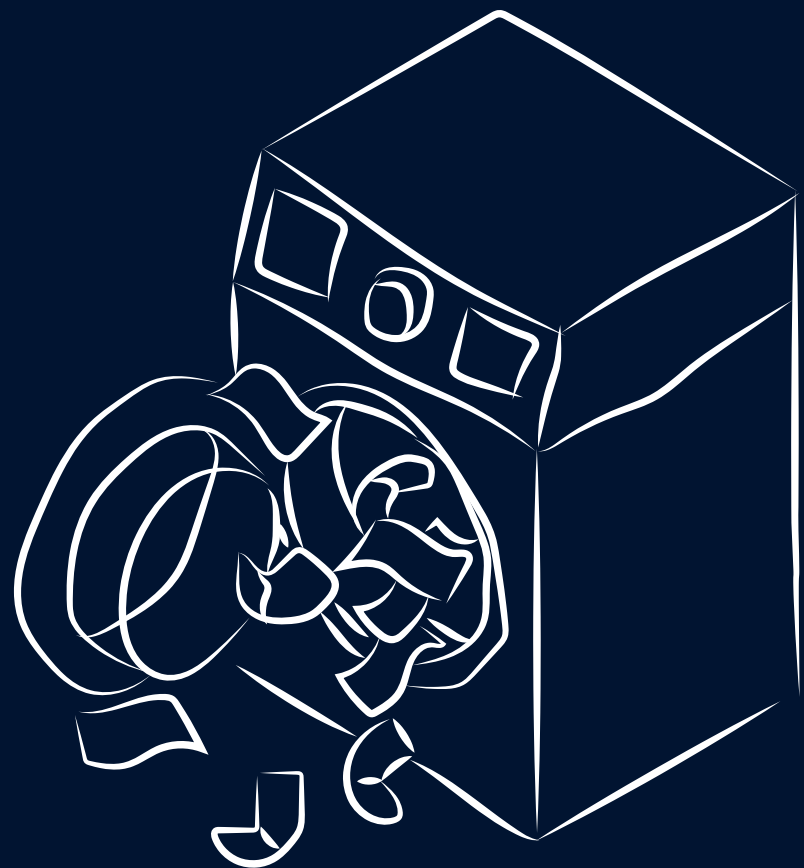


A systemic design approach to tackle money laundering



Master Thesis
Manon Blankendaal



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Master thesis Manon Blankendaal

Strategic Product Design
Industrial Design Engineering

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In collaboration with
**Testlab OM, the innovation unit of
The Public Prosecution Service (*Het Openbaar Ministerie*)**

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Abstract

The goal of almost all forms of crime is monetary gain. In serious forms of crime, like drug crime or human trafficking, enormous amounts of money are made. For criminals, this money is not directly usable. Spending it right away in the economy would be too obvious and attract attention from the authorities. Therefore, the dirty money gained by these criminal activities should be laundered first. The true origin of the money is disguised, and a legal source is linked to it. After money laundering the dirty money, the money appears clean and can be spent in the economy.

Money laundering is not only a crime in itself but also a secondary offence. It can be seen as a symptom of other criminal activities because the need for laundering money is always a result of criminal activities where much money is made. For this reason, it is crucial to tackle it. The fight against money laundering is essential to fight all other kinds of serious crime effectively.

The Public Prosecution Service plays a vital role in tackling money laundering. They are responsible for detecting criminal offences and prosecuting criminals. In this project, the initial goal was to:

Map the current money laundering system in the region of Limburg and identify opportunities that support the Public Prosecution Service in the fight against money laundering in the current system.

Money laundering is a complex problem. It involves many stakeholders and it is dynamic. In this project, the systematic design approach is used to tackle this complex problem situation. In the systemic design approach, the design thinking and system thinking methods are combined.

The project can be separated into two parts. The first part is about researching and identifying the money laundering system. The second part is about developing interventions that fit in this system. To move from insights to interventions, an experiment with different methods is carried out. These methods were: GIGA-mapping, the VIP method, system mapping by using a causal loop diagram, and the reframing method. By reflecting on these methods and developed personal design criteria, an intervention framework was developed. This framework helped develop three new sub design goals, focused on providing understanding, guidance and inspiration for the Public Prosecution Service.

These three goals resulted in three systemic interventions. The first intervention is the causal loop diagram, focused on understanding the money laundering system. Second, the action blueprint, consisting of six principles that guide the Public Prosecution Service in taking urgent action. And third, the tangible solution overview shows examples of how the six principles can be developed into tangible ideas. The interventions collaboratively help to increase the sense of urgency regarding money laundering among th Public Prosecution Service. Together they form the Money Laundering Design Manifesto.

Experts have evaluated the results of this project. This enabled further detailing of the manifesto and its interventions.

Preface from the Public Prosecution Service

Money laundering. *Money laundering?* **Money laundering!**

Quite a creepy form of crime. Because unlike murder for example, you do not have a corpse, while the devastating impact of money laundering on society is at least as deadly. The fight against subversive crime is getting more and more attention. But at the same time, it has to be said that the approach still yields too few concrete and structural results that are visible in society.

Therefore, I did not have to think twice when I was asked a few months ago whether I, from my role as Public Prosecutor, would like to support Manon Blankendaal, a student at TU Delft, in her final master study on the phenomenon of money laundering in the province of Limburg. The plan was not only to map out money laundering through the application of Systemic Design, but also and especially to use the findings to draw up a number of concrete proposals for solutions. This seemed to me to be an absolute win-win situation. After all, the time has passed when we only chased after criminals with a law book in our hands; being open to a different approach is a must.

The systemic design process was followed with surgical precision and soon the many parameters related to money laundering became literally visible and therefore clear. Connections became clear, the knobs that could be turned in money laundering could be pointed out, in short: the cliché is still true. Sometimes a picture says so much more than a thousand words.

Manon's research has led to money laundering getting a face and therefore being recognisable. Her findings and recommendations have been received enthusiastically within the Limburg District Public Prosecutor's Office. These will certainly be taken into account in the policy-making process with regard to combating money laundering.

To conclude.

As a prosecutor you have to be a bit curious. That keeps you sharp and ensures focus. Manon knew how to trigger that curiosity and how to explain the idea and functioning of systemic design in a clear and understandable way. With great involvement, commitment, enthusiasm and perseverance, she managed to fathom and map out the area of money laundering, which was unknown to her until now. Her recommendations will be taken to heart. I would say that we have learned a lot from each other in this process.

Mr B. Köke
Public Prosecutor

Preface from the author

As a designer, I have a strong fascination for criminality. This interest was born during my bachelor Industrial Design at the University of Technology Eindhoven. During this time, I worked for a year as a design intern at the Penitentiary Institution Vught, including one of the most well-guarded prisons in the Netherlands. Here, I discovered this personal interest by doing multiple design projects together with the prisoners, their families, guards and employees.

I had the chance to dive into the criminal world again for my master graduation project. Not in prison this time, but on a more strategic level, which was a perfect fit regarding my master Strategic Product Design. For the project, I dove into the world of money laundering and got to know the problem from the perspective of the Public Prosecution Service.

What is the best way to launder my money? This was definitely the most frequently asked question from people who got to know the subject of my graduation project. Getting to know the money laundering domain was fun and challenging at the same time. It is a complex world and peculiar domain, especially when you are new to it.

This project provides the Public Prosecution Service with a new perspective on the problem situation of money laundering. Built upon research, the Money Laundering Design Manifesto is developed that supports the Public Prosecution Service in tackling money laundering by creating a better sense of urgency among the organisation.

Although I did my graduating project during COVID, I had much fun, learnt a lot, and got good support. The result of my project is here in front of you. I am incredibly thankful for the people around me that supported me in this process.

First, I want to thank Nynke Tromp and Mieke van der Bijl-Brouwer. Your feedback and input brought my project to a higher level. I really enjoyed our coaching sessions, especially the few ones where we could see each other in real life. The balance between having fun and being critical was perfect. You both are very inspiring to me, and I enjoyed working on a colleague level together on this project.

Furthermore, I want to thank Albert Kingma and Jordi Otto. Our weekly coffee moments energised and motivated me very much. You really felt like my teammates. Working together with you two was very enjoyable, thanks for that!

A big thanks to Ben Koke. Ben, it was extremely helpful to have many chats about your way of working at the Public Prosecution Service. Your critical feedback, and at the same time your enthusiasm and humour, made all our meetings fun and interesting. I really appreciate the time and effort you put in helping me.

Thanks to all experts of the Public Prosecution Service that participated in the creative sessions and the interviews. Moreover, thanks to all the other experts who were willing to share their perspectives on money laundering and subversive crime with me over a digital coffee. Your input and openness were of high value.

Thanks to all my roommates, who were a listening ear during my project. It was relieving to work together in our rooms (aka home offices) and have many 'coffee to gos' in our breaks. The coffee star breaks with you, Lila and Rob, were the best.

Thanks Gittan, for our brainstorming sessions together and for actively thinking with me when I was stuck. It was valuable to always have someone to validate my thoughts with.

And lastly, thanks to all my friends and family who helped me have a good distraction when I was not working on the project.

You all helped to make graduating in COVID times more fun and easy.

Enjoy reading my master thesis!

Groetjes!

Manon

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Chapter 1

Establishing the project

This first chapter introduces the initial design brief and goal of the graduation project. Furthermore, the design approach and the design process are described.

1.1 Project introduction

1.2 Design approach

1.3 Design process

Establishing the project

Project introduction

The number of registered crimes has decreased by more than a quarter in eight years. The conclusion that is often drawn from this is that the Netherlands is becoming increasingly safer. The question, however, is whether this is the case. After all, this only concerns registered crime or crimes reported by citizens. Most people are not aware that there are forms of crime that are not visible and do not seem to bother citizens but do definitely harm our society. We call this category of crime: subversive crime.

Subversive crime damages our financial system, economic system, liveability, ecological environment, morality, sense of justice and constitutional state. There are different sorts of crime that belong to subversive crime: human trafficking and smuggling, organised hemp cultivation, drug labs and smuggling; fraud; and money laundering. One important central aspect of all these sorts of subversive crime is the interweaving of the under and upper world. Without collaboration of the upper world, the underworld is not able to function.

In this project, the focus will be on the subversive crime money laundering, which plays an essential role in all other sorts of subversive crime. Using the money obtained by criminal activities is not possible without easily getting caught by authorities. Money laundering is necessary to hide the true illegal origin of the money and to be able to spend it in the way you prefer.

The primary stakeholder in this project is the Dutch Public Prosecution Service (Het Openbaar Ministerie). The Public Prosecution Service's main job is ensuring that criminal offences are investigated, and prosecutions brought. During the project, there was a close collaboration with Jordi Otto. Innovation manager at Testlab OM, the innovation unit of the Public Prosecution Service. The goal of Testlab is to increase the effectiveness of the Public Prosecution Service by experimenting with innovations and methods. By testing these innovations and methods, they explore if they would fit their organisation or could be valuable for future investigations. The main task of Testlab is facilitating these experiments and finding problem owners among the organisation to execute them.

The problem owner in this project is Ben Köke. Ben is a Public Prosecutor at the Public Prosecution Service in the province of Limburg. The problem of money laundering is prominent in this area. Therefore, the need for an intervention or strategy to solve it is significant as well.

1.1

This graduation project is part of a bigger project for the Public Prosecution Service carried out by the Systemic Design Lab of the University of Technology Delft. In this bigger project, also focused on Money laundering, Albert Kingma, Nynke Tromp and Mieke van der Bijl-Brouwer research how a system approach can help the Public Prosecution Service to look at their issues differently and how this approach can lead to more effective interventions. This project is also done in close collaboration with Testlab OM, including Jordi Otto and Sanne Giphart.

The primary goal of this graduation project is to support the Public Prosecution Service in tackling money laundering in the current system. This will be done by first researching and identifying the current system, and second, by designing a suitable intervention.

Establishing the project Design approach

In this graduation project, a systemic design approach was used. Systemic Design combines systems thinking and human-centred design, intending to help designers cope with complex design projects, also called wicked problems. Before diving into Systemic Design further, the definition of complex problems will be explained first.

1.2.1 Different problem domains ask for different approaches

According to Snowden and Boone (2007), problems can be sorted into five different domains. They explain this by introducing the Cynefin framework (figure 1). Defined by the nature of the relationship between cause and effect of a problem, the framework consists of five different domains: simple, complicated, complex, chaotic and disorder. Each domain asks for a unique approach.

Simple problems

There are fairly straightforward relationships between cause and effect in this problem situation, which are evident for everyone involved.

Complicated problems

In this situation, there are still relationships between cause and effect, but they are much harder to understand. There are solutions to the problem, but there might be more than one. Expertise is required.

Complex Problems

In this domain, the relationships between cause and effect are not obvious. It might be impossible to identify one correct solution. To make progress in solving or managing the problem, experts' advice will help combined with experimentation. It is often best to look for patterns in problems in this domain.

Chaotic problems

Here there is no relationship between cause and effect. Immediate action might be needed to stabilise the situation. Crisis situations often fall into this domain. If immediate action is not needed to stabilise the situation, this domain may be ripe for successful experimentation and innovation.

Disorder

The fifth domain, disorder, is a problem situation in which it is difficult to recognise in which domain the problem belongs.

1.2

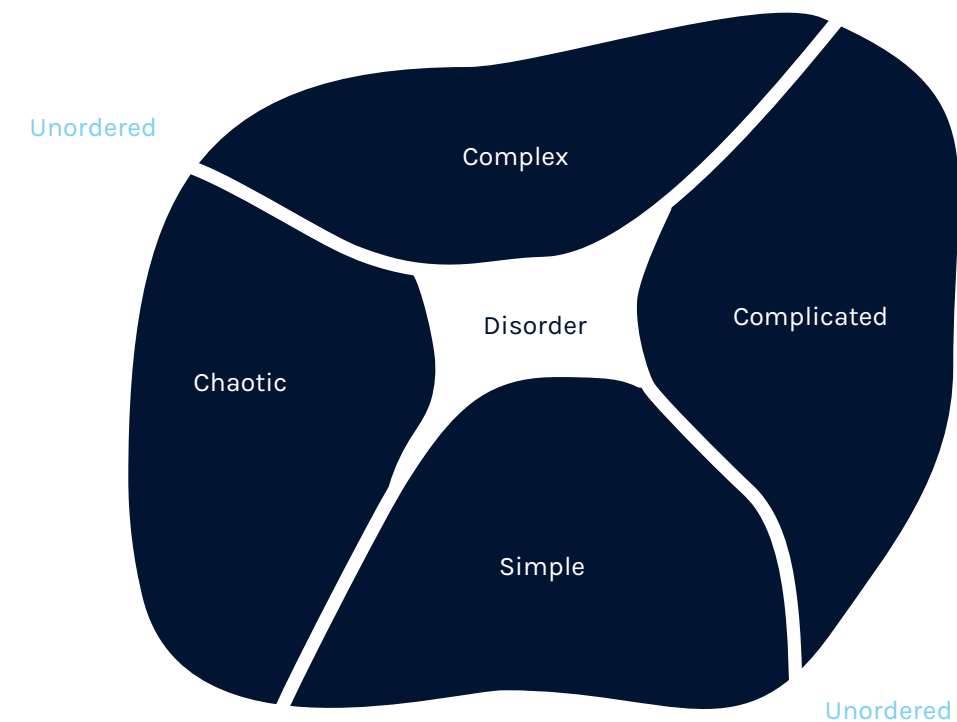


Figure 1: Cynefin framework

1.2.2 Focus on complex problems

Problems that fall in the complex problem domain of the Cynefin framework are also called wicked problems. In his book 'Designing With-in Public Organizations', Schaminée explains that four traits characterise wicked problems:

1. They are dynamic: they change as you work on them
2. They are open: they are accessible to many
3. They are networked: they can rarely be solved by a single organisation or within an individual pillar.
4. They are complex: simple solutions are not effective or permitted.

The problem situations of money laundering correspond to the characteristics mentioned above. Knowing this helps to understand why the systemic design approach was suitable for this graduation project.

1.2.3 What is systemic design exactly?

‘Systemic design is not a design discipline (e.g., graphic or industrial design) but an orientation, a next-generation practice developed by necessity to advance design practices in systemic problems. As a strong practice of design, the ultimate aim is to co-design better policies, programs and service systems. The methods and principles enabling systemic design are drawn from many schools of thought in both systems and design thinking. The objective of the systemic design project is to affirmatively integrate systems thinking and systems methods to guide human-centred design for complex, multi-system and multistakeholder services and programs.’
(Jones, 2014).

Systemic design was born when system thinking and design thinking/ human-centred design were combined. According to Jones (2014), systems thinking and design thinking share a common orientation to the desired outcomes of complex problems, affecting highly leveraged, well-reasoned, and preferred changes in situations. The most significant difference is that systems thinking is more focused on understanding complex contexts independently of solutions. Design thinking, on the other hand, is action-oriented towards creative solutions, often ignoring deep understanding.

‘Systems thinking is a context for seeing wholes. It is a framework for seeing interrelationships rather than things, for seeing patterns of change rather than static snapshots.’
(Peter Senge, 1990)

1.2.4 Why is systemic design better suitable than human-centred design?

Last decade our world has increasingly come to consist of complex systems. This increase is caused by advanced technology, globalisation, cultural change and intricate markets (Snowden & Boone, 2007). Research (Conway, Maters & Thorold, 2017) (Ahearn, 2017) notices that the human-centred design approach, embedded in the design thinking process, does not cover the complexity of most systems in our modern world.

Systems encompass many actors, competing incentives and hidden nuances. It is a mistake to assume that just because human-centred design processes create innovations that meet human needs, their diffusion into a system will follow a linear route that mirrors consumer markets (Conway et al., 207). They are not on their own. Ahearn (2017) mentions that system thinking offers a necessary antidote to some of design thinking’s blinds spots by taking a holistic view of complex social challenges rather than just building new solutions that address a problem’s symptoms, not root causes.

As the graduation project deals with a complex challenge where many stakeholders are involved, the systematic design approach seemed most suitable.

1.2.5 Systemic design lab

As mentioned in the introduction, this graduation project is part of the University of Technology Delft Systemic Design Lab. The Systemic Design Lab is a cross-departmental design lab that aims to develop and apply knowledge about the role of design - both the artefact and the process - in generating systemic change within society. The complex challenges that society faces regarding health, safety, and sustainability require innovative approaches that can help society transition towards more sustainable futures. The Systemic Design Lab is particularly interested in theory and methodology that combine systems and transition thinking with design to humanise the systems that support our collective life (Systemic Design Lab, n.d.). The supervisors of this graduation project, Mieke van der Bijl-Brouwer and Nynke Tromp, are the lab’s founders. Participating in the monthly Systemic design salon organised by the Systemic design lab helped to get a better understanding of the systemic design approach and corresponding tools during the project.

Establishing the project

Design process

1.3

Most design processes can be divided into four different phases, discover, define, develop and deliver. The Design Council (2019) calls this the Double Diamond. Each diamond consists of an exploring half and a focussing half. In the exploring half, divergent thinking is most important and in the focussing half convergent thinking.

The design process of this project differs from ordinary design thinking projects by blending the design thinking and the systems thinking approach. Inspired by Ospina (2018), an extra phase was added between the two regular diamonds (see figure 2). In between the discover and define phases and the develop and deliver phases, the synthesis step is added. The reason for adding this step is to deal with the complexity of the system and the research findings. Jumping immediately from defining to developing is not desirable in the applied systemic design approach. Adding an extra phase to reflect and decide on the best intervention areas between these phases was necessary.

As the form in figure 2 illustrates, the design process was not a linear process. The circles show the iterative dynamics of the process. By constantly tweaking earlier made steps, more convenient outcomes could be developed.

The goal of each phase of the process is shortly described:

- Discover**
The first phase is about understanding the initial problem and the core of the money laundering system. What is it exactly?
- Define**
The defining phase is about defining the system and the parts that play a role in it, like researching stakeholders and current approaches against money laundering.
- Synthesis**
In this phase, different synthesis methods were explored to find the most suitable way to translate all research insights and to find opportunities in this data. System mapping plays an important role in this step. Furthermore, design criteria are made as input for the develop phase.
- Develop**
In this phase, intervention ideation is the main activity. Ideas are developed and constantly iterated.
- Deliver**
The delivery phase is about evaluating the developed interventions that are created in the develop phase.

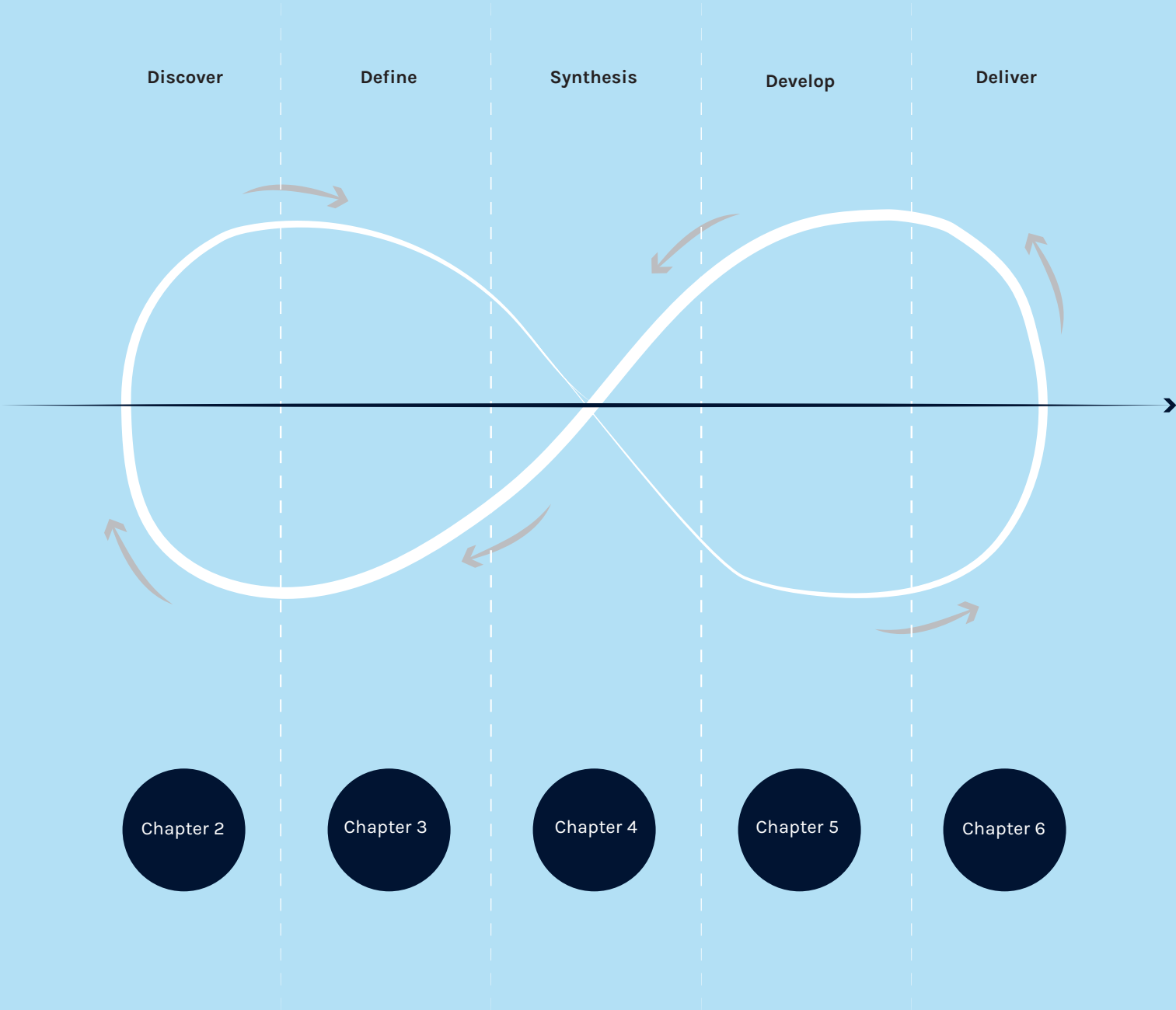


Figure 2: Project process

Chapter 2

What is money laundering?

This chapter describes the 'discover' part of the first triangle in the design process. The first section of this chapter offers background information about subversive crime. The second section is focused on the definition of money laundering, the main characteristics of money laundering and the consequences.

2.1 Research approach

2.2 What is subversive crime?

2.3 What is the definition of money laundering?

2.4 What are the consequences of money laundering?

2.5 Important insights overview

What is money laundering?

Research approach

Research methods

In order to understand the context of money laundering, extensive research has been executed. The research consisted of various methods:

- Literature research, consisting of papers, books, reports and news articles.
- Interviews with public prosecutors, experts in the field, stakeholders, and people on the street. See figure 3 for the complete overview of experts.
- Observing creative sessions with public prosecutors. These sessions were organised for the bigger project for the Public Prosecution Service by the Systemic Design Lab.
- External desk research, consisting of online desk research and government published data.
- Watching (live) webinars and conferences: 'Georganiseerde criminaliteit op de rem' and 'Crimineel verband?' organised by the Center for Crime Prevention and Security (CCV) and 'Spotlight op Ondernijning' organised by Aanjaagteam Ondernijning.
- Attending a money laundering trial in court.

Research questions

Different research questions had to be answered to be able to understand and map the system of money laundering. In the research phase, the following main questions were answered:

- What is subversive crime?
- What is money laundering?
- How is money laundering tackled?
- Who is involved in tackling money laundering?

The answers to these questions are divided over chapter 2 and chapter 3. Chapter 2 focussing more on the background of subversive crime and money laundering and chapter 3 focuses on the response against money laundering and which stakeholders are involved in this.

2.1

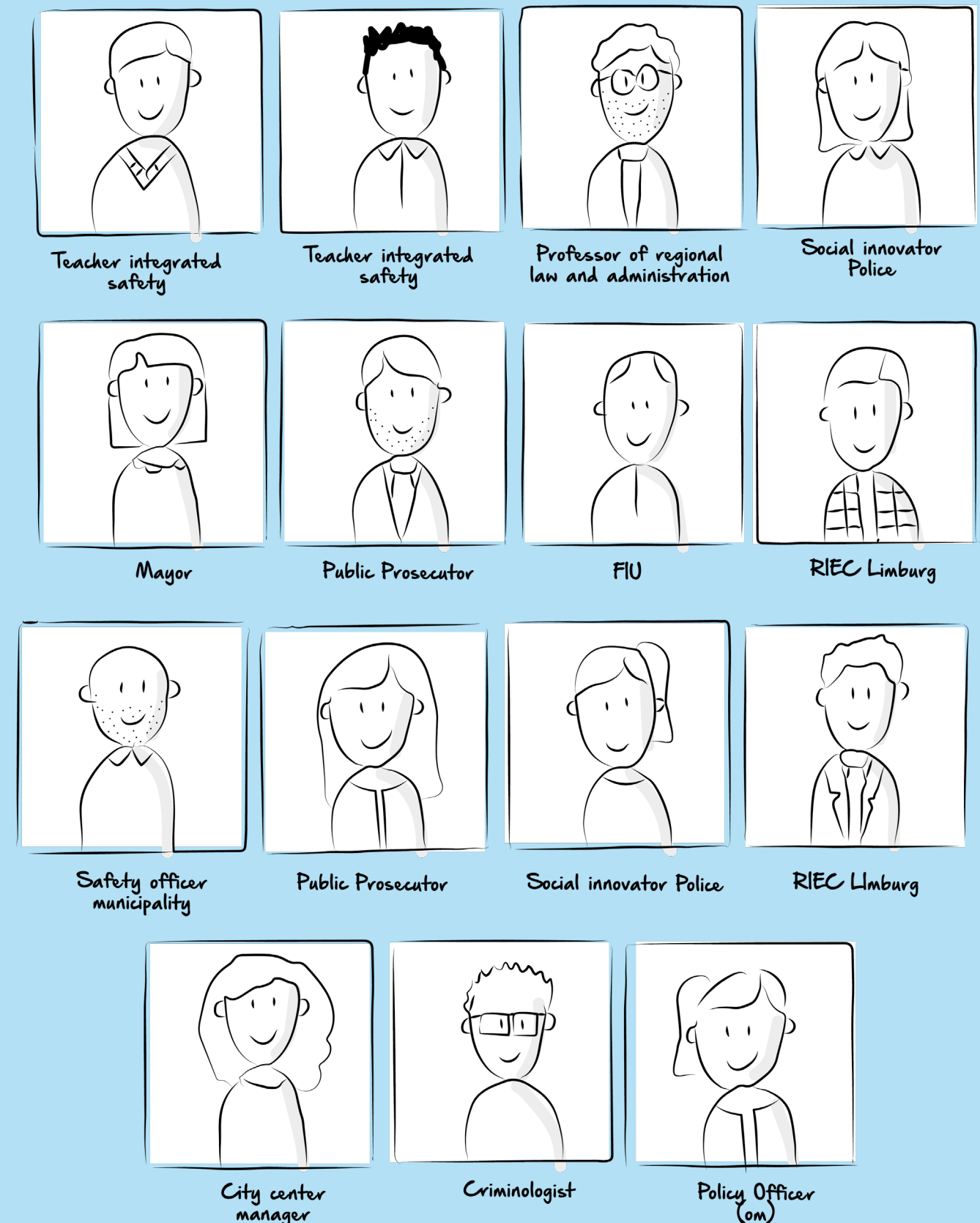


Figure 3: Overview of interviewed experts

What is money laundering? What is subversive crime?

Before diving into the context of money laundering, it is essential first to understand the relation between money laundering and other forms of crime. A term often used in combination with money laundering is subversive crime. Why is this the case? What is it? Moreover, what is so problematic about subversive crime?

2.2.1 Crime in the Netherlands

According to CBS, the Central Bureau of Statistics in the Netherlands, the number of registered crimes has decreased over the last ten years. There were 1.200.825 reported crimes in 2010 in the Netherlands and 808.030 reported crimes in 2020 (Central Bureau for Statistics, 2021). That is a decrease in reported crimes in the last ten years of nearly 33 percent.

The conclusion that is often drawn from this is that the Netherlands is becoming increasingly safer. The question is whether this is the case. After all, this only concerns registered crime or crimes reported by citizens (Lam, van der Wal & Kop, 2018).

In the book 'Sluipend Gif', Lam, van der Wal & Kop (2018) explain that most people are not aware that there is a category of crime that is not visible for citizens and does not seem to be a burden. The crimes belonging to this category do not directly affect citizens as theft or violence do. Still, they indirectly damage our financial and economic system, our liveability, ecological environment, morality, and sense of justice. This category of crime is like an insidious poison for our society, and it indirectly affects the functioning of our Dutch constitutional state. It is a grey area of crime where there is a strong interdependence between the criminal underworld and the legal upper world. We call this category of crime subversive crime.

2.2.2 Understanding the terms

A problem encountered early in this project is that there does not exist one true definition for subversive crime. During the interviews, this was also mentioned by one of the integrated safety teachers: "The terms undermining and subversive crime are vague, people use the terms for different things." Therefore having a clear understanding of the terms used in this project is critical before diving into the context of money laundering.

What is subversive crime?

Subversive crimes characterise themselves by the interdependence between the upper and the underworld. Without the collaboration of the upper world, the underworld cannot function. Crimes that fall in this subversive crime category are human trafficking and smuggling, organised hemp cultivation, drug labs and smuggling, fraud, and money laundering. Before diving further into these appearances of subversive crime, an understanding of the phenomenon is necessary first.

2.2

A clear description that was found comes from Tilburg University, which explains it as follows:

The term 'subversive' refers to forms of crime that undermine the integrity of companies and social institutions, or in a general sense, have a degrading effect on values and norms. It involves serious and organized crime, often involving drug production and trafficking, criminal motorcycle gangs and violence. However, also crimes committed by seemingly respectable companies, such as labour exploitation, fraud with personal care budgets, and environmental crimes. The consequences become visible in investments in real estate, economic activity and criminal 'benefactorship'. It is not just a problem of the big(ger) cities, but also of smaller towns in rural areas, and it affects all layers of society.

Not all sorts of crime are subversive. Kolthoff and Kohnraad (2016) made a quadrant explaining four types of misconduct and whether each type is or is not subversive. See figure 4. They also make a distinction between misconduct that is a crime and misconduct that is not a crime. A crime is a criminal offence which means that it is an act that is prohibited by law, also called an offence or a felony.

What is undermining and organised crime?

The term subversive crime is often used in combination with undermining and organised crime. Undermining and subversion are semantically related to this topic, but there is a difference between subversive crime and undermining.

As seen in Kolthoff and Kohnraads (2016) quadrant (figure 4), criminal and non-criminal activities can be subversive. They are both undermining. Subversive crime is undermining, but undermining is not necessarily subversive crime. To have an undermining effect on society, subversive crime is not the only cause. Undermining is broader, which does not automatically involve subversive crime but can also be non-criminal. Therefore undermining and subversive crime are not precisely the same thing.

Besides undermining, organised crime is also a term often used in combination with subversive crime. It is often used because organised crime is the most prominent type of crime that belongs to subversive crime. See figure 5. Organised crime is, per definition, undermining. To explain organised crime, the definition of the research group Fijnaut (1996) is used.

"Organised crime is groups of people that are primarily aimed at an illegal gain. These groups systematically commit crimes with serious consequences for society and can shield these crimes relatively effectively."

Organised crime is subversive crime, but subversive crime is not necessarily organised crime. Subversive crime is broader than organised crime only. It is not exactly the same thing. There are forms of crime that do not belong to organised crime but belong to subversive crime, like individual hemp cultivation. See figure 5 for a visualisation of this.

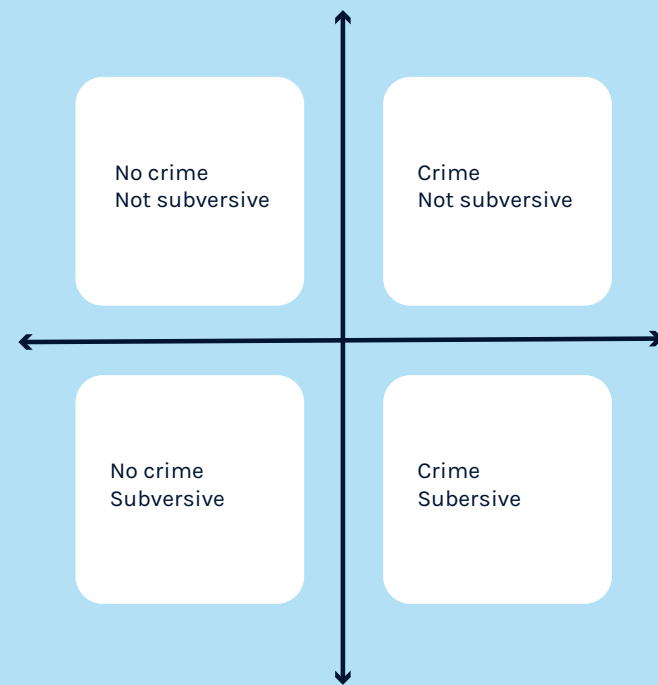


Figure 4: Quadrant Kolthoff & Khonraad (2016)

1: The first type is no crime and not subversive

With this, we mean behaviour that may be annoying, possibly even intimidating, but when viewed closely, cannot be called criminal, let alone undermining. An example of this type is rowdy behaviour by loitering youths.

2: The second type are crimes that are not subversive

Behaviour that is a criminal offence but is not undermining. An example of this type is a one-time bag thief or a brawl that got out of hand.

3: The third type is no crime that is subversive

Behaviour that is undermining but not punishable falls under this type, for example, a local police officer who does not act when required, a conflict of interest of a director without corruption, or the millions who disappear from housing associations due to maladministration.

4: The fourth type is a crime that is subversive

In this category falls behaviour that is both subversive and at the same time a criminal offence, for example, the large-scale systematic violation of legal norms, or intimidation, bribery or blackmail of citizens, companies, administrators and the civil service.

What are the characteristics of subversive crime?

As said earlier in this chapter, subversive crime is difficult to see. The reason for this is that most forms of subversive crime are victimless, and society is affected indirectly. Therefore regular people are not aware of this form of crime.

Besides the invisibility of subversive crime, there is another important characteristic: The interdependence between the upper and underworld. Subversive crime takes place in the twilight zone between the upper and underworld. Without the collaboration of the upper world, the underworld cannot function. This interdependence makes the consequences for society so damaging. What makes it difficult is that this twilight zone is a grey area where the distinction between good and evil is not very clear.

Pest, Nieuwdorp, Smeets, & Van Wijnen (2012) describe this interdependence as follows:

"There is an interdependence between the underworld and the upper world when criminal activities are carried out using the legal world (private and, or public), and there is a particular relationship or connection between the two. The upper world may or may not be conscious, forced or culpable in facilitating criminal activities."

This interdependence can be categorised into three different categories (Fijnaut, 1996):

- A cooperative relationship: the upper world consciously offers products and service to criminals. Both parties benefit from working together.
- A parasitic relationship: the underworld abuses or uses the upper world for criminal activities. The criminals are solely out to profit and victimise the actors in the upper world.
- Thirdly, actors in the upper world slip into the criminal underworld.

This invisibility and interdependence make the measurability of subversive and, at the same time, the approach against it a great challenge.

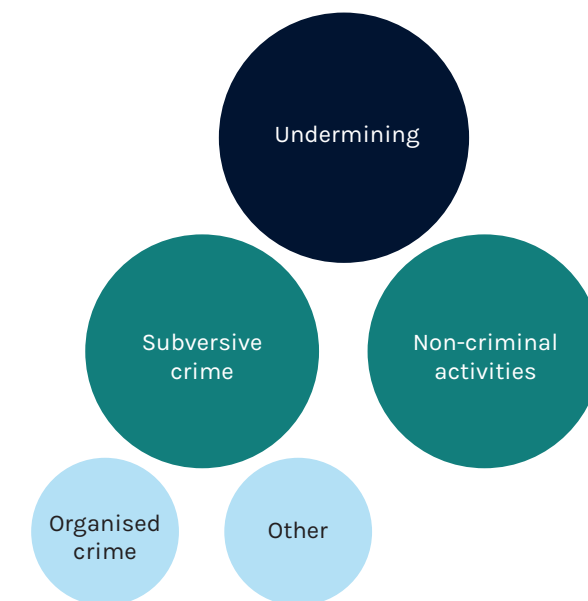


Figure 5: Overview of related terms

2.2.3 What are the consequences of subversive crime on society?

Undermining is never a goal itself for criminals. Most of the time, the primary motivation of criminals is monetary gain (Faber, 2013). Undermining is therefore mainly the result of criminal activity and possibly not even of one criminal activity in itself but of an accumulation of several of those activities; separately committed by several persons.

Our society consists of multiple cohesive systems. Our legal system, health care system, social security system, financial system, political system, mobility system, food system, etc. These systems can only function based on agreements, rules of the game and especially (related) trust (Faber, 2013). When these systems are undermined, the operation of these systems and, therefore, society is in danger.

The effects of undermining can be divided into five categories (Lam et al., 2018):

1. Harm to the financial and economic system;

Much money is made through illegal activities. The drug market in the Netherlands generates large profits that must be partly laundered and reinvested in the Dutch economy or abroad. As a result, the money flows back into society. It is a systematic effect because it interferes with the financial system. Besides harming the economic growth (Quirk, 1997), it creates unfair competition because criminal money is also invested in companies. The income of these companies does not depend on customers in contrast to bona fide companies.

2. Harm to the quality of life;

Organised crime has a disruptive effect in some neighbourhoods. Drug buildings and shadowy catering establishments cause immediate nuisance because suppliers and users meet here. Hemp plantations and synthetic drug laboratories pose physical risks, such as odours, noise and fire hazards. Shops and restaurants that are financed with criminal money create unfair competition with bona fide retailers.

It is also clear that organised crime needs local embedding to operate successfully. Many perpetrators are strongly locally rooted. The neighbourhood is an essential link in the social network. The criminals here have status, and delusions are also protected in a trusted environment.

3. Damage to the ecological environment;

Environmental crime damages the ecological environment and affects physical and psychological health. Companies that illegally dump waste or export waste abroad are closely connected to drug crime and subversive crime.

4. Violation of morality and the sense of justice;

Subversive crime often has to do with norms, values and trust in the government. Because the boundary between the upper and underworld is vague in subversive crime, citizens can no longer trust that certain activities, persons and activities are free from crime. This vague boundary can then result in a blurring of norms in society (Joldersma et al., 2008). In environments where crime seems to be becoming commonplace, it influences the sense of security and justice. The sense of justice can be affected in various ways, and with it, the confidence in the rule of law.

Besides, strict government enforcement also plays a role in the perception of safety and justice. It has not only led to some improvement in the eyes of the public but has also strengthened the feeling that they are sometimes mistreated. The feeling that the well-meaning citizen is being tackled harshly on minor matters, while much bigger criminals seem to escape the dance (Eysink Smeets,

2016).

5. Violation of the constitutional state and its institutions.

Violation of morality is closely linked to the violation of the constitutional state. The feeling of citizens that they are mistreated also influences the rule of law. For example, citizens who are fined for a traffic violation feel that they are being mistreated while criminals drive around untouched in expensive cars. Tops and Van der Torre (2014) indicate that such mismatches can lead to micro resistance against actions of the police and that they have a harmful effect on people's awareness of their rights and obligations as a citizen and their morality. Where subversive crime affects morality and the sense of justice, it also affects citizens' trust in the constitutional state's functioning and institutions.

Diminishing confidence in the government must be taken seriously. When transgressing behaviour is ignored, this creates a breeding ground for undermining: low trust and increasing individualisation can lead to fear (Politie Amsterdam-Amstelland, 2009). This can make citizens more susceptible to abuse, deception, manipulation or reduced accountability. In the report of Politie Amsterdam-Amstelland (2009), the researchers conclude that society's social norm is the first barrier against undermining.

2.2.4 What are the different forms of subversive crime?

As mentioned earlier, crimes that fall in the category of subversive crime are human trafficking and smuggling, organised hemp cultivation, drug labs and smuggling, fraud, and money laundering (LIEC, 2019).

Drug crime

Organised hemp cultivation, drug labs and drug smuggling are all forms of drug crime that are subversive. Drug crime in the Netherlands has a local and international character. A lot of drugs are locally produced and transported abroad. Many facilitators are involved and there is a constant search for new methods to be able to outsmart investigation services.

Human trafficking and smuggling

Human trafficking can be divided into different categories: labour exploitation, sexual exploitation and criminal exploitation. Not many reports of human trafficking are made because of shame, fear or unfamiliarity with Dutch regulations. Victims of human trafficking are often recruited by criminals putting them in a position of dependence.

Fraud

There exist multiple ways to commit fraud. Bankruptcy fraud, mortgage fraud and VAT carousel fraud are examples of that. Fraud can be a form of crime an sich, it can be an aspect of another crime, or individuals can do it on a local level. This last form is the most common. A large number of people see it as an opportunity to earn money from allowances and subsidies. They feel that they 'have the right to this' and in this way legitimise their actions.

Money laundering

Criminals ultimately want to be able to spend their criminal money and earnings in the legal economy. The money must therefore be laundered; otherwise, it would be too obvious for authorities. The focus of this project is on this form of subversive crime. In the next section, we will go in-depth into this criminal activity. An important side note: Money laundering is often done with cash money, but payments are also done in diamonds or expensive watches in the criminal world.

What is money laundering?

What is the definition of money laundering?

Most people know the term money laundering. However, what is it exactly, and what does it look like? In this chapter, we dive into the definition of money laundering, its main process, and the different methods. To design an intervention to support the Public Prosecution Service to tackle the problem, it is crucial to understand what money laundering exactly is and how it looks like.

2.3.1 What is money laundering?

According to CBS, the total number for almost all types of crime is decreasing in the last decade, like theft and drug offences. There is a type of crime that does not follow that decreasing trend. Money laundering counted 335 cases in 2010, while in 2019, there were 1390 registered cases. An increase of more than 400% in 9 years (Centraal Bureau voor de Statistiek, 2020).

Money laundering can be characterised as a secondary offence (Gilmour, 2013). It is always a result of another criminal activity because there must be a source to obtain the illicit money that is laundered. When committing crimes, like organised cannabis cultivation, drug crime and human trafficking, much illicit money is made. This 'black' money is seen as illegal because the money has been obtained illegally and is kept out of sight of the Dutch tax authorities. For criminals, this illicit money is only interesting when it is freely disposable in the legal economy. To be able to use this money carefree, criminals need to conceal the illegal origin of the money and, on the other hand, link a legal source to it. This phenomenon of concealing the illicit origin and linking a legal origin is called money laundering (Lammers et al., 2008). There exist multiple definitions of money laundering:

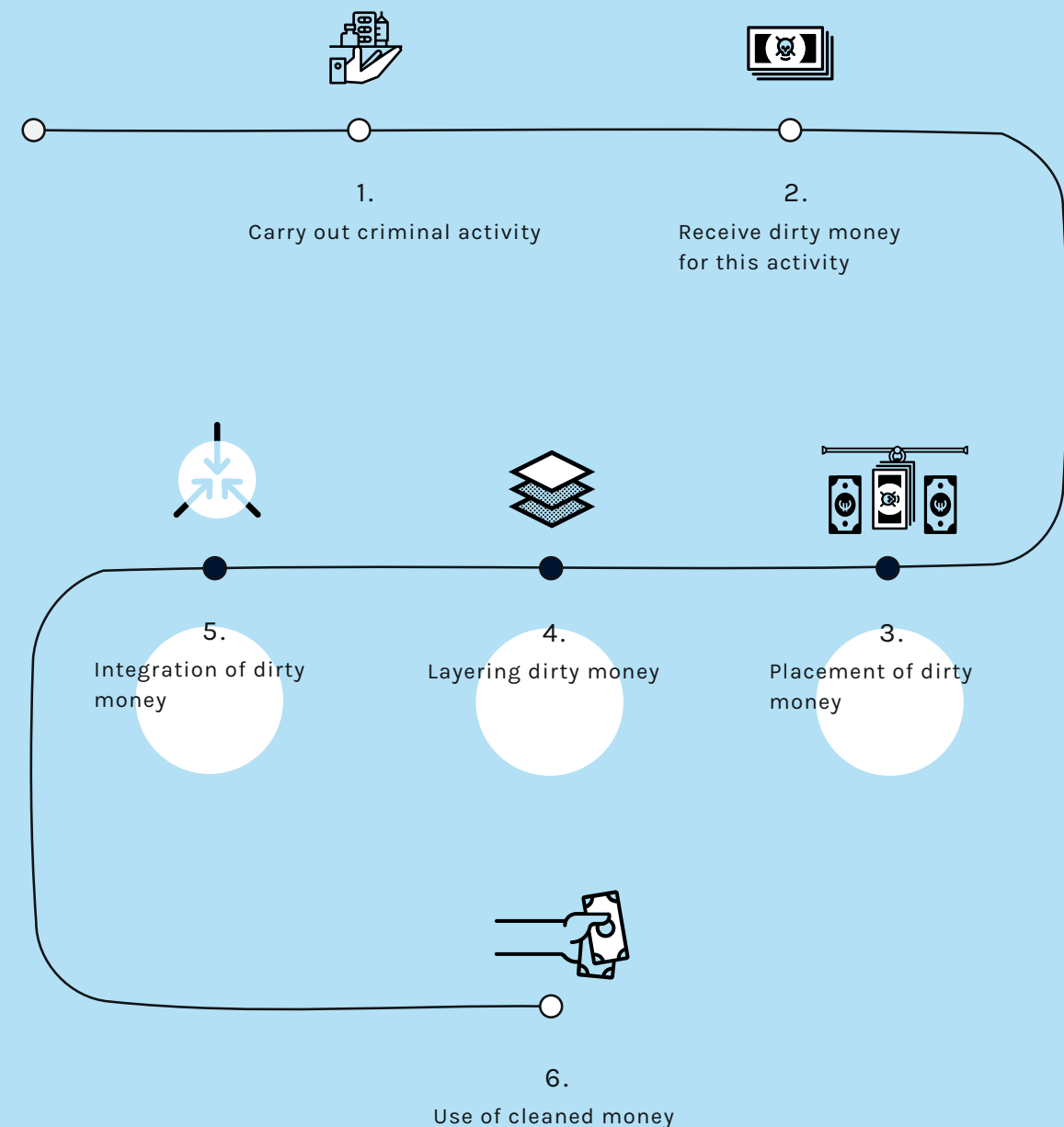
Guilty of money laundering is he who hides or disguises the true origin, the source, the alienation, the movement or the place where an object can be found, or hides or disguises who is the rightful claimant of an item or has it available. At the same time, he knows/should have known that the object is - directly or indirectly - derived from a crime. (Objects are all means and property rights).

He who acquires, possesses, transfers or converts an object or makes use of an object, while he knows that the object - directly or indirectly - originates from any crime. (Article 420bis lid 1 and 2 of the Criminal Code)

Money laundering is any act or attempted act to conceal or disguise the identity of illegally obtained proceeds so that they appear to have originated from legitimate sources. (Interpol, 2020)

Money laundering belongs to subversive crime because, with money laundering, illicit money is invested in the upper world. With this laundered money, criminals can influence people, companies and legal sectors. It has negative consequences on our economy, financial industry, policy and politics, and society (Unger et al., 2018).

2.3



Placement

The placement of illicit funds in the financial system



Layering

Layering hides the origin of the illicit funds. The more complex the less likely to trace suspected funds back to their illicit origins.



Integration

Illicit funds appear as normal earning endorsed by a semi plausible explanation.

Figure 6: The stages of money laundering.

Unger et al. (2018) estimated the amount of money laundering in the Netherlands in 2014 at 16 billion euros. This amount consists of domestic criminal money laundered in the Netherlands (6.9 billion in 2014) and the influx of money laundering from other countries (9.1 billion in 2014).

Money laundering consists of many typologies. There does not exist one way to launder dirty money. There is a range of methods that can be used to launder dirty money. Most of the time, multiple methods are combined to make the process as complex as possible. Later in this chapter, some methods will be explained further. Besides the considerable amount of methods, money laundering exists of multiple stages. This combination of multiple stages and methods makes the process of money laundering very complex.

2.3.2 Stages

Money laundering exists of three stages (Gilmour, 2013) (Schneider & Windischbauer, 2008). The placement stage, the layering stage and the integration stage. A visual journey of the money laundering process can be seen in figure 6. Although these three stages explain money laundering, this does not mean that each stage is automatically used in each money laundering case. This differs per case and per criminal.

The placement stage

In this phase, a criminal places the illegally obtained money into the financial system. This placing can be done via different methods. For example, via depositing cash, transferring money to a third person, money can be invested in real estate or luxury products, or it can also be used for consumer expenditure.

The layering stage

The second stage of the money laundering process is the layering stage. In this stage, it is all about increasing the difficulty of detection. The more complex the layering is done, the more difficult it is for authorities to trace the illegal origin of the money back. A series of methods can be used to make it as complex as possible. A car that is bought in the placement stage can be sold, multiple currency changes can be done, investments can be sold, and overseas deposits can be made.

The integration stage

The integration stage is the last stage of the money laundering process. This stage enables the dirty money to appear as licit money endorsed by a plausible explanation. Detecting the dirty money and its illegal origin would only be possible by receiving insider information. Once the money has entered the integration stage, the criminal can use the laundered money as regular money.

2.3.3 What are the characteristics of money laundering?

In criminology, the crime triangle describes the three necessary elements to commit a crime (Cohen & Felson, 1979). Gilmour (2013) determines that for money laundering to occur, there must be a motivated offender, a facilitator/money launderer and a place or process capable of facilitating the laundering of illicit funds. See figure 7. Each element will be discussed extensively, starting with the motivated offender.

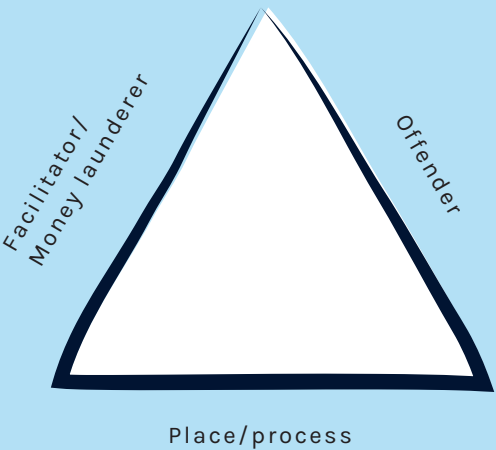


Figure 7: Crime traingle for money laundering

2.3.4 Motivated offender

The offender represents the criminal who is also likely to be the provider of the illicit money obtained through a predicate crime. The difficulty is that offenders have few handlers.

For money laundering, there are two different types of offenders. First, the provider of the illicit money and second, the facilitator/money launderer. The facilitator/ money launderer is responsible for carrying out the money laundering process. Sometimes these two offenders do not have direct contact because of a handler in between. Behind subversive crime and money laundering, there are often criminal networks at work instead of individual criminals.

Criminal networks can be seen as fluid networks of both criminal and non-criminal actors, who work parallel and constantly respond to each other. (Engers, Meijer & Barros, 2018)

Subversive crimes cannot be carried out by one criminal alone. Criminal networks and collaborations are essential. According to research, these networks have a strong adaptive capacity. They can respond and anticipate quickly to new interventions made by authorities (Korf, Luijk & Meijer, 2018). This was also confirmed during an interview with an officer of the Public Prosecution Service. This person mentioned that getting arrested is seen as a business risk in criminal networks, the possibility has been taken into account, and a plan B is already made.

According to Spapens (2008) criminal networks can exist of five different types of people:

- The organisers: they are criminal entrepreneurs who carry out criminal business processes. They have multiple contacts in the criminal network, and they have the management skills to do this.
- Financiers: these people are the ones providing investment capital to organisers.
- Intermediaries: the intermediaries can act as a (trusted) intermediary between organisers and bring them into contact with each other.
- Auxiliary workers: these are the unskilled personnel engaged in the execution of criminal business processes. They are the ones visible on the streets.
- Service providers: also called the facilitators. This can be people from the 'underworld' or 'upper world'. They are paid workers who have scarce knowledge or skills that are essential for the criminal network.

During the co-creating sessions and the expert interviews, it was a couple of times mentioned that it is difficult for the Public Prosecution Service to catch criminals that are high in the criminal network. Current approaches are mainly focused on minor criminals that use relatively simple constructed money laundering methods. It costs much more time to investigate the criminals high in the network. When the decision needs to be made between the easy to catch criminals or the higher in the network criminals, there is often chosen for the easy to catch criminals because these cases have fast results and immediate effect. This way of working is called the 'korte klap' in Dutch.

"When combating money laundering, the police units mainly limit themselves to 'low hanging fruit': taking criminal money as by-catch or cash that is found with criminals. The capacity for research into complicated money laundering constructions is often lacking." (Korf et al., 2018)

2.3.5 Facilitators

Facilitators are of vital importance to the existence of organised crime. Facilitators from the upper world are needed to launder dirty money. Without the collaboration of the upper world, criminals would not succeed. These contacts or 'red flags' threaten the legitimate environment (Gilmour, 2013). These facilitators possess particular knowledge or skills (professional or otherwise), enabling organised crime groups to carry out their criminal activities (Gilmour, 2013). Sometimes professionals are not aware of their facilitating function, but sometimes there is culpable involvement. Fijnaut et al. (1998) divide culpable involvement into two categories: actual culpable involvement and negligence. Culpable involvement means that the professionals are aware of the illegality of their client's activities. In this way, they can also be seen as an offender. Negligence refers to situations in which the culpable involvement of professionals cannot be ascertained. When warning signals were present, the professionals should have been alerted. These professionals could and should have known they were facilitating criminal activities. According to Gilmour (2013), first measures should be aimed at increasing awareness and integrity to avoid culpable involvement.

Not only literature but also multiple experts confirmed this in the interviews. One of the integrated safety teachers mentioned that society's resilience to subversive crime must be increased because most facilitators are not even aware that they could be a facilitator. A public prosecutor explained that there are three types of facilitators, the good, the bad and the ugly.

The good

These people are consciously competent; they actively screen their customers to be sure that they are not dealing with criminals. Integrity is an essential value for them.

The bad

These facilitators are consciously incompetent. They collaborate with other criminals on purpose; therefore, they can be seen as part of a criminal network. In the mentioned theory of Fijnaut (1998), this falls in the category of culpable involvement.

The ugly

These people are unconsciously incompetent. Without being aware of it, they offer their products or services to people in a criminal network. Sometimes these people are not even aware that their products or services are helpful for criminals. In the mentioned theory of Fijnaut (1998), this falls in the category of negligence.

Financial facilitators

Especially money laundering requires facilitators that have considerable expertise and resources; Soudijn (2012) calls them financial facilitators. A financial facilitator is therefore anyone who assists a criminal in some vital way with money laundering. Professionals such as lawyers, accountants and banking personnel play a vital role in money laundering processes (Soudijn, 2012). They deliver the following forms of assistance (Van de Bunt & Van der Schoot, 2003):

- Creating corporate vehicles or other complex legal arrangements such as trusts
- Buying or selling property
- Performing financial transactions
- Offering financial and tax advice
- Providing introductions to financial institutions

Besides legal professionals, accountants and banks, building societies, appraisers, gambling companies/casino operators, and estate agents can also function as financial facilitators (Gilmour, 2013).

Besides these facilitators, legal businesses and public administrations can also play a role in money laundering. Criminals often have their own companies that provide a cover for illegal activities. This concerns all kinds of businesses, such as import-export firms, restaurants, cafes and travel agencies. They serve as a cover for the logistics, the flow of money or money laundering activities (Van de Bunt & Van der Schoot, 2003). Besides these legal businesses, public administrations can also have a role in facilitating crime. There is evidence of the corruption of government agents that play a role by perpetrators of organised crime (Van de Bunt & Van der Schoot, 2003).

The above mentioned (potential) facilitators are also called gatekeepers. They are the ones that can prevent criminal money flows from passing through the financial system. Professions belonging to this group are subjected to various preventative obligations. This will be explained further in chapter 3.

2.3.6 Another characteristic: cash money

One sure thing is that cash plays a vital role in criminal circles (Kruisbergen, Leukfeldt, Kleemans, & Roks, 2018). This has been the case and will remain so, even though Western society has moved from cash to bank money (Soudijn & Akse, 2012). Where every cashless property or cashless transaction leaves a mark, cash can still pass anonymously from hand to hand. Soudijn & Akse (2012) also mention that cash could play an even more significant role because of the financial sector's stricter regulations.

2.3.7 What are the different kinds of methods that can be used to launder money?

Determining the place/process where each stage in the money laundering process occurs is problematic (Gilmour, 2013). The process can take many different forms; therefore, defining where it exactly took place is difficult. For each method, the place is different.

To understand the complexity of money laundering, it is essential to give some insight into the different methods used to launder dirty money. As mentioned in multiple expert interviews with public prosecutors, a social innovator at the police and RIEC Limburg, new methods of money laundering are constantly developed.

*"New technologies offer new opportunities for money laundering. Take a look at cryptocurrencies."
(public prosecutor)*

The WODC (The Scientific Research and Documentation Center) is the Ministry of Justice and Security knowledge institute. In 2019 they carried out a National Risk Assessment on Money Laundering (Van der Veen & Heuts, 2019). In this research, the 15 most threatening methods of money laundering are described. In the following part, these methods will be shortly described based on data from the Dutch National Risk Assessment (2019).

Money laundering via wire transfers by licensed banks

This money laundering method is often part of the other money laundering methods that will be discussed. This method is especially useful to integrate criminal money.

Example: ING systematically violated the Wwft (see chapter 3 for more information about this act). They did not properly fulfil their role as gatekeeper of the financial system. The bank should have noticed that certain flows of money that went through its customers' bank accounts were possibly criminal in origin.

Money laundering via structures by trust offices

Set up legal constructions with the help of (unlicensed) trust offices to conceal owners or the origin of money.

Example: A trust office did not report an unusual transaction of a customer to the FIU on time. They did not investigate the big transactions in sufficient depth.

Money laundering via offshore companies

Transferring criminal money to limited liability companies in countries with fewer controls and moving it further from there.

Example: A Dutch and British person used offshore bank accounts in Germany and Austria to launder criminal assets earned by them.

Money laundering via legal entities

Using legal forms to disguise identity or use activities of legal forms to explain the origin of money.

Example: A person purchased a house of 700.000 euro by using a fake foundation of which his brother was the director.

Money laundering via dealers of high-value services and goods

Bringing criminal cash into the financial system by purchasing expensive items such as watches, cars, art.

Example: A person obtained millions of euros by faking that he was trading expensive watches. There were large cash transactions, but these could not be based on the administrative records of his company.

Money laundering via trade-based structures involving services and/or goods

Cooperation between companies or legal forms to legitimise criminal money with commercial transactions.

Example: The payments of the export of potatoes and onions were not settled via the bank but with cash. A customer in Mauritania hands over money to an African broker who then contacts a fellow broker in the Netherlands. The broker in the Netherlands hands over the cash – presumably criminal in origin – to the Dutch agricultural companies. Banks accepted the cash deposits from the agricultural sector based on the declaration that potatoes or onions had been delivered in return for this money.

Money laundering via the use of intermediaries

The use of intermediaries – such as or straw men or frontmen – is often part of other money laundering methods. Criminals use this method to conceal their own identity and therefore reduce the chance of being caught. This method can be used in multiple ways.

Example: A person used two frontmen, who on paper appeared to be directors of companies to which he transferred illegal money. These front men were persons with debts who did not know how to run a business. Large amounts of money were transferred to the bank account of these fake companies.

Money laundering via investment institutions and companies

Use stock or fund trading to get criminal money into the financial system or to declare its origin.

Example: An investment company invests the accumulated capital of investors in financial securities. Investments are usually made through funding. These mutual funds can also be used by those who want to launder money.

Money laundering via ABC transactions

Explaining criminal income by reselling real estate with false equity.

Example: Person A purchases a property for 1 million euros, person B purchases the property some months later for 1.2 million euros from person A. Person B sells the property to person C for 1.5 million euros. The value of the property is still 1 million euros; they made 800.000 euros legal profit.

Money laundering via loan back arrangements

Place criminal money with another person (frontman, construction companies) and then borrow it back to appear as if it has been obtained legitimately.

Example: Two persons bought real estate in the Netherlands with the help of a mortgage from an international legal entity within their network. These arrangements disguised the fact that the money for these purchases was actually provided by themselves.

Money laundering via fictitious company turnover

Depositing criminal money as a company's turnover. Think of catering, nail salons or taxi companies.

Example: A person started a taxi company with 12 taxis. Private loans and turnover were falsified via the company. The stated turnover did not correspond with the data recorded by the taximeters.

Money laundering via cryptocurrencies

Depositing criminal money and receiving virtual currencies for it. These virtual currencies can then be used as payment or can be exchanged again for money.

Example: A bitcoin trader exchanged 11.5 million in bitcoins in a period of two years. The trader charged an unusually high commission for exchanging bitcoins. In this way, he guaranteed that his customers remained anonymous.

Money laundering via underground banking, including via unlicensed payment service providers

Depositing money with intermediaries so that it can be 'withdrawn' elsewhere, including hawala banking. Hawala banking is a way of transferring money without any money moving.

Example: An immense amount of cash money was brought into a particular company and then pumped around between multiple telecom companies in the Netherlands and abroad.

Money laundering via the physical movement of cash

Hiding money in vehicles, moving it with money mules (a person who transfers illegally obtained money), by mail, in goods or as apparently legal money transport between banks.

Example: At Schiphol a person was arrested with packages of money attached to his body. The person was unable to tell how he had obtained a large amount of money.

What is money laundering?

What are the consequences of money laundering?

The consequences of subversive crime in general were discussed earlier in this chapter. As money laundering is subversive crime, it contributes to these earlier mentioned consequences: harm to the financial and economic system; harm to the quality of life; damage to the ecological environment; violation of morality and the sense of justice; violation of the constitutional state and its institutions.

In this section, we dive further into the consequences by describing them in more detail for money laundering specifically. Unger (2018) made an overview of these effects. Figure 8 is based on the figure used in her report. The effects are divided into four categories: real economy, financial sector, public sector policymaking, and society.

The most relevant effects for the Netherlands are displayed in dark blue. The dark turquoise boxes are less relevant, and the light turquoise boxes are the least relevant for the Netherlands. The dark blue boxes will be discussed in more depth to give a better understanding of the consequences.

2.4

- Real economy treats
 - Change in output, income and employment:
Money laundering is not only having negative consequences but also positive ones. This one is a good example. Criminal money in the Netherlands comes from a great part from abroad. This is likely to have a stimulating effect on the financial services industry and create work for lawyers and financial experts. The Dutch economy and employment are therefore likely to benefit from money laundering activities.
 - More or less real economic growth:
Money laundering facilitates crime and corruption, negatively affecting economic growth. In addition, money laundering has a detrimental effect on financial institutions that are crucial for the proper functioning of the economy. On the other hand, money laundering can also have a positive effect on economic growth in a country if the money laundering and the crime behind it do not take place in the same country. The money laundering country may have the financial services benefits, but not the cost of the crime itself.
 - Changes in direct foreign investment:
The reputation of a country and the associated confidence of foreign investors can come under pressure if the financial and commercial sector is related to criminals and criminal acts.
- Financial sector treats
 - Profit:
The effect of money laundering on the financial sector can also be positive if financial institutions see money launderers as welcome customers. As long as money launderers see their anonymity guaranteed, they will not be very critical of the returns they achieve.
 - Reputations:
First, the financial institutions themselves are affected, as there is a direct link between money laundering and fraudulent employee behavior. Second, customers' trust in financial institutions is essential to the growth of those institutions and money laundering can damage that trust.
- Public sector policy making treats
 - Disruption of economic statistics:
Money laundering activities can cause errors in economic statistics, which in turn can lead to wrong economic policies. There are two reasons for this. First, money launderers make different considerations than ordinary citizens and businesses when making their investment choices. Second, money laundering can distort economic statistics, as it is difficult to pinpoint the exact magnitude and effects of the phenomenon on the economy.
- Society
 - Although there is no dark blue box in the domain of society. Society could play an important role. During the expert interviews it was multiple times mentioned that society should be more aware of these indirect negative consequences of money laundering. They should now this because that could help to create more urgency and limit acceptance of money laundering.

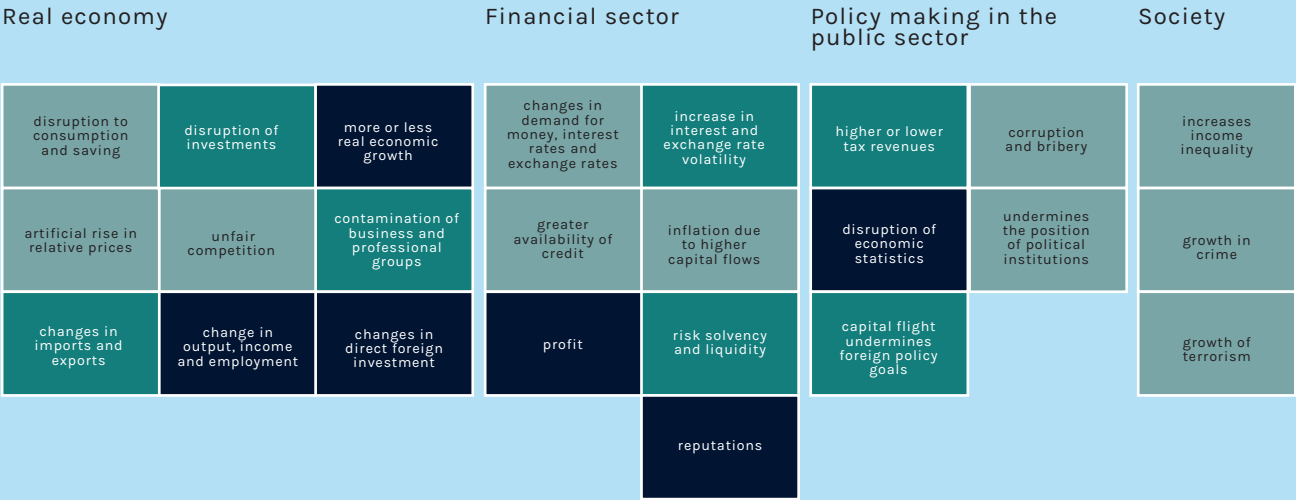


Figure 8: Consequences money laundering overview (Unger, 2018)

What is money laundering?

Important insights overview

2.5

In this section, the most important insights of this chapter are summarised.

Money laundering is, in comparison to other forms of crime, relatively invisible. Most people are therefore not aware of it. It has no direct victims, and the negative consequences are indirect. For these reasons, money laundering is not prioritised. A shooting gets immediate priority and investigation capacity, which is logical.

Investigating money laundering requires more time than other cases. Focussing on easy to catch criminals is often prioritised. That is a pity because money laundering is not only a crime in itself but also a symptom of other serious forms of crimes, like drug crime and human trafficking.

A dangerous characteristic of money laundering is the interweaving of the upper- and underworld. This makes the undermining effects of money laundering significant. It blurs the line between the legal and illegal world.

While researching money laundering, the discovery was made that there is no clear information source for gathering data. If money laundering is dangerous and a threat to our country, why is all information fragmented? Much time went by before receiving data and valuable documents.

Chapter 3

The response against money laundering

To understand the context of money laundering, the current approaches against money laundering and the multiple stakeholders involved in these approaches were explored.

3.1 What are the current approaches against money laundering?

3.2 Which stakeholders are involved in tackling money laundering?

3.3 The role of the Public Prosecutions Service

3.4 Why is Limburg attractive for money laundering

3.5 Important insights overview

The response against money laundering

What are the current approaches against money laundering?

3.1

Understanding the context gave a clear perspective on how money laundering is currently approached and which role multiple public organisations play in tackling this problem. In the phase, the following main questions were answered: How is money laundering tackled and who is involved in tackling money laundering?

3.1.1 The approaches

A lot of different parties in the Netherlands are involved in de prevention and repression of money laundering. There are collaborations, covenants and laws that ensure that many parties are involved.

Anti-Money laundering act

A vital law against money laundering is The Dutch Anti-Money Laundering and Anti-Terrorist Financing Act (Dutch WWFT). The Act is aimed at public and private organisations and entrepreneurs that could consciously or unconsciously facilitate money laundering or terrorist financing. These professions are the gatekeepers of our financial system, as mentioned in chapter 2. Professions and organisations that are covered by this act are the following:

- Accountants
 - Lawyers
 - Banks
 - Tax advisors
 - Investment institutions
 - Investment firms
 - Life insurance brokers
 - Payment service agents
 - Payment service implementers acting for a payment service provider with a licence from another EU member state
 - Payment service providers
 - Natural or Legal persons that put their address at another's disposal
 - Electronic money institutions
 - Traders/sellers of goods
 - Institutions for Collective Investment in Securities (ICBE)
- Institutions, not being banks, that carry out banking activities
 - Civil-law notaries
 - Pawnshops
 - Casinos
 - Valuers
 - Trust offices
 - Safe custody services
 - Money-exchange institutions

In this law, these entities are obligated to report unusual transactions to FIU-the Netherlands. A subjective indicator that applies to most entities is the following: A transaction for which the entity has reason to believe that it might be related to money laundering or terrorism financing.

Objective Indicators of unusual transactions differ per entity. For agents and brokers in properties, for example, it is remarkable when the commission is paid in cash. It is unusual for a dealer in goods to receive transactions in which payment in cash amounts to 10,000 euro or more. When entities fail to report unusual transactions, there are consequences.

For this act, there are six regulators that supervise certain entities to make sure that the rules are followed:

- De Nederlandsche Bank (DNB)
- Het Bureau Financieel Toezicht (BFT)
- Het Bureau Toezicht Wwft (BTW)
- De Autoriteit Financiële Markten (AFM)
- De Kansspelautoriteit (Ksa) supervises casinos.

FIU-the Netherlands receives all the unusual transactions reported by the entities and regulators mentioned above. By researching the reported unusual transactions, FIU-the Netherlands decides which unusual transactions can be labelled as suspicious. When the transaction is tagged as suspicious, it can be used as a signal for money laundering for the Dutch investigation services and their research.

Convenants & collaborations

Besides this act, there are also many sorts of collaboration established. All these different collaborations made it challenging to create a clear overview of all the approaches. In each collaboration, the most important stakeholders are involved, but the focus is somewhat different. Each stakeholder will be discussed later; first, these collaborations are shortly discussed.

- iCov

iCOV stands for information box Criminal and Unexplained Assets. It is a collaboration of various government organisations and regulators. iCOV helps these partners through data-driven reports in the fight against money laundering, tax evasion and fraud.

- Financieel Expertise Centrum (FEC)

The Financial Expertise Center (FEC) is a partnership between authorities with a supervisory, control, prosecution or investigation task in the financial sector and was established to strengthen the integrity of this sector.

- Integrale Afpakteams (Integral collection team)

There exist multiple integral collection teams in the Netherlands. In these teams, multiple stakeholders work together to tackle money laundering cases and investigations by focusing primarily on the recovery of unlawfully obtained (criminal) assets.

- OCFL - Organised Crime Fieldlabs

Each year some new Organised Crime Fieldlab projects are born. In these one or two years during projects, multiple stakeholders form a team to tackle a particular local crime issue. The goal is to come up with a solution to this issue by working together.

- MIT - Multidisciplinair Intervention team

This team is just new and is focused on analysing criminal business processes by working together with different stakeholders.

- Taskforces
There exist multiple task forces that also focus on specific cases by sharing information between multiple stakeholders.
- Anti Money laundering Centre (AMLC)
The AMLC is a knowledge and expertise centre where public and private parties work together nationally and internationally to combat money laundering.
- RIEC
Ten Regional Information and Expertise Centers (RIECs) and the National Information and Expertise Center (LIEC) focus on combating subversive crime on an administrative basis. They connect information, expertise and strengths from the various governmental institutions.

3.1.2 Downsides of these approaches mentioned by the experts
During the expert interviews and creative sessions with public prosecutors, these collaborations were discussed regularly. They mentioned some downsides of these collaborations, which will be shortly discussed here.

According to a public prosecutor in the interviews, the problem of most approaches is that most approaches are focused on repressing money laundering instead of preventing it. Another downside of some new approaches mentioned in the interviews is that they are not supported by everyone in the hierarchy of some organisation. A public prosecutor working in one of the mentioned integral collaborations said that some people are not allowed by their supervisor to spend much time on the collaboration project. Furthermore, there is ‘talk fatigue’ among people and organisations; many initiatives keep talking without taking targeted action. This is because each party has its interests that need to be met. The last-mentioned downside is that there does not exist one clear overview of all the current initiatives.

The wheel is invented twice by different initiatives, which is a waste of time.
(Public prosecutor)

Working differently than usual, including experimenting and innovative thinking, are pushed away by capacity and culture.
(Social innovator Police)

Criminals are creative and work agile. The government is not able to work that same way.
(Professor or regional law and administration)

The response against money laundering

3.2 Which stakeholders are involved in tackling money laundering?

Money laundering is not only a problem of the Public Prosecution Service. Multiple organisations want to tackle this form of crime. In this section, it will be explained what each stakeholder has to do with money laundering. In figure 9, a stakeholder overview can be found.

Public Prosecution Service

The Public Prosecution Service is responsible for detecting and prosecuting criminal offences. Money laundering is a criminal offence. Therefore, the Public Prosecution Service often deals with money laundering cases. It is often related to other criminal offences, for example, drug crime. Together with the police, the public prosecution officer is responsible for the investigation into suspects. Together they gather the evidence before the Public Prosecution Service can prosecute these suspects. Later in this report, the responsibilities of the Public Prosecution Service will be discussed more in-depth.

RIEC

The ten RIECs (Regional Information and Expertise Center) and the LIEC (National Information and Expertise Center) support government services in tackling organised crime. All ten RIECs are divided over specific regions in the Netherlands. The RIECs aim to stimulate cooperation and make the government and society more resilient to combat undermining.

The RIEC's bring government services together in each region to tackle local problems that consider subversive forms of crime. They exchange information and indicate to the RIEC when they encounter signals of subversive crime. When such a signal is received, the information will be gathered together, and the RIEC will decide which administrative government service has the best administrative (law) instruments to tackle the problem by doing an intervention. If criminal intervention is indicated, the RIEC will advise the Public Prosecutor's Office to this end. This integral approach is relatively new but very promising.

Money laundering plays a significant role in the cases that are dealt with at the RIEC. This will be future discussed in section 3.4.

FIU Finance Intelligence Unit - The Netherlands

FIU-the Netherlands contributes to the national and international fight against money laundering and financing of terrorism. (About the FIU | FIU-Nederland, n.d.). Under the Money Laundering and Terrorism Financing (Prevention) Act (Wwft), FIU-the Netherlands is the organisation to which entities with an obligation to report should report unusual transactions. Payment in cash with an amount of

10,000 euro or more is an unusual transaction. Companies and professionals that belong to these entities that need to report are, among others, banks, casinos, accountants, lawyers, real estate agents and dealers in goods. With its analysis of reported unusual transactions, FIU-the Netherlands uncovers money flows that can be linked to money laundering, the financing of terrorism, or underlying crimes. After the transactions have been declared suspicious by the head of the FIU-the Netherlands, they are put at the disposal of various law enforcement and investigative services like the police.

One flaw of the FIU, mentioned in the experts' interviews with an employee of the FIU, is that it is not possible for entities to report anonymously. For an estate agent in a small municipality, who suspects that he is dealing with a criminal customer, it is a risk to report an unusual transaction to the FIU because he cannot do it anonymously. When the criminal would be prosecuted and hear the charges against him, he will know precisely that the tip came from his local estate agent.

FIOD The tax information and investigation service

The FIOD is the investigative service of the Tax and Customs Administration. They detect and combat financial and tax fraud. Based on fraud signals, they start an investigation to gather evidence and bring the suspects to court, often in collaboration with the Public Prosecution Service.

Police

The police are involved in multiple ways involved by tackling money laundering. They receive suspicious declared transactions from the FIU. They are responsible for conducting investigations in collaboration with the Public Prosecution Service, and they receive reports done by people.

AMLC Anti Money Laundering Centre

The AMLC is a knowledge and expertise centre where public and private parties work together nationally and internationally to combat money laundering (Wie zijn wij en wat doen wij?, n.d.). The AMLC contributes to the formulation of new money laundering typologies; they describe phenomena, start extensive money laundering investigations, and build and manage a unique data position. All this in connection with the cooperation partners. These partners are the police, the Public Prosecution Service, the Financial Intelligence Unit (FIU), the FIOD, banks, accountancy firms, and civil-law notaries.

Municipalities

Together with the Police and the Public Prosecution Service, the mayor forms the local triangle. In this triangle actions of the police are coordinated. In doing so, the police must consider the local priorities of the municipality and have an investigation task with regard to the Public Prosecutor of the Public Prosecution Service. During the expert's interview, there was an interview done with a mayor and a security officer. The mayor explained that there is tension in her work regarding crime. "I am a crimefighter and at the same time head of the community." Mayors get more and more authority nowadays to tackle crime, but at the same time, they want to be accepted by their residents. This can be difficult to work with sometimes. Furthermore, she recognised that it could be difficult, especially in a small village, to report others. In a village, everything comes close quickly, which makes it challenging during a criminal investigation to report. Another disadvantage is that there is a limited budget among municipalities to spend time on tackling crime.

The security officer said that it is sometimes difficult to gain trust from entrepreneurs in their municipality. Municipalities take action to organise meetings for entrepreneurs that could possibly be facilitators for money laundering, but entrepreneurs do not like that. They see the municipalities as a party that makes their work difficult by having many rules. This was also confirmed by another interview done with a Centre Management organisation.

"The municipality has an information position that should be put to good use." One of the integrated safety teachers, mentioned this. A municipality has much information that they sometimes do not even know that it could be helpful for the Public Prosecution Service. The information exchange between municipalities and the Public Prosecution Service could be improved.

Citizens

In some expert interviews, citizens were also considered as a crucial potential stakeholder in tackling money laundering. At the moment, they are not actively included in approaches, but they can report it.

Every citizen is a potential witness.
(Criminologist)

Citizens are the ears and eyes of society.
(Social innovator Police)

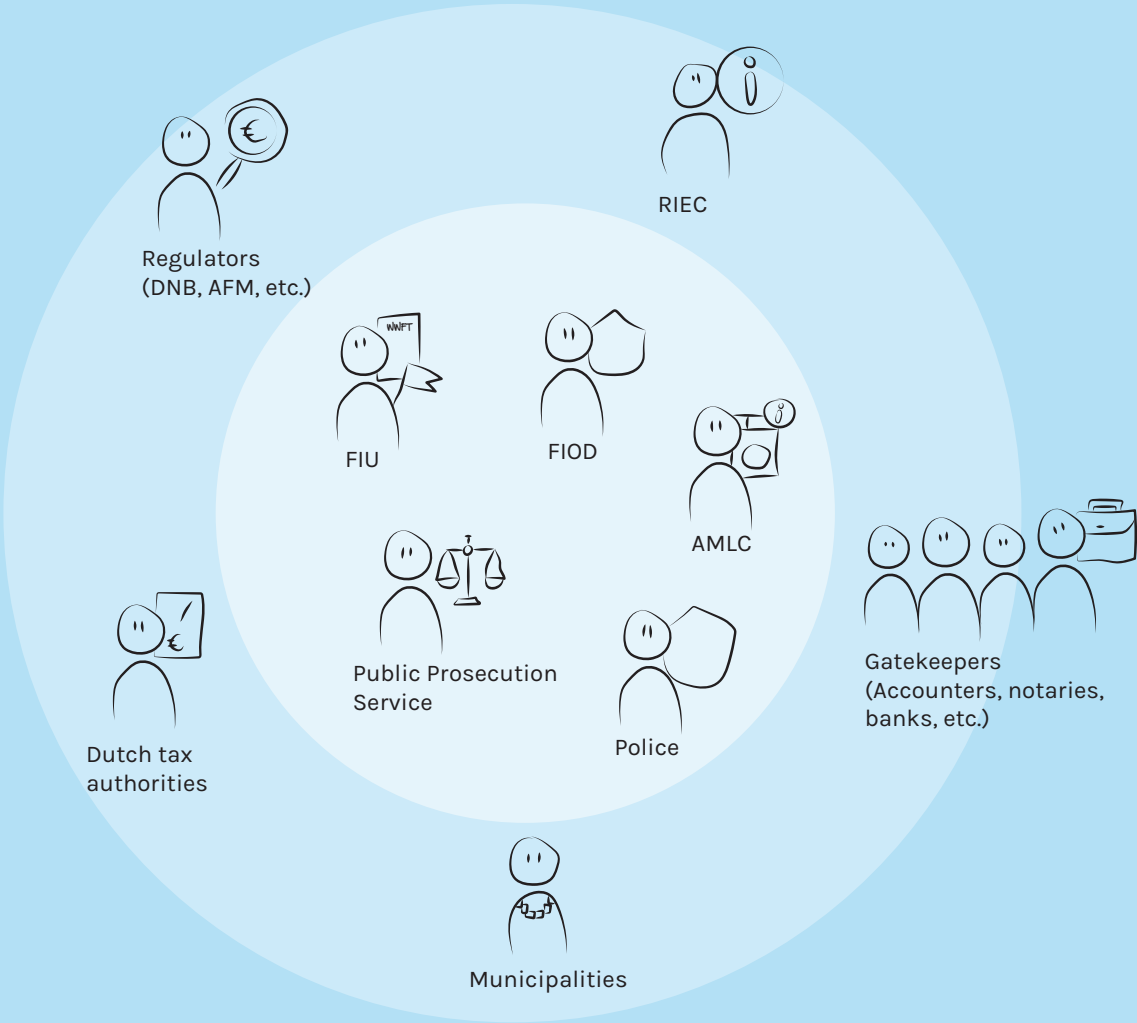


Figure 9: Stakeholder map

The response against money laundering

The role of the Public Prosecution Service

3.3

To identify possibilities for the Public Prosecution Office, it is essential to understand how the company works and its main tasks. To do this, we need to dive into the judicial system first.

Justice is a core value of the Dutch rule of law. If we want to live together with almost 17 million people in peace, people need to obey laws. When a person breaks one of these laws, it is essential to punish him or her appropriately. Someone must be only penalised if it is established that that person is guilty of a criminal offence. This requires research and independent jurisdiction. The Public Prosecution Service and the courts together make up the judiciary.

The court system in the Netherlands comprises different areas of law and a variety of bodies. The areas of law are divided into 3 categories (Ministerie van Justitie en Veiligheid, 2018):

- Civil law (also known as private law)
- Administrative law
- Criminal law

The Public Prosecution Service is only concerned with criminal law. It, therefore, has no involvement in civil matters such as rent disputes, labour issues or divorce proceedings.

They are responsible for detecting and prosecuting criminal offences. It is the only body in the Netherlands that can determine whether someone should appear before a criminal court, and if so, for which criminal offence.

The Public Prosecution Service acts for society. The Public Prosecution Service work aims to ensure that perpetrators receive appropriate punishment, that victims and next of kin feel that someone is standing next to them and that society thinks that the law is in good hands with the Public Prosecution Service.

3.3.1 What are the main tasks of the Public Prosecution Service?

"The prosecutors at the Public Prosecution Service have ultimate responsibility for investigations and – especially where serious offences are concerned – they supervise the police during the investigation. Throughout the process, the public prosecutor ensures that the police follow all the rules and procedures laid down by law and take account of all relevant information."

(Ministerie van Justitie en Veiligheid, 2019)

- Supervising the police in the investigation of criminal offences
- Prosecuting criminal offences, and bringing suspected offenders before the courts
- Dealing with criminal offences without involving the courts

3.3.2 How is the Public Prosecution office organisationally divided?

The Public Prosecution Service employs around 5,000 people, including some 800 public prosecutors. The Public Prosecution Service is a national organisation divided into ten regions, see figure 10. The organisation's office (arrondissementsparket) in a given area is located at the district court (rechtbank) serving that region. A Chief Prosecutor heads every office of this kind. In this project, there was a close collaboration with the organisation's office in the province of Limburg. Every organisation's office has multiple prosecutors, each with a unique specialisation.

3.3.3 How does the Public Prosecution Service receive money laundering cases?

There are multiple ways a money laundering case ends up with the Public Prosecution Service. We will explain the four main ways that the Public Prosecution Service receives money laundering cases:

1. Via basic criminal investigation by the police

It could be discovered that money laundering is also suspected during a criminal investigation besides the original criminal offence. Depending on the case, there are two options: first, the financial aspect can be considered. Second, they will research what happened with the earned money of the crime. A new investigation starts based on the money laundering suspicion based on the first criminal investigation that was focused on the crime itself.

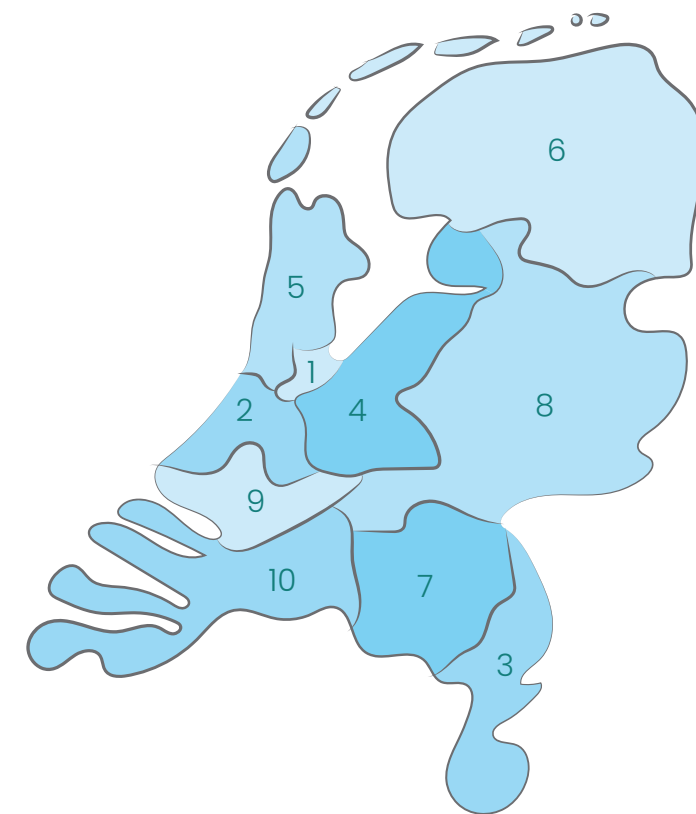


Figure 10: The 10 organisations offices of the Public Prosecution Service

2. Via Crime Stoppers Netherlands (Meld Misdaad Anoniem)

A signal is reported to Crime Stopper Netherlands by a citizen. The signal will be reported to the police when it is sure that the reporter can stay anonymous. When prosecution is necessary, according to the police, the Public Prosecution will be involved.

3. Via the criminal intelligence team (Team Criminele Inlichtingen) of the police

The criminal intelligence team of the police collects information on serious crimes. Her primary sources are informants: people who secretly pass on information to the police. People can also report signals by the TCL.

4. Via RIEC casuistry

When a signal comes in at RIEC Limburg, they advise which partners need to tackle a case. RIEC Limburg can decide that a case requires a criminal intervention from the Public Prosecution Service.

3.3.4 How much money laundering cases does the Public Prosecution Service bring to court?

To get a better view of the amount of money laundering cases of the Public Prosecution Service in Limburg, data in collaboration with the organisation's office in Limburg, was retrieved. The data was collected on the 26th of November 2020.

From January first 2020, till November 26, 2020. There were 291 cases in which money laundering was included in the charges of a Public Prosecutor. See figure 11 for more information about this data.

When talking about money laundering in legal terminology, the following articles of the law are meant:

Deliberate money laundering	Art. 420bis
Simple intentional money laundering	Art. 420bis.1
Debt money laundering	Art. 420quater
Simple guilt money laundering	Art. 420quater.1
Common money laundering	Art 420ter lid 1
Profession or company	Art 420ter lid 2

Art. 420bis is most common in the 291 analysed cases, 275 of them belong to that article.

3.3.5 Challenges for the public prosecution service

During the interviews with the experts, multiple challenges were mentioned in tackling money laundering cases. First of all, some public prosecutors do not prefer to work on money laundering cases. Other forms of crime are more exciting and important because money laundering does not have direct victims. This is a broader urgency issue that plays among the Public Prosecution Service. In comparison to other crime cases, money laundering does not have the same urgency. The main reason is that money laundering does not directly negatively impact society and a direct victim like a murder or sex offence. When cases are prioritised, money laundering ends up at the bottom of the list. Besides this, many prosecutors think it is very complex to work with money laundering because of the financial aspect that plays a significant role. Furthermore, a mentioned challenge is the dependence on the police; the Public Prosecution Service depends on the capacity of the police in investigations. This can sometimes hinder the approach they want to take if there is a capacity problem.

291 cases in total
arrived from January 1, 2019 to November 26, 2020 at
the district of Limburg

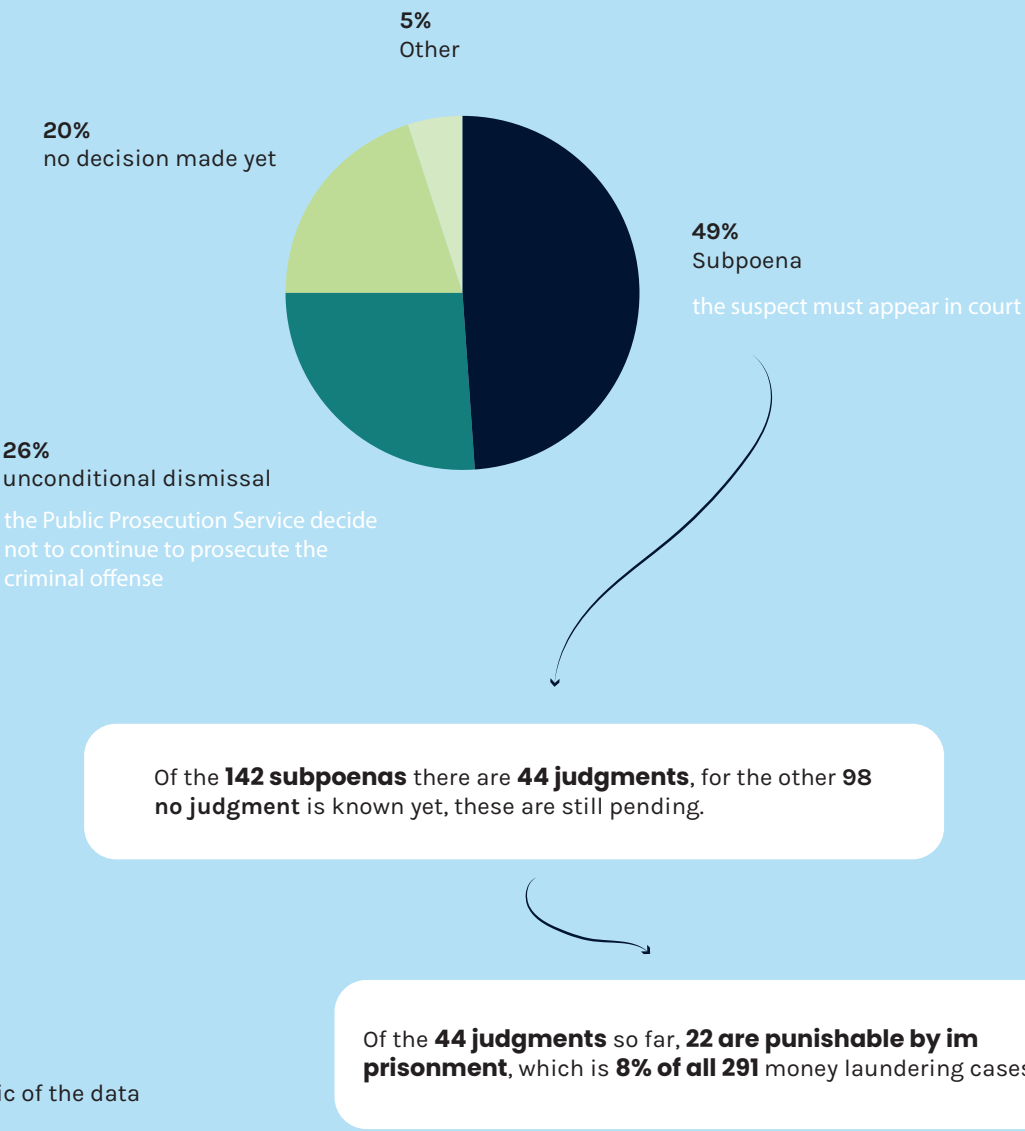


Figure 11: Infographic of the data

The response against money laundering

3.4 Why is Limburg attractive for money laundering?

Criminal activities take place throughout the whole country and all provinces in the Netherlands. However, some provinces are extra attractive for criminals to carry out illegal activities. These provinces are attractive because they offer unintentionally pleasant criminal circumstances by having a beneficial location near multiple borders and rural areas where it is easy to hide illegal activities. A province that falls into this category is the province of Limburg.

Undermining Image Limburg

Limburg's undermining image is a collection of signals and phenomena of criminal presence and activities within the province of Limburg's geographic area (RIEC, 2020). This undermining image is based on the common threads from the 31 integral undermining pictures drawn up by the RIEC Limburg for all the 31 Limburg municipalities. The sources for this chapter are documents from RIEC-LIEC and RIEC Limburg.

3.4.1 Crime opportunity structures

When carrying out criminal activities and investing obtained profits, criminals depend on the possibilities offered by the regional infrastructure and its facilities: the so-called opportunity structures for undermining crime. In the province of Limburg, multiple factors provide this opportunity structure.

Geographical location

The province of Limburg borders both neighbouring countries of the Netherlands, Belgium and Germany. Especially for drug criminality, this location close to multiple borders is extremely attractive. There is a high demand for Dutch drugs; the geographical location makes it easy for foreign drug users and traffickers to enter the Netherlands via this province.

Furthermore, the easy access to Germany and Belgium create the opportunity for criminals to spread their activities and possessions by moving them abroad. That is beneficial because authorities have no insight into activities that take place abroad. Besides these country borders, the province borders with Noord-Brabant and Gelderland are also beneficial. Criminals can be active in different provinces. The management and competence area of different government services (municipalities, provinces, tax authorities and police) split over the various provinces. This separation makes cooperation between the services, but also within, more complex.

Infrastructure

The province of Limburg has a good infrastructure and various logistics hubs like highways, waterways, ports and airports.

The high- and waterways connect the province to the rest of the country. The A2 highway goes directly to the Randstad. The rivers and canals, the Maas, the Julianakanaal and Zuid-Willemsvaart connect Limburg to Rotterdam and Antwerpen. This infrastructure connects different regions. Ports function as logistical hubs that are ideal for the import and export of illegal goods belonging

to criminals. Criminals can operate relatively anonymously in ports; there is little supervision, and registration is not always necessary.

Furthermore, Limburg has multiple airports close by, Eindhoven airport, Brussels Airport and Dusseldorf Airport. They also have their airport: Maastricht Aachen Airport. National investigations by the Royal Netherlands Marechaussee have shown that airports play an essential role in the international transport of illegal goods, such as (raw materials for the production of) drugs, human trafficking and money laundering practices.

Rural area

About three-quarters of the province of Limburg consists of rural areas (CBS, 2015). There is less supervision and social control in this rural area with afforestation and unlit and unclear country roads. Research from Gies et al. (2016) shows that drug laboratories and cannabis farms are increasingly found in sheds in rural areas. Professionals mention that many signals are based on conjectures and gut feelings. The rural area is, therefore, a blind spot for a large part of the municipalities.

Risk locations

Risk locations are locations that offer opportunities for the development of the various facets of undermining crime. These risk locations need extra alertness from authorities.

Locations that fall under this category are first industrial and business parks. The (social) control and cohesion within these areas are often lower than in an average residential area. There are enclosed areas, and not many people are present here outside office hours. Others perceive less nuisance, and transport movements are generally less noticeable in an industrial park.

The second risk location is trailer parks. The closed nature of trailer parks ensures that these parks cannot or can hardly be entered unnoticed by outsiders. Criminal activities that take place in these parks remain protected. (Kruisbergen, Van de Bunt and Kleemans, 2012) The last-mentioned risk location is recreation and holiday parks. People who want to stay out of sight of the government often stay at holiday parks. Furthermore, dilapidated recreation parks are interesting objects for criminal investments to transform them into luxurious parks (LIEC, 2019).

Socio-economic factors

Socio-economic factors can contribute to an environment in which subversive crime can gain a foothold. Average income, social security payment and education level of the population are essential here, as well as the WOZ values of houses. In the province of Limburg, some of these numbers are lower than the national average. Another factor is the vacancy of buildings. In Limburg, there is more vacancy of buildings than in the rest of the Netherlands. Both the low WOZ values of houses and buildings' emptiness attract criminals because they are ideal places to engage in illegal activities.

Culture

The last factor in the crime opportunity structure of Limburg is culture. Limburg contains many villages with a village culture. The social cohesion and control in these villages can work in two ways. It can prevent unconventional behaviour or create a closed community where people do not betray each other and trust in the goodness of the other. Not only this village culture but also the urban culture has advantages for subversive crime. In large cities with a high population density, it is easier for criminals to work anonymously. Moreover, these cities have many facilities, such as cafes and retail shops that can be used as a cover, meeting places, or stash places for drugs.

3.4.2 Subversive crime in Limburg

RIEC Limburg describes in their research three main themes in subversive crime that appear in Limburg. These themes are drug crime, human, trafficking and money laundering. Because the focus of this project is on money laundering, only that theme will be covered in depth.

Money laundering in Limburg

There is a close relationship between drug crime and money laundering. Many criminals involved in drug crime can also be related to money laundering. As said earlier in this report, this link is not surprising. The main goal of drug criminality is, after all, monetary gain (Faber, 2013). This illicit money cannot directly be used in the financial system; that would be too obvious. Laundering this illegal money is needed to be able to use it in the financial system. This need is also seen in the annual figures of 2019 of the RIEC-LIEC (2020). See figure 12. From the 96 RIEC cases in 2019 in Limburg, 63 times played the theme of money laundering a role in the cases. Expressed in percentages, that is almost 65% of all cases in 2019.

As explained earlier, there are many methods to launder money. RIEC Limburg describes four main methods that came to the front in their research. These methods are:

1. Companies as cover

The use of companies for money laundering is the most common form of money laundering. Companies are often used by criminals as a cover to conceal criminal money flows.

Cash-based businesses such as catering and retail are particularly suitable for this form of money laundering. This money laundering method is often characterised by high turnover and profit margins against limited customers. Besides these fake businesses, actual running companies can also be used for money laundering. For example, a restaurant can have many customers, generate high revenues and appear fiscally healthy at first glance. However, this also offers opportunities to blend criminal money unnoticed into the natural money flows.

In addition to catering and retail, companies in the personal care sector are often mentioned concerning money laundering. Think of hairdressers, nail salons, beauty salons, tanning salons. These personal care companies are attractive for criminals for a couple of reasons: the lack of a permit requirement, a few or no requirements for study diplomas or investments and turnovers can be manipulated relatively easily (Pest et al., 2012). Other sectors that are more often mentioned in relation to money laundering are the car sector, telephone shops, horse trade, metal recycling companies and construction and DIY companies.

2. Real estate

A second common form of money laundering found is money laundering through the purchase of real estate. The real estate sector is known to be prone to abuse by criminals because of its size, the generally high returns and the lack of transparency of both value and pricing, as well as the lack of transparency in the transfer of real estate (Soudijn & Akse, 2012) (Kruisbergen, Kleemans en Kouwenberg, 2015). There are multiple methods used to launder money in real estate. A commonly used way is to purchase real estate with (partly) dirty cash without taking out a mortgage. Another method is that high mortgages are provided based on false documents, while the criminal receives benefits or has too little income to obtain such a mortgage. This mortgage is, in these cases, often paid with illicit money. A third method is to use the ABC method. In this form of money laundering, a property is sold at least twice within no more than six months. Each time the price gets higher, so the dirty money can efficiently be invested.

96 RIEC-cases were handled in total in the year 2019 at RIEC Limburg

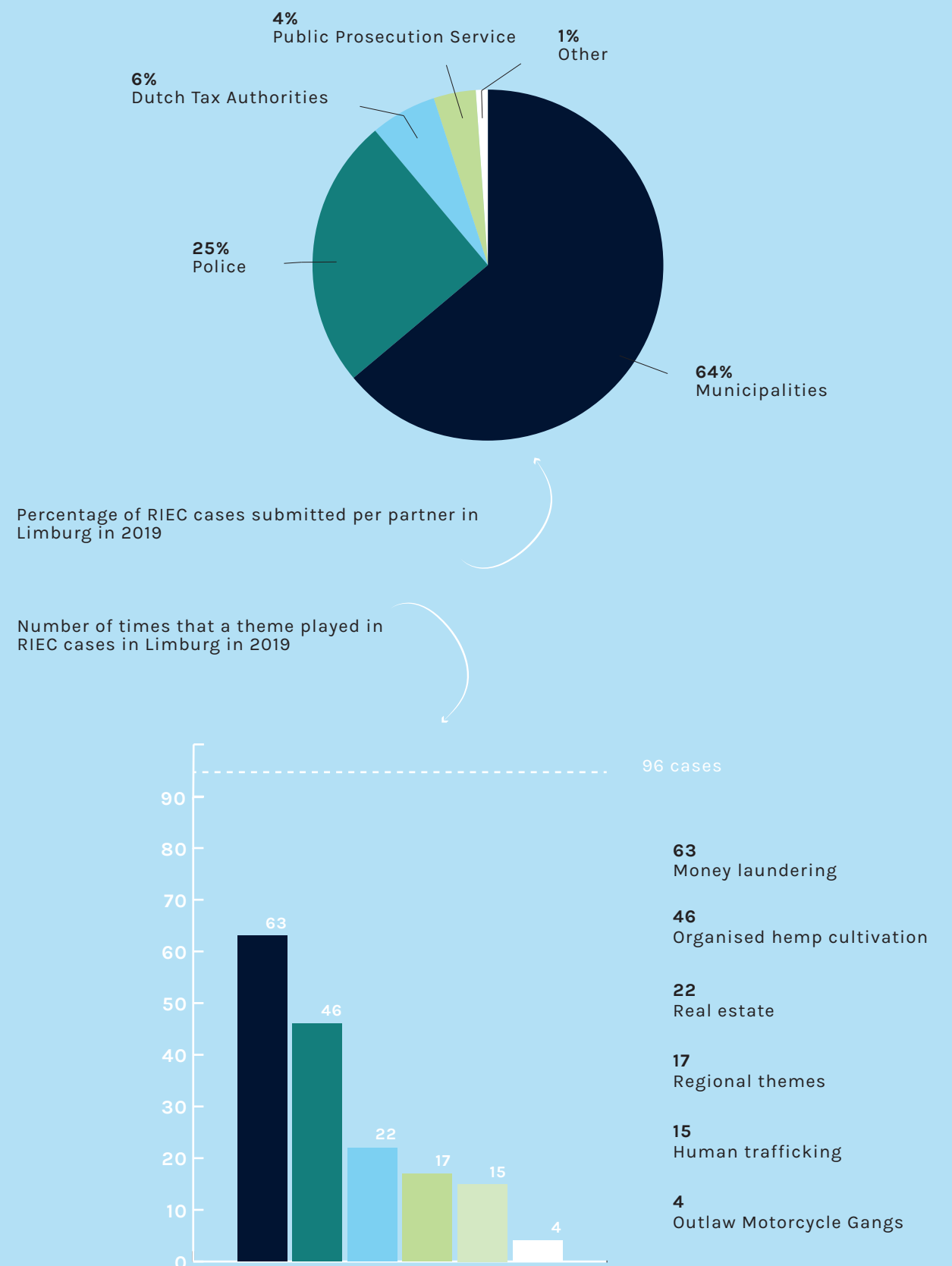


Figure 12: RIEC Limburg data overview cases 2019

3. Concealment of possessions

The third common method is the concealment of possessions. In this method, criminals try to hide their possessions for the government and tax authorities. Criminals can park their assets abroad by having real estate or vehicles in other countries. Alternatively, they live in Belgium or Germany and carry out their criminal activities in Limburg. Different concealment methods include registering property and other expensive possessions in someone else's name, using rental cars and using straw man constructions. In these constructions, a person without specific skills is pushed forward by a criminal to hide the criminal's actual ownership. Trust offices are also used to conceal ownership from the government through certification of goods or shares.

4. Inexplicable capital

In Dutch, criminals belonging to this method are called 'patsers' and 'windhappers'. 'Patsers' spend their illicit money on luxury items that cannot be justified from their registered income. They have expensive clothes or jewellery or drive around in expensive cars. 'Windhappers' do not show off their wealth, but they also have no legal sources of income to support themselves.

Blindspots

Regarding money laundering there are a couple blind spots in the region of Limburg (RIEC-LIEC, 2020). Blind spots are points where it is assumed that money laundering is also taking place, but signals are not strong. For money laundering the two most important blind spots are criminogenic branches and facilitators. There are suspicions within Limburg about the misuse of a number of branches as a cover for criminal activities. Think about hair dressers, tanning salons, car rental companies, cell phone repair shops and the horse industry. Facilitators are an essential part of money laundering. There are some signals in the province of Limburg of people that facilitate subversive forms of crime like money laundering.

The response against money laundering

Important insights overview

3.5

In this section, the most important insights of this chapter are summarised.

Tackling money laundering is only possible when working together. Different (governmental) organisations have different expertise and knowledge. Combining these is the best way to do something against money laundering. This is called the integral approach. An important question that arose during this phase was: Are the organisational cultures suitable for this? Working together requires putting the collective interests over the individual, organisational interests. This will happen when the sense of urgency is high enough among all the organisations, but is this the case at the moment?

Furthermore, criminals and governmental organisations fight an unequal battle. Criminals organisations are flexible and fluid, which makes them easily adaptable to new situations. Governmental organisations, on the other hand, are conservative. They want to avoid risk as much as possible. For this reason, governmental organisations lag behind the working style of criminals. Money laundering is a complex problem. Snowden & Boone (2007) suggest in their cynefin framework that the right response for complex problem situations is to create environments and experiments that allow patterns to emerge and use methods that can help generate ideas. A danger signal that Snowden & Boone (2007) describe is the temptation to fall back into habitual, command-and-control mode.

The Public Prosecution Service is responsible for detecting and prosecuting criminal offences. They are the ones that investigate money laundering cases and bring them to court. An important challenge in tackling money laundering among the Public Prosecution Service is that some public prosecutors do not prefer to work on money laundering cases. It is seen as complex, and they prefer to work on cases where direct victims are involved. In the integral approach and in tackling money laundering in general, the Public Prosecution Service plays an important role. They are the ones that can really make a difference by prosecuting someone and leading investigations. If they are not taking urgent action? Who will do it?

Chapter 4

Synthesis

The synthesis chapter corresponds with the third step of the design process. In this phase, an experiment with multiple methods was done to determine which approach would visualise the system of money laundering the best and bring the most valuable intervention opportunities.

- 4.1 The experiment
- 4.2 GIGA-mapping
- 4.3 VIP-method
- 4.4 Causal-loop diagram
- 4.5 Reframing

Synthesis

The experiment

The extensive research phase of this project gave much clarity about the process of money laundering, the multiple methods and the involved stakeholders. This knowledge was necessary to gain confidence in this unknown field and to empower the intervention ideation later in the project. After finishing the research, there was a need for having a clear overview of all the gathered data. The goal was to grasp, embrace and mirror the complexity of money laundering by making it visually tangible. By doing this, the underlying goal was to find opportunities in the current system to intervene.

4.1.1 Exploring methods to design for money laundering

In this phase of the project, multiple synthesising methods were used to find the most suitable way in using and synthesising the data of the research phase. The four different methods used for sense-making were: developing a GIGA-map, using the Vision in Product (ViP) design method, creating a causal loop diagram and using the reframing method. In this chapter, each of these methods will be explained and reflected on regarding the two goals:

- Grasp the complexity of money laundering by making it visually tangible.
- Use the resulting visualisation as a means to find opportunities for intervening in the system.

4.1.2 Why the need for visualisation?

In all methods, visualisation played a vital role. This is because visual thinking and visualisation function as a tool for analyses, processing, and communication.

We can form mental images in our head, but we do much better when those images are out in the world, on paper, or on a computer screen.
(Colin Ware, 2008)

In his book Visual Thinking for Design (2008), Colin Ware explains that visual thinking is an extension of your brain, like a hammer is for your hand. Visual thinking helps in the process of allocating attention and in the process of searching for patterns. By making all the research visual, the goal was to find patterns and connections between the different research topics. During the project, data visualisation was often used to clarify and validate decisions and open up discussions. Especially in times where interactions are mainly taken place digitally, visualisation helps to convey a message.

4.1

Synthesis

GIGA-map

4.2

To make sense of all the gathered data by making it visual, the visual thinking method GIGA-mapping was used first. GIGA-mapping is a commonly used tool in systemic design; it integrates systems thinking with design thinking (Ryan, 2014). GIGA-mapping is often used as a tool to increase and aid our capacity to grasp and work with super complexity. It is useful for visual thinking and understanding these complex systems (Sevaldson, 2011).

The process of making a GIGA-map itself is fascinating. It is about finding relationships in the data you have and striving for information richness. In a GIGA-map it is not strange to have an overload of information. Everything is relevant and interesting. You can find maps, diagrams, text and graphs on it. The GIGA-map made for this project can be seen on the following page, in figure 13. It is validated and redesigned multiple times during the project.

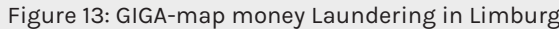
Most information that can be found in the GIGA-map is the information you have already read in this report. Creating the GIGA-map was helpful to summarise the research phase and helped in finding essential elements to explain money laundering in the first place.

4.2.1 Reflection

The GIGA-map helped in summarising the research that was done and in creating a story out of it. This synthesis phase aimed to make sense of all the data and find opportunities to intervene in the system of money laundering, but the GIGA-map did not help in making this last step. There are a couple of reasons that could have caused this. First, the GIGA-map is mainly based on literature research, the insight from the expert interviews done in the project were not well represented in the map. Therefore, the GIGA-map data is one-sided and does not provide new perspectives that could inspire an intervention direction. The second reason is that creating the GIGA-map did not strive for information richness well enough. It was challenging to put aside filters about what is relevant or not. Thirdly, the extensive messy sketch phase in creating the GIGA-map was skipped. Creating an aesthetically pleasing map was a focus from the beginning onwards, which could have biased the work. In the end, the question is if the GIGA-map is a real GIGA-map or just an infographic that is mostly focused on communicating information.

An insight overview of the initial research phase of my graduation project. With this overview I want to combine and relate all the insights I collected by doing literature research and interviews.

An insight overview of the initial research phase of my graduation project. With this overview I want to combine and relate all the insights I collected by doing literature research and interviews.



Synthesis

ViP-method

The second method used to make sense of the gathered data was the Vision in Product Design method, also called the ViP method. This method focuses on designing for the future and is about looking for possibilities and possible futures instead of solving present-day problems (Hekkert & Van Dijk, 2011). This VIP brainstorm was not done alone, but in collaboration with the core team of the Systemic Design Lab project, Albert, Nynke and Jordi, during the Kaboom week.

Kaboom week
Halfway through the graduation project, the Kaboom week took place. During this week, there was a close collaboration with the core team of the Systemic Design Lab project. The goal of this week was to do a ViP brainstorm together, get input from Prosecutors from the Public Prosecution Service during a creative session and make a system visualisation of all the insights of this session.

During the ViP brainstorm that was spread over a couple of days, the focus was on the future context part of the ViP method (Hekkert & Van Dijk, 2011). In this part, the following three steps were carried out, see the blue coloured steps in figure 14:

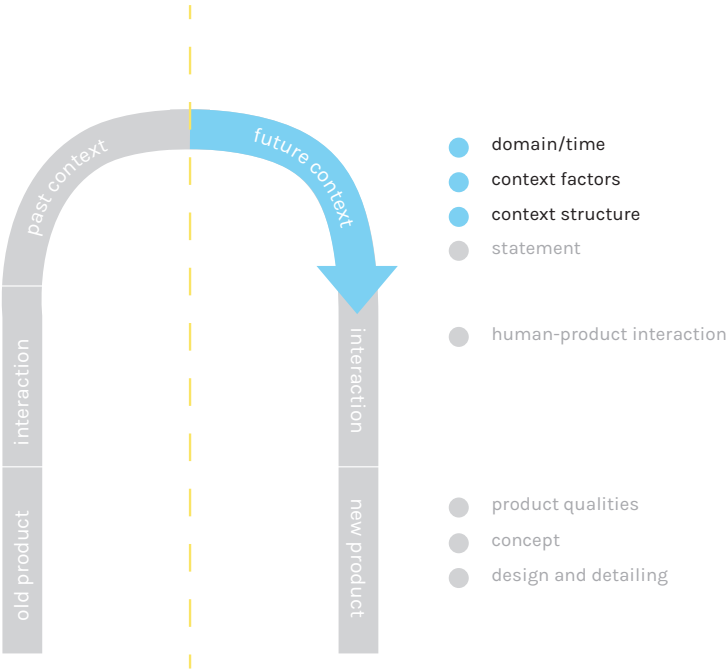


Figure 14: Used steps of the Vip method

4.3

4.3.1 Establishing the domain

In this step, the domain is determined; this is the area where you aim to contribute. The decision was made to focus on the context of money laundering in 2030.

Generation of context factors

The goal of this step is to build a world in the established domain. This is done by coming up with factors that function as building blocks for this world. Factors are observations, thought, theories, laws, consideration, beliefs or opinions. They are value-free descriptions of world phenomena as they appear to you. There exist four types of factors: developments, trends, states and principles (Hekkert & Van Dijk, 2011). Principles are stable patterns in life, from physical to biological to social and psychological; they can be laws of nature and fundamental human concerns or patterns of behaviour. States are things that are relatively constant. By developments, we mean things that are changing over time and their accompanying trends in people's behaviour as a result of such a development. All the factors that were created can be found in Appendix B.

4.3.2 Structuring the context

In this step, the set of factors must be turned into a unified whole that explains how the separate elements are connected. By combining various factors, clusters are created. In Appendix C can be found how these factors were combined. In the end, ten clusters were created that represent the context of money laundering in 2030.

- Cluster 1: Money laundering is a wallflower that is overgrown
- Cluster 2: The changing normal questions justice
- Cluster 3: The human buffer: turning a strategic blind eye
- Cluster 4: Your moral boundary is always in front of you
- Cluster 5: Once you go black, you never go back
- Cluster 6: Empowered through the collective
- Cluster 7: Fertile culture & infrastructure
- Cluster 8: Making a profit from digitisation
- Cluster 9: Government is less often seen as a reliable companion
- Cluster 10: From ad hoc to strategic collaboration

Cluster 1: Money laundering is a wallflower that is overgrown
Money laundering is not a sexy subject. Other forms of crime are prioritised over money laundering among the Public Prosecution Service. This prioritisation is because there is no direct impact on society when money is being laundered in contrast to a sex offence or liquidation where there is a prominent victim. 'It is not interesting for prosecutors because there is no blood on it,' said a public prosecutor in the interviews. Not only the Public Prosecution Service prioritises these forms of crime, but also the media. 'If it bleeds, it leads', said American journalist Eric Pooley in the late eighties. The more dramatic the image, the better chance it has of making the headlines in the media. Society wants thrill-seeking media.

Clusters 2: The changing normal questions justice

Technology is booming, and social media is playing a vital part in people’s everyday lives. Everything you want to know can be found online, and communication knows no boundaries.

People share on Facebook and Instagram their unfiltered opinions. Where decades ago religions provided support to people, mass media now plays a vital role in that as well. People can find any support they want on the internet. Humans are herd animals and are constantly looking for social proof in real life and online.

The Internet has become a new religion. Using the resources of the Internet, people can easily find answers to their or others’ questions, find followers and opponents, and easily find like-minded people to communicate with each other.

Similarity breeds attraction, and interaction breeds similarity.
(Blau, 1977 cited by Brass et al., 1998)

Our government is based upon the Trias Politica system, power is separated, and they control each other. Mass media can be seen as an extra power organ in this system. Justice is questioned and governmental actions are often criticised in the mass media. There is a group of people that think that rebelling against the government is tough. What is justice, and do society and the judiciary think the same about this? What will happen when this grows further apart because of mass media. Does society trust its political system?

Cluster 3: The human buffer: turning a strategic blind eye

People that are active in money laundering activities do not often see themselves as ‘real’ criminals. They do not indirectly harm people like people that steal or murder. The criminal image of money launders is not that bad. Especially when there is a personal connection with someone, it is easy to turn a blind, justify the action and even think that person deserves to do that.

Some criminals accused of money laundering are very smart and use their money to support others. They make use of philanthropy to protect their illegal actions. A typical example is a criminal that invests in their local soccer club. In this way, they can launder the dirty money and, at the same time, create a positive status towards other people.

Furthermore, betrayal is seen as something very negative in our society. It is easier to turn a blind eye and ignore what someone else is doing, especially when you are not personally harmed by it.

Cluster 4: Your moral boundary is always in front of you

Criminals use neutralisation techniques to rationalise or justify their criminal acts. Especially with money laundering, this is very easy to do. Denial of injury and denial of responsibility is extremely easy in money laundering because no one is directly hurt, and sometimes people are not even aware of the facilitating role they play in the money laundering process. This neutralisation is not only used by criminals themselves but also by society.

Furthermore, it is difficult to make good choices. It often is a moral dilemma between what is legal and what is ethical. Helping someone to cash them out black is not legal but socially very friendly. Your moral boundary is always in front of you. It is effortless to justify your actions.

Cluster 5: Once you go black, you never go back

Once you are active in the criminal circuit, it is difficult to get out. In criminal networks, loyalty is an important value. When you are not loyal, you will get killed. Furthermore, criminal networks are often built around whole families. When you are born in such a family, this will be seen as usual and part of daily business. It is a risk to get out of criminal networks. There are no positive opportunities to get out of it.

Cluster 6: Empowered through the collective

Collaboration is necessary and essential to tackle crime. There is not one organisation responsible for doing this. Human intelligence can play a significant role in this. Humans can indicate well when they do not trust a person or a situation. Furthermore, there already exist multiple platforms nowadays where collective intelligence is used to tackle complex problems. Connecting insights and data can be solutions to tackle crime or even prevent it.

Cluster 7: Fertile culture & infrastructure

The need for money laundering in the Netherlands is not strange. Our country is inextricably linked to drugs. Drug crime is, in most cases, the proceeding crime of money laundering. We are one of the largest drug exporters in the world. Besides this, we stand out far above other countries in the percentage of inhabitants that used XTC at least once in their lifetime (Cijfers drugs: gebruik en trends, n.d.). Our free and entrepreneurial culture and our good infrastructure will not change much over time.

Cluster 8: Making a profit from digitisation

Through the digitisation of our society, it became an essential condition to deal with digitisation to be able to participate. Criminals have high digital literacy and make use of people who have low literacy. New technologies will constantly provide new opportunities for criminals to find new ways of money laundering. Cryptocurrencies are an example of this.

Cluster 9: Government is less often seen as a reliable companion

According to Peeters et al. (2020), a quarter of the Dutch lack confidence in governmental institutions. The leading cause of this is the invisibility of the government. Who is the government exactly? Besides this invisibility, there is also tension in the dual role of municipalities and the mayor. On one side, they must act as crime fighters, and on the other side, they should function as representatives of the community. This is contradictory and sometimes difficult for municipalities to find the right balance. This tension came to light during an expert interview with a mayor at the beginning of the project.

Cluster 10: From ad hoc to strategic collaboration

There is a need for an integral approach from the government and involved gatekeepers to fight crime effectively. Different organisations are working on this, but information sharing seems to be difficult sometimes. During an interview with a project leader undermining crime of a municipality, it was mentioned that gatekeepers are not all aware of their facilitating function and do not seem to be interested in more imposed rules by the government.

4.3.3 The cluster framework

After this clustering, the second thing that must be done in step three is looking for relationships between the created clusters. By zooming out, you can watch for a storyline or a pattern between the clusters. Through a visual framework, all the clusters were organised. In the framework (figure 15) created with the clusters, a distinction was made between three main stakeholders connected to the different clusters. These three main stakeholders are the government (The Public Prosecution Service belonging to this), the gatekeepers and the criminal organisation. Each of them is displayed utilising a big white gear in the visual. The white and grey area in the back represent the upper and underworld. As you can see, the criminal gear is placed in the underworld, and the government gear is placed in the upper world. The gear of the gatekeepers is placed in between these worlds. This is because with money laundering, the area between illegal and legal activities can be vague. Gatekeepers are not always aware that they facilitate the underworld while they are running a legal company.

4.3.4 Reflection

The ViP brainstorm and related cluster framework included much more soft knowledge in comparison to the GiGA-map. The created framework gives insight into which clusters will play a role in money laundering in the future, especially on a social level. Despite these advantages, the framework lacks complexity regarding the system of money laundering and therefore does not give a full clear picture of the whole system. It misses an extra layer of more depth. Although this disadvantage, it did give much more inspiration for intervention areas in comparison to the GiGA-map.

What really helped in this method was that it was carried out with multiple people, Nynke, Albert and Jordi. The factors were made by four different people which makes them overall less subjective. This broadened the scope and brought different topics into the picture.

Furthermore the created framework of the clusters really helped to get an overview and see how all clusters are connected in one story. Seeing the system as multiple gears, influencing each other, was helpful and is also used in the next method.

The framework and the clusters give a good simplified overview of all the topics that play a role in money laundering. This outcome could not be reached by only analysing the research data. This translating step was really necessary to achieve this. Each of the clusters (the blue gears in the framework) could be an interesting intervention area to work on further. The following method should be built upon this knowledge but should contain and display the complexity of the money laundering system.

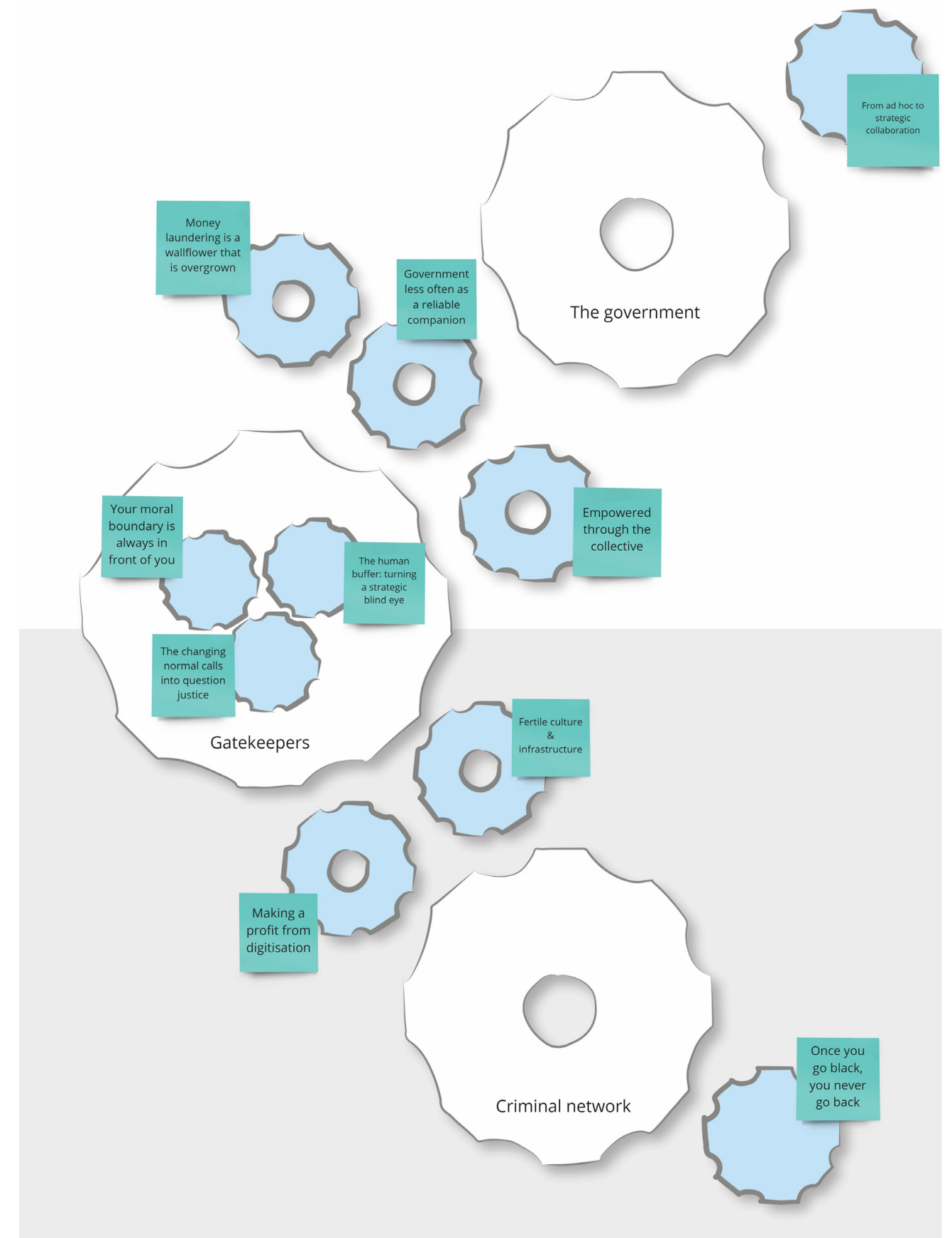


Figure 15: ViP cluster framework

Synthesis

Causal-loop diagram

4.4

Next to the VIP brainstorm session, a creative session with Prosecutors from the Public Prosecution Service in the Kaboom week was organised. Their input was used to make a start of a system visualisation, also called a system map.

There are multiple ways in systemic design to map and visualise the whole system. This process of mapping is helpful to show the dynamics and interconnectedness of all elements in the system. A system map can help discover valuable intervention points and give insight into how an intervention could influence the other elements in the system. In this project, the causal loop diagram was chosen to map the system of money laundering.

4.3.1 What is causal loop diagram?

A causal loop diagram identifies the critical variables in a system and indicates the causal relationships between them via links. The relationships between the variables can either be increasing or decreasing. An example can be seen in figure 16. When there is an increasing relationship, it means that if variable A increases, variable B will also increase. When there is a decreasing relationship, it means that if Variable A increases, variable B will decrease.

A large part of the variables were the outcome of the expert session. During the Kaboom week, the relationships were defined, and extra variables were added to the diagram. In Appendix D you can find the original causal loop diagram that was created by using Miro. After finishing the system in Miro, there was a need to visualise this system even further to communicate it better. The second iteration can be seen in figure 17. During the creation of this visual causal loop diagram, the decision was made to bring attention to the variables with the most relationships with other factors. These variables can be seen in the gears.

As the causal loop diagram became one of the final interventions, more in-depth information will be given in chapter 5.

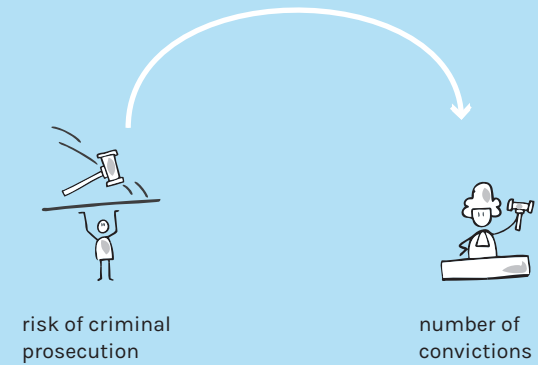
4.3.2 Reflection

The causal loop diagram is a visual representation of the current system of money laundering. It gives an overview of all the variables and makes the relationships between variables explicit. Of the four experimented methods, the causal loop diagram reflects the complexity of money laundering the best. It was helpful to create the basis of the diagram and define the first factors in collaboration with the experts from the Public Prosecution Service and the Systemic Design Lab core team. Compared to the GIGA-map and VIP framework, the causal loop diagram is much more thought through. It contains soft knowledge of the ViP methods as well as some hard knowledge out of the GIGA-map.

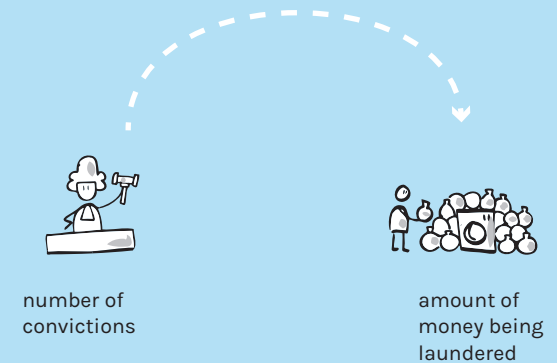
The causal loop diagram was discussed with company mentor Ben. He pointed out valuable and interesting gears for the Public Prosecution Service to focus on. According to him, the most fruitful gears would be: degree to which money laundering is noticed, risk of criminal prosecution, motivation to act against money laundering and sense of urgency. This input is used later in the project.

Although the advantages of the causal-loop diagram, it was still a struggle to decide which part of the system an intervention would be most valuable. It felt random to just pick one of the gears. This led to using a fourth method, the reframing method.

Increasing relation
If variable A increases, variable B increases as well.



Decreasing relation
If variable A increases, variable B decreases.



Loops

A causal loop can occur when there is a closed circle and the arrows does not have contradictory directions.

A loop can be reinforcing or balancing. This example loop is balancing because there is an odd number of decreasing relations.

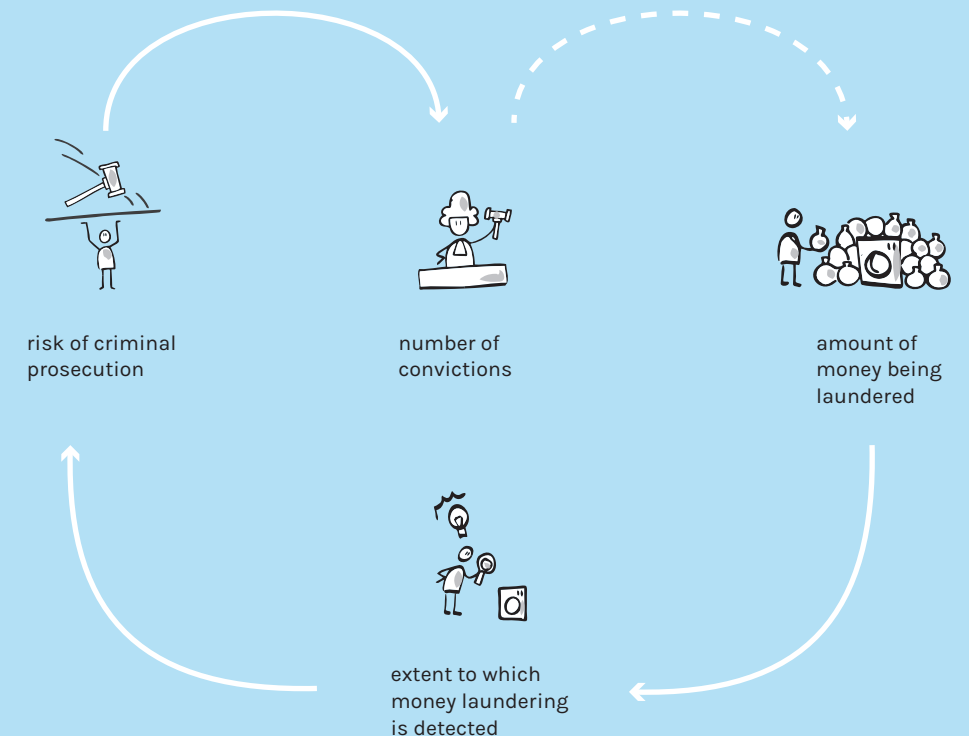


Figure 16: Causal loop explanation

Witwassen

Causal loop diagram

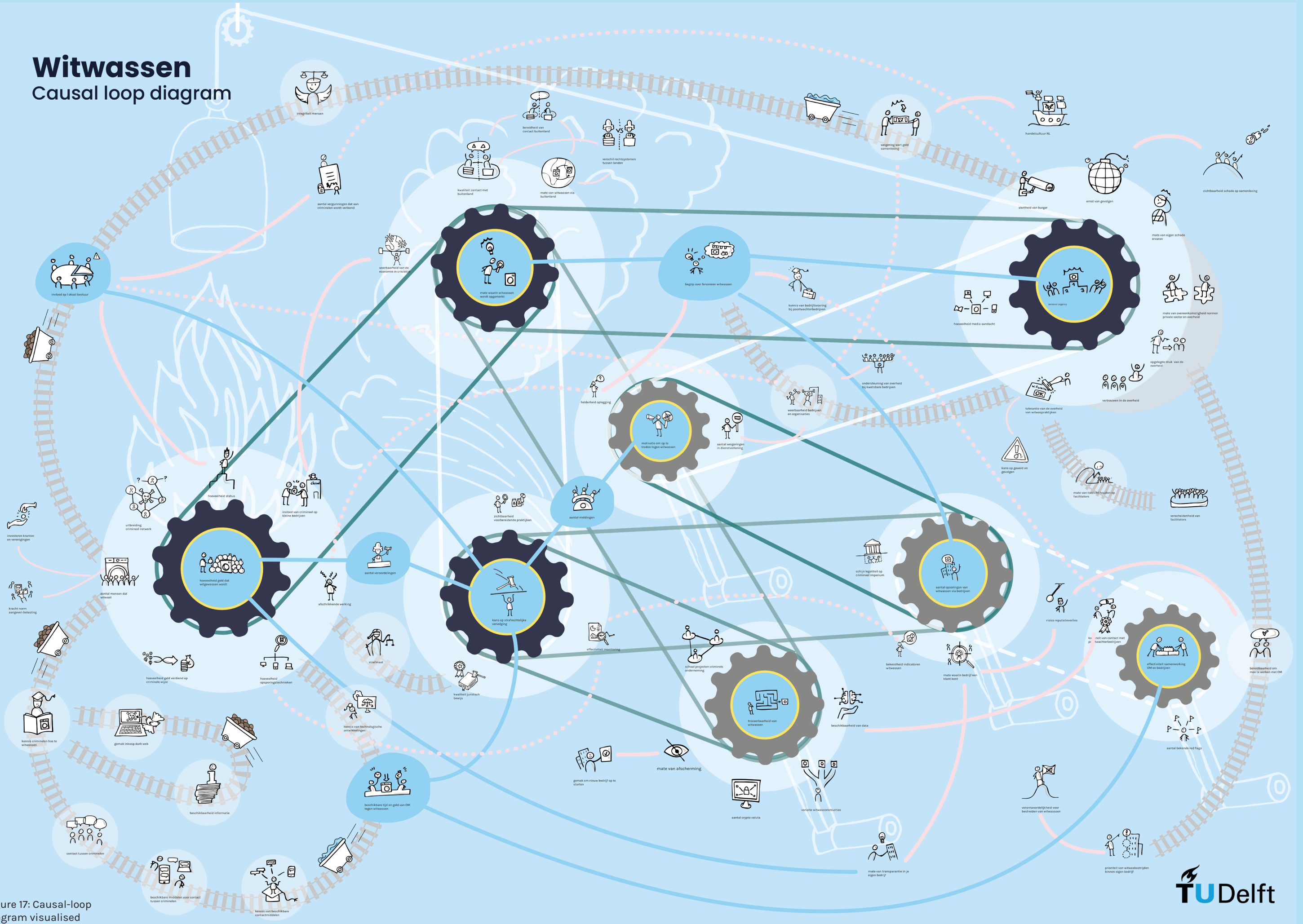


Figure 17: Causal-loop diagram visualised

Synthesis

Reframing method

The reframing step of the Frame creation method of Kees Dorst (2015) was used as the last experimentation method.

Using this reframing step seemed helpful because it forces you to see the problem situation differently and think in a different way. Being immersed in the whole context of money laundering made it difficult to think without limitations. The reframing step of the Frame creation method could help to think out of the box again and leave the context of money laundering behind for a moment.

In his book ‘Frame Innovation’, Dorst (2015) explains that frames can be formulated as the implication that adopting a particular pattern of relationships will lead to valuable outcomes. It can be seen as an ideation tool to approach the project from a different angle. A new frame for a problem situation functions both as a new approach to the original problem situation and at the same time proposes a new solution direction. Schaminée mentions in his book ‘Designing With-in Public Organizations’ (2018) the following about reframing in projects:

Reframing is the key to finding a solution to a wicked problem. It introduces a new way of looking at the issue and offers a new perspective on solutions that had previously been out of the picture.

Dorst (2015) suggests writing a new frame down as the following sentence: If the problem situation is approached as if it is ... , then

Before diving into the creation of new frames, it is essential to have themes. This step precedes the reframing step and is all about defining themes that emerge from the context research earlier done in the project.

To come up with the right theme, the outcomes of the previously used experimentation methods were analysed. The clusters of the ViP method were put on the causal-loop diagram to see where topics correlated. Five out of ten clusters related to the factors around the gear sense of urgency. The urgency topic is also shortly pointed out in the GIGA-map. Finding this overlap was valuable and gave good support to use this theme for the reframing method.

4.5.1 Creative session

To make the step from themes to frames, a creative session was organised with six students. The session consisted of two main activities: brainwriting to develop nomological networks (Dorst, 2015) and the metaphor technique (Heijne & Meer, 2019) to see which other domains could connect to the themes.

In the first part of the creative session, the brainwriting technique (Heijne & Meer, 2019) was used to create nomological networks of the theme: Sense of Urgency. In making a nomological network, the theme is put central and is surrounded by

4.5

concepts that are related to the theme.

The second part of the creative session was focused on coming up with metaphorical situations in other domains that resembled Sense of Urgency. The students had to write or sketch situations where they experienced a Sense of Urgency or which situation it reminded them of. The results of both exercises can be seen in Appendix E.

After analysing the results, there popped up one metaphor that was mentioned multiple times by different participants. This metaphor was global warming.

During the investigation of this metaphor, multiple similarities with the problem situation of money laundering were found. Just like money laundering, global warming is a challenge that involves many stakeholders. It is an issue of which the consequences are not directly visible, and urgent action is necessary to improve the situation. Therefore, the chosen frame to take up intervention and design goal two became the following:

If the problem situation is approached as if it is global warming, then we should approach it with the same urgency.

If we see the situation as one of **global warming**, and we adopt its working principle of **the sustainable development goals**, Then we will create a situation that **calls for urgent action**, and helps the Public Prosecution Service to **guide future actions in combating money laundering**.

4.5.2 Reflection

What was valuable in using the reframing method was that the outcomes of other experimented methods could be combined in this last method. The other experiments and the different outcomes they produced together formed a good base to find a common theme. Without these methods, this would be a difficult step.

Compared to the other methods, the reframing method just left the whole context of money laundering behind for a moment. Doing this was helpful to not only think of limitations. Although the method does not contain the system’s complexity, it did help to move from insights to interventions. In chapter 5, where the interventions are described, this can be seen.

Having one method that must grasp the complexity of money laundering by making it visually tangible, and secondly, use the resulting visualisation as a means to find opportunities for intervening in the system was ambitious. None of the used methods fulfilled both of these goals perfectly. This experiment showed that combining multiple methods was the best solution to move from insights to interventions. When looking back at the different methods in the experiment, none of them could be skipped. In one way or another, every method helped to support the project.

intermezzo

Design choice

To create better focus in the project, a reflection on design choices and goals was necessary to continue. In this intermezzo, this reflection is shared.

Intermezzo

Design choice

After experimenting with the different synthesis methods, the goal was to find a focus point for the last part of the project. Taking a step back was necessary at this point in the process to reflect on the outcomes and find out how to move from insights to interventions. What helped to do this was diving into theory again and looking at how other people make the step in system design in moving from insights to interventions. Figure 18 visualises how theories and personal design criteria helped to form design goals for systemic interventions. First, the two theories will be explained that played a role in this: The leverage point theory of Donella Meadows, together with the seven-step guideline of Leyla Acaroglu

Leverage points: places to intervene in a system

Meadows (1999, 2008) leverage points theory explains that when working with complex systems, intervention areas can be found by looking at the system's leverage points. These leverage points are specific places in the system where a small change could lead to a large shift in behaviour (Meadows, 1999). Meadows explains in her book 'Thinking in Systems' that leverage points are often not intuitive; the reason for that is that systems are often way too complicated and dynamically complex (Meadows, 2008).

According to Donella Meadows, scientist and writer of the book 'Thinking in systems' (2008), leverage points are points of power. When working with complex systems, intervention areas can be found by looking at the system's leverage points. These leverage points are specific places in the system where a small change could lead to a large shift in behaviour (Meadows, 1999). Meadows says that leverage points are often not intuitive; systems are often way too complicated and dynamically complex (Meadows, 2008).

Meadows describes 12 different places to intervene in a system:

12. Constants, parameters, numbers (such as subsidies, taxes, standards).
11. The sizes of buffers and other stabilising stocks relative to their flows.
10. The structure of material stocks and flows (such as transport networks, population age structures).
9. The lengths of delays relative to the rate of system change.
8. The strength of negative feedback loops relative to the impacts they are trying to correct against.
7. The gain around driving positive feedback loops.
6. The structure of information flows (who does and does not have access to information).
5. The rules of the system (such as incentives, punishments, constraints).
4. The power to add, change, evolve, or self-organize system structure.
3. The goals of the system.
2. The mindset or paradigm out of which the system, its goals, structure, rules, delays, parameters arises.
1. The power to transcend paradigms.

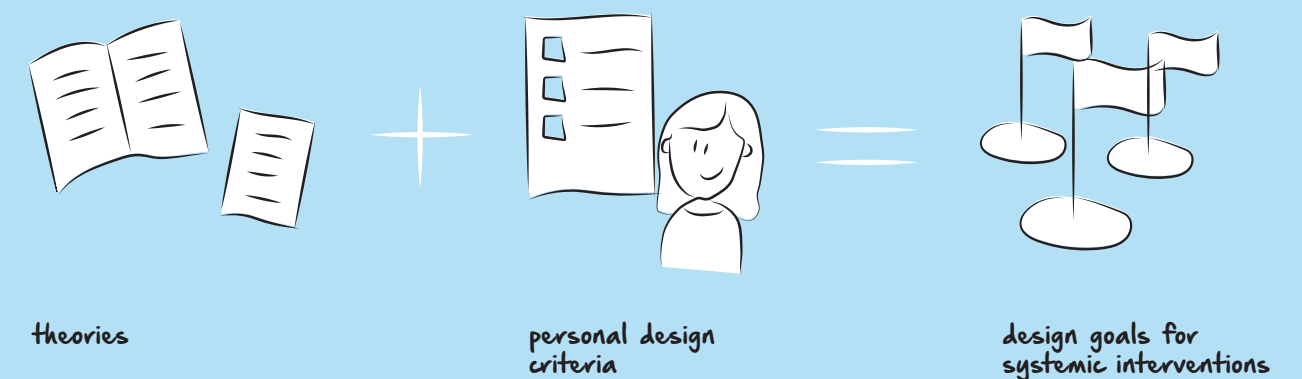


Figure 18: Generating the design goals for interventions

Leyla Acaroglu - Moving from insights to interventions

System interventions must be based on a systemic understanding of what is going on. Leyla Acaroglu wrote down seven steps to move from insights to interventions in systemic design projects (Acaroglu, 2017b).

- Embrace the complexity
A good understanding of the system is necessary to be able to look at non-obvious intervention areas. The gigamap and causal loop diagram made earlier in the project help embrace and visualise the system's complexity.
- Suspend the need to solve
The human brain tends to want the reward of fixing things. Suspending the need to solve helps to explore the system better and in uncovering the dynamics of it.
- Look for the non-obvious leverage points
Leverage points are the parts within a system that has the power to shift the status quo. Most of the time, they are not evident at first sight; you have to seek them. Analyse the system maps and explore new insights.
- Understand the level you are intervening at
There are three primary levels of systems at play in the world: social, industrial and ecological. When designing an intervention, decide at what level you want to intervene. Interventions can be physical or relational. Physical interventions have material and touchable qualities; relational interventions is more on the behavioural and social interaction level.
- Work within your sphere of influence
To successfully design positive systems change, you always need to start within your sphere of influence. Make use of immediate and available resources no matter how small they are.
- Account for delays
Most systems have delays. It takes some time between the action and the desired outcome. Sometimes it is hard to see what outcomes will happen in a complex system when there is a delay in feedback.
- Avoid unintended consequences
When designing an intervention, it is essential to keep a close eye on the outcome to avoid unintended consequences. When designing the wrong interventions, more problems may be accidentally created by focusing on the system's least effective part.
- The theory of meadows helped to realise that there does not exist one way to change a whole system. The guideline of Acaroglu helped to realise that complexity should be embraced and the need for solving suspended. These insights were used in making the personal design criteria.

Personal design criteria

At this moment in the project, design criteria were formed to assess the directions that were created. They are based on personal ambitions.

First, the intervention must include the complexity of the money laundering system in the final intervention. The phenomenon of money laundering itself, visualised through the GIGA-map, already showed the multiple aspects of money laundering. Furthermore, the causal loop diagram showed the social complexity of the money laundering system. It feels ignorant to leave the complexity out at the end of the project.

In the end, the goal is to have an intervention that is feasible for the Public Prosecution Service. It should guide them to work further with the insights and do something with them in the future. The final intervention should be feasible, easy to understand and therefore be concrete.

After reflecting and rethinking these design ambitions, a quadrant was created to display this thinking process. This quadrant can be seen in figure 19. On the x-axis, the complexity scale is displayed, and on the y-axis, the concrete-abstract scale is displayed.

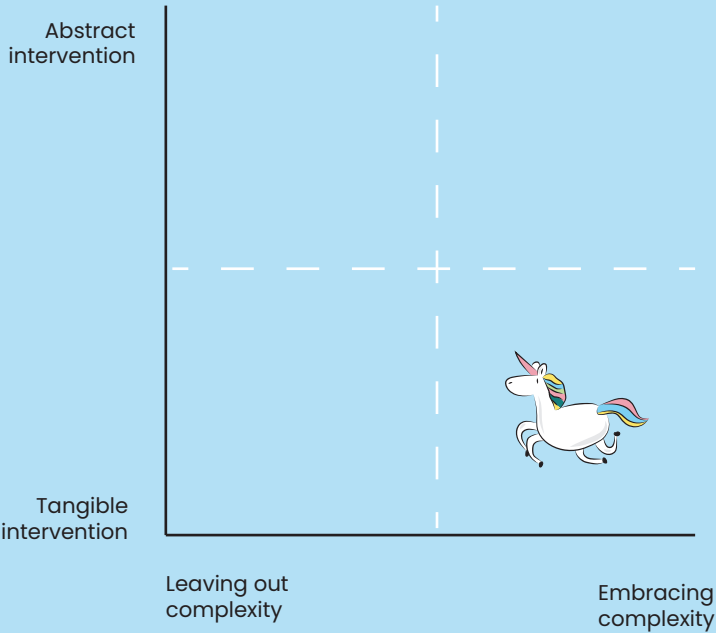


Figure 19: Develop intervention framework

Much time was spent on creating an intervention that would fit perfectly in the bottom right corner. It took some time and ideation to realise that one intervention that would fit in this corner simply just not exist. It was given the name: unicorn intervention. Creating an intervention in this quadrant seemed perfect but is not achievable and realistic.

The earlier mentioned theories of Meadows and Acaroglu helped to realise this. Furthermore, their theories helped to create my thinking pattern displayed in the quadrant (figure 17). The y-axis is based on the leverage point theory of Meadows (1999, 2008). Her list of places to intervene in a system could also be placed on an abstraction level scale. Number 12 is very concrete, number 1 being very abstract. This idea of abstraction levels is applied in the y-axis of the quadrant. The x-axis is partly based on Acaroglu (2017b) theory, which is about embracing complexity on the right side and leaving out complexity on the left side.

Design goals

The original goal of the project, as formulated in the project brief, was the following:

Map the current money laundering system in the region of Limburg and identify opportunities that support the Public Prosecution Service in the fight against money laundering in the current system.

Based on the theory of Meadows (1999, 2008), saying there are multiple places to intervene in a system, it seemed appropriate to create multiple design goals for the different planes in the developed quadrant (figure 20). The original design goal was kept in mind while developing these new design goals. These new design goals function as extensions to this original goal and help create better focus, as the original goal was rather broad.

Design goal 1:

Design an intervention that shows the complexity of the system. This will help to understand the system of money laundering better and could be used as a tool to see how a new idea can influence the whole system.

As Acaroglu (2017b) also mentioned in her guideline to move from insights to interventions, complexity should be embraced. The first plane in the quadrant is about embracing complexity by developing an intervention on a high abstraction level. This can be achieved by using the research output of the project that includes this complexity.

Creating an understanding of the system’s complexity is necessary to realise that there is no straightforward solution. Furthermore, it could be interesting for the Public Prosecution Service to have a visual overview of the system of money laundering and determine which factors are playing a role in the system. This intervention would be valuable to create understanding, however, the high abstraction level combined with the complexity would make it not that feasible for the Public Prosecution Service.

Design goal 2:

Design an intervention that clearly communicates the most valuable and promising intervention areas to take action. This will guide the Public Prosecution Service in taking focused action.

Leaving out the systems complexity but still having an intervention on a high/ medium abstraction level is an essential addition to design goal 1. This allows space to translate the intervention that results from design goal 1 to a simplified intervention related to design goal 2. For this reason, guidance is an essential aspect of this design goal. Taking action instead of talking is difficult. Guidance is necessary to help the Public Prosecution Service decide where to take action and to show promising areas.

Design goal 3:

Design an intervention that functions as a tangible example for the Public Prosecution service. This will inspire them what a concrete solution can look like.

As design goal 1 and 2 are still on an abstract level, a concrete intervention is necessary to increase feasibility. Concrete solutions will inspire the Public Prosecution Service more in taking action than abstract interventions. Inspire is necessary because it can support and motivate the Public Prosecution Service to stop talking and start doing and to show what is possible.

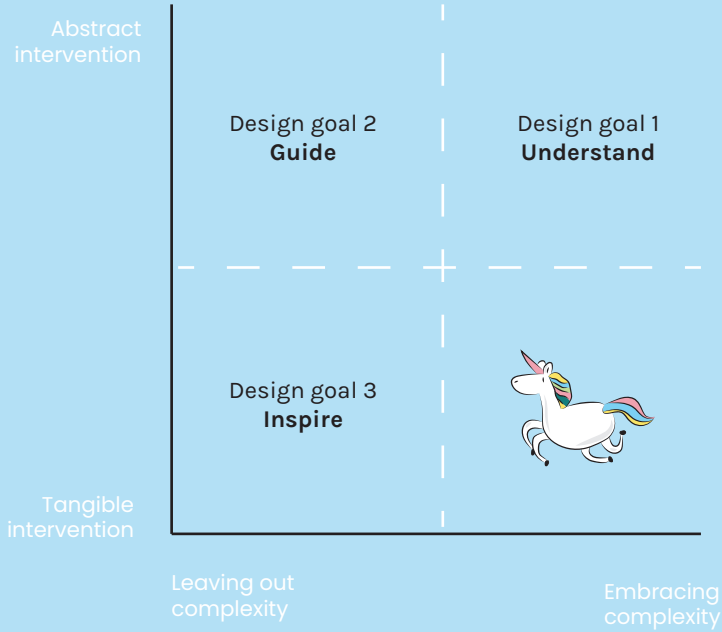


Figure 20: Intervention framework with the corresponding design goals

Chapter 5

Systemic intervention portfolio

This chapter describes the designed intervention portfolio for the system of money laundering. The portfolio consists of three separate interventions. It corresponds with the develop and deliver phases of the design process.

- 5.1 The portfolio
- 5.2 Causal loop diagram
- 5.3 Blueprint
- 5.4 Tangible solution
- 5.5 Money Laundering Design Manifest

Systemic intervention portfolio

The portfolio

5.1

The final systemic intervention portfolio consists of three interventions. The first intervention is the causal loop diagram, the second intervention is a blueprint, and the third intervention is a tangible solution overview. In this chapter, each intervention will be discussed one by one. Each intervention corresponds with a different abstraction level of the money laundering system and a different complexity level. This can be seen in figure 21.

The reason to create a portfolio was made based on the design choice reflection in the intermezzo. This reflection made clear that coming up with one solution to solve the whole system is not possible. Multiple interventions based on different levels of abstraction are preferred to make the most impact.

Each intervention in the portfolio is connected to a specific design goal (see figure 22), which were discussed in the intermezzo. The causal loop is all about improving understanding, the action blueprint goal is to guide action by proposing promising areas to take action, and the tangible concept overview is to inspire the Public Prosecution Service what ideas, resulting from the blueprint, could look like.

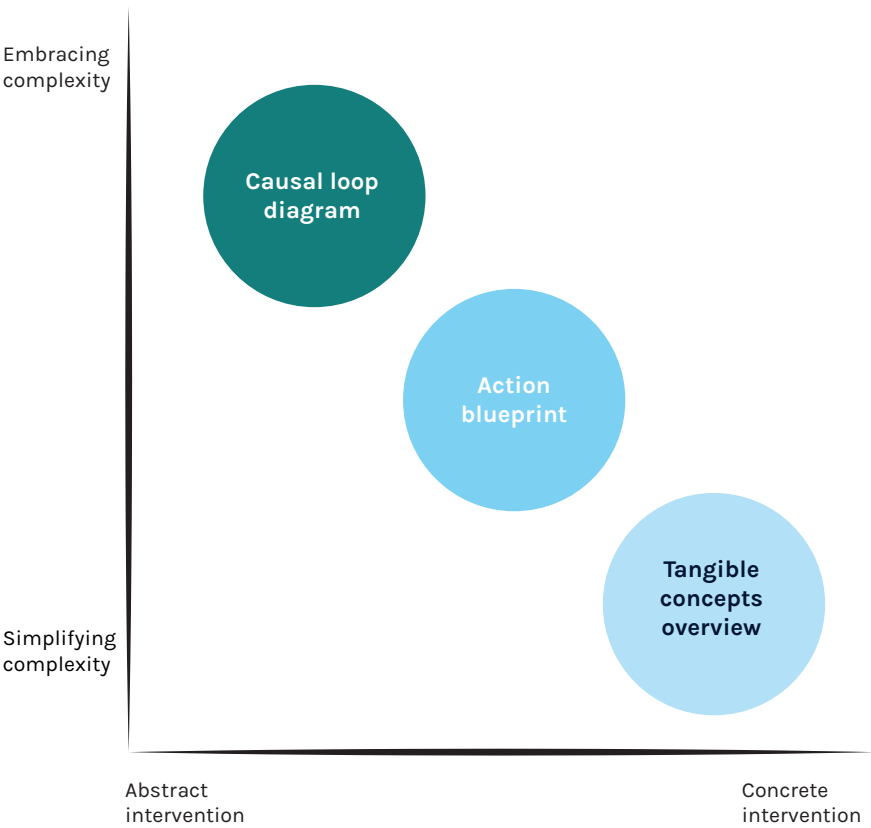


Figure 21: Redesigned intervention space with the interventions included

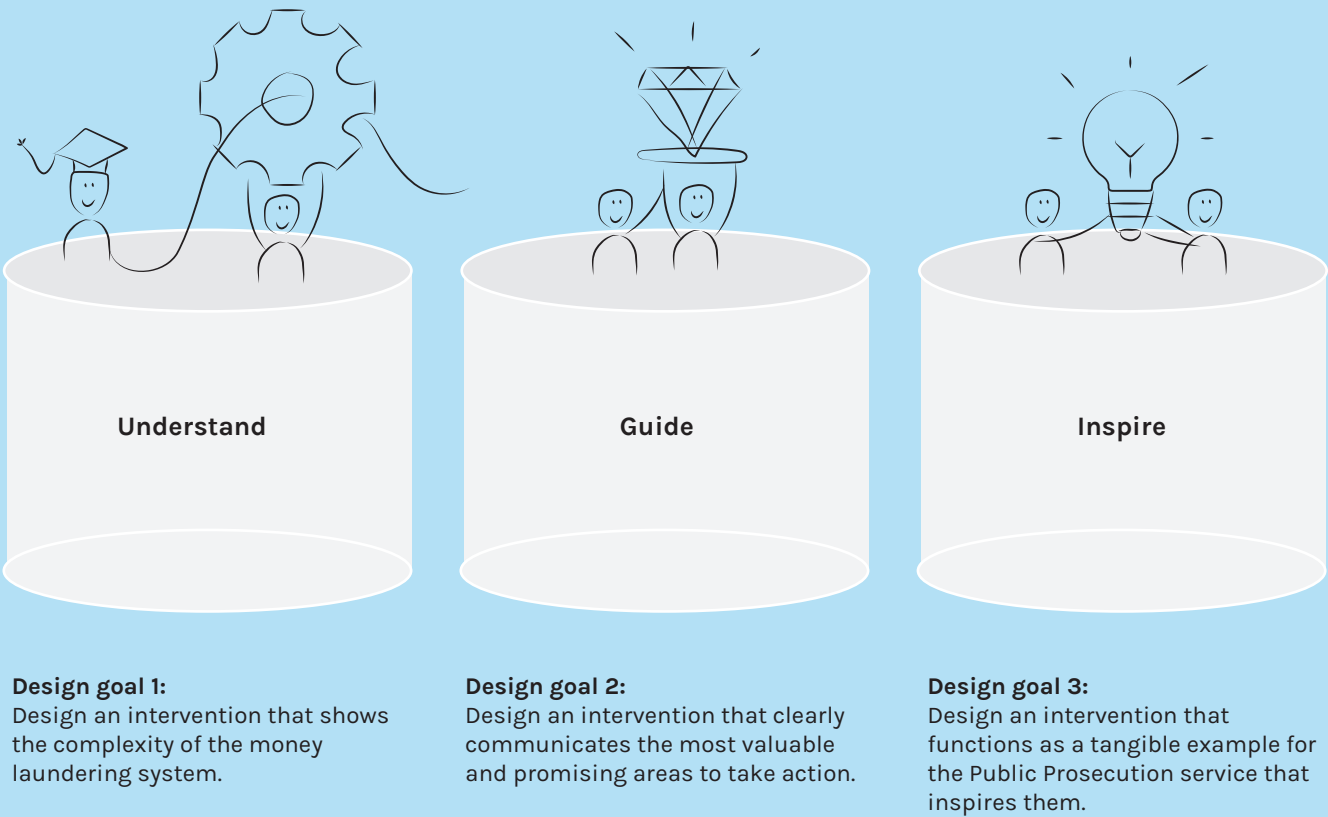


Figure 22: The design goals

Systemic intervention portfolio

Causal loop diagram

Design goal 1

Design an intervention that shows the complexity of the system. This will help to understand the system of money laundering better.

The first intervention is the redesigned causal loop diagram. The redesigned causal loop diagram shows the multiple aspects of the money laundering system, see figure 23. It contains the complexity of the research done in this project and gives insight into the relationships between all variables. It is an intervention on a high abstraction level. The causal loop diagram gives insights how factors influence a specific aspect in the system of money laundering. Which are, in their turn, also influenced by other factors. As said at the beginning of this report, money laundering is a complex issue. This diagram visualises a big part of the money laundering issue. It validates the complexity by showing that there is no simple cause and effect that can be applied to the issue.

The causal loop diagram consists of multiple aspects: a metaphor illustrated in yellow can be seen in the background of the illustration, big and smaller gears, doodled icons and arrows. These elements will be discussed in the following section.

Metaphor & gears

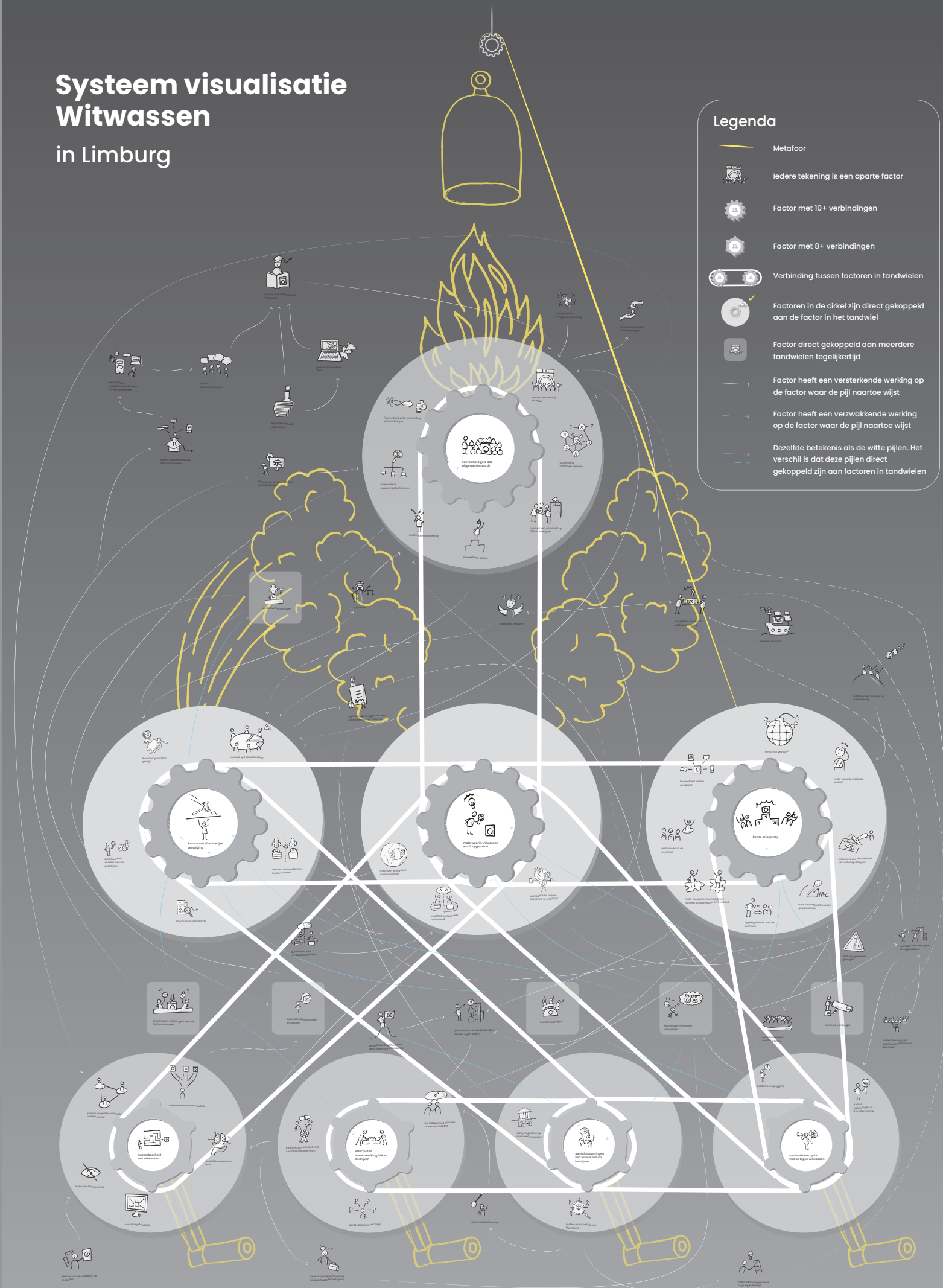
The metaphor in the causal loop diagram, displayed by the yellow illustrations, symbolises the money laundering issue. The fire is the amount of money that is being laundered. This is the real problem. As you can see in the causal loop diagram, there are two ways to fight this fire: applying water and coordinating the bell jars oxygen supply. The water supply is regulated by the factor in the big gear on the left, the chance of criminal prosecution. The higher the chance of criminal prosecution, the less the amount of money that is being laundered. The bell jar is regulated by the big gear on the right, the sense of urgency. The better the sense of urgency among the Public Prosecution Service, gatekeepers, and society, the lower the bell jar will come to the fire.

The gear in the middle, the extent to which money laundering is detected, symbolises smoke. This smoke hampers the view on the top gear, the amount of money laundered, the fire. Detecting money laundering is problematic because of its invisible character. This invisibility blocks the chance of criminal prosecution and the sense of urgency.

The row of gears on the bottom of the diagram illustrates the handles that affect the gears in the middle row. This row of gears have fewer connections to other factors than the upper four gears but are still essential to highlight. These factors are traceability of money laundering, the effectiveness of cooperation between Public Prosecution Service and companies, number of money laundering investigations through companies and motivation to take action against money laundering.

Figure 23: Final causal loop diagram

Stelsystem visualisatie Witwassen in Limburg



Doodle icons & arrows

Each icon represents a factor in the causal loop diagram. This factor can be seen as a variable that can increase or decrease. Factors with many connections (arrows) to other factors are placed in the gears. The arrows in the diagram show how one factor influences another factor. This is more elaborately explained in chapter 4 by using examples.

Gears

Some gears are connected by white lines, the chains. This illustrates how each gear factor is connected to another gear factor. The circle around each gear displays the factors that are directly connected to the factor inside this gear.

Squared factors

The factors placed in the squared boxes between the middle and bottom layers gears are factors that are directly connected to multiple gears at the same time. The blue lines are the connections of these factors.

Systemic intervention portfolio

Action blueprint

5.3

Design goal 2

Design an intervention that communicates the most valuable and promising areas to take action. This will support and guide the Public Prosecution Service in taking action.

The second intervention is the action blueprint. The action blueprint supports the Public Prosecution Service in taking urgent action to combat money laundering. The created principles, of which the blueprint consists, are based on factors and corresponding loops in the causal loop diagram, related to the factor sense of urgency. These principles are opportunity areas for the Public Prosecution Service to take action that, in the end, support the growth of the sense of urgency.

The working principle of this blueprint is based on the new frame that came out of the experiment with the reframing method: If the problem situation is approached as if it is global warming, then we should approach it with the same urgency.

The solution of this new frame towards the problem of global warming are the sustainable development goals. The sustainable development goals form a blueprint to take urgent action against global challenges, of which global warming is one. This working principle of a blueprint was used as an incentive to create a blueprint for taking urgent action against money laundering for the Public Prosecutions Service.

A blueprint was created, consisting of six principles. These principles are:

- Realise that money laundering is a symptom.
- Make harm to society better visible.
- Enhance contact with gatekeepers during a case.
- Share insights of a case with other prosecutors.
- Share successes and look for media attention after a successful case.
- Create one clear information overview regarding money laundering.

The chosen principles resulted from two activities. First, reflecting on the causal loop diagram together with company mentor Ben Kôke. This reflection emphasised the potential of some factors in the diagram. Second, by analysing the system diagram, in particular the connections of the gear sense of urgency. By combining these insights, this resulted in the six principles.

Mission statement:

A blueprint to take urgent action to combat money laundering in the Netherlands



Figure 24: Action blueprint

1

Create one clear information source

Money laundering is a problem and, at the same time, a symptom of many serious forms of crime. Tackling money laundering is therefore of great importance to effectively fight other sorts of crime. Money laundering, or the financial aspect of crimes like money flows, should be included in the charges of the public prosecutor and in the investigation of the police more often. In this way, money laundering will be prioritised better. There should be support from supervisors to not only use the strategy of 'korte klappen' but also to do in-depth investigations. Sense of urgency starts within the Public Prosecution Service itself. They should propagate it first if we want to grow the sense of urgency among other parties, like gatekeepers and citizens.

2

Enhance contact with gatekeepers

Make the indirect effects of money laundering visible. Collect data and insights during cases that prove how money laundering harms our country and society. Make these effects known to everyone. Realising the severity of the consequences will contribute to the sense of urgency in society and for gatekeepers.

3

Make harm visible & known

Facilitators play a significant role in money laundering. Without a facilitator, money laundering would be difficult. Enhancing contact with potential facilitators, also known as gatekeepers, will help create a better understanding of their working principles and business operations. Having a good understanding of this will positively influence the quality of contact with the gatekeepers and, in the end, the effectiveness of collaboration.

4

Share insights of a case with others

Sharing insights of a case can motivate and help other prosecutors in doing money laundering cases. Furthermore, information that could be irrelevant for you could be valuable for other parties, like municipalities or gatekeepers. The more data is available, the more that can be learnt about money laundering phenomena. Especially for local governments, this knowledge can be beneficial to make them more resilient.

5

Share successes with the world

Share successes with the world by using media attention after doing a successful case. More media attention will increase the sense of urgency. It should be visible and clearly communicated that money laundering is punished and will not be accepted. Furthermore, media attention can help make gatekeepers and citizens more aware of the issue and give them a better understanding of phenomena.

6

Realise that money laundering is a symptom

Creating one clear information position for money laundering will help to boost knowledge about money laundering in general. At the moment, information about money laundering can be found all over the place. There does not exist a clear overview of all the current projects regarding money laundering.

Systemic intervention portfolio

Tangible concept overview

5.4

Design goal 3
Design an intervention that functions as a tangible example for the Public Prosecution service. This will inspire them what possible solutions could look like.

The last intervention is the tangible concept overview. This overview consists of multiple concepts, each corresponding to one of the six blueprint principles. The principles give a good overview of the opportunities areas, but a more concrete level intervention could still be achieved. The goal of this was to make a concrete intervention without the complexity of the whole system.

To inspire the Public Prosecution Service with tangible solutions, a possible concept is developed for each of the six principles. These concepts demonstrate how each principle can be used as input for new ideas.

An overview of all the created concepts linked to the corresponding principles of the action blueprint can be seen in figure 25.

Tangible concepts



Blueprint principle

Create one clear information overview regarding money laundering.

Enhance contact with gatekeepers during a case.

Make harm on society better visible.

Share insights of a case with other prosecutors.

Share successes and look for media attention after a successful case.

Realise that money laundering is a symptom.

Figure 25: Concepts related to principles

Systemic intervention portfolio

Money laundering for dummies

Money laundering for dummies is an online (secured) platform containing all vital information about money laundering. You can find an overview of involved parties, contact persons of different organisations, relevant literature and documents and an overview of ongoing projects and initiatives that deal with money laundering. This clarifies what is going on in the field and ensures that all the information is less fragmented over different sources. This can help future research to save time but also helps to avoid repetitive research and projects.

5.4



Systemic intervention portfolio

Gatekeeper peer program

The gatekeeper peer program is a collaboration between prosecutors and gatekeepers. A gatekeeper, for example, a real estate agent, works in this program a day a week for the Public Prosecution Service. In this way, there will arise a personal relationship between the prosecutor and the gatekeeper in which they can share their work principles and professional interests. The prosecutor gets the chance to better understand the business operations of the real estate agent, which can be helpful for money laundering cases in the real estate domain.

2 Enhance contact with gatekeepers



5.4



Systemic intervention portfolio

Damage exhibition

The damage exhibition is an exposition that makes visitors aware of the damage and the indirect consequences of money laundering. In the exposition, virtual reality or video experience will show a dystopian world in the future in which money laundering will increase more and more. Making society aware of the negative consequences of money laundering would make their sense of urgency increase.

Another idea for an exhibition could be focused on creating an experience for youth at festivals. For many people, festivals are the place to use drugs. Since drug crime often is the proceeding activity before money laundering, it could be interesting to give festival visitors a sneak peek into the world behind the drugs they are using. The Public Prosecution Service should have a stand that shows the money laundering world behind the drugs to make them aware of what they support by using it.

3

Make harm visible
& known



5.4



Systemic intervention portfolio

Local phenomena platform

This local phenomena platform is a collaboration with municipalities and the Public Prosecution Service. For local governments, it would be valuable to get a better view of signals of money laundering and the possible damage it causes. At the moment, there is less information shared among the Public Prosecution Service and municipalities. If this would be better organised, money laundering could be detected more easily.

4

Share insights of a case with others



5.4



Systemic intervention portfolio

Virtual Safe

The Public Prosecution office creates a virtual safe website. On this website, you can see how much money is taken away in money laundering cases by the Public Prosecution Service. This website is dynamic and is adjusted every week. The goal of this website is provocation and a way to find media attention. After finishing a successful case where money is taken away, the money pile will virtually grow bigger and bigger.

A possible addition to this website would be an overview that shows what happens with this dirty money by the government, for example, supporting foundations or societal projects.

5.4

5

Share successes
with the world



Systemic intervention portfolio

Money laundry cafe

Every two months the money laundry cafe is organised. At this event, different people from The Public Prosecution service are invited, people that often deal with money laundering but also people that are less familiar with it. They have the chance to meet each other in person and to share experiences. At the money laundry cafe, the ambience is informal, and activities can be organised to stimulate interaction and get to know each other. Different ways to fill these afternoons can be done by guest lectures, speed dates or even pub quizzes. During a guest lecture, someone can take the stage and inform others about their insights and experiences regarding money laundering. Speed dates are the opportunity to get to know each other informally, and the pub quiz can test your knowledge about money laundering.

6 Realise that money laundering is a symptom



5.4



Systemic intervention portfolio

5.5 Money Laundering Design Manifesto

The Money Laundering Design Manifesto was created to combine the multiple interventions of the systemic intervention portfolio into one final product. In this manifesto, the three interventions: the causal loop diagram, the blueprint, and the tangible solution overview are described. The reason for creating this manifesto was to make the results of this graduation project accessible for employees of the Public Prosecution Service. Having one clear final product is easier to communicate and could attract more attention than three separate interventions. The Money Laundering Design Manifesto is written in Dutch to make it more accessible for employees of the Public Prosecution Service. The whole manifesto can be found in Appendix F.

Why a design manifesto?

As explained in the previous chapter, all three interventions have their own design goal. Putting these three intervention together fulfill an overarching goal, which is to make impact among the Public Prosecution Service by creating more urgency towards money laundering.

According to Choi (2018), a design manifesto is: "A written statement where you publicly declare your intentions, opinions and vision." A design manifesto therefore seemed the perfect medium to convey the results of this project. The developed interventions could be seen as intentions and vision to take action to tackle money laundering with more urgency. Furthermore, Money Laundering Design Manifesto is an attention-grabbing name. It makes people curious to read it.

To spread the manifesto among the Public Prosecution Service, a box was made with the title: first aid for money laundering. This supported the attention grabbing/provocative intention of the manifesto.

Positioning statement

The value of the Money Laundering Design Manifesto is described by creating a positioning statement. The following positioning statement was created:

For the Public Prosecution Service, the Money Laundering DesignManifesto offers the first steps in creating more urgency among the employees of the organisation. The insights and guidelines written down in the manifesto should encourage the Public Prosecution Service to take urgent action in tackling money laundering. This is done by providing an understanding of the money laundering system, an overview of fruitful action areas and inspirational concepts. Taking urgent action in these areas will, in the end, lead to a higher sense of urgency.



Chapter 6

Evaluation

Evaluating the Money Laundering Design
Manifest and the included systemic interventions
with experts.

6.1 Expert evaluation

Evaluation

Expert evaluation

An expert evaluation was carried out to validate the Money Laundering Design Manifesto and the interventions described in it. During this expert evaluation, the manifesto was evaluated with multiple employees of the Public Prosecution Service organisation’s office in the province of Limburg. The goal of the expert evaluation was to find out if the manifesto encourages people to take urgent action in the proposed areas. Furthermore, the three interventions were evaluated separately.

During the expert evaluation, suggestions were made to make small textual changes in the Money Laundering Design Manifesto and give specific parts more nuance. This feedback is adjusted in the Money Laundering Design Manifesto that can be found in Appendix F.

6.1.1 Setup

The Money Laundering Manifesto was sent one week beforehand via post to the people that participated in the evaluation interviews. The manifesto was printed to make it more tangible and to make it more enjoyable for the participants to read. The printed manifesto was sent in a box to the participants accompanied with an explanation note.

The people participating in the evaluation interviews had different functions in the organisation’s office of the Public Prosecution Service in Limburg. The different functions of the participants were important to evaluate for who in the organisation the manifesto is most relevant and to get different perspectives during the evaluation.

In total four different people were interviewed digitally. One person was interviewed individually and three people interviewed together in a group session.

6.1.2 Key insights

Insights that came out of the experts’ evaluation will be mentioned and discussed in this section. First regarding the manifesto in general, then about the three different interventions, and lastly about the next steps and the expected use scenario.

Manifesto

The design manifesto offered the different employees a different view on the problem situation of money laundering. By receiving the package and the printed manifest, they were immediately curious to read it. The design of the product was inviting and helped to trigger their curiosity. They found it intriguing to read and it triggered them to think differently about their own work. The approach on a system level was totally new for them.

"The manifesto provides insight at a level where I do not normally think of. It triggers me to think differently."
(Deputy Chief Public Prosecutor)

6.1

"Your perspective is a completely different perspective than one of a lawyer. All of a sudden, your perspective made it all very clear to me. Therefore I was very impressed."
(Head of the Policy & Strategy department)

"The design really appealed to me. How you worded it and executed it is very refreshing, very different from the pieces of text that we sometimes receive."
(Information officer)

Instead of talking, action is necessary to tackle money laundering. According the Money Laundering Officer, the manifesto could help in supporting more action instead of talking. He also mentioned that the manifesto really fits the undermining approach.

"I am critical and sometimes get tired of all those conversations [which lead to no action], but I really think this [design manifesto] is an addition."
(Money laundering officer)

"The way in which you have organised your research is very much in line with the approach to tackle undermining. In this approach, you try to look at transcending problems and see if you can come to a sustainable solution."
(Money laundering officer)

The goal of this manifest was to provide the first steps to create more urgency by encouraging action. According the experts the manifesto does encourage a new way of thinking and supports taking action. If it really leads to more urgency in the end is not sure, and difficult to say at this point. Validating this goal is something that should be measured over the long term.

Causal loop diagram

The goal of the causal loop diagram was to give insight and show the complexity of the money laundering system. When seeing the diagram for the first time, the experts mentioned that it was overwhelming. Furthermore, the size of the foldable poster, on which the causal loop diagram was printed, was unhandy according them.

"I like it very much, but it is quite complicated."
(Head of the Policy & Strategy department)

Although it was overwhelming the experts found it interesting to see the system approach visually represented. The money laundering officer mentioned the added value of the causal loop diagram for the rest of the manifest. They agreed that it was an essential part for the rest of the manifesto to understand where the blueprint and tangible solution came from. The text supporting the causal loop diagram was really helpful to understand it better.

"If you do not put this [causal loop diagram] in it [manifest], it is still beautiful, but it is disjoint. I am much more impressed with your results because they come from a structured approach, a scientifically based method to gain an understanding of money laundering, the systemic thinking about it. And that you then get the ideas from there."
(Money laundering officer)

According the head of the policy and strategy department, the metaphor of the causal loop diagram could help the police, mayor, and public prosecutor (called the triangle) in their decision making. It shows that other forms of action could be taken to solve a problem.

"If you discuss in a triangle meeting that money laundering is taking place somewhere in the municipality, then what are you going to do? Extinguish oxygen or add water? This [causal loop diagram] can really help in that situation. They are often only focused on how we get this evidence substantiated. And then you skip a few steps."
(Head of the Policy & Strategy department)

The causal loop diagram does show the complexity of the system. It provides understanding and gives the other interventions in the manifesto a base. However, the visualisation is overwhelming. Presenting it in parts would be better to communicate it. An explanation video could be a good improvement and would support the goal of the intervention better.

Action blueprint

The goal of the action blueprint is to communicate the most valuable and promising areas to take action. The experts agreed with the principles and thought that they were a good fit for the Public Prosecution Service.

"Those six points are spot on."
(Money laundering officer)

The money laundering officer mentioned that information organisation seemed to be an overlapping topic among multiple principles.

"It's about sharing knowledge better. Principles 1, 3, 4, and 5 all have to do with information organisation. What do we do with our knowledge, how do we share it, how do we make others enthusiastic? That is very important."
(Money laundering officer)

As can be seen in the following quote, the information officer liked this principles as base to start action.

"You have categorised it into those six principles. You can turn these into action points. You can use it as a base for a good discussion with each other. I wish we could do this more and more often in this way."
(Information officer)

The action blueprint does communicate promising action areas. They are in line with the interests of the Public Prosecution Service. Explaining the areas by making six principles made it structured and clear. However, the tangible solution overview is a necessary part to add to the blueprint, otherwise the principles would be abit shallow.

Tangible solution overview

The goal of the tangible solution overview was to inspire the Public Prosecution Service what concrete solution could look like. These solution are related to the principles out of the action blueprint.

According to all participants, the tangible solutions were the highlight of the design manifesto. They were creative, new and really inspired them. All of the participants had their personal favourites. As this was the most concrete intervention, this was also the easiest topic to talk about with the experts.

"I was particularly surprised by the creative comments in the chapter 'inspire', which I really liked. The idea of money laundering for dummies really appeals to me. In this you explain that information is fragmented, which is true indeed. That makes it difficult to get all the

information together. You need that to make a good analysis."
(Information officer)

"What I also really liked is that gatekeeper buddy process. That is quite exciting for us because then you let private parties participate in your work. Sometimes we encounter those parties in a less positive way, so that idea could be very interesting. Those kinds of contacts can provide us with a lot of insights. I found that very valuable."
(Information officer)

"The money laundering cafe is just beautiful. Most of the secretaries and officers don't like the financial aspect. They think that it is something what the money laundering officer should do. It should be an integral part of your qualities as prosecutor. Almost all crimes are committed to make money. Prosecutors should realise this, the money laundering cafe is a very good idea for that."
(Money laundering officer)

The tangible solution overview appeared to be the most essential part of the manifesto. The concrete solutions were triggering the experts the most. This was exactly the reason why this intervention was part of the intervention portfolio. In comparison to the other two interventions this is the least abstract one. The solutions really show original and creative outcomes. For the experts it was most interesting to see how these solutions are related to the blueprint principles and what the outcomes could look. The solutions were suprising and made sense. It definitely did inspire them.

Estimated impact

During the expert evaluation, the estimated impact of the manifesto was discussed as well. Furthermore, the estimated use scenarios were argued.

"The influence it [the design manifest] could have is that people start to realise that criminal charges in a criminal case are a very small part of the solution of the problem. That is perhaps the most important influence of the manifest. You open that door with what you describe in it."
(Money laundering officer)

"It [design manifest] will not immediately lead to more cases. It would lead to thinking and asking questions. Asking questions is the beginning of wisdom, that's important."
(Deputy Chief Public Prosecutor)

The experts think that the manifesto will have the biggest impact on new ways of thinking among employees of the Public Prosecution Service. Before taking action it is an important step to realise a new way of thinking first. To be able to have more impact on triggering action, the manifest should include more focus on implementation suggested by one of the experts. This could be done by giving specific examples.

"I would like to get a guide for a specific situation. A case could be used as an example for the principles. A layer of more deepening would lead to implementation because then people will recognise it."
(Deputy Chief Public Prosecutor)

Furthermore, the experts thought that the manifesto would not only be interesting for the Public Prosecution Service but also for other parties, like the RIEC for example. The Public Prosecution is not the only one that deals with tackling money laundering.

"What you write is now directed to the Public Prosecution Service, but the message applies to many more parties."
(Money laundering officer)

"I certainly think the RIEC can do something with this as well. They can name enforcement bottlenecks. The RIEC can play an important role."
(Information officer)

Use scenario
The experts gave advise how they think the manifesto should be spread among the public prosecution service to create the most impact. Furthermore they shared how they think the manifesto would be used by people.

"The manifesto should be shared with the National Head office of the Public Prosecution Service (het PAG)."
(Money laundering officer)

"The national money laundering officer should get the manifest. All money laundering officers have this person in charge, via this person they should all get the manifest."
(Money laundering officer)

"I don't think it is something that ends up in the drawer. I will give this to people on my team later. It is suitable for that."
(Money laundering officer)

"You have categorised it into those six principles. You can turn these into action points. You can use it as a base for a good discussion with each other. I wish we could do this more and more often in this way."
(Information officer)

The first step that should be done is sharing the manifesto with people among the Public Prosecution Service. The experts mentioned that it could be shared among multiple layers in the organisation, on a strategic level but also in steering committees (stuurgroepen) and with people at the workplace. It should especially be shared with the National Head office and with the national money laundering officer. The experts expect that the blueprint and the connecting tangible solutions can lead to action points and could function as a base for a good discussion with each other. The manifesto can be shared in teams to trigger each other to think differently about the work you are doing.

Chapter 7

Conclusion

7.1 Discusson & limitations

7.2 Recommendation

7.3 Personal reflection

Conclusion

Discussion & limitations

In this section, the relevance and limitations of the thesis results are discussed. Furthermore, the use of the systemic design approach is reflected on, as well as the synthesis experiment with the different methods.

At the beginning of the project, the initial goal was stated:

By conducting extensive research, I will map out the current money laundering system in the region of Limburg. The ultimate goal of this project is to identify opportunities that support the fight against money laundering in the current system.

Later in the project, this goal was extended with three sub-goals for designing interventions. These goals were: providing understanding, guidance and inspiration for the Public Prosecution Service.

7.1.1 The Money Laundering Design Manifesto

These three design goals resulted in three systemic interventions, communicated by the Money Laundering Design Manifesto. These three interventions are the causal loop diagram, the action blueprint and the tangible solution overview.

The causal loop diagram offers an understanding of the complexity of the money laundering system, the action blueprint includes fruitful action areas, and the tangible solutions provide inspiration for possible outcomes. These interventions together function as tools to support the Public Prosecution Service to take urgent action against money laundering. The ultimate underlying goal is to increase a sense of urgency among the organisation. A better sense of urgency could improve the overall approach to tackle money laundering in the current system.

The manifesto can be seen as a starting point to increase the sense of urgency. Spreading the manifesto among different layers of the Public Prosecution Service should be the next step. As came out of the evaluation with the experts, it is uncertain to say that the sense of urgency will immediately arise after reading the manifesto, but it certainly does provide the right tools. By following the principles and taking action in these areas, the sense of urgency could grow. As current initiatives prove not to work, change is necessary. Creating urgency is the first step to be able to change.

A limitation of the design manifesto and its included interventions is the implementation aspect. How can the ideas be implemented among the Public Prosecution Service? In the project there was no focus on this aspect. A next step would definitely include a focus on implementation. This will be further discussed in the recommendation section.

7.1

7.1.2 The synthesis experiment

The synthesis part of the project, in which the research insights were translated into interventions, was the most prominent and crucial step in the design process.

The synthesis part turned into an experiment in which different methods were used. In this experiment, systemic design methods like the system maps: GIGA-mapping and the causal loop diagram were used, and design thinking tools, like the ViP method and the Frame Creation method.

The experiment gives insight into the value of the different methods and describes the advantages of each method to move from insights to interventions when applying the systemic design approach. The synthesis step had two goals, first map the research insights and second, find points in the system to intervene.

These two goals were valuable at the beginning of the experiment but later became a limitation. Each method was validated by using these two goals which was very ambitious but at the same time unrealistic. This resulted in creative paralysis and disappointing outcomes. Reflecting helped to realise that there was not one perfect method that could be validated by these two goals at the same time. Finding the strengths in each of them and combining them, in the end, seemed the best solution to move on.

7.1.3 The systemic design approach

The project is carried out by using the systemic design approach. This project shows how a complex problem situation can be tackled by using this approach. The most significant advantage of using this approach instead of the human-centred design thinking approach is that systemic design includes the complexity of the problem. Real-world complex problems are not isolated problems. The holistic, system view of systemic design, takes into account all factors of a problem and recognises the complexity of a problem.

Visualisation is an important aspect in systemic design. Visually mapping the systems helps to create common ground and puts the complexity literally on paper. This design skill makes it better accessible for others.

The systemic design approach allowed to come up with multiple interventions. Creating a portfolio of three different interventions seemed most appropriate to fulfil the original goal.

A limitation of using the systemic design is that it can stay on an abstract level of thinking. Including all complexity of the reserach was at some points overwhelming. As a novice systemic designer, it was sometimes difficult to move from abstract thinking to concrete thinking. An essentiel step, because moving towards more concrete levels of thought makes systemic design better understandable for others and the final solutions better feasible.

7.1.4 Focus point Limburg

Focussing on the province of Limburg helped in scoping the project. Especially in the research phase, it was helpful to have this concrete region. The final results are built upon the research done in this region, but they could still be valuable and applicable for other parts of the Netherlands as well.

Conclusion

Recommendations

In this section, recommendations for future research will be proposed. Not only on a practical level regarding the thesis result but also an organisational level. Part of them is based on the limitations mentioned in the previous section.

7.2.1. Money Laundering Design Manifesto

The Money Laundering Design Manifesto should be deepened with an implementation layer including examples and concrete steps to take. This could make the impact bigger by triggering action. Another option is to focus on a specific part of the Public Prosecution Service in doing this. A promising group among the Public Prosecution Service could be the money laundering officers.

Another option for Testlab OM is to connect with the Organised Crime Field Labs (OCFL) and provide the principles of the blueprint as input areas for future projects to them.

Besides having the Manifesto as a starting point, how could they be supported in implementing the principles or ideas in the organisation? Research could be done to add a second implementation layer to the manifest focused on a specific group of people among the organisation. The money laundering officers could also be valuable in this step.

The Money Laundering Design Manifesto is only validated with people among the Public Prosecution Service. As the principles and tangible solutions also deal with other parties besides the Public Prosecution Service, it could be valuable to validate these ideas with these organisations as well.

7.2.2 Sense of urgency meaning

In this thesis, the main scope for creating the interventions was focused on a sense of urgency. As could be seen in the causal loop diagram, there are many more leads to have an impact on the system of money laundering. Zooming into this diagram further could provide new innovation areas. Especially the gears with many relations to other factors could be interesting focus points for further research.

Sense of urgency is difficult to measure as it is a feeling. How should it be formulated so it can be measured? Research can be done on defining sense of urgency regarding money laundering to find out what the correct measurement for this term could be. When do public prosecutors feel urgency towards money laundering? And how can you measure that feeling?

7.2.3 The Public Prosecution service dealing with complex problems

Money laundering is recognised as a complex problem but not handled in this way by the Public Prosecution Service. A complex problem situation asks for a specific solving approach. As Snowden & Boone (2007) suggest with their Cynefin framework is that complex problem situations ask for environments and experiment that allow patterns to emerge. Methods should be used that generate ideas.

7.2

Testlab OM and the OCFLs are progressive in this, but the organisation’s culture in general is not built for this way of working. Hierarchy is strong and does not allow experimentation. The Public Prosecution Service would benefit when they would create specific environments where experimenting and making mistakes are allowed, especially when this will be supported by supervisors and managers. There should be one ‘test parket’ among the organisation where prosecutors work that are open and willing to experiment with new ways of working. Tackling complex problems in the appropriate way instead of conservatively stick to the traditional ways of working could be very exciting and promising.

7.2.4 Applying systemic design

Future research could focus on applying the systemic design to specific cases, situations or factors of the causal loop diagram. The causal loop diagram is a first visualisation and overview of the whole system. Zooming into specific factors of the causal loop diagram and researching these factors even more in-depth could be valuable.

Furthermore, there should be a system map for every type of money laundering. This will help to understand each method better and could help in finding common patterns. As there are many typologies of money laundering, there are also many solutions available.

7.2.5 Other

Connected to the previous recommendation: When doing future (design) research or projects focused on money laundering, it could be wise to focus on one specific kind of money laundering. As money laundering can exist in many different ways, it could be valuable to develop a solution focused on one specific typology. In this way, solutions can be made more concrete. There is a slight chance that one solution will apply to multiple money laundering method, by isolating one method and focusing on the specific connected gatekeepers. This could lead to exciting outcomes.

Conclusion

Personal reflection

Ambitions

As mentioned earlier in the preface of this thesis, I have a huge fascination for designing for criminality. The reason for this is that most criminality related problems are wicked problems. To tackle these problems, you need to deal with multiple, sometimes contradictory or even controversial perspectives. I think this is most interesting and at the same time very challenging to design with.

For my graduation project, I wanted to do something with this fascination, but on a strategic level related to the specialisation of my master. I wanted to prove to myself that I am capable of doing a strategic design project on my own. Another learning ambition I made was to get a better understanding of systemic design and to find out if this is something I would like to work with in the future. The close collaboration with the systemic design lab and the opportunity to work together on a project considering money laundering for the Public Prosecution Service provided the perfect setting for my learning ambitions.

Looking at the process of my project and at my final interventions fills me with pride. It is on the strategic level I wanted it to be. Letting go of designing a product as the end goal in a project was a challenge. At specific points in the project I felt stuck because of this. A mental shift and a good reflection were needed to move away from this product design perspective. Diving into systemic design theories and getting a better understanding of the systemic design approach were helpful at that point.

What certainly influenced this was the systemic design approach that I applied for the first time in a project. Mieke already warned me before even starting the project that it could be challenging to apply this approach for the first time in your graduation project. It was sometimes difficult indeed, and it made the process less intuitive than other projects I did before. Although my whole project was at the same time a learning journey about systemic design, I have no regrets that I applied this approach. What was really helpful was that I could join meetings and sessions organised by Nynke, Mieke and Albert for the Public Prosecution Service regarding the same topic. In this way, I had a sneak peek backstage and could observe how professional designers apply the systemic design approach.

What I like about applying systemic design is that it is better connected to real-world phenomena in my opinion than the human-centred design approach. Especially when dealing with complex problems. Regular design thinking projects are sometimes carried out isolated from all the things that normally influence it. The holistic aspect of this approach is an essential power in this. Furthermore, identifying the whole system of money laundering required much research. I really enjoyed doing this extensive research and collecting much data about a topic I was totally unfamiliar with.

7.3

COVID pandemic

Graduating during the COVID pandemic was not always easy. The options to leave the desk for the project were because of COVID limited. Sitting most of the time behind your laptop sometimes blocked my creative thoughts and creative energy. Social contacts are an important motivational factor for me. Not only on a personal level but also on a working level. Doing interviews in real life, being able to visit the company and have coffee with the people you are working together with, are the things I enjoy most in ordinary design projects. A digital working style can, in my opinion, not replace that feeling.

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