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THE EFFECTIVENESS OF ANTI-MONEY LAUNDERING TRAINING

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Master of Human Resource Management



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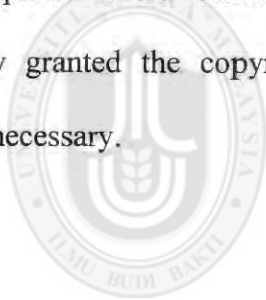
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ABSTRACT

Banks are traditionally measured as pillars of economic prosperity. The best banking system will be able to ensure good production in all sectors of the economy. Money laundering is the process of providing legitimate appearance to the illegally gained revenue. Money laundering has the tradition of eroding the financial institutions and weakening the financial sector role in economic growth. All bank staff must aware on the money laundering activities and the impact of money laundering to the economic growth. The needs of Anti Money Laundering training has been increased in current situation. The purposed of this study is to find out the effectiveness of anti-money laundering (AML) training among Bank A staff. There are number of key conceptual models used to illustrate the relationship between factors significantly influence the effectiveness of training. The key conceptual models are used in this study is trainee characteristics, training design and work environment. All the three (3) models are the influencing factor in the effectiveness of training. Based on analysis it was found that training design and work environment have significant contribution to the effectiveness of AML training among Bank A staff. Hierarchically, these two factors are found have positive relationship with the effectiveness of AML training. Recommendation and implications for future research and practice were also discussed.

Keywords: trainee characteristics, training design, work environment and effectiveness of training.

ABSTRAK

Secara tradisinya bank memainkan peranan yang penting untuk ekonomi negara. Pekerja bank perlu peka terhadap aktiviti pelaburan wang haram kepada kemajuan ekonomi dunia. Bagi situasi masa kini, kepentingan latihan anti pelaburan wang haram telah meningkat. Tujuan kajian ini adalah untuk mengkaji sama ada latihan Anti-Pelaburan Wang Haram 'AML' akan memberi manfaat kepada pekerja di Bank A. Model konsepsi telah digunakan untuk mengilustrasikan hubungan antara yang mempengaruhi keberkesanan latihan. Faktor-faktor yang digunakan untuk mengkaji keberkesanan latihan adalah sifat pelatih, rekabentuk latihan dan suasana tempat kerja. Berdasarkan analisis, kajian mendapati bahawa rekabentuk latihan dan suasana tempat kerja menyumbang kepada keberkesanan latihan 'AML' dalam kalangan pekerja Bank A. Secara dasarnya, kedua-dua faktor ini menyumbang kepada keberkesanan latihan 'AML'. Cadangan dan implikasi kepada penyelidikan masa hadapan juga telah dibincangkan.

Kata kunci: sifat pelatih, rekabentuk latihan, suasana tempat kerja dan keberkesanan latihan.

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6th January 2018

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1 INTRODUCTION

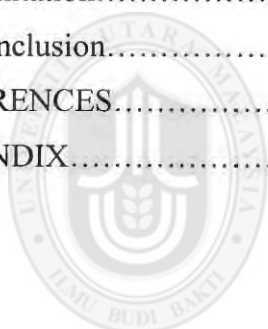
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CHAPTER ONE

INTRODUCTION

1.1 BACKGROUND OF STUDY

Money laundering can be defined as a process of converting illegally received money from different source of activities which is unlawfully such as drug trafficking, terrorist or some other serious crimes into legal money changing the real source root. According to Axtell & Maitlis (1997), money laundering defined as sum amount of money earned from illegal activities. The activities can be from various sources or varies types of activities such as bribery, blackmail, prostitution, illicit alcohol and betting.

Due to the negative impact of the process of money laundering towards economics and social consequences, it is considered as a global phenomenon with noteworthy policy concern for governments. Thus, there is need for collective responsibility in combating this process together as it has higher chances of weaken the financial system in overall (Brethower, 2001).

In general, money laundering is mostly used to finance terrorists, and sometimes it's called reverse money laundering which means using clean money to implement illegal activities. There are many cases whereby rich and wealthy people use their wealth position to finance terrorist operations. Some of the examples are Pakistan through Taliban and some other Arabic countries financing Al-Qaeda activities against USA and its associates. The same activities have been carried by USA by funding illegal operations during the cold war period in the fight against USSR operations to inaugurate communism. In a study by Bagenda (2003), he widens the scope of money laundering to be concluded on the influences and the use of money or property to fleece their illegal source by using it in legal or illegal activities. Additionally, he also revealed

the scope of Money Laundering into two dimensions to encompass national or transcontinental activities that expand to money laundering.

There are many measures that have been taken to combat the issue of money laundering as it is becoming a global phenomenon and the impact towards economic stability is considered high priority as well. For example, the Financial Action Task Force (FATF) is developed to overcome the issue on money laundering phenomenon. The task was established to recommend the national and international procedures to combat money laundering and terrorist financing (Sturman, 2002).

According to Sturman (2002), apart from the role played by FATF, another initiative to guide people about Money Laundering is providing necessary training. In this competitive society, the human resource needs to be creative, innovative and inventive to increase productivity and thus increase competitive advantage. Therefore, the need of training and development to employees to enhance their ability, skills and knowledge is important. It will lead them to perform efficiently in their work. Training and development also plays an important role in increasing a company work performance and productivity. Training can be helpful to improve an employee's work performance once they are well versed about their role in the organization. It is one of the most pervasive techniques to increase knowledge of the employees and at the same time increase the productivity.

For any organization, employees are most important and expensive asset as they are the main key element in gaining competitive advantage and to enhance the employee's skills, training is essential. The knowledge of the employees will determine the organization's competitive advantage. The employees' competence is the main factor that directly related to an organization's ability to compete with other companies. The changes in technology, influence of

economic environments, globalization and ethical issues are the main obstacles faced by many organizations and companies worldwide. Yet, not many researches has been carried out on determining the importance of training and the effectiveness of training to the organization and companies. Therefore, this study was focused on the effectiveness of training and the relationship between training of transfer and the factors of transferring training such as trainee characteristics, training design and work environment. In banking sector, most crucial issue at time being is the money laundering phenomenon. Consequently, the training specified in this study is Anti-Money Laundering training among banking staffs' and in particular among one of the financial institution in Malaysia (Bank A). The main purpose of this study is to seek the effectiveness of the AML training among Bank A staffs' and to seek the relationship between transfer training and its components, trainee characteristics, training design and work environment. Training that gives better output to the staffs can ensure the employees' performance will be increased and the organisation will be competitive with other organization.

The Anti-Money Laundering Training is an important approach in creating awareness among banking staffs' in Malaysia and this research will be focused on the effectiveness of AML Training among Bank A staffs' and also to seek the relationship between transfer of training and trainee characteristics, training design and work environment.

There are few cases has been charged due to anti money laundering. One of the case has been publish in the new paper is two man charged with money laundering involving RM10.3m. In Seremban two man were charged in separate session court on 22 Feb 2017 with a total of 11 counts of money laundering involving more than RM 10.3 million. The charges against the two men were made under section 4(1)(b) of the Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 which provides an imprisonment for up to 15 years and shall also be liable to

a fine of not less than five times the sum of the proceeds from unlawful activities, or RM5 million, whichever is higher (Bernama, 2017).

1.2 STATEMENT OF THE PROBLEM

In most of organizations, training has been implemented as one of the most effective method in updating employee's knowledge and skills. Hence, it also will improve their work performance and increase the productivity of the management in parallel, also to their own career development. Training has been always an essential approach implemented by companies and management in increasing worker is adapting behavior towards new environment and flexibility, which is important for both the parties. For the perspective of a management, adequate training can help a company to sustain their competence among employees and with external competitors.

The main objective and need to perform training is to get, and enhance existing skills for individuals in order to perform better and assist on organization's goals and from the view of management, training is to help them to create highly competitive employees enable to compete with current market (Baldwin & Ford, 1998). Apart from setting up trainings in an organization by allocating high investments and ensuring the resources for the training are suitable, the effectiveness of the training is also essential (Velada, Caetano, Michel, Lyons & Kavangh, 2007). After the training, the employees are expected to transferring their knowledge that was gained in the training and uses the skills was learnt in the training. This is the main motive or objective looked into facilitating training and highly expectable criteria from an organization.

Hence, transfer of training is also considered as one of the effective strategy in ensuring there are progresses in company performance and it can help in sustaining competitive advantage (Davis & Daley, 2008, Korth, 2007). In today's market, the imperative competencies for

companies are transfer of training and learning organization. These two criteria's can ensure the company to achieve organizational goals. According to a study conducted by Baldwin and Ford (1998), statistics shows that 40% of the skills needed in the training process are proximately transferred, whereby 25% transferred done in the period of six months times and 15% are done within a year.

Deliberating the transfer of training with anti-money laundering training, many studies has been done both locally and abroad about the effectiveness of the training (Goradema, 2000; Haemala, 2007; Masciandaro, 2003). Bagenda (2003) conduct study about combating money laundering, Goredema (2000) conducted study on effective control of money laundering and Haemala (2007) studied on issue of money laundering in international business. All these studies show empirical findings on the needs of combating money laundering issues and the impact of the act of money laundering to the country. However, less is known on how much has been done and how effective can it means in the war against money laundering. Therefore, there is a need to conduct more empirical studies on anti-money laundering regulation and implementations of AML trainings among banking staffs in Malaysia so as to bridge the knowledge gap that still exists.

Bank's has been instructed to oblige to the terms that their employees to attend on-going training and programs to enlighten on their responsibilities as bankers and this report obligation was under AMLATFA. The management role is to ensure the trainings and programs attended by the employees are effective and complies with the training purposes. The need for this obligation is to ensure AML training is given properly to the bank's staff. A study by Bossworth-Davies (1998) indicated that there is deficiency of training programs conducted by UK and Australian bank's. The study also further show on the statistics of 13% did not receive any training on AML and another 20% received poor and unsatisfactory training. This indicates that future empirical studies need to be conducted to see the effectiveness of AML trainings among

bank's staff and thus can contribute to the decrease number of money laundering cases in Malaysia. Therefore, there are needs to conduct more empirical studies on anti-money laundering training in Malaysia as to bridge the knowledge gap that still exists. The research commits to disclose the status in all frameworks that have been put in place to fight AML.

The cost related to the implementation of AML training also is another important factor looked into by investors and stakeholders. This would enable the government and other stakeholders to examine the achievement and take a relevant action. Without such assessments, it would sound that they have done enough or less without empirical evidence. The effectiveness of AML training among bank's can strengthen the need of the training in other bank's in Malaysia and the impact of training can fight the AML act in Malaysia.

1.3 RESEARCH QUESTIONS

The main research question in this study was to assess the level of observance and efficiency of AML Training among staffs in Bank A.

The study was also steered by the following precise research questions;

- i. Is there any significant relationship between trainee characteristics and transfer of training?
- ii. Is there any significant relationship between training design and transfer of training?
- iii. Is there any significant relationship between work environment and transfer of training?

1.4 OBJECTIVES OF THE STUDY

The study was channeled by the following detailed purposes;

- i. To examine the relationship trainee characteristics and transfer of training among Bank A staff.
- ii. To investigate the relationship between training design and transfer of training among Bank A staff.
- iii. To inspect the relationship between work environment and transfer of training among Bank A staff.

1.5 SIGNIFICANCE OF THE STUDY

It is expectantly that the findings of this study would enable Bank A to come up with endorsements to ensure that financial institutions adhere to anti-money laundering regulations. In doing so, it will help to reduce incidences of money laundering in financial institutions.

On the other hand, financial institutions will also use these findings to improve the state of adherence to anti-money laundering trainings. Basically the findings of this research study will be made available to the Bank A as the in charge of the financial institutions, and other financial institutions as to help them mitigate issues related to money laundering in their operations as well as improving their adherence to anti-money laundering trainings. A finding of this study is expected to guide other researchers who will conduct study on the same topic. Specifically, findings of the study will pave the way for further studies on anti-money laundering trainings.

The theoretical significance of this study to enrich literature discussion on the influence of the trainee characteristic, training design and work environment that are necessary or transfer of training to occur in financing institution. This study is important to realize that for training to be effective all factors and transfer of training are needed to be assessing continuously. It also significant for describing the employees' ability to apply what they learn in the training and the ability to continuing used what they learn overtime.

1.6 SCOPE OF THE STUDY

The scope of this study is limited to assess the adherence and the effectiveness of Anti-Money Laundering training by the Bank A in Malaysia. The Institutions covered in the due course of the research only the bank as the case study. The researcher narrowed the scope to one bank because it is relatively large compared to other branches in Malaysia based on branch networks and also budget constraints that impeded contacting all financial institutions in the industry. In addition, the research specifically looks at AML measures in place, challenges and the extent to which the existing AML trainings are effective.

1.7 ORGANIZATION OF THE STUDY

The research proposal and the research report were organized in form of chapters. Chapter one constitutes of the introductory part of the study. It includes issues like, background information, problem statement, purposes of the study, research questions, importance of the study, scope of the study and the limitations.

Chapter two focuses on the previous studies and writings done by other researchers. It constitutes the hypothetical and the empirical literature reviews.

Chapter three is the research methodology and modeling. In this chapter the researcher talks of the research approach and methods used. Also, this chapter accommodates any model description that the researcher may design to use in the data analysis stage.

Chapter four is on data analysis. This chapter presents the major research finding, their implications and impacts. It gives a clear picture of the recommendations that may be practical to put forward.

Chapter five includes study recommendations. This flows from the discussion of the findings. This is where the researcher adds value to the study and makes the study useful academically, in the policy environment and the community at large.



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CHAPTER TWO

LITERATURE REVIEW

2.1 INTRODUCTION

Money Laundering is not something new to the people of the 20th and 21st century in compared to those in the 18th and 19th century. Those who are in financial institutions were not well versed on the crimes, however at current the crimes are increasing in the form of insider trading, duplicating financial reports and also corporate fraudulent cases. Thus, it creates a space for new money laundering crimes (Thanasegaran & Shanmugam 2007).

According to Adekunle (1999), money laundering is defined as illegal flow of cash which is then made into legal sources; it is made of such incident so that tracing of its original sources would be difficult. The entire system of which money laundering is concerned, it is normally carried out very distinctly and usually involves activities by many heads. As such, in most cases the cash flow does not go through proper banking system. After which is the processed money if used legally without creating doubts.

However, according to Osofsky (1993), money laundering term firstly used in 1973 in the scandal case of Watergate. The case did not have a specified legal definition however the process was said to be a transformation of illegal matters into legal assets. United Nations Convention of Drugs has mentioned that criminals usually lauder their crimes via bank and then looks as the cash was obtained via legal channels. The cash that was deposited is considered as savings by the bank and difficult to identify the source of the cash.

Money laundering's main function would be for the criminals to escape interrogations on wealth that has no source of income (Okogbule, 2007). With the laundering, the criminals are able avoid legal actions, they are able to increase their income and also they are able to avoid

interference from taxes. The criminals who are into money laundering are smart to avoid legal complications that will link to the performed crime.

Having the items and later part making sales will relate to (CRDB- Anti money laundering manual). However according to Samah (2007), cash can come in many forms, which is illegitimate. Illegitimate money is something that is from a source that is not approved by the state. The money later will be cleaned and laundered to make it become legal.

In many cases, it is also stated on literatures and research books that even money that is from a legal source could be made into money laundering, such as bribery that is from legal sources redirected to illegal channels.

2.2 CONCEPTUAL DEFINITIONS

2.2.1. MONEY LAUNDERING

Looking into further definition and understanding of money laundering, it is a disguise agent that makes it looks like it is from a legitimate source. The money that is being laundered is versatile and has many methods. The government officials are working on estimating the amount that is involved yearly.

2.2.2. ANTI-MONEY LAUNDERING

Anti-money laundering or best known as AML is a phrase in financial and legal departments and used to describe legal controls that involve financial institutions and other government bodies to detect and control money laundering. The Financial Action Task Force (FATF) responsible to prevent and report the activities to the authorities for further action.

2.2.3. MONEY LAUNDERING TECHNIQUES

There are many techniques of money laundering. They include Placement, Layering and Integration.

Placement in money laundering is channeling illegal cash flow into the country's financial system. Such as the cash would be broken into smaller cash and then deposited into bank. In some cases, they also make the transition via bank drafts , bonds, money orders and also cheques.

Speaking on layering, it is about channeling cash into different bank accounts among countries, where there are no strict restriction on the funds received. In the interval stage, the funds received are then laundered into legal financial systems by investing into other things such purchasing of assets and properties and luxurious things and goods (Thanasegaran & Shanmugam, 2007).

Integration is the provision of legitimate crimes deprived wealth. Once the layering process is done successfully, then the laundered funds and assets are proceeds back into the economy to make it look normal and legal funds.

2.3 TECHNIQUES OF MONEY LAUNDERING

There are more variations of laundering some of them has been discussed in the above context such as placement and layering. It is transmitting the funds into different banks around the world which has limited authority access. According to Zeldin (1989) the criminals attempt to make the illegal transitions into legal business purposes. As soon as the illegal funds are turned into legal business operations, then it is much easier to launder the funds into many ways.

Some of the ways are, the company that is using the laundered money will increase the amount of the income in their balance sheet and sometimes they would state that the expenses has gone high in certain months. The most effective method is to write cheques and deposit the cash in the reports which will brings us back to the placement, layering and integration techniques.

Based on the objective of this case study, most affected sectors are the bank's. According to Okogbule (2007), it is clearly stated that banks become the main target for money laundering through various activities such as savings, credit card transactions and deposits. That is why financial institutions become the easiest pick for criminals for their activities.

In this case, we could say that bank is an easy target therefore becomes an innocent party that is only concluding normal business transactions. As a result, the banks and other financial institutions are being fined and they also become the object of public attention on loss of trust.

Other than the bank as a corporate organization, the employees are also affected directly and indirectly. In view of that, why the know your employee will be used. In other way, the bank employee might be cooperating with the money laundering crimes, as such certain legislation and processes will be undertaken.

In money laundering and in its controlling tools, there are many acts as well as political involvements have been obtained mainly to ensure that maximum protection and control is used against money laundering. Which also brings us to the integrity of the financial institutions that is made to support the general economic policy of the government to ensure that national security and national economic conditions are adhered. For example, Malaysia is considered as developing and still undergoing issues with such issues. Thus, more strong and committed employees are required in the financial institutions.

According to Vildy (2007), money laundering is difficult to identify as most of the criminals tend to use their wealth in buying properties , investing in large companies, import and exports, legitimate the cash and investments. Those financial institutions that are involved in the activities are also paid to assist in covering the transactions.

Further on that, the money laundering acts are further advanced and processes are tightened. Financial institutions are considered as center point to minimize the money laundering activities.

2.4 ANTI –MONEY LAUNDERING LAWS IN MALAYSIA

Even though, there aren't much findings to say that Malaysia is a contributing country in money laundering, it does however indirectly offers multiple financial services offshore and also locally that could lead to misuse of service. Thus, making it an intent on money laundering and also could lead to terrorism. This also makes the law to be enhanced for the sake of national security.

Based on other findings, it is concluded that drug trafficking is the source of the main illegal activities in Malaysia. Malaysia was the country that was used to transport drugs from golden triangle and Europe countries. However, the issues with drug trafficking has been under control by the effectiveness of an act enacted in 1988, which was the Dangerous Drugs Act. Other than drug trafficking, Malaysia is also the target for financial frauds, human trafficking, forgery and other main illegal activities.

All this has led to money laundering and many techniques are being used by the criminals in Malaysia, which includes, using family members as nominees into the banking transactions. The criminals also are smart in setting up front companies, buying insurance, purchasing

properties, investments and also targeting gatekeepers and money changing companies. These criminals are quite manipulative in terms of concealing the trails in their transaction.

Following many other countries, Malaysia has also implemented anti-money-laundering laws and anti-terrorism acts. The enactment of the anti-money laundering acts and anti-terrorism act 2001(AMLATFA) is considered an important step by Malaysia to support and to show commitment in overcoming the international criminal issues related to money laundering. Thus, this leads us to learn more about the details and provisions, which is a crucial legislation in terms of money laundering and terrorism. However, in order to understand the AMLAFTA better we would need to look further into the anti-money laundering laws.

2.4.1. BACKGROUND TO THE ANTI-MONEY LAUNDERING LAWS

Moving on to the laws prior to AMLAFTA, the focus would be on the dangerous Drugs Act 1988 and also the Anti-corruption Act (ACA) 1997. Both of the above acts have been enacted in consideration of the national importance and is applicable in Malaysia. These laws are the only acts enacted to protect against money-laundering prior to AMLAFTA. We would also be highlighting on the National Coordination committee which acts as a body to overcome money laundering and developing the basic frameworks.

2.4.2. PRE-AMLATFA REGULATORY REGIME

Prior to having AMLAFTA, Malaysia did not have a specific acts or law to control money laundering activities, thus it makes the term still new and vague to many people. Even so, the activities of covering up illegal funds were not new and it was already in an enactment in few

law sections. Which are the Dangerous Drugs Act 1988 and also Anti-Corruption Act 1997, the Labuan Offshore Trust Act 1996 and also the Penal code and the customers Act 1967.

Under the DDFD act section 4 says, it is an offence to use, receive or hide any properties that came from activities related to drugs trafficking. Based on the law, this offence is considered as money laundering. However, these types of prosecutions rarely happen. For example, in the case of state V Lim the accused who is a money changer, was charged with four offences under the DDFP act, for receiving and keeping property, with the knowledge that it was owned by a drug dealer who passed on. Lim also changed large amounts of Malaysian currency into Thai notes and gave approval for the amount go through his account in Malaysia. But, Lim denied knowing that the deceased was a drug dealer. Even though the prosecution produced many evidences, the law was not strong and had loophole which made the judge to equate the defense.

The concept of concealing the origin of illegal proceeds can also be found in the Anti-Corruption Act 1997 (ACA), Labuan Offshore Trust Act 1996, the penal code and the Customs Act 1967. Section 18 of the ACA makes it an offence for a person to deal with, use, hold, receive or conceal gratification in relation to an offence under the Act. Similarly, section 53 of the Labuan Offshore Trust Act 1996 prohibits a trust company from accepting money derived from a criminal offence under the laws of Malaysia. Under sections 411 to 414 of the Penal Code, it is an offence for a person to accept stolen goods knowingly. This also works the same way for those who deal with stolen property or even assist in the cover ups of the stolen property. These acts are provided for in the customs Act 1967 that actually, prohibits any member of the society to be in association of any goods that are not allowed in the country. However the issues with these acts are that, it is only made possible with certain illegal activities which then make it much easier for other criminals to go apprehended.

Even so, there are also certain laws that actually allow the officers to confiscate the property if related to criminal procedures. The act that is The Criminal Procedure Code (CPC) is the main source that allows the enforcement officers to take action. Section 407 of the act also ensures that the court of law is able to retain custody of such properties.

It could be concluded that under the section 407 of the CPC act, the court of law does have the power to forfeit any properties that is deemed to be under the criminal influence, however this power also needs to be properly conducted relating to certain provisions. And these are the laws and sections under the ACA, DDFP, Custom Act 1967, Excise Act 1967 and also the Dangerous Drugs Act 1992.

Under the section 36 of the ACA acts, it does mention that any property withheld under criminal influence can be forfeited. And in section 37, it states that the public prosecutor have the right to apply to the court to forfeit within the expiration term, which is twelve months from the date the property was captured. However there seems to be a loophole in the system, whereby the judge is required to publish to ensure that no one has the interest in claiming the property prior to the hearing date.

To conclude, prior to having the AMLAFTA law, the Malaysian government had its ways in controlling money laundering activities under different legislation and laws. However in most cases, due to the international law and procedures, most of the cases were acquired under difference provisions. Certain provisions did not have the type of properties to be seized. However, with the efficacy of AMLAFTA, there are precise procedures and legislation to ensure seizures and forfeits are legal.

2.4.3. THE NATIONAL COORDINATION COMMITTEE TO COUNTER MONEY LAUNDERING

The Malaysian government, in its effort to control money laundering, has come up with the National Coordination Committee (NCC) in the year 2000. The purpose of the organization was to control money laundering activities and also terrorism. There are a total of 12 Ministries and government bodies under the establishment. Bank Negara seems to be the lead in this organization. The bodies work together to form new laws and enactment that will lead to bringing money laundering under control. Some of the main functions of the NCC are :-

- i. To develop and also in ensuring the implementation are properly made to counter the money laundering issues. The implementation that was made under Financial Action task force.
- ii. Enforcing policies that will work well with international measures and coordinating the policies that will best suit nationally and internationally.
- iii. Agreeing on action plans in accordance with money laundering and terrorism law enforcement.
- iv. Identifying and preparing suitable solutions for any overlapping acts that involves fast resolution on the money laundering issues.
- v. Creating suitable legislation and measures to ensure implementations are properly done.
- vi. Monitoring and overseeing if all the agreed implementations are in place and being executed.

NCC's main objectives are more focused on the ministries, government agencies and also the authorities to ensure that the Malaysian government implements and also executives an effective anti-money laundering and handle the financing of terrorism issues.

The NCC is there to ensure that the systems are followed according to international standards as decided and outlined by the FATF. As the leading official, the Bank Negara Malaysia is always there to ensure that there are cooperative measures between the government officials and private sectors to counter the issues together. Both the sectors working together will ensure that compliance is achieved. Among the activities that Bank Negara has initiated are, to create awareness by having public dialogues and keep emphasizing the importance of maintaining the safety measures at all times. Further on NCC, the responsibilities of NCC were moved further into handling terrorism financing. This includes making researches into money laundering activities, information findings and reporting the implementation of NCC. Decisions were then made that was within the controls of NCC. Based on the new responsibilities, there were four new committees that were established under the main NCC, which was inter-agency training, subcommittee for countering terrorism financing.

Apart from all the other responsibilities, the NCC is also in charge in ensuring that the Malaysian government works together with Asia Pacific Group Money Laundering. They have certain requirements that NCC is required to follow.

NCC's other responsibilities also includes compiling with Asia Pacific Group money laundering membership requirements. Among the requirements are the involvements to be a part in agreements by other members. However the main aim to target the monitoring system is to ensure that the progress and international standards of AML/CFT is followed through. The international standards are to be adhered in any circumstances. The Asia Pacific Group of money laundering will also decide if all the stated standards and rules are followed through by each member. The step is taken to ensure any mistakes are identified and corrected accordingly.

Malaysia's first evaluation on the above matter was with the Labuan International Offshore Financial Centre (LOFC). This was carried out in the year 2001. Based on the findings, the team at that point of time, it was concluded that LOFC did not have much issues with money laundering and other related organized crimes. This was due to the fact that AMLAFTA was already in practice and the Malaysian government was very attentive to the money laundering issues internationally and taken much careful steps to conquer the problems. Bank Negara Malaysia also had introduced new regulation that helped to enforce the safety measurements.

The next evaluation on Malaysia took place in the year 2007 and based on this particular year's findings, Malaysia's scores was quite astounding and could be compared to many developed international countries. Among the recommendations that Malaysia received was the compliant, 24 largely compliant, 15 partially complaint and noncompliance ratings by the FATF and anti-money laundering and anti-terrorism financing. However, NCC came up with an action plan to identify and implement most of the compliances. Some of the action plans are amendments to existing law, ensuring the guidelines are monitored thoroughly and also to enforce the law to be stricter. This called for the enactment if national asset management to forfeit and confiscate properties more freely.

However the most important action plan based on the evaluations and findings was the establishment of a subcommittee under the NCC. This was to overcome any gaps that existed related to cash couriers. And the outcome was the foundation of a task force on cross boarder transportation of currency. This newly establishes committee comprises of Bank Negara Malaysia, Immigration department and Royal Malaysian Customs. Based on the above we could conclude confidently that the NCC working efficiently to implement policies and coordinate effectively.

2.5 THE ANTI-MONEY LAUNDERING AND ANTI-TERRORISM FINANCING ACT 2001

The first anti-money laundering law was the anti-money laundering Act (AMLA). This particular law has approved in the year 2001, however it was only practiced in the year 2002. The law was formulated with the combination of 13 ministries and government bodies. The main purpose was to off course to control money laundering activities. Once AMLA was in practice, the law became more tide in the sense that many reporting institutions had the obligation to report on customers, records and also to report suspicious transactions that took place.

AMLA also formulated procedures to investigate money laundering crimes and from there proceed to take extra measures to freeze, seize and also take over any illegal and criminal activities.

In time, terrorism financing and money laundering became the most vicious crimes internationally. Thus AMLA was amended by the Anti Money Laundering Act in the year 2003. The purpose was to extend the measures in handling the crimes. It is also set up to predict and predicate the crimes. In March 2007 onwards, AMLA was renamed to Anti Money Laundering and Anti-Terrorism Financing Act 2001. This is to facilitate and enlarge the scope to handle bigger criminal situation. Thus, AMLAFTA is a newly formulated and improvised enactment law to create broader apprehension. It is targeted to prevent and detect money laundering and terrorism activities as well as seizures and containing illegal properties.

The AMLAFTA act or the law is segregated into eight different sections, which begins with preliminary, money laundering offences, financial intelligence, reporting obligations, investigations, freezing, seizure and forfeiture of territory property and also miscellaneous.

However there are also certain mandatory actions to follow when dealing with AMLAFTA. Which is there is a provision caked Mutual Assistance in Criminal Matters Act 2002. This act must be read together with AMLAFTA. The act which is MACMA includes some specific details under its provision for the government of Malaysia to offer and also to get international assistance in the criminal issues involving money laundering and also other terrorism matters, such as foreign and international crimes, recovery and seizing of properties. The MACMA assistance also includes identifying of key witnesses and suspects.

In AMLAFTA there are in total of 93 sub sections and acts and also two different schedules. The first however has the reporting institutions meanwhile the second schedule handles predicate criminal issues. As for the Malaysian government, it has taken on the listing based method to decide on the predicate criminal cases. This is due the fact that in the year 2002, predicate offences has evolved tremendously which also includes a wider range usually committed crimes which is of course money laundering.

2.6. TRAINING AND DEVELOPMENT

Training and development are efficient and excellent approach for achieving high performance among employees. Many organizations are more confident in investing large amounts for the employees to advance in the competitive corporate business world (Hatala & Gumm, 2006). According to Hatala and Fleming, (2007), it is now identified that over empowering employees into training and development would also lead to misleading of objectives. Companies and organizations are encouraged to perform and engage training and development that would lead to the productiveness of the organization and also to maximize the talents of the employees. Trainings and development's main motive and objective should

revolve around developing the employee relevant skills and knowledge. The trainings and development practice in the organization should be leading towards technology and techniques.

The outcome of the training and development should ensure that output should be beneficial to both the company and the employee. However most of the training and development conducted are also for the benefit of the third party or other organizations that are in business as well (Sommerville, 2007). Training can be provided by on-the-job or off-the-job training depending on the needs and circumstances.

2.6.1 ON-THE-JOB TRAINING AND EMPLOYEES' PERFORMANCE

According to Hayes and Ninemeier (2009), on-job-training concept often mistaken by many companies as it is a process of guiding one more group of trainees by letting them observe how seniors perform the jobs. Thus, the real meaning and purpose of this concept is not as being believed off. The on-job-training have its own consequences and there are not much benefit gained throughout this process. Some of the implications in implementing this method of training among new employees or to those employees seeking skills enhancements are the extra burden need to be carried by the experienced staff in giving on-job-training to the newly appointed staffs. This extra responsibility can be annoying and frustrating to them as having someone following around while they are doing their job, especially suddenly given new tasks (Velada Caetano, Michel Lyons & Kavangh, 2007). Beside this implication, the other main constraint with this method is some trainers might skip some steps in the work they perform as familiar with it and it can be done unintentionally. This may give bad impression to the new comer as they will tend to follow the example shown by the experience staffs. The problem will prolong when the employee pass down the incomplete information to other staffs. Apart from all these

limitations, the interruption occurs in the middle of training if the trainers have something else to complete will cause a frustrated learning environment for the trainees.

2.6.2 OFF-THE-JOB TRAINING AND EMPLOYEES' PERFORMANCE

The other approach in training is off-the-job training which is contra version of on-the-job training. The off-the-job trainings mostly will be conducted in the classroom environment with specific modules used as guidance (Davis & Daley, 2008, Korth, 2007). Some of the examples of off-site trainings are attending conferences, workshops, web seminars, and also with new era of ICT technology, e-learning also become famous way of attending training, (Bates, Holton, Seyler & Carvalho, 2000). If we compared to on-the-job training from the aspect of costing, the off-site trainings are much more expensive and need resources to be supported financially. The main costs are accommodation for the trainees and also meal costs apart from paying consultation fees to the invited spokesperson. In some cases, to get trainees attention the trainers will try to use multimedia facilities such as power point presentations, video, role plays and also case study and all these needs internet access. Thus, the facility cost also need to be considered in order to implement off-site training. Even this approach can cause extra cost to the organization, yet the output is something every management looked into. Trainees' attention and the learning effectiveness will be positive with more new techniques rather than traditional approach in conducting trainings. The vary type of trainees also can be a reason for the new techniques to be imposed, such as visual learners will prefer more graphic training presentations where else auditory or kinesthetic oriented trainees will be looking forward some material based modules in the trainings (Yamnill & McLean, 2001).

2.7. RELATED THEORIES OF EMPLOYEE TRAINING AND DEVELOPMENT

There have been various theories propounded to explain the relevance of training needs in any establishment of organization (Hayes & Ninemeier 2009). Trainings offered to individuals can be vary according to their needs and expectations and their different value also should be considered (Burke & Hutching, 2007). Thus, all these criteria are needed to be focused before implying appropriate training to employees in order to get the output as per expected.

2.7.1 SOCIAL LEARNING THEORY

Company employees will gain new learning and skills by observing the senior staff or employees that are more reliable, knowledgeable and experiences. Thus, this will brings us to the theory of influential employees who are able to assist other employees with their self-confidence (Burke & Baldwin, 1999). Based on this, the new employees are able to have more self-confidence and tend to have longer staying period in an organization.

2.7.2 THE RESOURCE-BASED VIEW (RBV)

Researcher view that, in any places or companies of the firm advocated that an organization can gain competitive advantage by attracting and retaining capable human resources and as well identifying relevant training for them to keep improving their capacity for best performance. By implications, the effectiveness of training and learning depends on the pattern of the job related knowledge, skills, capability, competencies and behavior that are important for greater performance which in variably be capable of influencing organizational success.

2.8 TRANSFER OF TRAINING

According to Baldwin and Ford (1988), transfer of training can be defined as the process of trainees apply effectively the knowledge, skills and attitudes gained in the training to their current job or teach other colleagues regarding the content of training. In order to success, the process of transfer of training effectively the need of the employees to understand the competencies of the new-job related issues is vital. The content of learning is focused to paradigm changes in knowledge, skills and behaviors of the trainees. According to Chuang, Liao and Tai (2005), upon completion of the training the trainees are expected to transfer the knowledge to other peers or implement the newly learned skills in their work to improve the work performance in duration of anticipated time. Nevertheless according to study done by Tsai and Tai (2003), only 10% of all training experiences are transferred from the training modules to the real live time environment related to work. Hence, this is contra with findings by Velada, Caetano, Michel, Lyons, and Kavanagh (2007), whom believed the 10% is only a lower-bound estimation and the other statistics related are about 40% knowledge transferred immediately after training, about 25% transferred in the next 6 months and 15% after a year. This study also reveals that after a period of time, the trainees feel less motivated and unable to maintain and use the knowledge they gained in the training program.

According to Wexley and Latham (1999), conceptual models related to the process of transfer of training are limited, even there are many studied has been conducted related to the theory. In order to understand the constraints faced in the process of transfer of training (TOT) a multi-level multistage process has been developed to understand the findings are influenced by several variables such as individual, supervisor, workgroup and the company itself and also the influences of different stages in the training as pre-training, training and post-training (Kanfer,

(1991). According to Baldwin, Magjuka, and Loher, (1991), there are three main determinant factors of TOT which is training model, trainee individualistic and also work settings. According to Elangovan and Karakowsky (1999), training is useless and waste unless it is proven help in employees work performances. Performance is the key to measure successful for Human Resource Development to become a core business process (Woods, 2006). Thus, TOT is a core issue related to individuals obliged to the requirements of the organization or management. Hence, according to Woods (2006), if a management wants training to bring changes to the company, they need to understand and support on the implementation of trainings in their organizations.

Furthermore this indicates that, much of the time and money spent in training was never fully realized because only a small percentage of the training effectively results in permanent transferability to the workplace. As a result, understanding and improving the transfer of training process has become a primary anxiety for training researches and practitioners.

2.8.1 THE RELATIONSHIP BETWEEN TRAINEE CHARACTERISTIC AND TRANSFER OF TRAINING.

In the training process, some of the characteristics of the trainee which influence on the effectiveness of the transfer of training are motivating to learn and to transfer personality related factors and also inner-ability of the individuals. According to Foxon (1994), in the context motivation to learn the importance entity is the motivation to learn the skills in the training and also motivation to share the knowledge to other employees.

Apart from motivation some trainees whom have more information and knowledge about where and how the training can assist the training process will tend to show positive affection towards the transfer knowledge (Green, & Skinner, 2005). When the trainees feel positive about

the learned content of the training, they will be positively tried to guide the knowledge to others. Apart from the perspective of the trainees, the other considerable factors are training methods, trainee ability, motivation to learn, training favoritisms and training antiquity.

According to Colquitt, LePine and Noe, (2000), if a trainee consistently applies the skills and techniques learned from earlier training programs, they most likely will face problems and issues adapting to the new environment learning new skills and knowledge. This is especially true if the employees' had formed scripts and schema (Abelson, 1981; Lord & Foti, 1986). This would adversely affect new knowledge acquisition, which would then lower effective transfer of training.

2.8.2 THE RELATIONSHIP BETWEEN TRAINING DESIGN AND TRANSFER OF TRAINING

Training design or model can be defined as a collection of teaching materials and learning principles related to the title of the training given to the trainees. In model developed by Baldwin and Ford, they emphasized on the importance of training design such as identical elements which can trigger the response in both the training and transfer settings, teaching theoretical knowledge which can be related to specific skills, using training stimulus and identify the effectiveness of the training measurements (Machin, & Fogarty, 2004). The effectiveness of the training can be measured by dividing the training into sections; use feedback forms to get trainee's perception and also learned knowledge from their own view.

According to Mathis and Jackson (2006), training purposes and contents should be effective and useful relevant to the need of transfer task. According to Mathieu, Martineau and Tannenbaum, (1993), trainers play important role in ensuring trainees optimize the transfer of training. The trainees also have their roles and responsibilities in ensuring the transfer taken

place properly as trainees are obliged to transfer these skills to the workplace. According to Mathieu, Tannenbaum and Salas (1992), the effectiveness of the training can be measured by seeking the working performance of the trainees before and after attending the course. Thus, it is appropriate to conduct training that are related to work of the trainees instead of general trainings like team building, religious and other not related to work of the trainees. According to Meyer and Marsick (2003), the transfer design reflects both hands-on research of transfer and the professed relevancy of the training programmed (content rationality), whereas involvement self-actualization refers to the scope to which the preparation meets expectations and needs.

2.8.3 THE RELATIONSHIP BETWEEN WORK ENVIRONMENT AND TRANSFER OF TRAINING.

According to Mathis and Jackson (2006), mostly trainees will get highly motivated and excited about the new knowledge they learn in the training. Thus, the excitement will be less over the years and also influence from other factors such as new policies, and new working mates. In the early 90s, the factor of influence of work environment has been focused and it receives attentions in the field of transfer of training. According to Cheng and Hampson (2008), work environment and transfer of training have strong relationship. Some other literatures also believed that work environment is a influence factor of transfer of training with two different dimension; the influence of work environment on the proximal factor of motivation and the other is influence of work environment on the distal of transfer of training outcome (Baldwin & Ford, 1988; Burke, Holly & Hutchins, 2008; Cohen, 1990; Burke & Hutchins, 2007; Facteau, 1995; Trace, 1995).

According to Holton (1997), difference scope of studies related to work environment suggested other diverted factors influenced the transfer of training from the content of work

environment such as peer support, manager or superior support, subordinate support and transfer climates like the chance to use the newly learned skills and knowledge. Some studies merge the concept of social support and the transfer of climate.

2.9. CONCEPTUAL FRAMEWORK

This study will give attention to the effectiveness of training of AML in Bank A staffs in Malaysia by studying the relationship between transfer of training and trainee characteristics, training design and work environment. However as obtained in the literature reviewed above, the following model was proposed.

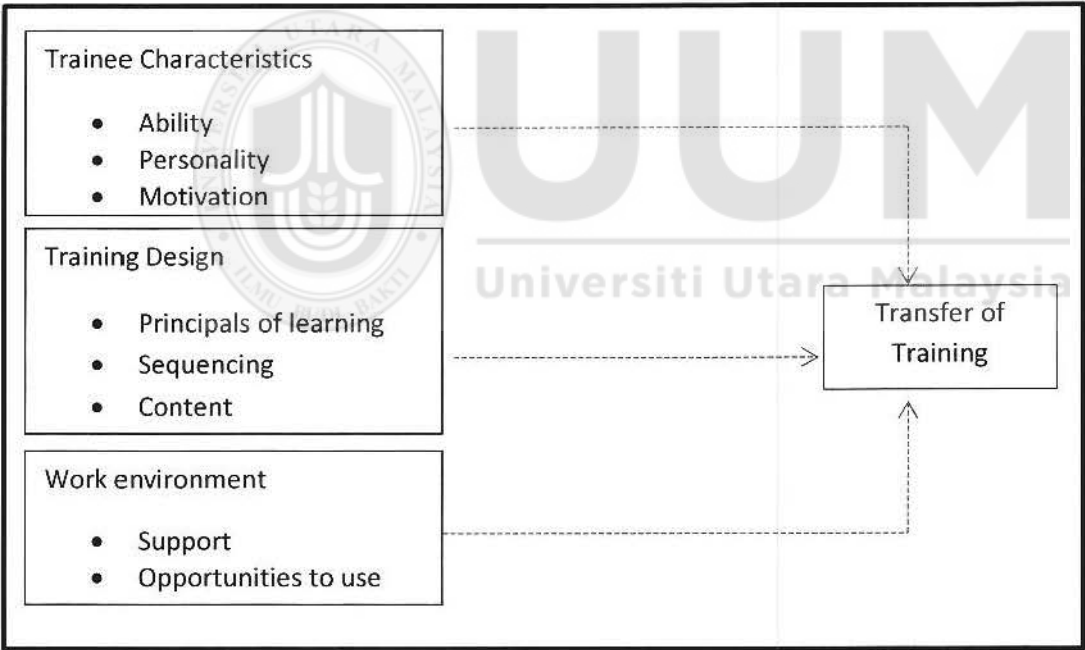


Figure 2.1 Conceptual Framework

2.10 SUMMARY

In the current economic situation money laundering and terrorism financing are considered serious criminal offences reflecting many countries. As such many developing countries including Malaysia has been working hard on passing laws and enactments to counter these criminal offences. Prior to ALMAFTA enactment in 2001, Malaysia was also in a situation whereby money laundering was only detectable via drug trafficking. Thus the enactment of ALMATFA was a success whereby money laundering is detectable in most transactions.

Malaysian government now able to follow international standards and the revolution in the law making has made many illegal transactions to be confiscated. The punishment for money laundering crimes has been made severe with combining international involvement. This makes it harder to white collar crimes to misuse internal banking policies. However so, the penalty is still lower than most of other crimes which also makes room for more improvement in the law.

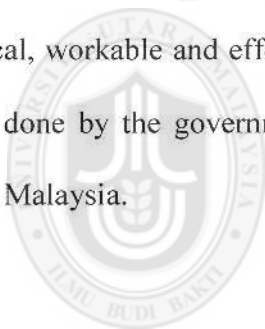
Most importantly, it must be said that the adoption of anti-terrorism financing policies has far reaching effects on the reporting institutions. The laws could expose the employees and management of the reporting institutions to very severe punishment (including death) even if they are negligently involved in terrorism financing activities. However, despite these arguments AMLATFA is still considered a major tool for the prevention of Malaysian financial institutions from being abused by criminals and terrorists.

Apart from combating money laundering and terrorism financing activities, effective implementation of the AML/CFT laws would also have a significant impact on other criminal activities, by reducing the ability of criminal organizations to finance further criminal operations.

Most importantly, effective AML/CFT measures could preserve the stability and integrity of the financial institutions in the country.

With the implementation of the AML/CFT laws, the responsibilities of Malaysian supervisory and regulatory agencies as well as the enforcement agencies and the reporting institutions are greater than before. Effective implementation of the laws will require considerable supervisory and enforcement resources. It is not clear at this stage whether the relevant agencies have the necessary resources, or expertise, to carry out their very onerous responsibilities. This is an area that requires further research.

AMLATFA is relatively new, therefore it remains to be seen whether the Act could become a practical, workable and effective legislation. Although much has been done, there is still more to be done by the government to prevent the suspicious flows of dirty money and terrorist funds in Malaysia.



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CHAPTER THREE

RESEARCH METHOD

3.1 INTRODUCTION

Research methodology consisting research design is important in order to collect and analyze needed information in conducting a research study. It can help the researcher to structure out his or her research project to ensure it is on right track. A research design is developed to lay out the whole research, to indicate the major tasks in the project, the population, measurement needed and type of assessment needed. By logically and structurally adapting a proper guideline using various steps, research methodology can be a systematic approach in solving research questions and hypotheses developed. In this chapter, the research approaches used to guide the scope of research and data collection procedures apart from the analysis process will be elaborated. Using a guided research methodology can ensure the path of research is followed appropriately.

The researcher provides set of questionnaires for respondents which will be from employers working in Bank A and all the related sub modules such as research design, sampling approaches, and procedures to generate analysis, data examination and instrument are presented in this chapter as well.

3.2 RESEARCH DESIGN

Upon conducting a research, there are various methods and approaches can be used. Some of the methods are qualitative research, quantitative research and combining the both. But the method should be applied suitable to the context of the research, and depending on the sample sizes as well. For example, larger population studies can use quantitative approach as the need to get answer or opinion from many respondents. Whereby, if the sampling size is small and needed detailed answers, qualitative approach will be most suitable. Some of the example, quantitative method is survey and example of qualitative method is interview.

To conduct the study the study design will be using quantitative approach and for this approach, the method of collecting data will be questionnaires (Ghauri & Grönhaug 2005). Mostly survey approach used in many researches to seek the self-report data from respondents by giving them multiple choice answers. If a research focused on collecting factual information about individuals and their opinions regarding a subject, survey is highly recommendable. The purpose of choosing quantitative research approach for this study is due to the high population of sampling. The survey in this study was conducted by giving a set of questionnaire to respondents chosen randomly to seek their knowledge and perception regarding the Anti-Money Laundering Training in the workplace and the output of this questionnaire was from their own opinion. The input in the survey ensures the results are standardized and it can be arranged in table and chart forms and also available for statistic calculations. To establish a standardized questionnaire, survey form usually tested for reliability and validity tests before contributing them to respondents. Standardization is important to cater larger population and in this study, the total population is 396 respondents. Therefore, standardized set of questionnaire is important to conduct a research study in a short period of time. The other purpose of choosing this method

was surveys are less expensive compared to other approaches such as interviews and recordings. In this research, a survey approach is used because it can cater all 396 respondents in short period of time and from different department in Bank A. The time needed to prepare a survey form is quick and it can be manageable well also. For this study purpose, important characteristics are personal opinions; attitudes and past experience in attending the AML training of employers are needed. Therefore, survey approach has been used to collect information regarding the characteristics and the opinions comes out from that employer's job scope related to employees' directly. The collected information is the primary data and secondary data also needed to conduct a study such as journals, internet sources and articles. Apart from raw data collected from employers regarding their knowledge on the AML training, secondary data on previous studies on Anti-Money Laundering issues and training has been obtained easily. The secondary data was needed to support the identified facts regarding the study which has been strengthen the findings for future purposes and been useful for stakeholders like Bank A and other banks as well.

In this study, the independent variables will be trainee individualities, training model and work settings. The dependent or criterion variable will be transfer of training.

3.3 POPULATION AND SAMPLING

Sampling size or population is a set of respondents chosen to conduct the study and these sampling has been chosen based on own criteria such as random or specified respondents. To determine the generalized findings or output, samples or known as respondents has been used. It was characterize the whole population and the sampling technique used in this study is census sampling. A census is a study of every unit in a population. Thus, a total of 396 questionnaires

were distributed among 396 staffs from Bank A located in Kuala Lumpur. To conduct an effective approach in choosing sample size, the need for the representative statistics number is important.

3.4 DATA ANALYSIS PROCEDURE

In research studies, data plays significant aspect and useful in analysis part. Different researchers and different studies can be done using variety of methodology, yet the common source is the data collected which is used in analyzing and interpretations to access more information. The first data collected in this research is primary data which can be classified as raw data as well. These data is solely collected from the questionnaire which was answered by respondents and in need to polish and strengthen the data, secondary data from journals and other dissertations was needed.

Primary data cannot be changed and this shows it is good compared to secondary data which the source can be reliable or vice versa. The primary data collected for this study is basically from questionnaire which was key-in in excel format to be generated analysis. The primary data considered important as it is the first reliable data which can be accessed by researchers and they can generate variety of analysis based on the needs of the study compared to secondary data which can only access the outer information. This makes the secondary data least reliable and may have prejudice as it is already populated by somebody else and the only accessible information is final output. In statistical surveys, it is important to get complete data to analyze to gain information from primary resources and the data can be analyzed based in importance to the study.

Beside that before obtaining data from secondary sources, it is important to check the validity and the genuineness of the information as the current study will be based on published findings. In some cases, if primary data not reliable and during time constraint, secondary data can be useful. But then, the source of secondary data needs to be genuine and reliable.

Data was collected by handing over the questionnaire to the respondents, (396) which are bank staffs of Bank A and they were given period time of two weeks to complete the form and return to the researcher. The distribution was done by hand as the researcher can easily meet the respondents and ask for their favor to participate in this research study. During the distribution, the researcher will explain on the sections in the questionnaire briefly as she does not want to drag respondents' time. Upon given time of two weeks, the researcher recollects them back and uses SPSS to key-in the data in the saved file.

3.5 DATA ANALYSIS

Once the data are collected, the type of analysis needed to be done on the data to generate findings will be preferred. The organized data such as after done the data cleansing and also re-correct the null columns, can time saving and prevent errors. Using appropriate analytical tool, it can guarantee the output of the analysis. For quantitative method, the most suitable way to run the data is by using statistical or analytical tool and Statistical Package for the Social Science (SPSS) is commonly used in the field of research.

The first step upon collecting the survey forms are, to key-in the data to excel format using same format cell and in the same file. The data cleansing can be done in the excel file by checking the null answers and inappropriate numbers. Sometimes the data entry can be mistake

due to negligence and this should be properly checked before the data transferred to analytical tool. Data cleansing also can ensure errors and check the data for accuracy and errors can be corrected. Once error is identified, it is important to cross check with the manual survey form before deleting it permanently to avoid problem in future during analysis stage. All information should be saved and all adjustments to the data set should carefully and clearly state. Once all the data has been processed, the file can be migrated to analytical software using query database feature. In the analytical software, the data then can be interpreted and presented in graphic figures like tables, charts and graphs.

The questionnaire is used in collecting data for this research study as the population was high and the need to see the effectiveness of the training among the bank staffs. In the questionnaire, there are four sections which were divided in order to collect data based on the sections. The first section used to collect information about profile of the respondents such as name of the training attended, department they are working for, gender, age, level of education and also their working experiences.

The second section has been focused on the respondents view on trainee in individualities. The following section is on the training model and the last section requires the respondents to answer on the work settings and transfer of training. The items in the section B, C and D are measured using “5-point Likert scale”, ranging from strongly disagree to strongly agree. To seek the significant relationship between transfer of training and all the reliable factors such as trainee individualists, training model and work settings, Pearson Correlation test has been generated.

The type of data analysis conducted in this study is quantitative using analysis tool 20.0 for windows (IBM SPSS) and analysis test focused more on descriptive analysis, regression analysis and t-test to seek significance mean difference. To check the significance value in t-test, alpha value at $p < .05$ is used. Descriptive analysis is done to check the mean, percentage, and standard deviation on the collected data. Frequency analysis has been carried as it can identify null columns and rows and this can be adjusted.

3.6 INSTRUMENT VALIDATION

Survey method are used in most of educational research involving high population and with a set of questionnaire, the researcher can gain information on demographic, acquaintance, approaches, views, facts and behavioral patterns. According to Groves (1987), survey is one of the important aspect in collecting data from huge population. To ensure the validity and reliability of the developed questionnaire, the suitable tests are conducted. To test on reliability, reliability test can be done by checking on the Cronbach's alpha value. Depending on an objective and purpose of a study, the validity types can be chosen out of contented, assemble decisive factor and countenance.

The total respondents of 30 used for pilot test are chosen randomly the Bank A and reliability coefficient (alpha) was tested using analysis tool. The dependency test is done based on the reliability coefficient identified as alpha which can be in range of 0 to 1. The range 0 is representing a survey full of inaccuracies and ranges 1 defined total deficiency of error. In a study, if the alpha value is more than .70, it indicates that the survey is fully in an acceptable reliability range. The computed reliability co-efficient (r) value can summarize than the purposes of the research study is reliable or not. The reliability test was done on the four sections in the

questionnaire. This is inclusive of all the four sections in the survey form. Cronbach's α (alpha) is a coefficient of reliability. The reliability of questionnaires used in the pilot test were tested using Statistical Package for Social Science (SPSS) and it shows Cronbach's α (alpha) was 0.82, and that fulfilled the standard reliability coefficient.

In the final step conducting pilot test, reliability test is done. Reliability test can ensure the survey is dependable and can detect random error in measurement. According to Norland (1990), reliability can determine the accuracy or correctness of the instrument needed to be measured. The internal consistency test can be generated. Test-retest can be used to seek reliability of knowledge type questions. A structured and systematic questionnaire needs to be developed to decrease measurement errors and it also can guide the proper track to assist a researcher to design questionnaire according to format. Respondents' demographic data types also can be ensured in the beginning for analyze purposes. For all researchers conducting survey on educational and evaluation research, are obliged to these test to ensure their instrument are valid and can be used to collect data to enhance the research purposes.

3.7 SUMMARY

In the chapter three, it has been summarized on the research design and method used by researcher in this study. The sampling size is representative of the total population determining the need for this study to gather respondent's information such as demographic details and their measurement on effectiveness of the AML training in their workplace. The instrumentation method chosen for this study is survey approach in order to gather primary data directly from respondents and secondary data was used to support the findings from the analysis. The procedures illustrated on how data was collected to complete the study and lastly, the data

analysis section explains on how the analysis is structured and well managed which was collected throughout of the study. Choosing proper method depends on the objective and scope of a study and this research need to use big sampling size. Therefore, the need to use survey seemed to be appropriate. In the following chapter, the data analysis and findings has been explained in depth and statistical tests also shown. Analysis tool is used to analyze raw data collected from respondents and data is processed in tables, charts and graphs to give clearer picture. Data analysis chapter can measure the response from respondents using valid formulas.



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CHAPTER FOUR

DATA ANALYSIS AND FINDINGS

4.1 INTRODUCTION

The main purpose of this chapter is to present collected data in a systematic and simplified method to generate analysis in an appropriate approach. The first section will report the response rate and the description of the study followed by the findings are presented into demographic results, trainee individualities, training model, work settings, learning outcome and training effectiveness. The second part will consist of descriptive statistics, and results of hypotheses testing.

4.2 RESPONSE RATE

Total respondents of this research were 396 and all the collected data were analyzed through SPSS version 20. The analysis was done to identify the research questions and complies findings from other researches. The statistical analysis has been produced to evaluate the effectiveness of Anti-Money Laundering Training of Transfer among Bank A staffs. Bank A has been organizing the AML training among their new staffs and also to those staffs whose been with the company over past years to ensure they still aware of the AML concepts. Thus, great cost has been allocated to accommodate these trainings among the staffs the create awareness about the AML training and the value for money for their expenditure can be measured by the effectiveness of the provided training to them. This can be helpful to the management as well as they can ensure the return of the expenses on providing this AML training on monthly basis and

ensuring all the newly appointed staffs attend this training as mandatory step in their career procedures.

The questionnaire was distributed among staffs of Bank A in the working hours and the completed questionnaire was collected after a week. The actual number of distributed questionnaires was 396 and the same total was collected and this indicates that the response rate is 100%. The analysis tools used for this study were IBM SPSS Statistics Version 20 for windows. The collected data were tested for validation and reliability by using the reliability and validity test and it will be presented in the validation section. The questionnaire was distributed among the staffs through the period of working hours and collected after a week.

4.3 RELIABILITY ANALYSIS

In this section, reliability test is tested on questions from part Trainee characteristics, Training Design, Work Environment, Learning Outcome and Training effectiveness. The main reason to conduct a validity test on the questionnaire is to ensure the validity of the data and the suitability of questions. If the used variables are revealed, then the instrument can be considered as valid instrument. The collected data in this study, the questionnaire's validity was tested using Pearson Product Moment Correlation whereby each item in the questionnaire from part Trainee characteristics, Training Design, Work Environment, Learning Outcome and Training effectiveness was correlated with the total scores. The questions can be said as 'valid' if the significant value is lesser than 0.5 and correlation coefficient is greater than 0.361 as for the confidence interval should be 95%", (Weinberg & Abramowitz, 2008).

Reliability test conducted to each questions from part Trainee characteristics, Training Design, Work Environment, Learning Outcome and Training effectiveness (total number of items 50) and the result showed in table 4.1 as below. The Cronbach's Alpha value (0.788) indicates that the set of questions is reliable as the appropriate statistic measure should be at least 0.7 or above.

Table 4.1: Reliability Statistics for all constructs

Part	Cronbach's Alpha	N of Items
Trainee Characteristics	.655	10
Training Design	.711	10
Work Environment	.718	10
Learning Outcome	.589	10
Training Effectiveness	.525	10
Total Questions	.788	50

4.4 DESCRIPTIVE STATISTICAL ANALYSIS

In this section, demographic analysis and all the variables has been analyzed and showed in each section.

4.4.1 DEMOGRAPHIC ANALYSIS

In the questionnaire, section A were used to collect demographic information about the respondents and the details of gender, marital status, years of service in Bank A, position in the organization, total years of services in the banking sector, education level, information on attended AML training, the need to provide the training on monthly basis and lastly the opinion

on the importance of AML training to Bank A staffs'. Overall the respondent's profile demographic information has been summarized and shown below on the table 4.2.

Out of 396 respondents, 70% were females while 30% were males. The age of respondents was categorized according to six groups, which are less than 21 years old, in between 21 to 25 years old, in between 26 to 30 years old, in between 31 to 35 years old, in between 36 to 40 years old and more than 40 years old. Based on the table 4.2, it shows 53.0% respondents are in category age of 31 to 35 years old and followed by 22 to 25 years old 23.5%.

Most of the respondents are married which are 67.3% followed by single respondents which are 22.8% respondents answered others showing 10%. For the question of indicating years of service in Bank A, the list of given answers was grouped into seven groups which are 0-5 years, 6-10 years, 11-15 years, 16-20 years, 21-25 years, 26-30 years and more than 30 years. The generated output indicates most of respondents has been in Bank A for more than 16 years and less than 20 years (52.0%). There is only one respondent that worked more than 26 years and less than 30 years (0.3%). Around 10 respondents are new to Bank A whom are categorized in 0-5 years of service group.

Around 84.3% respondents are from middle management followed by supporting level which are 10% of them and lastly top management whom are total of 5.8% respondents. Among them, many respondents have experience in banking sector more than 16 years and less than 20 years. If we see the education level, it shows that those with diploma qualifications are higher in population followed by STPM/Matriculation levels.

For the question regarding attended AML training among the respondents, all answered they have attended AML Training in their organization. All staffs will need to go AML training

as one of their mandatory requirement and the organization are fully responsible in providing proper schedule for all staffs. The suggestion on providing AML training monthly were questioned to the respondents and 95.3% agreed for ‘yes” and only 4.8% of the respondents said ‘no’. For the last question on the importance of AML Training for Bank A among staff were answered positively whereby 95.3% respondents answered the training is important.

Table 4.2: Respondent’s profile

Respondent’s Profile	Frequency	Count	Percent
Sex	Male	119	30
	Female	277	70
Age	< 21 years old	37	9.5
	22-25 years old	93	23.5
	26-30 years old	21	5.3
	31-35 years old	210	53
	36-40 years old	21	5.3
	> 40 years old	14	3.5
Marital Status	Married	266	67.3
	Single	90	22.8
	Others	40	10
Years Of Service	0-5 years	10	2.5
	6-10 years	49	12.3
	11-15 years	61	15.5
	16-20 years	206	52
	21-25 years	2	0.5
	26-30 years	1	0.3
	31+ years	67	17
Position	Top Management	23	5.8
	Middle Management	334	84.3
	Supporting Level	39	10
Total Years of services in Banking	0-5 years	10	2.5
	6-10 years	26	6.5
	11-15 years	76	19.3
	16-20 years	117	29.5
	21-25 years	97	24.5
	26-30 years	2	0.5

Respondent's Profile	Frequency	Count	Percent
Total Years of services in Banking	31+ years	68	17.3
Education	PHD	40	10
	Master Degree	38	9.5
	Bachelor Degree	49	12.5
	Diploma	181	45.8
	STPM/Certificate/Matriculation/A-Level	53	13.5
	SPM	35	8.8
Attended AML Training	Yes	396	100
AML Training should be provided monthly	Yes	377	95.3
	No	19	4.8
Is AML Training important	Yes	377	95.3
	No	19	4.8

4.4.2 DESCRIPTIVE ANALYSIS OF TRANSFER OF TRAINING

In order to find out the perception of employees on transfer of training firstly all the ten questions asked in the part A in the questionnaire regarding the respondent's perception of transfer of training outcomes with the factor of trainee willingness and opportunities, preparation inspiration and apparent job career will be identified.

If see the table 4.3, the highest mean value shown is 2.22 which shows highest agreed on statement "*before the training, I had a good understanding of how it would fit my-job related development*". It shows that among the ten questions asked regarding the transfer of training, the respondents most likely to agree that they were briefed and they aware on the need of the training to their job related development. All the statements related to the trainee characteristics towards the influence on transfer of training is more to agreed statements as the mean value showed less than 3.0. The second highest mean value indicates that the respondents agreed to the statement "*I value the importance of training motivation*" (mean=1.83). This shows the

trainee’s motivation behavior is one of the influence factor in determining the effectiveness of transfer of training.

The most agreed statement in this section regarding the effectiveness of transfer of training is the statement “*What is taught in training closely matches my job requirements*” as showed in table 4.4. Total of 66.5% chose strongly agreed to the statement as they feel the content of training matches with their job requirements. Based on the same table, second highest statement chosen for highly agreed is “*I will get opportunities to use this training on my job*”. Total 62.0% strongly agreed to the statement as they strongly belief that once the training is over, they can fully optimize their knowledge learned in the training to implement their work routines. This is their own motivational characteristics that could make the AML training effective among the Bank A staffs.

In summary, the respondent’s perceptions of transfer of training outcomes with the factor of trainee willingness/expectancy, training enthusiasm and professed job and profession effectiveness is considered high and it indicates positive reaction towards effectiveness of transfer of training among Bank A staffs

Table 4.3: One-Sample Statistics

	Mean	Std. Deviation
The expected outcomes of the training were clear at the beginning of the training	1.80	1.186
Before the training, I had a good understanding of how it would fit my-job related development	2.22	1.409
Employees in this bank will be penalized for not using what they have learned in training	1.79	1.094
I value the importance of training motivation	1.83	.957
If I use the training I am more likely to be rewarded.	1.81	1.207

I will be able to try out this training on my job	1.79	.916
The trainers used lots of examples that showed me how I could use my learning on the job.	1.81	1.026
What is taught in training closely matches my job requirements	1.66	1.171
I will get opportunities to use this training on my job.	1.64	1.029
My job performance improves when I implement new things I learned from the training	1.79	.950

Table 4.4: Frequency Analysis

Statements	Strongly Agree (%)	Agree (%)	Neutral (%)	Disagree (%)	Strongly Disagree (%)
The expected outcomes of the training were clear at the beginning of the training	57.3	24.3	5.3	7.5	5.8
Before the training, I had a good understanding of how it would fit my-job related development	48.8	10.5	22.5	6.5	11.8
Employees in this bank will be penalized for not using what they have learned in training	49.8	37.5	2.8	3.8	6.3
I value the importance of training motivation	40.5	49.0	1.0	6.5	3.0
If I use the training I am more likely to be rewarded.	57.0	24.5	6.5	4.5	7.5
I will be able to try out this training on my job	43.5	42.5	8.8	2.3	3.0
The trainers used lots of examples that showed me how I could use my learning on the job.	47.3	37.3	7.2	4.0	4.3
What is taught in training closely matches my job requirements	66.5	18.5	4.0	4.3	6.8
I will get opportunities to use this training on my job.	62.0	23.8	6.0	4.8	3.5
My job performance improves when I implement new things I learned from the training	44.8	41.3	6.8	4.5	2.8

4.4.3 DESCRIPTIVE ANALYSIS OF TRAINING DESIGN

The second research question for this research study was to seek significance relationship between transfer of training and training design. For this research question, part B in the section B which inclusive of total ten questions regarding the training design were asked to respondents. Likert Scale with 5-point were used as answer from strongly agree to strongly disagree with neutral in the middle scale. One-sample statistics t-test was conducted to seek the mean value of these questions and test value used was 3 as the middle value for 5-point Likert Scale used. Based on the table 4.5, mean value for the statement *“I did not have any exact learning goals from the manager or the trainer regarding the training”* is 4.44. This indicates that the respondents disagree for the negative statement as above and they did have learning goals from the manager or the trainer regarding the training. The second highest mean value is $x=3.61$ for the disagreed statement *“I have post-training assessment to examine what I have learnt from the training and how effective the training was”*. The mean value shows that the respondents disagree that post-training assessment was conducted after the implementation of the training to seek the effectiveness of the training. Apart from these two statements that showed value more than 3.0, the rest of questions have mean value less than 3.0. This shows that the majority of questions regarding the training design is positively agreed by respondents.

Based on the frequency table 4.6, it shows highly strongly agreed statement is *“I believe that trainers have different specialties, thus it is important for the right trainer to do the right course”*. Respondents agreed to the fact that one of the important criteria in a training design is assigning right trainer for the right course. For instance, AML training should be conducted by trained trainer whom specialized in anti-money laundering issues in Malaysia and overseas. Second highest in the table is the statement for *“I believe that trainer to be professional,*

knowledgeable, communicate well with the trainee". Respondents choose strongly agree for this statement 63.7%. For the statements of *"I did not have any exact learning goals from the manager or the trainer regarding the training"* and *"I have post-training assessment to examine what I have learnt from the training and how effective the training was"*, respondents' chose strongly disagreed which are 77.3% and 54.3%.

In summary, the respondents agreed that the content of the training design have influence on the effectiveness of transfer of training and their perception of learning, sequencing and training contents has been identified and explained before the management conducted the training. Thus, the staffs of Bank A agree and believe that there is significant relationship between the training design and transfer of training of AML training.

Table 4.5: One-Sample Statistics

	Mean	Std. Deviation
I acknowledge the importance of content relevance to transfer of training.	1.67	1.092
I agree that content relevance is different between hard skill and soft skill training.	1.84	.867
I agree that trainer quality is a very important factor in the training program, as it is a factor of motivation what motivates my transfer	1.70	1.035
I believe that trainer to be professional, knowledgeable, communicate well with the trainee.	1.75	1.282
I think an unskilled trainer would demotivate me with inconsistencies of what is expected and what actually happens	2.11	.551
I believe that trainers have different specialties, thus it is important for the right trainer to do the right course	1.35	.808
I agree that pre training needs assessment and analysis thought it helps me to know clearly what is expected to learn in the program, which helps the learning	1.63	.995
I did not have any exact learning goals from the manager or the trainer regarding the training	4.44	1.151

I have post-training assessment to examine what I have learnt from the training and how effective the training was	3.61	1.606
I agree that post-training assessment or performance appraisal can be a motivation to learn and to transfer	1.90	1.236

Table 4.6: Frequency Table

Statements	Strongly Agree (%)	Agree (%)	Neutral (%)	Disagree (%)	Strongly Disagree (%)
I acknowledge the importance of content relevance to transfer of training.	63.5	20.8	3.5	9.5	2.8
I agree that content relevance is different between hard skill and soft skill training.	39.0	44.3	12.0	3.3	1.5
I agree that trainer quality is a very important factor in the training program, as it is a factor of motivation what motivates my transfer.	56.5	29.0	6.3	4.3	4.0
I believe that trainer to be professional, knowledgeable, communicate well with the trainee.	63.7	21.0	2.8	1.8	10.8
I think an unskilled trainer would demotivate me with inconsistencies of what is expected and what actually happens.	3.5	87.3	5.5	2.3	1.5
I believe that trainers have different specialties, thus it is important for the right trainer to do the right course	80.3	10.5	4.8	3.5	1.0
I agree that pre training needs assessment and analysis thought it helps me to know clearly what is expected to learn in the program, which helps the learning.	58.5	31.5	2.5	3.3	4.3
I did not have any exact learning goals from the manager or the trainer regarding the training.	3.8	8.8	5.0	5.3	77.3
I have post-training assessment to examine what I have learnt from the training and how effective the training was.	12.3	25.8	5.0	2.8	54.3
I agree that post-training assessment or performance appraisal can be a motivation to learn and to transfer	55.0	19.5	14.5	3.0	8.0

4.4.4 DESCRIPTIVE ANALYSIS OF WORK ENVIRONMENT

In the research question 3, questions was asked to seek respondents' perception of the manager/supervisor support, opportunity to use the skills and knowledge and organizational continuous learning culture and the transfer of training. To seek answer for this part C, work environment was used as variable with 10 questions related to work environment asked. The test values of 3 were used and the mean value more than 3.0 indicates that statements are disagreed whereby mean value less than 3.0 shows the statements are supported. Based on the table 4.7, all the nine questions showed mean value of less than test value except for the statement "*Because there are no opportunities to use the skills and knowledge learnt from the training program, I failed to transfer and forget in a period of time*" ($x = 3.99$). This statement is negative statement saying that respondents failed to transfer training and forget in certain period of time due to there are no opportunities to use and skills learned in the training. This statement is disagreed as the mean value showed more than test value thus, it is assumable that the respondents did succeeded in the transfer of training and had the opportunities to use the skills and knowledge they gained in the training.

Based on the table 4.8, for the Likert Scale strongly agree highest percentage value is 57.3% for the statement "*I agree that the manager should be aware of the training content. If the manager could be aware of what I have learnt or supposed to learn from the training program, he or she would better assist the transfer of training and try to provide opportunity for me to apply and practice the skills*". This shows that the respondents agreed that from the aspect work environment, the most important prospect is managers. If managers aware of the training content and provides opportunities for respondents apply and practice the skills, the transfer of training can be effective. For the last Likert Scale, strongly disagree, the highest value is 66.5% for the

statement “*because there are no opportunities to use the skills and knowledge learnt from the training program, I failed to transfer and forget in a period of time*”. The respondents do not agree to this statement as they feel opportunities are always there for them to implement the transfer of training.

In summary, the part C work environment shows, significant relationship between transfer of training as respondents agreed that manager/support supervisor need to give support and motivation for them implement the things they learn from the training.

Table 4.7: Descriptive Analysis

	Mean	Std. Deviation
I agree that manager or supervisor have influence on my transfer of training.	1.80	1.124
I agree that the manager should be aware of the training content. If the manager could be aware of what I have learnt or supposed to learn from the training program, he or she would better assist the transfer of training and try to provide opportunity for me to apply and practice the skills.	1.80	1.186
I agree that company management should make efforts to ensure that supervisor or manager is aware of the training information so that he or she could better match the training to proper job requirement.	2.22	1.409
I agree that feedbacks from the managers are very useful for the transfer. But in the real world context, I do not quite often receive feedback from the managers after the training finishes.	1.79	1.094
I agree and consider peer support has positive influence on my transfer of training. I learnt a lot of knowledge and skills while working with colleagues.	1.83	.957
I agree that my colleagues are not only a source to support the transfer of training, but also source of learning.	1.81	1.207
Peer support is also a source of motivation for individual to learn and to transfer. I think that colleagues are role models who let me be aware of what I lacks and what I needs to learn.	1.79	.916

I think the opportunity to use is considered as one of the most important work environment factor by me.	2.48	1.636
Because there are no opportunities to use the skills and knowledge learnt from the training program, I failed to transfer and forget in a period of time.	3.99	1.546
I believe the learning culture positively affect my application of skills and knowledge.	2.07	1.353

Table 4.8: Frequency Table

Statements	Strongly Agree (%)	Agree (%)	Neutral (%)	Disagree (%)	Strongly Disagree (%)
I agree that manager or supervisor have influence on my transfer of training.	54.5	25.5	11.5	2.5	6.0
I agree that the manager should be aware of the training content. If the manager could be aware of what I have learnt or supposed to learn from the training program, he or she would better assist the transfer of training and try to provide opportunity for me to apply and practice the skills.	57.3	24.3	5.3	7.5	5.8
I agree that company management should make efforts to ensure that supervisor or manager is aware of the training information so that he or she could better match the training to proper job requirement.	48.8	10.5	22.5	6.5	11.8
I agree that feedbacks from the managers are very useful for the transfer. But in the real world context, I do not quite often receive feedback from the managers after the training finishes.	49.8	37.5	2.8	3.8	6.3
I agree and consider peer support has positive influence on my transfer of training. I learnt a lot of knowledge and skills while working with colleagues.	40.5	49.0	1.0	6.5	3.0
I agree that my colleagues are not only a source to support the transfer of training, but also source of learning.	57.0	24.5	6.5	4.5	7.5
Peer support is also a source of motivation for individual to learn and to transfer. I think that colleagues are role models who let me be aware of what I lacks and what I needs to learn.	43.5	42.5	8.8	2.3	3.0
I think the opportunity to use is considered as one of the most important work environment factor by me.	48.0	9.5	9.5	13.0	20.0
Because there are no opportunities to use the skills and knowledge learnt from the training program, I failed to transfer and forget in a period of time.	14.2	9.5	5.8	4.0	66.5
I believe the learning culture positively affect my application of skills and knowledge.	46.5	28.0	10.5	1.8	13.3

4.4.5 DESCRIPTIVE ANALYSIS OF LEARNING OUTCOME

For the section to know more on the learning outcome, “10 questions were asked regarding the training contents of AML”. From this part outcome, it can be determined that the training has achieved the target of educating and creating awareness on Anti-Money laundering training to Bank A staffs. Descriptive analysis was conducted to seek the highest ranked learning outcomes with the mean value. The test value of 3 were used and the mean value more than 3.0 indicates that statements are disagreed whereby mean value less than 3.0 shows the statements are supported. Based on the table 4.9, all the 10 questions showed mean value of less than test. These statements are agreed, as the mean value showed less than test value thus, it is assumable that the respondents did succeeded in the transfer of training and had the opportunities to use the skills and knowledge they gained in the training for the section learning outcomes.

Based on the table 4.10, highest ranked learning outcome is the understanding of how financial services firm misuse their roles and responsibilities to finance terrorism act and the importance of AML procedures. Secondly most of the respondents agreed on understanding the reporting obligations. The last learning outcome in the rank is the understanding the functions of the Money Laundering Reporting Officer (MLRO). The mean value showed is 1.66. All the statements are showing that the learning outcome from the AML training is beneficial to respondents. The respondents also aware on the risk based approach and other learning outcomes.

The summary table of frequency descriptive analysis showed on table 4.11, indicates that the statement *“I do understand their obligations under the applicable laws and regulations and know what they must and must not do to comply with them”* was highly agreed by most of

respondents followed by statement “*I understand the ‘risk based approach’ and how to comply with in practice*”. From the part of learning outcome, most of respondents do show impact of knowledge on understanding risk approach and obligations and rules under AML concept.

In summary, the impact of learning outcome was proven with the agreed statements more than disagreed statements and the training was implemented effectively.

Table 4.9: Descriptive Analysis

	Mean	Std. Deviation
I understand how financial services firms may be used for money laundering and terrorist financing activity and the procedures that must be carried out to prevent it	2.31	1.496
I do understand their obligations under the applicable laws and regulations and know what they must and must not do to comply with them	1.78	1.292
I do understand the functions of the Money Laundering Reporting Officer (MLRO)	1.66	1.067
I know how to carry out risk based customer due diligence	2.00	1.386
I know how to identify and report suspicious activity	1.93	1.251
I know how to profile and monitor expected relationship activity	2.06	1.169
I understand reporting obligations	2.07	1.257
I appreciate post reporting obligations	2.03	1.373
I understand the ‘risk based approach’ and how to comply with in practice	1.79	1.285
I appreciate the vulnerabilities of different products and services to criminal abuse	1.82	1.246

Table 4.10: Frequency Table

Statements	Strongly Agree (%)	Agree (%)	Neutral (%)	Disagree (%)	Strongly Disagree (%)
I understand how financial services firms may be used for money laundering and terrorist financing activity and the procedures that must be carried out to prevent it.	42.8	24.5	10.0	5.0	17.8
I do understand their obligations under the applicable laws and regulations and know what they must and must not do to comply with them.	66.3	11.0	9.5	4.8	8.5
I do understand the functions of the Money Laundering Reporting Officer (MLRO).	63.5	19.0	10.3	2.8	4.5
I know how to carry out risk based customer due diligence.	54.5	19.3	10.5	3.0	12.8
I know how to identify and report suspicious activity.	56.5	16.3	8.8	15.0	3.5
I know how to profile and monitor expected relationship activity.	37.8	38.0	12.3	4.3	7.8
I understand reporting obligations.	41.8	34.0	8.5	6.8	9.0
I appreciate post reporting obligations.	54.0	17.3	10.3	8.5	10.0
I understand the 'risk based approach' and how to comply with in practice.	65.0	12.5	10.3	3.3	9.0
I appreciate the vulnerabilities of different products and services to criminal abuse.	62.0	13.0	13.0	5.0	7.0

4.4.6 DESCRIPTIVE ANALYSIS FOR TRAINING EFFECTIVENESS

For the section to identify training effectiveness, 10 questions were asked regarding effectiveness of the training among the respondents. From this part outcome, it can be determined that the training has achieved the target of educating and creating awareness on Anti-Money laundering training to Bank A staffs. Descriptive analysis was conducted to seek the highest ranked learning outcomes with the mean value. The test value of 3 were used and the mean value more than 3.0 indicates that statements are disagreed whereby mean value less than 3.0 shows the statements are supported. Based on the table 4.11, all the 9 questions showed mean value of less than test. This statement are agreed as the mean value showed less than test value thus, it is assumable that the respondents did succeeded in the transfer of training and had the opportunities to use the skills and knowledge they gained in the training for the section training

effectiveness. The only disagreed statement was “*Company policies and procedures regarding anti-money laundering issues were thoroughly explained in this training*”. This indicates that the before conducting the training, the trainers failed to explained on the company policies and procedures regarding the AML concept in the banking sector and also the impact of failed AML to the bank and the management.

For the statement “*My Trainer thoroughly explained each task that would be expected of me*”, the percentage shows highest for strongly agreed statement. When the expectation of the training explained in the beginning of the training, it will be beneficial to both participants and also the management. Thus, the training can be concluded as effective as the respondents know what to expect from the training and practice it in the real life scenarios. It can be concluded that, respondents gained knowledge from the training and therefore, the training has been effective among the respondents.

Table 4.11: Descriptive Analysis

	Mean	Std. Deviation
My Trainer thoroughly explained each task that would be expected of me.	1.30	.632
Each modules was demonstrated first before I was asked to access it.	1.30	.634
The company’s expectations on money laundering issues were discussed in great deal.	1.35	.684
I feel enough time was devoted to learning each on the modules.	2.48	1.636
Company policies and procedures regarding anti-money laundering issues were thoroughly explained in this training.	3.99	1.546
I gained more knowledge in money-laundering issues and steps on overcome it.	2.07	1.353
I learned more on the Anti-Money laundering and anti-terrorism Financing Act 2001 from this training.	1.80	1.124

The training modules was well prograded and completed	1.31	.647
I learn more on the money laundering techniques in this training	1.31	.660
I do aware that the National Coordination Committee (NCC) was established in April 2000 to coordinate Malaysia's national efforts to counter money laundering and terrorism financing.	1.30	.632

Table 4.12: Frequency Table for Training Effectiveness

Statements	Strongly Agree (%)	Agree (%)	Neutral (%)	Disagree (%)	Strongly Disagree (%)
My Trainer thoroughly explained each task that would be expected of me.	80.0	10.5	9.5	0	0
Each modules was demonstrated first before I was asked to access it.	79.3	11.3	9.5	0	0
The company's expectations on money laundering issues were discussed in great deal.	77.3	10.8	12.0	0	0
I feel enough time was devoted to learning each on the modules.	48.0	9.5	9.5	13.0	20.0
Company policies and procedures regarding anti-money laundering issues were thoroughly explained in this training.	14.2	9.5	5.8	4.0	66.5
"I gained more knowledge in money-laundering issues and steps on overcome it".	46.5	28.0	10.5	1.8	13.3
I learned more on the Anti-Money laundering and anti-terrorism Financing Act 2001 from this training.	54.5	25.5	11.5	2.5	6.0
The training modules was well prograded and completed.	79.8	10.0	10.3	0	0
I learn more on the money laundering techniques in this training.	79.8	9.3	11.0	0	0
I do aware that the National Coordination Committee (NCC) was established in April 2000 to coordinate Malaysia's national efforts to counter money laundering and terrorism financing.	80.0	10.5	9.5	0	0

4.4.7 HYPOTHESES TESTING

In the beginning of the chapter, based on the research questions, the following hypotheses produced:

H₁: The relationship between trainee characteristics and transfer of training

H₂: The relationship between training design and transfer of training

H₃: The relationship between work environment and transfer of training

These three hypotheses were tested to seek significant relationship between trainee individualities, training model and work settings and the effectiveness of the training of the transfer. In order to seek the significant relationship between trainee individualities, training model and work settings and effectiveness of transfer of training, multiple regression analysis was carried out. Multiple regression analysis was carried out as in this study the independent variables are trainee characteristics, training design and work environment and one dependent variable, transfer of training was used. The table 4.13 is the Multiple Regression Result table. This table shows the R , R^2 , adjusted R^2 and the standard error of the estimate which can be used to regulate how well a regression will fit the data. The “ R ” is essentially represents the value of R , the multiple correlation coefficient. R can be considered as one the measure of the quality of the prediction of the dependent variable, which will be transfer of training in this study. In this analysis, the dependent value shows 0.802, which indicates a good level of prediction. The R square is presenting the R^2 value also can be said as coefficient of determination. This value is the proposition variance in the dependent variable that can be explained by the independent variables which can be accounted for by the regression model as below and beyond the mean model. From the table 4.13, the value R square of .643 explain 64.3% of the variability of the

dependent variable, transfer of training. The adjusted R square, *adj. R²* can be used to explain the accuracy of the data as well.

Table 4.13 Multiple Regression Table

	Model	Unstandardized Coefficients		Standardized Coefficients Beta	t	Sig.
		B	Std. Error			
1	(Constant)	-.076	.101		-.755	.450
	trainee characteristics	-.212	.035	-.260	-6.036	.000
	training design	.182	.041	.156	4.416	.000
	work environment	.871	.036	.915	24.142	.000
	R	.802				
	R ²	.643				
	Adj. R2	.641				
	F value	238.127				

The output in the table shows that the independent variables, trainee characteristics, training design and work environment statistically significantly predict the dependent variable, transfer of training, $F(3, 396) = 238.127, p < .0005$.

Based on the table 4.13, out of three independent variables, all the three independent variables shown significantly positive in its relationship with transfer of training which are training design and work environment (the result of beta value ($\beta=.182, p<.05, \beta=.871, p<.05$ and $\beta=-.212, p<.05$), thus supporting the hypotheses H₁, H₂ and H₃. Thus, the hypotheses H₁ showed negative significant value in its relationship with transfer of training, $\beta=-.212, p<.05$, hence the sig value of .000 shows this hypothesis is supported.

To explain on the overall result of the multiple regressions, it is generated to predict that transfer of training from trainee characteristics, training design and work environment. These variable statistically predicted transfer of training, $F(3, 396) = 238.127, p < .0005, R^2 = .643$. All these variables added statistically significantly to the prediction, $p < .05$. Among all the three factors determining the influence of transfer of training, the correlation of work environment

factor proves to be highly influencing factor in determining the effectiveness of the AML training (0.871). To summarize the hypotheses tests, it is proven that work environment inclusive of trainee's perception on managers, peer support, opportunity to use the skills and organizational continuous learning culture and training design will determine an effectiveness way of transferring training.

4.5 SUMMARY

The overall results from the questionnaire for this research study can be concluded training design and work environment are positively significant towards the effectiveness of transfer of training. This study was conducted to seek the effectiveness of transfer of training of AML training among Bank A staffs located in Klang Valley. In the chapter four, it is discussed the response rate and also respondent's demographic characteristics, validation of the instrument and also the analysis of the research questions.

Table 4.14 presents a summary from the research hypotheses test. Transfer of training is considered successful only if the trainee can adapt and apply the learned new skills and knowledge to other colleagues and also implement in their work. This study shows, training transfer was significantly correlated and was influenced by the trainee characteristics, training design and work environment.

Table 4.14: Summary of the hypotheses results

Number	Hypothesis	Results
H ₁	Relationship between trainee characteristic and transfer of training	Supported
H ₂	Relationship between training design and transfer of training.	Supported
H ₃	Relationship between work environment and transfer of training.	Supported

CHAPTER FIVE

DISCUSSIONS, RECOMMENDATIONS AND CONCLUSIONS

5.1 INTRODUCTION

In this chapter, key conceptual models of trainee characteristics, training design and work environment will be discussed related to the findings in chapter four and examined with the past literature of transfer of training strategies. There are number of key conceptual models used to illustrate the relationship between factors significantly influence the effectiveness of transfer of training to evaluate the effectiveness of training. The significant relationship between various predictor factors and the transfer of training outcomes can relatively guide future studies on this field.

In this Chapter also, the summary of the findings from the last chapter will be explained supported by previous studies. Then, limitations of this study and theoretical and managerial implications along with future research opportunities will be discussed.

5.2 DISCUSSION OF FINDINGS

5.2.1 TRAINEE CHARACTERISTICS

In the first hypothesis developed, it has been assumed that trainee characteristics significantly related to transfer of training among the banking staffs in Bank A. The aim of this study is to seek the relationship between this entity and effectiveness of transfer of training. On the important factor to be considered in trainee characteristics is the motivation. In this study, the

instruments were developed to analyze the motivational factor in trainee characteristics in affecting the effectiveness of transfer of training of Anti-Money Laundry training (AMLA). The results show the significant value of (.000) which is less than $p < .05$ and this indicates that trainee characteristics are significantly related to the effectiveness of transfer of training, AMLA.

The finding shows negative relationship between trainee characteristic and transfer of training. This finding indicates that employees are not effectively and continually applying what they learn in anti-money laundering training to their job. Some author believe that there are no difference between motivation to learn and motivation to transfer the gained knowledge as many studies revealed in studying about training motivation among employees (Baldwin & Ford (1998), Lance et al., (2002), Rouiller & Goldstein (1993) and Tracey et al., (2005)). Trainees believe on the motivation aspect also differs as some think intrinsic components of motivation are more important and extrinsic components of motivations. Some of the example of extrinsic motivations is working colleague support, the support from the colleagues that driven them to be motivated to learn new skills and hence transfer the knowledge to other workers.

It is identified that both the entities intrinsic and extrinsic can be influence factor for trainee's motivation to learn and transfer the knowledge. There are three intrinsic factors are identified that could assist in triggering motivation such as results, personal interest and career development. Among all these three entities, the most influence factor in creating motivation among workers are the results or output of the new things they learn. In the extrinsic influence on the motivation are the climate of changes, that influences the motivation to learn and also colleague support, (Clark, 1993; Colquitt , 2000; Facticeau , 1995; Goldstein & Rouiller, 1993).

Other than identified, motivation to transfer the knowledge gained in the training is the trainee's personal learning style. This scope has not been researched widely by researchers and this can be good topic for future research.

5.2.2 TRAINING DESIGN

The findings from this study support the hypotheses that there is relationship between training design and transfer of training. It is supported from previous literature by Axtell et al., (1997); Kontoghiorghe (2002); Rouiller and Goldstein, (1993), whom conducted the effectiveness of transfer of training of hard skills and soft skills training in line with past literature. Focusing more on the type of training which can be easily transferable, a study was conducted by Clark & Voogel, 1985; Goldstein, 1986; Yamnill and McLean, (2001), which concludes that short term technical training that specifies the contents are easily transferable compared to soft skills trainings. This is due to the reason that soft skills is complex but can be transferable if the contents are generalized.

In this research paper, most of the participants think that the attendance has impact and influence on their transfer of training behavior, thus some of the trainings are instructed voluntarily or mandatorily (Noe, 1986). Some of trainees prefer to be given choice of attending or not attending training instead of being instructed. According to Noe and Schmitt, (1986), most trainees consider trainer quality as one of the important factor in determining the effectiveness of the training. They believed trainer quality is the main motivational factor and thus this can motivate them to participate in the training and enthusiastic to learn more. Trainees also believed, unskilled trainers will give negative perception towards their interest to learn as

they will notice the inconsistencies. Thus, competence trainer is needed in ensuring the effectiveness of the training is implied.

There are some other issues raised by the trainees. One is that some found there are skill relapse of the training program, especially in some of the soft skill training programs. The other important factor is that the inconsistencies between what is expected and what actually happens in the training' might be a factor that affects transfer of training, (Kraiger, , Salas, & Cannon-Bowers, 1995).

5.2.3 WORK ENVIRONMENT

Trainees do not distinguish between transfer climate and work environment as the literature do. Most trainees agree that managers or supervisors, have influence on their transfer of training. Some trainees suggest that the managers should be aware of the training content. If the managers could be aware of what the trainee has learnt or supposed to learn from the training program, they would better assist the transfer of training and try to provide opportunity for trainee to apply and practice the skills.

Trainees believe feedbacks from the managers are very useful for the transfer. However, according to the response of trainees, they do not quite often receive feedback from the managers after the training finishes.

Peer support as another social support factor besides manager/supervisor support, function in the same way as manager support. The finding has shown that peer support has influence on their transfer of training. In some cases, it is also a source of motivation for

individual to learn and to transfer. Only a few consider peer support has no influence on their transfer.

Overall, the findings of the relationship between work environment and transfer of training are in line with previous studies (Cheng & Ho, 2001; Chiaburu & Tekleab, 2005; Tracey, 1995). The complex relationships among variables from the findings mostly supported those previous literatures. However, further in-depth studies about how and in which way that factors of work environment such as managers and colleagues and organizational learning culture would support individual transfer of training would be further explored.

5.3 SUGGESTION FOR FUTURE RESEARCH

Based on the results of this research project, the recommendations provided below might be considered by any training or management professional who wants to improve the success of training programs.

From a perception perspective mandatory training appears to reduce motivation to transfer. Eventually, the willingness to learn affects their perception of training and how comfortable the trainees are with changes that the training brings to their workplace. It is recommended that for trainees to maintain the use of newly learned skills and transfer them to the workplace, a mentoring system needs to be developed where an experienced supervisor coaches, supports, and encourages the newer trainees to implement their knowledge and skills.

The training program should be based on a needs assessment. Upon analysis of the need assessment data, appropriate instructional strategies need to be selected prior to delivering the

training program. It also should be pilot tested and modified as appropriate and continually evaluated periodically and updated accordingly.

Training needs to be designed with more 'hands-on' activities related to banking environment. It is recommended that training content should be divided into chunks and delivered with adequate breaks to avoid monotony and hold the attention of the participants. The instructors should also utilize instructional strategies to make the lessons interesting and relevant for the participants.

It is proposed that there should be a follow-up of training periodically. The research findings of this study add to the existing body of literature on transfer of training. However, transfer of training studies may continue to produce mixed results. Nevertheless, systematic identification of factors influencing transfer of training, as well as testing how these actors inter-relate, need to continue. More research is needed to provide evidence to training and development professionals as to why transfer does not take place regardless of the amount of money that is spent on training. In future researchers can adapt new techniques to evaluate the before, during and after training to enhance and improve on their topic regarding the effectiveness of transfer of training, (Rousseau, 1990). These type of evaluation not only useful from research studies but also to the management whereby the management can evaluate the development on the employees' skills before and after training.

5.4 LIMITATIONS

There were some limitations faced during the period of research. The insufficient time does not allow the research to conduct pre-training and post-training survey evaluation to seek the

difference on the effectiveness of the training before and after. According to Kirkpatrick (1967), effectiveness of a training can be measured if the trainees learn something and willing to transfer the knowledge to others. In this study, the researcher did not focus on pre-training evaluation as the time does not allow and also it will make the study scope much more bigger. This can be further explored in the future research. In this study scope, the pre-training and post-training evaluation after the AMLA training can be beneficial to the individuals and also to the management.

The constraint related to research period is the insufficient time faced by researcher in the process of collecting data. The respondents chosen for this case study are bank staff of Bank A and the main restraint is getting their time to answer the questionnaires. The staffs are obliged to their works and this may lead to improper time in answering the questionnaire and also restricts the time they needed to read and understand the questions. The other limitation was, due to time constraint, this study was unable to expand to other banks in Malaysia even there are other banks applies the policies and conduct training on AML.

The understanding of the questions in the questionnaire can make it tranquil for the respondents to answer the questions, rather than answering without understanding. The researcher did not have time to explain the questions nor the respondents have time to understand the questions either. Therefore, there might be an assumption that respondents might answer based on their own individual understanding and not from the perspective of the researcher.

5.5 CONCLUSION

This chapter has concluded on the overall thesis and also merging from other chapters conclusion as well. In this research study, three factors were determine to be influence of the transfer of training. The suggested factors are trainee characteristics, training design and work settings which is predicted to be influencing factors in the effectiveness of the transfer of training. Limitations also discussed with recommendations as well. The limitations are the scope of banks used for this research purpose is only Bank A with the respondents from the bank only. If the time period can be adjusted, the scope can be opened to other banks as well. Thus, it can be concluded that all the three factors have positive relationship with transfer of training.

The research area of transfer of training dates back to the 80s, which has a research history of over thirty years. Though various studies have explored diverse factors including how they affect transfer of training, there is still a long way to go to and many research gaps to fill for improving training effectiveness and work performance, (Thorndike, & Woodworth, 1901).

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Section A:

Demographic information

1. Gender

Male () Female ()

2. Age

- <21 Years old
- 22-25 Years Old
- 26-30 Years Old
- 31-35 Years Old
- 36-40 Years Old
- >40 Years old

3. Marital Status

Married () Single () Others ()

4. Please circle to indicate your years of services in Kuwait House of Finance (M) Bhd.

- 0-5 years
- 6-10 years
- 11-15 years
- 16-20 years
- 21-25 years
- 26-30 years
- 31+ years

5. Position in the organization?

- Top Management ()
- Middle management ()
- Supporting Level ()

6. Please circle to indicate your total years of services in banking sector.

- 0-5 years
- 6-10 years
- 11-15 years
- 16-20 years
- 21-25 years
- 26-30 years
- 31+ years

7. Education level

() PHD () Master Degree() Bachelor Degree
() Diploma () STPM/Certificate/Matriculation/A-level() SPM

8. I have attended Anti-Money Laundry Training

Yes () No ()

9. I hope AML training will be provided for the staff monthly basis.

Yes () No ()

10. I believe AML Training is important for Kuwait Finance House (M) Bhd Staffs.

Yes () No ()



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Section B:

This section consists of five parts; trainee characteristics, training design, work environment, learning output and training effectiveness.

Part A

Trainee Characteristics

In this section, the participants' perceptions of factors of individual characteristics and their influences on transfer of training outcomes with the factor of trainee readiness/expectation, training motivation and perceived job and career utility will be identified.

Please choose one answer based on the Likert scale as below:

1 = strongly agree

2 = Agree

3 = Neutral

4 = Disagree

5 = strongly disagree

Question	Answer				
1. The expected outcomes of the training were clear at the beginning of the training.	1	2	3	4	5
2. Before the training, I had a good understanding of how it would fit my-job related development.	1	2	3	4	5
3. Employees in this bank will be penalized for not using what they have learned in training.	1	2	3	4	5
4. I value the importance of training motivation.	1	2	3	4	5
5. If I use the training I am more likely to be rewarded.	1	2	3	4	5
6. I will be able to try out this training on my job.	1	2	3	4	5
7. The trainers used lots of examples that showed me how I could use my learning on the job.	1	2	3	4	5
8. What is taught in training closely matches my job requirements.	1	2	3	4	5
9. I will get opportunities to use this training on my job.	1	2	3	4	5
10. My job performance improves when I implement new things I learned from the training.	1	2	3	4	5

Part B

Training Design

In this section, the participants' perceptions of factors of principles of learning, sequencing and training contents will be identified.

Please choose one answer based on the Likert scale as below:

1 = strongly agree

2= Agree

3= Neutral

4 = Disagree

5 = strongly disagree

Question	Answer				
11. I acknowledge the importance of content relevance to transfer of training.	1	2	3	4	5
12. I agree that content relevance is different between hard skill and soft skill training	1	2	3	4	5
13. I agree that trainer quality is a very important factor in the training program, as it is a factor of motivation what motivates my transfer	1	2	3	4	5
14. I believe that trainer to be professional, knowledgeable, communicate well with the trainee.	1	2	3	4	5
15. I think an unskilled trainer would demotivate me with inconsistencies of what is expected and what actually happens.	1	2	3	4	5
16. I believe that trainers have different specialties, thus it is important for the right trainer to do the right course	1	2	3	4	5
17. I agree that pre training needs assessment and analysis thought it helps me to know clearly what is expected to learn in the program, which helps the learning.	1	2	3	4	5
18. I did not have any exact learning goals from the manager or the trainer regarding the training.	1	2	3	4	5
19. I have post-training assessment to examine what I have learnt from the training and how effective the training was.	1	2	3	4	5
20. I agree that post-training assessment or performance appraisal can be a motivation to learn and to transfer	1	2	3	4	5

Part C

Work Environment

In this section, trainees' perception of manager/ supervisor support, peer support, opportunity to use the skills and knowledge, and organizational continuous-learning culture will be identified.

1 = strongly agree

2= Agree

3= Neutral

4 = Disagree

5 = strongly disagree

Question	Answer				
21. I agree that manager or supervisor have influence on my transfer of training.	1	2	3	4	5
22. I agree that the manager should be aware of the training content. If the manager could be aware of what I have learnt or supposed to learn from the training program, he or she would better assist the transfer of training and try to provide opportunity for me to apply and practice the skills.	1	2	3	4	5
23. I agree that company management should make efforts to ensure that supervisor or manager is aware of the training information so that he or she could better match the training to proper job requirement.	1	2	3	4	5
24. I agree that feedbacks from the managers are very useful for the transfer. But in the real world context, I do not quite often receive feedback from the managers after the training finishes.	1	2	3	4	5
25. I agree and consider peer support has positive influence on my transfer of training. I learnt a lot of knowledge and skills while working with colleagues.	1	2	3	4	5
26. I agree that my colleagues are not only a source to support the transfer of training, but also source of learning.	1	2	3	4	5
27. Peer support is also a source of motivation for individual to learn and to transfer. I think that colleagues are role models who let me be aware of what I lacks and what I needs to learn.	1	2	3	4	5
28. I think the opportunity to use is considered as one of the most important work environment factor by me.	1	2	3	4	5
29. Because there are no opportunities to use the skills and knowledge learnt from the training program, I failed to transfer and forget in a period of time.	1	2	3	4	5
30. I believe the learning culture positively affect my application of skills and knowledge.	1	2	3	4	5

Part D

Learning Outcome

In this section, trainees' outcome will be identified.

1 = strongly agree

2= Agree

3= Neutral

4 = Disagree

5 = strongly disagree

Question	Answer				
31. I understand how financial services firms may be used for money laundering and terrorist financing activity and the procedures that must be carried out to prevent it	1	2	3	4	5
32. I do understand their obligations under the applicable laws and regulations and know what they must and must not do to comply with them	1	2	3	4	5
33. I do understand the functions of the Money Laundering Reporting Officer (MLRO)	1	2	3	4	5
34. I know how to carry out risk based customer due diligence	1	2	3	4	5
35. I know how to identify and report suspicious activity	1	2	3	4	5
36. I know how to profile and monitor expected relationship activity	1	2	3	4	5
37. I understand reporting obligations	1	2	3	4	5
38. I appreciate post reporting obligations	1	2	3	4	5
39. I understand the 'risk based approach' and how to comply with in practice	1	2	3	4	5
40. I appreciate the vulnerabilities of different products and services to criminal abuse	1	2	3	4	5

Part E

Training Effectiveness

In this section, effectiveness of the training will be identified.

1 = strongly agree

2= Agree

3= Neutral

4 = Disagree

5 = strongly disagree

Question	Answer				
41. My Trainer thoroughly explained each task that would be expected of me.	1	2	3	4	5
42. Each modules was demonstrated first before I was asked to access it.	1	2	3	4	5
43. The company's expectations on money laundering issues were discussed in great deal.	1	2	3	4	5
44. I feel enough time was devoted to learning each on the modules.	1	2	3	4	5
45. Company policies and procedures regarding anti-money laundering issues were thoroughly explained in this training.	1	2	3	4	5
46. I gained more knowledge in money-laundering issues and steps on overcome it.	1	2	3	4	5
47. I learned more on the Anti-Money laundering and anti-terrorism Financing Act 2001 from this training.	1	2	3	4	5
48. The training modules was well prograded and completed	1	2	3	4	5
49. I learn more on the money laundering techniques in this training	1	2	3	4	5
50. I do aware that the National Coordination Committee (NCC) was established in April 2000 to coordinate Malaysia's national efforts to counter money laundering and terrorism financing.	1	2	3	4	5

Thank you for your cooperation