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### **Banks as security actors**

*Countering terrorist financing at the human-technology interface*

Bosma, E.

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# BANKS AS SECURITY ACTORS

Countering Terrorist Financing at  
the Human-Technology Interface



Esmé Bosma



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# BANKS AS SECURITY ACTORS

Countering Terrorist Financing at the  
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Esmé Bosma

ACADEMISCH PROEFSCHRIFT

ter verkrijging van de graad van doctor  
aan de Universiteit van Amsterdam  
op gezag van de Rector Magnificus  
prof. dr. ir. K.I.J. Maex

ten overstaan van een door het College voor Promoties ingestelde commissie,  
in het openbaar te verdedigen in de Aula der Universiteit  
op vrijdag 18 februari 2022, te 11.00 uur

door Esmé Bosma  
geboren te Assen

# Promotiecommissie

<i>Promotor:</i>	prof. dr. M. de Goede	Universiteit van Amsterdam
<i>Copromotor:</i>	dr. P.E. Pallister-Wilkins	Universiteit van Amsterdam
<i>Overige leden:</i>	prof. dr. C. Bueger	University of Copenhagen
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Faculteit der Maatschappij- en Gedragwetenschappen

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*Voor mijn moeder, die altijd naast ons heeft gestaan*





[T]he practice of description provides the material that gives future scholars (including the future self of the describer) the opportunity to engage differently with their objects, and serves as a building block for extending the collective and networked aspects of scholarly work across time (Marcus et al., 2016: 4).

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# Previous Publications

This dissertation draws on the following publications.

Chapter 3 builds to a large extent on a previous publication ‘Multi-sited ethnography of digital security technologies’ in the edited volume *Secrecy and Methods in Security Research: A Guide to Qualitative Fieldwork*. The chapter has been substantially expanded to include the entire methodological span of the thesis.

The bibliographic details of the published material are as follows:

Bosma E, De Goede M and Pallister-Wilkins P (2020) Introduction: navigating secrecy in security research. In: De Goede M, Bosma E, and Pallister-Wilkins P (eds) *Secrecy and Methods in Security Research: A Guide to Qualitative Fieldwork*. London: Routledge, pp. 1–27.

Bosma E (2020) Multi-sited ethnography of digital security technologies. In: De Goede M, Bosma E, and Pallister-Wilkins P (eds) *Secrecy and Methods in Security Research: A Guide to Qualitative Fieldwork*. London: Routledge, pp. 193–211.

# List of Abbreviations and Acronyms

ACAMS	Association of Certified Anti-Money Laundering Specialists
AI	Artificial Intelligence
AIVD	Netherlands General Intelligence and Security Service
AML	Anti-Money-Laundering
ANT	Actor-Network-Theory
BCBS	Basel Committee on Banking Supervision
CAM	Customer Activity Monitoring
CDD	Customer Due Diligence
CTF	Counter Terrorist Financing
DTN	Dutch Terrorism Threat Assessment
EFIPPP	Europol Financial Intelligence Public-Private Partnership
ERP	Enterprise Resource Planning
ETA	Euskadi Ta Askatasuna
EU	European Union
FATF	Financial Action Task Force
FEC	Financial Expertise Centre
FIOD	Fiscal Information and Investigation Service
FIU	Financial Intelligence Unit
FRS	Fire and Rescue Service
GBP	Great British Pound
GDPR	General Data Protection Regulation
HCI	Human-Computer Interaction
IR	International Relations
IRA	Irish Republican Army
IS	Islamic State
IT	Information Technology
JCPOA	Joint Comprehensive Plan of Action
JMLIT	Joint Money Laundering Intelligence Taskforce
KYC	Know Your Customer
MiFID	Markets in Financial Instruments Directive
MLRO	Money Laundering Reporting Officer
NCA	National Crime Agency
NCTV	National Coordinator for Security and Counterterrorism
NTFIU	National Terrorist Financial Investigation Unit
OFAC	US Office of Foreign Assets Control

PEP	Politically Exposed Person
PPP	Public-Private Partnership
RBA	Risk Based Approach
RUSI	Royal United Services Institute for Defence and Security Studies
SAR	Suspicious Activity Regime
SBI	Standard Business Classification codes
SCOT	Social Construction of Technology
SIRA	Systematic Integrity Risk Analysis
STS	Science and Technology Studies
SWIFT	Society for Worldwide Interbank Financial Telecommunication
TF	Terrorist Financing
UAE	United Arab Emirates
UBO	Ultimate Beneficial Owners
UTR	Unusual Transaction Reporting
WODC	Research and Documentation Centre of the Dutch Ministry of Security and Justice
Wpg	Police Data Act
Wwft	Money Laundering and Terrorist (Prevention) Act

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