoringu finansowego na Ukrainie, tj. wzmocnienie współpracy międzynarodowej, zapobieganie wykorzystywaniu osób prawnych i organizacji do celów przestępczych, poprawa procedur dochodzeniowych i ścigania prania pieniędzy, zwłaszcza biorąc pod uwagę międzynarodową pomoc otrzymywaną w walce z rosyjską agresją, przegląd procedur dochodzeniowych i ścigania karnego w finansowaniu terroryzmu oraz stosowanie sankcji finansowych w finansowaniu terroryzmu.

Słowa kluczowe: FATF, monitoring finansowy, system przeciwdziałania praniu pieniędzy i finansowaniu terroryzmu, terroryzm, Ukraina