

GLOBAL FORUM ON
**TRANSPARENCY AND EXCHANGE OF
INFORMATION FOR TAX PURPOSES**

Capacity Building

A new strategy for the widest impact

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9-11 December 2020

Table of abbreviations

AEOI	Automatic exchange of information
EOI	Exchange of information
EOIR	Exchange of information on request
IFF	Illicit financial flow
ISM	Information security management

Table of contents

Table of abbreviations	1
Executive summary	4
1 Introduction	6
Building capacities in transparency and exchange of information since 2010	6
Capacity building becomes one of the core duties of the Global Forum Secretariat	6
Revisiting the Global Forum Secretariat's strategy after 10 years of capacity-building	7
2 Revisiting the capacity-building strategy	8
The challenges ahead for the Secretariat's capacity-building programme	8
The demand for capacity building has significantly increased	8
Ensuring the sustainability of the capacity-building programme	9
Core components of the Strategy	9
Scope of the Strategy	9
Objectives of the Strategy	9
A comprehensive capacity-building process	10
Engaging with stakeholders	11
Building partnerships	11
Monitoring and assessing the capacity-building programme and its impact	12
Remaining accessible	13
Understanding the needs of developing members	13
Standard of transparency and exchange of information on request	14
Standard of automatic exchange of financial account information	14
Effective use of EOI	15
Defining developing jurisdictions' profile	16
3 The new capacity-building Strategy	18
Raising awareness and reaching out	18
Building knowledge and skills	19
Knowledge development tools	19
Trainings	19
Supporting effective implementation and use	21
Technical assistance trigger	21
A differentiated approach	22
A modular approach	23
An agile approach	23

4 A revised approach to capacity building in AEOI	25
The 2017 Plan of Action	25
Lessons learnt from the implementation of the Plan of Action	25
Parameters of a revised Plan of Action	26
5 Conclusion	28

Executive summary

Capacity building is one of the core duties of the Global Forum Secretariat. It supports a rapid and effective implementation of the transparency and exchange of information (EOI) standards by all its members, in particular the developing ones. Beyond implementation, the objective is to ensure that developing members effectively benefit from the standards by fighting more efficiently tax evasion and other illicit financial flows and ultimately by mobilising more domestic resources to finance their development.

Over the years, the capacity-building programme, which was launched in 2011, has expanded to cover new areas and has intensified to support the growing membership of developing jurisdictions which now make up the majority of the members of the Global Forum.

In order to ensure a sustainable capacity-building programme in a context where resources are not infinite, the Secretariat has continued its efforts to better manage its resources to deliver the best assistance to members. Thanks to donor support and cross-organisation cooperation, the increased demand for assistance has been met. The COVID-19 pandemic also turned out as an opportunity to brainstorm, innovate and develop new approaches and tools that have enriched the Secretariat's reflection.

In the perspective of the 10-year mark of its capacity-building programme, a new strategy has been developed to have a greatest impact for the benefit of developing jurisdictions.

The objective is to ensure that developing jurisdictions receive the assistance they need to implement and benefit from transparency and exchange of information. To that end some key principle will be implemented or strengthened:

- **A comprehensive approach to capacity building** will be implemented by using in a coherent, organised and progressive manner all capacity-building instruments (i.e. knowledge development tools, training and technical assistance).
- **The mobilisation of all the energies is critical to bring effective change.** The Secretariat will continue to interact with relevant stakeholders, including civil society organisations, to educate, exchange and innovate. It will further deepen its coordination with technical partners to have a common message, build on synergies and avoid duplication. It will also strengthened its relationship with donors in order to exchange and share ideas to improve the programme.
- **The assessment of the quality and the impact of the capacity-building programme is essential** and will continue to inform on the additional revenues identified, structural reforms implemented and promotion of gender balance and to improve or adjust the delivery of the assistance.
- **The profile of developing jurisdiction requesting assistance will be also defined** to better understand their specific circumstances and better address their specific needs.

The new Strategy is based on three key pillars that support each other and generate synergies for a greater capacity-building impact:

- **Raising awareness** of decision-makers and senior officials whose support is critical to the success of the capacity building programme, as well as other relevant stakeholders.
- **Building knowledge and skills** through a better integration of development knowledge tools into capacity building work and a new training policy.
- **Supporting the implementation and effective use of EOI.** In addition to assistance on request, a proactive approach will be put in place to help developing countries identify their needs in a timely manner or exploit their potential. The differentiated approach between tailored assistance for experienced members and induction programme for new members will continue. A modular approach will be followed to divide a technical assistance programme into several coherent and logical modules with specific actions, timeframe and objectives to be achieved. This approach would allow for better management of resources and the establishment of a rapid reaction mechanism to intervene when a module does not progress as agreed. Finally, a greater use of the hybrid assistance developed during the pandemic will offer a more agile approach.

Finally, the Secretariat's Plan of Action developed to help developing jurisdictions implement automatic exchange of information will be adjusted accordingly.

1 Introduction

Building capacities in transparency and exchange of information since 2010

Following its restructuration in 2009, the Global Forum on Transparency and Exchange of Information for Tax purposes (Global Forum) was tasked “*to ensure a rapid and effective global implementation of the standards of transparency and exchange of information (EOI) for tax purposes through in depth monitoring and peer review*”. At that time, Global Forum members were mainly G20 and OECD countries, developed jurisdictions and developing jurisdictions hosting a financial centre.

As early as 2010, the issue of building capacities was raised to help developing jurisdictions implement the transparency and EOI standard. Developing jurisdictions represented one third of the membership at that time. In the statement of outcomes of its 2010 plenary meeting held in Singapore, the Global Forum encouraged developing countries to join its work and also agreed to develop a technical assistance programme in order to help all its members fully implement the standard, and to be a resource for other jurisdictions and organisations with respect to tax information exchange.

In the wake of the financial crisis, transparency and EOI was also introduced in the development agenda. The G20 Leaders’ Development Working Group requested in November 2010 the Global Forum to “*enhance its work to counter the erosion of developing countries’ tax bases and, in particular, to highlight in its report the relationship between the work on non-cooperative jurisdictions and development*”.

Capacity building becomes one of the core duties of the Global Forum Secretariat

To answer the demand of its members as well as the request of the G20, the Global Forum Secretariat started to explore the kinds of technical assistance needed and how technical assistance programs could best be designed, co-ordinated and delivered. It also played the role of an intermediary between the jurisdictions requesting assistance and development agencies.

In 2011, the Secretariat effectively started its capacity-building programme with training courses to help its developing members prepare for their peer review against the standards of transparency and exchange of information on request.¹ The importance of building capacities to ensure that developing jurisdictions implement the international standard on a global basis as well as benefit from the new transparent environment was reaffirmed at the Global Forum plenary meeting held in Bermuda in June 2011.

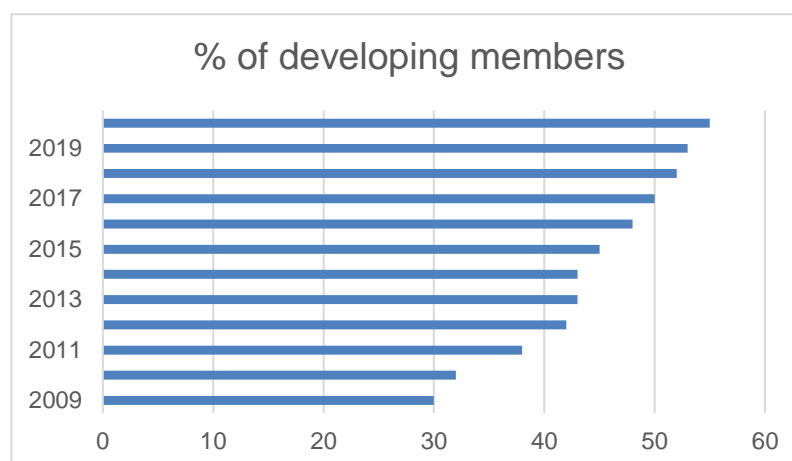
The Global Forum Secretariat’s capacity-building guidelines were adopted at the Global Forum plenary meeting held in Paris in October 2011.² At this occasion, the Global Forum welcomed the

¹ The inaugural training course took place in Jamaica in January 2011, a further session for Pacific and Asian members was held in Australia in March 2011, and a third session was held in June in South Africa.

² CTPA/GFTEI(2011)19 Technical assistance: note on guidelines

commencement of two pilot projects, funded by the United Kingdom, to support Ghana and Kenya implement and benefit from the standard.

In the following years, the Secretariat's capacity building work intensified considerably as the number of its members doubled and a majority of them are now developing jurisdictions. In addition, with the adoption in 2014 of the standard of automatic exchange of financial account information (AEOI standard), new areas of assistance were developed to ensure that developing jurisdictions also benefit from this more demanding but very promising standard for domestic resource mobilisation.



Since 2015, capacity building has been expressly included in the Global Forum's mandate, one of the missions of which is to develop tools and assist members to effectively implement the standards.

Revisiting the Global Forum Secretariat's strategy after 10 years of capacity-building

Membership of the Global Forum has dramatically changed since the launch of the Secretariat's capacity-building programme. The needs vary significantly from one member to another while the demand of assistance has considerably increased.

The implementation of the capacity-building programme over the last 10 years has also been a learning process to constantly improve the quality of the assistance provided, to better apprehend and address developing jurisdictions' needs and better manage the resources available. The Secretariat also listened to the Global Forum members and its technical and donor partners without which the achievements reached so far would not have been possible.

The COVID-19 pandemic has turned out as an opportunity to reflect, innovate and develop new approaches and tools that have enriched the capacity-building strategy (the Strategy) as it has challenged the ability of the Secretariat to deliver effective support in difficult times.

The rest of this note enlightens the rationale and the core components leading to a revised Strategy (Section 2), presents the new Strategy (Section 3) including a revised approach for AEOI assistance (Section 4), before concluding (Section 5).

2 Revisiting the capacity-building strategy

The challenges ahead for the Secretariat's capacity-building programme

The demand for capacity building has significantly increased

The inclusive nature of the Global Forum and the successes achieved since 2009 have attracted a growing number of developing jurisdictions seeking to improve their capacity to combat tax evasion and other illicit financial flows (IFFs) and increase their domestic resource mobilisation. Most of the recent new members are developing jurisdictions with limited capacities.

In parallel, the scope of the needs for assistance has considerably extended with, for instance, the adoption the AEOI standard, which is more demanding than the standard of exchange of information on request (EOIR standard). In particular, the implementation of the AEOI standard requires an appropriate information security management (ISM) framework, for which assistance is provided by the Secretariat. The development of other forms of automatic exchange under the Inclusive Framework on Base Erosion and Profit Shifting (e.g. country-by-country reporting) also contributed to increased requests for ISM support, as the Secretariat has built a strong expertise in this area.

The main drivers of the intensification of the capacity building work are as follows:

- The increase of the membership;
- Preparations for the EOIR and AEOI peer reviews;
- The implementation of an appropriate ISM framework for the implementation of automatic exchanges, including under the common reporting standard and the country-by-country reporting;
- The willingness of member jurisdictions to comply with the commitments they have made to the Global Forum and other organisations
- The call by the global community to ensure developing countries' participation in the tax transparency agenda in order to improve their domestic resource mobilisation by addressing the challenges posed by tax evasion and other IFFs.

In addition, there is a growing difference in needs between pre-2015 and post-2015 members. The scope of the capacity-building programme currently covers:

- The implementation of the EOIR and AEOI standards;
- The establishment of an appropriate confidentiality and ISM framework;
- The effective use of the EOI infrastructure, including the use of AEOI data, to tackle tax evasion and other IFFs and improve domestic resource mobilisation. This includes also emerging issues such as cross-border collection and wider use of data.

Ensuring the sustainability of the capacity-building programme

Thanks to the financial support of its donor partners, the Global Forum Secretariat was able to cope with the needs of developing members. To that end, it has created a dedicated unit for capacity building, developed new expertise (e.g. ISM) and coordinated its activities with other technical partners to avoid duplications and benefit from synergies.

To face the challenges ahead, a revisited Strategy has been developed to ensure a sustainable capacity-building programme which provides a high-quality assistance responding to the needs of the developing members. This requires continuing to ensure a good allocation and management of the Secretariat's resources, improve the balance between generic and tailored support, obtain tangible results and communicate those results.

Core components of the Strategy

Scope of the Strategy

The Secretariat of the Global Forum assists all its members in implementing the EOI standards. While the assistance provided to developing jurisdictions is largely funded by voluntary contributions from donors, the assistance provided to other members is financed through other means.

The Secretariat also assists developing jurisdictions that are not members of the Global Forum through pre-membership assistance. This limited assistance aims in particular at clarifying international standards, explaining the benefits of their implementation and specifying the obligations related to the membership so that any interested jurisdictions can take informed decisions.

The Secretariat is also carrying out specific capacity-building programmes which are supported by dedicated funding. While most of the aspects of the Strategy would apply to these programmes, they do not fall under this Strategy due to their specific criteria, objectives and targets.

The Strategy will therefore apply to capacity building provided to member and non-member jurisdictions with the specificities in terms of scope, intensity and resourcing as detailed below.

Objectives of the Strategy

The main objective of the Strategy is to ensure that developing jurisdictions implement and benefit from transparency and EOI for tax purposes to fight tax evasion and other IFFs and raise much-needed domestic resources to finance their development. This main objective is in line with the sustainable development goals.

To achieve this main objective, the Strategy aims to meet core and interrelated sub-objectives:

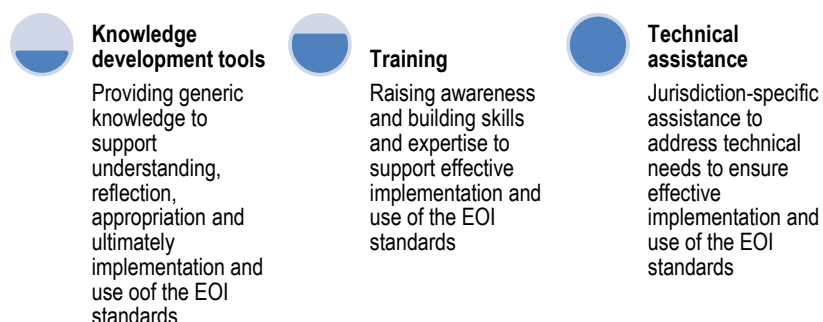
- Ensuring a good allocation and management of the Secretariat's resources;
- Continuously developing the capacity-building activities;
- Responding effectively and proactively to the needs of developing jurisdictions and adapting the assistance to their particular situation and to exceptional circumstances;
- Defining and meeting annual targets;
- Obtaining tangible results;
- Communicating on the outcomes of the capacity-building programme.

A comprehensive capacity-building process

To maximise the impact of the capacity-building work and manage resources, a balance should be made between jurisdiction-specific work and assistance that is more general. To that end, the capacity-building activities shall be broken down as follows:

- **Knowledge development tools** – this is a generic capacity-building instrument aimed at improving global knowledge, supporting reflection and ownership, and preparing for implementation. This includes toolkits and e-learning courses³.
- **Training** – this is a more general form of capacity building designed to raise awareness or build skills and expertise, as appropriate, on key issues in the implementation of the EOI standards and their effective use. The main feature of training is the interaction between trainers and participants, which allows questions to be answered, concepts to be clarified, experiences to be shared and cases encountered by the participants to be discussed.
- **Technical assistance** – this is a customised assistance to address the technical needs of a particular jurisdiction. It encompasses for instance support in drafting legislations and regulations, setting up an EOI network and infrastructure, and practical implementation of the legal framework. It also includes dedicated workshops organised to support this work. Technical assistance will intervene at the implementation stage of the standards.

These capacity-building activities will not be deployed in isolation. On the contrary, they are integrated components of a comprehensive Strategy and mutually complement each other. The activities have different purposes and shall be used at the appropriate time of the capacity-building process.



These different activities are mutually reinforcing. They enable a progressive and structured implementation of the capacity-building programme.

Although all of them are resource-intensive, **the development of tools and trainings⁴ is usually a one-off investment with long-term benefits and the ability to reach a wide audience.** Tools and trainings are standardised products, which serve technical assistance work. They also support regional activities (e.g. regional trainings, regional initiatives such as the Africa Initiative or the Punta del Este Declaration, a Latin America Initiative) and facilitate greater cooperation between development partners (e.g. toolkits and e-learning course can be co-produced, training co-organised) as well as a common approach and standardised guidance.

Technical assistance is, by nature, generally less standardised in that the specificities of the jurisdiction are at the core of the technical work. On the other hand, in some cases a regional approach

³ Unlike trainings, e-learning courses do not include interaction with trainers or other participants and therefore fit better in the category of knowledge development tools.

⁴ Tools and trainings need nevertheless to be revised or updated where required.

can be developed, in particular when several jurisdictions share a common legal framework (e.g. economic communities) and similar challenges. Finally, the pooling of the technical assistance actions of different partners working with one or more jurisdictions is desirable to avoid duplication and ensure coordination and consistency.

The Global Forum Secretariat has always sought to improve standardisation, regionalisation and cross-agency cooperation in its capacity-building work. This Strategy aims to further develop this approach.

Engaging with stakeholders

Building capacities for transparency and EOI for tax purposes in developing jurisdictions is a major part of the dynamics of change. The focus of this work is mainly on government officials and decision-makers. However, the Secretariat also works to train and inform other important stakeholders, including government bodies, members of parliaments, civil society organisations and the public in general. They are indeed important relays for ensuring ownership of tax transparency issues, for supporting and advancing the implementation of the EOI standards and overcoming potential blockages.



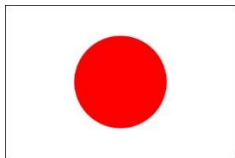




The Strategy will further promote the education and information of all relevant stakeholders. Engagement with all stakeholders is a key component to support the dynamic of change.

Building partnerships

Strengthening relationships with donor partners

The contribution of donor partners is crucial to the existence of the capacity-building programme. Thanks to their trust and commitment, this programme has developed into a high-quality service to developing jurisdictions.

The Secretariat will continue to consult and share ideas with donor partners in order to constantly improve the programme and its impact on structural reforms, on reducing tax evasion and other IFFs, and on domestic resource mobilisation.

Australia	European Union	France	Japan
 Australian Government Department of Foreign Affairs and Trade		 MINISTÈRE DE L'EUROPE ET DES AFFAIRES ÉTRANGÈRES <i>Liberté Égalité Fraternité</i>	
Norway	Senegal	Switzerland	United Kingdom
 Norad		 Schweizerische Eidgenossenschaft Confédération suisse Confederazione Svizzera Confederaziun svizra Swiss Confederation Federal Department of Economic Affairs, Education and Research EAER State Secretariat for Economic Affairs SECO	 UKaid from the British people

Consolidating the synergies with partner organisations

Coordination and cooperation with other development partners have been central to the Global Forum Secretariat's capacity-building programme since the beginning. In the last 10 years, the Secretariat has built strong relationships with partner organisations to develop tools, deliver trainings and provide technical assistance to developing jurisdictions.

These partnerships have enabled the launch of regional initiatives, the avoidance of duplication and the dissemination of a consistent message to our counterparts.

The Strategy of the Secretariat is to deepen these partnerships and to build new ones where appropriate, to ensure continued coordination and to benefit from synergies.

African Development Bank Group	African Tax Administration Forum	African Union Commission	Asian Development Bank	Centro Interamericano de Administraciones Tributarias
				
Cercle de réflexion et d'échange des dirigeants des administrations fiscales	Inter-American Development Bank	International Monetary Fund	Pacific Islands Tax Administrators Association	World Bank Group
				

Monitoring and assessing the capacity-building programme and its impact

To ensure the sustainability and quality of the capacity-building programme, the Secretariat is implementing new tools to improve its monitoring. It is exploiting surveys and evaluation forms to detect opportunities for improvement and adjust the content or the form of its capacity-building activities. In addition, the Secretariat is also looking at ways to evaluate the participants' knowledge and skills following its activities, in particular training courses.

Annual assessments of the capacity-building programme are performed. At the global level, a survey is sent on an annual basis to member jurisdictions to assess the quality of the capacity-building programme and its impact on transparency and domestic resource mobilisation. This assessment is included in the Global Forum annual report. In addition, in the context of the Africa Initiative, a regional assessment of the progress made is carried out and supports the annual publication of the Tax Transparency in Africa report. A similar approach will be followed in 2021 under the framework of the Punta del Este Declaration.

As education and training contribute to reducing gender gaps in the long term, the Secretariat started to mainstream gender equality considerations in its capacity-building activities and to monitor whether there is a good gender balance among participants in its activities, in particular trainings. In addition, Secretariat's initiatives to promote gender balance, and, more generally, participation by other underrepresented groups should be pursued, including by working with the authorities nominating participants.

The Secretariat will therefore continue its monitoring and evaluation process.

Remaining accessible

Language barriers can be a hindrance to the effectiveness of capacity building. Experience has shown that in many developing jurisdictions, officials who are not working on international matters have little or no foreign language skills.

In order to limit this risk to the effectiveness of the programme, the Secretariat is committed to developing all its tools and programme in three languages, i.e. English, French and Spanish. Exceptionally, activities could be organised in other languages if appropriate.⁵

A contact point in the Secretariat has been assigned to each member jurisdiction to answer any general questions, including with respect to the assistance that can be provided. In addition, a Secretariat member is assigned to deliver technical assistance to each assisted jurisdiction. A generic email address (gftaxcooperation@oecd.org) is also made available for questions and exchanges.

The Global Forum website has been upgraded to be bilingual (English and French) and a resource section containing all toolkits and e-learning courses is easily accessible⁶. In addition, some content is also available in Spanish.

Regular newsletters are sent to all member jurisdictions to inform them about capacity building events and tools.

Understanding the needs of developing members

The Global Forum currently counts 161 members, of which 88 are developing jurisdictions (i.e. 55% of the Global Forum membership). The membership of developing jurisdictions has surged in recent years:

- Between 2009 and 2015, 53 out of 122 members who joined the Global Forum were developing jurisdictions (i.e. 43.4%).
- Since 2015, 34 out of the 39 new members have been developing jurisdictions (i.e. 87%).
- It is expected that any new members will be developing jurisdictions.

Helping developing jurisdictions implement the EOI standards is a core objective of the capacity-building work. All Global Forum members are committed to implement the EOI standards and to be subject to a peer review of their level of compliance. The resulting rating has an important reputational effect and a potential impact on a jurisdiction's economy. The Global Forum's ratings are an important source of information for economic operators in taking into account country risks, and for many organisations and countries in defining their policy towards jurisdictions that have not obtained a satisfactory rating.

Assistance in the effective use of the EOI infrastructure to mobilise domestic resources is also a core objective of the capacity-building programme. Beyond the implementation of the standards, the expectation of developing jurisdictions joining the Global Forum is to benefit from administrative cooperation to better fight cross-border tax evasion.

These two fundamental objectives complement each other. The implementation of the EOI standards is a key requirement of administrative cooperation, which is based on reciprocity. In turn, an

⁵ For instance, certain activities were carried out in Arabic, Portuguese or Russian.

⁶ Toolkits and e-learning courses are accessible via <http://www.oecd.org/tax/transparency/resources/>

EOI infrastructure should be in place so that tax auditors can conduct their investigations by mobilising domestic information and using EOI to obtain the information that they need from abroad.

Standard of transparency and exchange of information on request

All Global Forum members are committed to implement the standard of transparency and exchange of information on request (EOIR standard). The consequence of this commitment is that they will be all subject to the EOIR peer review process.

It is critical to support the implementation of the EOIR standard by Global Forum members, in particular developing jurisdictions. The experience of the early stage of the first round of EOIR peer review, which was launched in 2010, showed the importance of helping developing members implement the EOIR standard in advance of their peer reviews to avoid them failing their assessment because of a lack of domestic capacities and understanding of the requirements of the standard. With the growing membership of developing jurisdictions with limited capacities, the support required has intensified to cover legal, operational and organisational aspects of an effective implementation. The strengthening of the EOIR standard in 2015, in particular the requirement of ensuring the availability of and access to information on beneficial ownership, has also contributed to this intensification.

Beyond improving tax compliance, the merits of the implementation of the EOIR standard are two-fold:

- **Strengthening the domestic framework.** The EOIR standard is also about transparency. Its implementation is beneficial for the strengthening of the domestic framework to ensure effective domestic and cross-borders audits and investigations. Ensuring availability and access to relevant information, in particular ownership, accounting and banking information may contribute to close information gaps and improve access to relevant information by the tax administration.
- **Tackling cross-border evasion and other IFFs.** The effective use of the EOI infrastructure in anti-tax evasion efforts is a key expected outcome. Tax administration should be well versed in requesting offshore relevant information needed to tackle tax evasion.

To date, 62 developing jurisdictions are still to be reviewed, out of which 33 have not been assessed under the first round of EOIR review. All these developing jurisdictions will be supported as need may be.

Standard of automatic exchange of financial account information

While all Global Forum members have committed to implement the AEOI standard adopted in 2014, developing jurisdictions without a financial centre were not asked to commit to its implementation by a specific date.

The AEOI standard is a more demanding standard in terms of implementation but has a very large potential for developing jurisdictions as they can receive information without any prior request. This can help them identify compliance risks and initiate investigations. It could also contribute to successful voluntary disclosure programmes, which may significantly increase voluntary compliance and revenue collection prior to first exchanges and even after.

As of November 2020:

- 27 developing jurisdictions have implemented the AEOI standard, including 14 jurisdictions with a financial centre and 8 G20 countries, which were requested to commit by 2018. Only 5 developing jurisdictions have therefore voluntarily started to exchange automatically. Two other developing jurisdictions with a financial centre are still failing to meet their commitment to exchange by a specific date.

- 12 other developing jurisdictions have committed to start exchanging automatically by 2023 (including 8 that do not host a financial centre and committed voluntarily to a specific date);
- 46 developing members have not yet determined the date of their first automatic exchanges.

Year of first exchange	Jurisdictions	Number of jurisdictions
2017	Anguilla, Argentina, Belgium, Bermuda, British Virgin Islands, Bulgaria, Cayman Islands, Colombia, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Faroe Islands, Finland, France, Germany, Gibraltar, Greece, Guernsey, Hungary, Iceland, India, Ireland, Isle of Man, Italy, Jersey, Korea, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Mexico, Montserrat, Netherlands, Norway, Poland, Portugal, Romania, San Marino, Seychelles, Slovak Republic, Slovenia, South Africa, Spain, Sweden, Turks and Caicos Islands, United Kingdom	49
2018	Andorra, Antigua and Barbuda, Aruba, Australia, Austria, Azerbaijan, Bahamas, Bahrain, Barbados, Belize, Brazil, Brunei Darussalam, Canada, Chile, China (Peoples Republic of), Cook Islands, Costa Rica, Curaçao, Dominica, Greenland, Grenada, Hong Kong, China (China), Indonesia, Israel, Japan, Lebanon, Macau, China (China), Malaysia, Marshall Islands, Mauritius, Monaco, Nauru, New Zealand, Niue, Pakistan, Panama, Qatar, Russia, Saint Kitts and Nevis, Saint Lucia, Saint Vincent and the Grenadines, Samoa, Saudi Arabia, Singapore, Sint Maarten, Switzerland, Trinidad and Tobago, Turkey, United Arab Emirates, Uruguay, Vanuatu	51
2019	Ghana, Kuwait	2
2020	Nigeria, Oman, Peru	3
2021	Albania, Ecuador, Kazakhstan, Maldives	4
2022	Kenya, Morocco	2
2023	Georgia, Jordan, Montenegro, Thailand	4
No date	Armenia, Benin, Bosnia and Herzegovina, Botswana, Burkina Faso, Cabo Verde, Cambodia, Cameroon, Chad, Côte d'Ivoire, Djibouti, Dominican Republic, Egypt, El Salvador, Eswatini, Gabon, Guatemala, Guinea, Guyana, Haiti, Honduras, Jamaica, Lesotho, Liberia, Madagascar, Mali, Mauritania, Moldova, Mongolia, Namibia, Niger, North Macedonia, Palau, Papua New Guinea, Paraguay, Philippines, Rwanda, Senegal, Serbia, Tanzania, Togo, Tunisia, Uganda, Ukraine, Viet Nam	46

Taking into account the specific nature and requirements of the AEOI standard, its implementation requires a long-term investment by both the Secretariat and the jurisdictions. This is not an easy task and requires capacities, skills and an appropriate confidentiality and information security management framework and robust IT infrastructure. The appropriate time frame for AEOI implementation also varies considerably from one jurisdiction to another. To ensure they benefit from AEOI, the Secretariat issued a Plan of Action developing jurisdictions in 2017. The rationale of this plan is to support a step-by-step implementation approach in order to ensure both sustainable implementation and technical assistance. The Strategy aims to strengthen this step-by-step approach with new tools and priorities (see below).

Effective use of EOI

The Secretariat has developed over time a comprehensive programme to ensure that the main users of EOI mechanisms (EOI officials and tax auditors) take ownership of it and thus build a culture of EOI in developing jurisdictions. The “Last Mile Seminar”, which is aimed at training EOI officials and tax auditors to identify potential EOI cases and explains how a request should be drafted, has been successful in this regard. This training has been organised at initial, intermediate and advanced levels to adapt to the skills of the participants and to better accompany the increase in knowledge. For instance, the drafting of bulk and group requests is a new area of assistance. **The Secretariat will continue to adapt the content and material used to strengthen the impact on domestic resource mobilisation.**

More developing jurisdictions are now implementing AEOI and in need to develop and implement a strategy for an effective use of AEOI data. This entails an understanding of the nature of the AEOI data received, good data quality control, a sound approach in data matching and the definition of various ways to effectively use the AEOI data received. The Secretariat has delivered assistance in this area to three developing members with the assistance of an expert from Norway. These first projects were very fruitful and allowed to better targeting the areas where assistance is relevant. **The Secretariat will develop new capacity-building tools in this area bearing in mind the existing material and the confidentiality requirements.**

More advanced developing jurisdictions are looking for assistance in new areas to maximise the use of the data received, whether on request, spontaneously or automatically. In accordance with EOI international agreements, treaty-exchanged information is to be used for tax purposes.

- **Cross-border assistance for the recovery of tax claims, where there are no assets or insufficient assets to fully cover the tax claims, is one of the use contemplated by advanced developing members.** However, it implies that the developing jurisdiction has implemented internally a cross-border tax collection function in line with treaty requirements (e.g. confidentiality) and equipped with all relevant tools. It also requires that agreements allowing for this form of administrative cooperation (including competent authority agreements or memorandum of understanding) are in place.
- **Wider use of AEOI data is also one area where advanced developing jurisdictions are interested in.** Treaty-exchanged information obtained in the course of tax investigations may become relevant to tackle other serious crimes such as money laundering, terrorism financing and corruption. A better utilisation of the possibilities offered by EOI agreements is usually the first step, which implies to unpack the specific conditions set out in these agreements for the wider use of this information.⁷ In addition, at regional level, some developing members would like to implement pilots to facilitate the wider use. This would require an agreement between the interested jurisdictions.

The Secretariat will support these initiatives to maximise the use of EOI data bearing in mind the legal conditions and the appropriateness of the usages. Work will be carried out in the framework of the Africa and the Punta del Este Initiatives.

Defining developing jurisdictions' profile

By defining the profile of developing jurisdictions, a better prioritisation of the capacity-building work can be decided. As a principle, all requests for assistance from member jurisdictions will be considered by the Secretariat. However, in addition to the tax compliance needs, other factors should be taken into consideration to determine the scope of the activities (targeted or broad), the intensity (initial, intermediate, advanced) and the method or way the activities are delivered (remote, on-site, hybrid). This assessment is also a way to manage capacity-building risks (i.e. support provided without concrete impact), and to increase proactive actions where necessary.

As the ingredients for a successful programme must be present, objective factors should be considered:

- **Area of assistance:** unlike the implementation of the EOIR standard, the implementation of the AEOI standard is more demanding, especially in terms of IT infrastructure and ISM. Some pre-

⁷ It is possible for the information received by one party to be on-shared with other agencies and used for other purposes if such information may be used for those other purposes under the laws of the sending jurisdiction, and the competent authority of that sending jurisdiction authorises such use.

requirements should be met before engaging in a very resource intensive technical assistance programme on AEOI (see below).

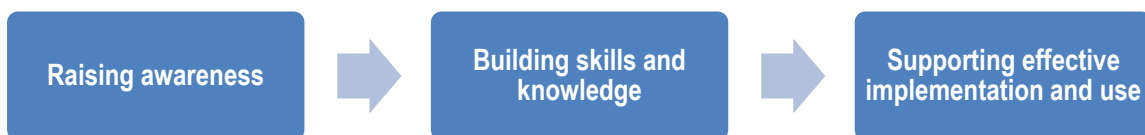
- **Domestic context:** the success of a capacity-building programme greatly depends on the commitment of decision-makers and senior officials to cooperate and engage at a technical level. In addition, with respect to the implementation of AEOI, the level of IT capacity and ISM maturity is an important factor. Finally, the stability of a jurisdiction as well as its exposure/vulnerability to some risks (such as IFFs) are also relevant factors to consider.
- **Exogenous factors:** considerations should also be given to external elements such as the upcoming peer review process of a developing jurisdiction, and the impact of EOI-related policies of international organisations or multilateral development banks on the developing jurisdictions

The Secretariat does not purport to determine these various factors on its own. On the contrary, its intention is to document jurisdictions' profile from publicly available sources of information with all the usual precautions. Indeed, the jurisdiction profile as an internal document is only one element of a more global reflection on how to provide the most relevant and timely assistance to developing jurisdictions.

3 The new capacity-building Strategy

The capacity-building Strategy rests on three main pillars which are essential for an effective change:

- Raising awareness and reaching out;
- Building knowledge and skills;
- Supporting effective implementation and use.



Raising awareness and reaching out

Political will is a crucial prerequisite for the implementation of the EOI standards and the success of a capacity-building programme. Without the support of political authorities, decision-makers and senior officials, the required legislative, operational or organisational changes will not occur. Therefore, raising awareness at the highest level on the importance of transparency and EOI and the benefits for developing jurisdictions remains a priority to obtain and maintain the political buy-in. To that end, the Secretariat should continue to raise awareness among decision-makers and senior officials through regional events and bilateral meetings.

Engagement with other stakeholders is also a key factor to bring change. The Secretariat should therefore meet with other governmental bodies, civil society organisations, parliamentarians, researchers and academics, and it should invite them to contribute to Global Forum events as appropriate to disseminate knowledge and information and share ideas and initiatives.

Communication is also a powerful tool to obtain the political support and ensure the social appropriation. The Secretariat should therefore continue to inform on its capacity-building programme and its impact, including in terms of resources mobilised.

Deepening the political support and consolidating the progress of member jurisdictions is the main objective. Awareness-raising activities may arouse the interest of non-member jurisdictions. To ensure that developing jurisdictions interested in joining the Global Forum take an informed decision, the Secretariat will continue to provide pre-membership assistance, i.e. a limited capacity-building activity to explain the standards, the membership obligations, in particular the related peer review, and the benefits of transparency and EOI.

Building knowledge and skills

Building knowledge and skills is the preliminary capacity-building activity to be carried out before a more specific assistance is started for a developing jurisdiction. Therefore proposing knowledge development tools and trainings is an efficient way to prepare the ground for more technical and specific support. The Secretariat should continue to develop tools and training. In doing so, attention should be paid to the standardisation of the tools and materials, the promotion of regional events and the pooling of resources with other development partners.

Knowledge development tools

Knowledge development tools are a strategic element for a comprehensive capacity-building programme. They could take different forms such as toolkits, model legislation, templates and e-learning courses and have in common being standardised tools.

The Secretariat has already gained experience in this area with the publication of several knowledge development tools. These tools have been well received by officials of member jurisdictions and they also benefit non-member jurisdictions, civil society organisations, other governmental organisations, etc. The significant investment made in this area is ultimately efficient because these tools allow for the preparation of technical work with jurisdictions, thus saving time and resources in the practical implementation stage.

Under the Strategy, the Secretariat will continue the development of knowledge tools in all relevant areas to support and rationalise its technical assistance work. The promotion of these tools will be amplified and the coordination with the communication function of the Global Forum Secretariat will ensure a better exposure (new website with dedicated capacity-building section, regular newsletters, etc.). As part of the comprehensive approach, the effective use of these tools would be strongly encouraged before any technical assistance to ensure jurisdictions take ownership of the topic and understand the key concepts, and therefore improve the level of communication and understanding on the issues and the way to address them.



Trainings

Trainings are valuable tools to increase skills and knowledge. They are useful to support both implementation of the EOI standards and the effective use of these standards in fighting tax evasion and other IFFs.

Trainings can be delivered in different ways, and the experience gained in the pandemic context helped innovate and elaborate a stronger policy in this area.

Virtual and physical trainings:

Virtual trainings have become an integral part of the Strategy. The assessment made in 2020 of the 21 virtual trainings delivered was very positive:

- Participants rated them 4.4 out of 5.

- The vast majority of the participants did not experience connection issues.
- The level of attendance was very good and the engagement of the participants similar or even better than in some physical trainings.
- One of the main benefits was that virtual trainings enabled reaching out a large audience (3 600 officials trained), in particular officials who would not have the opportunity to benefit from these trainings otherwise.
- While virtual trainings are resource intensive for the Secretariat, they alleviate the cost for developing jurisdictions.

However, participants have identified some inherent limitations of virtual trainings:

- The time allocated to the trainings was not always found sufficient;
- Participants may not be freed from their usual work;
- Interaction between participants was not always easy.

Mindful of these challenges, the policy for virtual trainings should ensure that they are delivered where the objectives are to:

- Familiarise a broad audience with key concepts and EOI instruments; and
- Maximise the impact in a jurisdiction or region through initial and intermediate level trainings;

Virtual trainings should constitute a first step before contemplating in person trainings. Virtual trainings shall also be used to increase the knowledge and capacities of relevant stakeholders as explained above. As a variation, training videos could also be recorded and made available to a broad audience.

Physical trainings remain particularly relevant to cover topics that are very technical and focus on practical implementation and effective use, with complex case studies and enhanced experience sharing sessions. Typically, advanced training for auditors and EOI officials shall be to the extent possible carried out face-to-face (“Advanced Last Mile Seminars”). The same shall apply to more specific trainings involving very technical aspects that may fit better in an in person training.

In addition, the “Train the Trainer” programme⁸ under development by the Secretariat shall be preferably carried out face-to face.

The synergies between the knowledge development tools and the trainings whether in person or virtual should always be ensured. Participants shall prepare for the training by reading the relevant materials and taking the e-learning courses.

The Secretariat will continue monitoring the implementation of this policy and adjust it where necessary.

Regional or national trainings

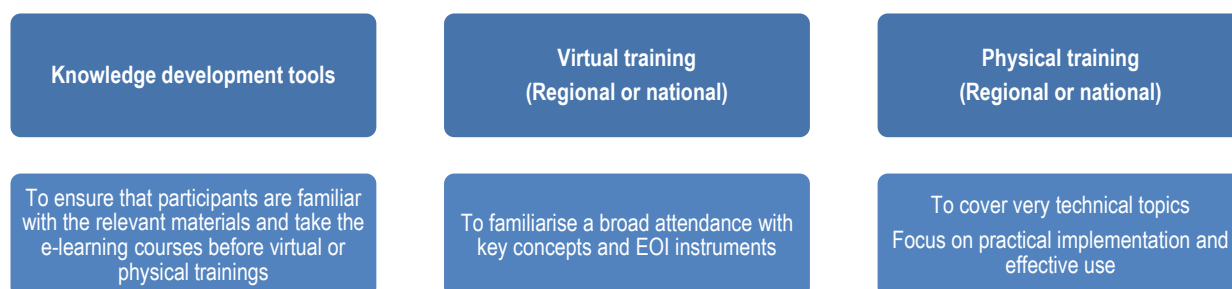
Delivering training at regional or national levels is a strategic choice that depends on the objective pursued.

Regional trainings should be preferred to national training when the public targeted is not large enough at national level (e.g. training of EOI or information security officers), a regional dynamic is sought or the theme is suitable for it. This should also be the approach for the “Train the Trainer” programme.

⁸ This programme will consist of training courses that are specially designed to assist officials in developing jurisdictions to improve (i) their knowledge on various topic relating to transparency and EOI and (ii) their training skills so that they can adapt the training materials that will be made available to them to train other officials in their own jurisdiction. The aim is for developing jurisdictions to have trained officials who can deliver training across their jurisdiction to build an EOI culture.

Where possible, regional trainings should be held in collaboration with relevant regional bodies to avoid duplication and ensure more impact.

In other cases, national trainings should be contemplated. They should be comprehensive or address a specific need. For instance, the organisation of a national “Last Mile Seminar” has shown good results in fostering an EOI dynamic. The same applies to national trainings aimed at consolidating domestic reforms, such as the training of the staff of a new beneficial ownership register. The delivery of national trainings should always intervene at the appropriate time, i.e. when the relevant requirements are met. For instance, a national “Last Mile Seminar” should only be considered when a developing jurisdiction has a sufficiently broad EOI network in line with international standard, a functioning EOI unit and the EOI officials and auditors have already taken the relevant e-learning course and read the appropriate material.



Supporting effective implementation and use

Technical assistance is usually critical at the various steps of the implementation process of the EOI standards. The objective is to advise and assist developing jurisdictions in making the relevant legal, operational or organisational changes necessary to comply with and benefit from the standards.

Providing technical assistance is resource intensive, as it needs to be adapted to the realities of the supported jurisdiction. Aspects related to legal tradition, administrative culture or level of development must be included in the preparation and implementation of technical assistance in order to achieve concrete results. Indeed, the acceptability of technical proposals is a fundamental element for the success of the assistance provided.

Developing members have different needs depending of their specific circumstances. As indicated above, the approach to technical assistance cannot be the same for a pre-2015 developing member that has already undergone a full EOIR peer review and a new developing member. Therefore, technical assistance can take various forms, from very targeted assistance to more extensive support. Technical assistance can be a short, medium or even a long-term project.

Taking into account this diversity, **a differentiated and modular approach should be followed to take into account the specific circumstances of developing jurisdictions** and address their specific needs. In addition, the full range of modalities of intervention should be used to ensure effective assistance while managing resources.

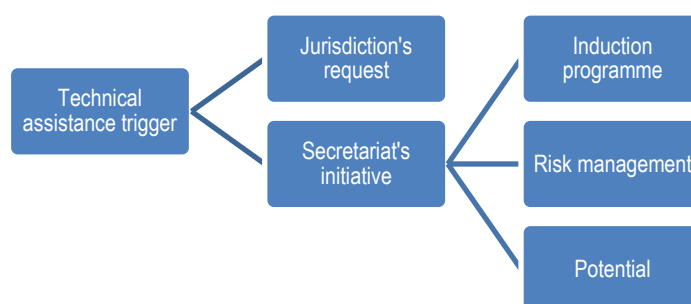
Technical assistance trigger

In principle, technical assistance is delivered upon formal request from a developing jurisdiction. The request materialises the commitment at political or senior official level and enables to better assess the needs of the requesting jurisdiction. This approach is followed in practice with pre-2015 members.

With respect to induction members, the technical assistance programme is usually proposed at the initiative of the Secretariat. Once a new member is welcomed, a meeting is organised with decision-makers and senior officials to offer and launch the induction programme.

A more proactive approach to technical assistance will also be developed in order to anticipate the needs of developing jurisdictions but also to help them identify their needs in a timely manner. Indeed, experience shows that the lack of stability within administrations and ministries, the level of administrative capacity or other priorities of the counterparts can lead to a situation of risk when jurisdictions do not request assistance from the Secretariat or request it too late (e.g. the draft law being before the parliament, the peer review being soon launched). In addition, some developing jurisdictions, while having the potential of implementing the AEOI standard and being exposed to IFFs, may have not yet considered implementing it.

The Secretariat will strive to identify more proactively potential needs of developing jurisdictions, ascertain them and propose the appropriate assistance.



A differentiated approach

Since 2015, a differentiated approach has been set up between pre-2015 members and post-2015 members. The rationale of this distinction was two-fold:

- **Level of capacities:** pre-2015 members had in general a higher level of EOI capacity than the jurisdictions joining the Global Forum since 2015.
- **Level of preparation:** the vast majority of the pre-2015 members were assessed or partly assessed under the first round of EOIR review, therefore their level of preparedness for the strengthened EOIR standard was higher than for post-2015 members.

Based on this distinction, the technical assistance work is divided into two categories:

- **Tailored assistance:** this is in principle targeted assistance provided to a pre-2015 member. The areas of assistance are clearly defined.

Regarding EOIR, the scope is in general quite limited as the objective is to address deficiencies identified in the peer review process and implement the requirements of the strengthened EOIR standard, in particular beneficial ownership information.

With respect to AEOI, the scope can be limited, when it comes to address recommendations made in the assessment, or broader when a jurisdiction decides to implement AEOI.

- **Induction programme:** this is a comprehensive and multi-year programme proposed to post-2015 members, which started in 2016.

The objective is to help them understand, implement and benefit from the EOI standards. It covers all relevant areas of the implementation of the EOI standards from the legal aspects to the practical ones. However, the content of the programme is not identical for all “induction members” as it will be further explain below.

Currently, 38 members are benefiting from an induction programme, including 34 developing jurisdictions.

The 38 Global Forum's induction programmes

Armenia, Benin, Bosnia and Herzegovina, Cabo Verde, Cambodia, Chad, Côte d'Ivoire, Djibouti, Ecuador, Egypt, Eswatini, Faroe Islands*, Greenland*, Guinea, Guyana, Haiti, Honduras, Jordan, Kuwait*, Lebanon, Madagascar, Maldives, Mali, Moldova, Mongolia, Montenegro, Namibia, Niger, Oman*, Palau, Papua New Guinea, Paraguay, Rwanda, Serbia, Tanzania, Thailand, Togo and Viet Nam.

* Assistance provided to these jurisdictions is not funded by voluntary contributions.

This differentiation ensures that the technical assistance programme better addresses the needs of developing members. Induction members usually require intense assistance to catch up on the latest tax transparency developments, especially because several legal or operational changes are required in a relatively short amount of time. They also require greater follow-up and regular engagement at high-level to maintain the political buy-in.

Taking into account the positive outcomes obtained, the induction programme will continue to be proposed to new members, albeit with some improvements based on the modular approach.

Pre-2015 members
Tailored assistance

Post-2015 members
Induction programme

A modular approach

The modular approach aims at better managing resources by dividing technical assistance programmes into several coherent and logical modules with specific targets to be achieved in order to move from one module to another. This approach has already been partially implemented in broad tailored assistance programmes (e.g. AEOI implementation) and for induction programmes. It can also be implemented in relation to limited tailored assistance where appropriate, and with relevant adjustments (e.g. where the assistance covers legal and operational aspects). Some flexibility between the modules will be allowed, provided that the project is moving forward sufficiently and targets are progressively reached.

By delivering technical assistance gradually, a better management of the programme is possible and a quick reaction mechanism can be implemented to keep the programme on track. This implies:

- the development of a clear roadmap agreed at a high-level by the assisted jurisdiction, which defines the different modules;
- an assessment of the situation of the jurisdictions with respect to the modules;
- a specific action plan for each module with clear targets, milestones and timeline;
- the delivery of technical assistance in each module on a step-by-step basis;
- a monitoring framework for the roadmap, the modules and action plans;
- an active follow-up and a quick reaction mechanism to re-engage at high-level if appropriate.

An agile approach

Usually provided desk-based or on-site, technical assistance can also take a hybrid form.

- **Desk-based assistance should be the first level of intervention.** This form of assistance should be offered in response to any technical assistance request. It should also be the first stage of a

technical assistance activity as it will allow a better preparation of any on-site work. As a rule, desk-based assistance should be preferred when on-site assistance is not necessary or decisive, or does not offer significantly greater benefits. In general, document-based analysis, legislative work or advisory services can perfectly be performed at distance.

- **On-site assistance should be envisioned as a second level of intervention.** Usually, desk-based assistance would have already been provided before an on-site assistance is carried out. This form of assistance remains a key element of the technical assistance work, which is particularly relevant for assistance related to practical implementation (e.g. mock on-site visits, organisation of a functional EOI unit). This could also be an element of the quick reaction mechanism. In a nutshell, on-site assistance should be contemplated when face-to-face meetings and/or physical observations are decisive for a successful outcome of the assistance provided.
- **Hybrid assistance will be further used where possible and appropriate as an enhanced first level of intervention, the benefit of which is to make on-site assistance more effective.** During the pandemic, remote technical assistance through desk-based work and teleconferencing led to successful outcomes thanks to the use of new technologies. Assisted jurisdictions have commended the efforts made during this period to effectively support them and good outcomes were achieved through virtually means. However, this positive feedback is balanced by some issues and limitations identified by assisted jurisdictions and the Secretariat such as the quality of the communication (e.g. connection disruptions, IT platform unauthorised, interpretation), the questions related to confidentiality, the time difference and the difficulty to assess the implementation of organisational, practical and operational arrangements. Based on this recent experience, greater use of these technologies should be made to advance technical work as much as possible before any on-site support.

These modalities of intervention fit well with the policy of gradual implementation of the technical assistance, and, more generally, of capacity-building activities. An appropriate use of these different forms of assistance will improve the quality of the support provided and ensure the sustainability of the technical assistance work in the long term.

4 A revised approach to capacity building in AEOI

The 2017 Plan of Action

The Global Forum's [Plan of Action for Developing Countries' Participation in AEOI](#) outlines a step-by-step approach for developing jurisdictions to commit to and implement the AEOI standard. ISM is often the starting point and centrepiece of the work to support them (particularly lower capacity countries which do not have a workable ISM framework). Unlike the other more standardised elements of AEOI (e.g. legislation), ISM is highly specific to each jurisdiction and may require fundamental changes across the tax administration (e.g. security governance) and even across government (e.g. whole of government IT services).



The steps are as follows:

- Step 1 – a preliminary evaluation of the confidentiality and ISM framework is carried out;
- Step 2 – based on the preliminary evaluation, the developing jurisdiction, in consultation with the Secretariat, determine a practicable commitment date, which is supported by a tailored staged action plan for AEOI implementation.
- Step 3 – the developing jurisdiction is invited to make a formal high-level commitment to implement the AEOI Standard by a specific date (which can be adjusted to account for unforeseen circumstances), and to make sincere efforts towards implementing the AEOI Standard effectively, in a timely manner and in accordance with the agreed action plan.
- Step 4 – technical assistance is provided by the Secretariat, subject to available resources and funding, along with other development partners. The Secretariat will also monitor and assess whether countries deliver necessary implementation steps in accordance with the agreed action plan. If insufficient progress is made by a committed jurisdiction, technical assistance may be suspended.

Lessons learnt from the implementation of the Plan of Action

Many jurisdictions requested assistance under the Plan of Action (either at the political or senior official levels). Following completion of an evaluation questionnaire, they benefitted from an on-site visit (Step 1) and a technical assistance report with proposed commitment dates, action plans and detailed gap analyses was provided (Step 2).

The results have been mixed:

- For reasons associated with a loss of political will and/or administrative priority, some of these jurisdictions did not proceed to commit to an action plan, establish a commitment date and make a formal commitment. The Secretariat continued to prompt them from time to time.
- Other jurisdictions proceeded with the detailed technical assistance work and have started exchanging or are about to start.

In line with the Plan of Action, **the Secretariat has sought to accommodate most requests for ISM assistance as part of seeking to extend the benefits and raising awareness of the requirements of AEOI** among developing jurisdictions. It became increasingly clear, however, that ISM technical assistance is particularly resource-intensive. It requires a large investment by the Secretariat from Step1.

In light of the experience gained, the resources available, and the widespread demands for assistance, adjustments are needed to the Plan of Action to rationalise the support provided and increase positive impact for developing members. Central to this are a clear political will and resource commitment to implement AEOI by the assisted jurisdiction. The step-by-step approach should therefore be reviewed in order to allocate resources where delivery is realistic and promote an effective use of the Global Forum's resources.

Parameters of a revised Plan of Action

The main objective is to ensure a consistent and efficient approach in assisting developing jurisdictions in implementing the AEOI Standard. This objective resources are appropriately allocated and concrete outcomes are achieved (i.e. reciprocal exchanges and effective use). On the other hand, it implies that assisted jurisdictions are committed and engaged in the assistance process.

Based on the principles mentioned in the Strategy, **the relevant parameters to consider in providing AEOI assistance would be:**

- **Assisting where a request is made or potential is identified.** While the assistance is generally triggered by a request, the Secretariat should be proactive to manage risks or to convert potential into reality by: (i) identifying jurisdictions, which seem mature for a short-term AEOI implementation and (ii) where appropriate, by approaching jurisdictions at risk of being considered relevant for AEOI. The Secretariat may also proactively identify jurisdictions that, while needing more time may stand to benefit greatly from AEOI data (i.e. common reporting standard and country-by-country reporting), e.g. larger jurisdictions that have been widely recognised to suffer considerably from tax-related illicit financial flows or corporate tax avoidance.
- **Obtaining an informed political commitment from the jurisdiction.** The jurisdiction needs to understand what it is committing to. This implies:
 - A prior virtual/physical meeting with decision-makers to explain the AEOI standard, the AEOI requirements (i.e. building blocks), the challenges and the potential benefits, the respective responsibilities of the jurisdiction and the Global Forum Secretariat; and
 - A formal political commitment to the AEOI capacity-building project and its milestones.
- **Relying on a strong preliminary ISM assessment.** This assessment is the key step to determine the level of maturity of the jurisdiction and usually a good first indicator of commitment to the capacity-building programme. Preliminary does not mean superficial. It should involve a strong cooperation of the jurisdiction and lead to a detailed analysis aimed at determining what would be a practical implementation date. This work would be done remotely in the initial stages, until a reasonably complete set of information on the jurisdiction's existing ISM arrangements is obtained (i.e. via an initial maturity assessment, the technical ISM questionnaire and teleconferences, as appropriate). An on-site visit could then be scheduled. The preliminary ISM assessment work will be the basis for the action plan to be agreed with the jurisdiction and the commitment date.

- **Delivering the AEOI capacity-building programme based on a step-by-step approach for the implementation of the agreed action plan**, where the beginning of the next step will be linked to sufficient progress in the previous one. This will allow to (i) monitor the advancement of the work while managing resources and (ii) maintain, document and support high-level communication.
- **Partnering where possible** with other development partners and jurisdictions.

5 Conclusion

The last 10 years, the Global Forum Secretariat has progressively set up a comprehensive capacity-building programme which is well appreciated by its member jurisdictions, and especially developing jurisdictions. The strength of this programme lay in the Secretariat's ability to innovate, propose new approaches and adapt to the evolution of the standards and the needs of developing jurisdictions.

This programme has led to significant results. The implementation of the standards was a success for many jurisdictions, even if more needs to be done with respect to AEOI. Developing jurisdictions are building their EOI infrastructure and are effectively using it. This culture of EOI has already led to the identification of EUR 28 billion of additional revenue through voluntary disclosure programmes and tax investigations. Compliance has also significantly increased in a number of developing jurisdictions following the implementation of the AEOI standard.

During this period the capacity-building programme improved and developed as it faced the challenges of the ever-increasing demand of assistance and the limited resources available.

At the dawn of the 10-year mark, a revisited strategy built from the lesson learned, including under the extraordinary Covid-19 pandemic circumstances, should ensure the sustainability of the capacity-building programme so crucial for a number of developing jurisdictions to reap the benefits of the new global tax transparency environment.

Characterised by its adaptability, the greater use of new approaches and new technologies, and a new rationale in the delivery of the capacity-building activities, **this revisited Strategy is expected to have a greatest impact for the benefit of developing jurisdictions.**



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