



# Royal United Services Institute

## Future of Financial Intelligence Sharing (FFIS)

皇家聯合研究所 金融情報分享(FFIS)的未來

**SURVEY REPORT 研究報告**

Five years of growth in public-private financial information-sharing partnerships to tackle crime

公部門-私部門金融資訊 - 共享夥伴關係

打擊犯罪之五年發展



# Future of Financial Intelligence Sharing (FFIS) 金融情報分享(FFIS)的未來

## Survey report:

## 研究報告：

## Five years of growth in public–private financial information-sharing partnerships to tackle crime 公部門-私部門金融資訊-共享夥伴關係打擊犯 罪之五年發展

August 2020

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## Abstract

## 摘要

This report is the result of an international survey of public–private financial information sharing partnerships to disrupt crime, which took place between April and June 2020. The report provides descriptive summaries of 23 national and trans-national financial information-sharing partnerships. In initial chapters, the report sets out a global overview of the field of public–private partnerships; summarises evidence relating to the impact of such partnerships in tackling financial crime and their role in responding to COVID-19; and raises 12 key factors relevant to the future growth of partnership models. It is intended that this report provides a reference document for the worldwide state of public–private financial information sharing partnerships to disrupt crime, as at June 2020.

本報告為 2020 年 4 月至 6 月間公私部門金融資訊共享以打擊犯罪之夥伴關係之國際研究報告結果。本報告提供了 23 個國家及跨國金融資訊共享夥伴關係之描述性摘要。在一開始的章節中，本報告對公私部門夥伴關係進行全球性的概覽；摘述影響打擊金融犯罪夥伴關係相關證據以及應對 COVID-19 疫情之角色；並且提出與未來夥伴關係模式發展相關之 12 項關鍵因素。此報告旨在為截至 2020 年 6 月前之以全球公私部門金融資訊共享以打擊犯罪之夥伴關係提供參考文件。

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Global strategic partners of the FFIS programme in 2020:

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## About 關於

This report is produced by the [Future of Financial Intelligence Sharing \(FFIS\) programme](#), as part of our mission to lead independent research into the role of public-private financial information-sharing to detect, prevent and disrupt crime. The FFIS programme is a research partnership between the [RUSI Centre for Financial Crime & Security Studies](#) and NJM Research.

本報告由[未來金融情報分享計劃\(FFIS\) 計劃](#)製作，我們的任務是為領導公私部門金融資訊共享角色之研究，用以偵測、預防並且打擊犯罪。FFIS 計劃為[皇家聯合研究所之金融犯罪及安全研究中心](#)以及 NJM 研究所共同研究。

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## Background and methodology:

### 背景及研究方法

Since 2017, the FFIS programme has published three international comparative studies about the role and experience of public-private financial information-sharing partnerships in disrupting crime. In tandem, the FFIS programme convened over 50 high-level public-private research and dialogue events across a number of jurisdictions that had established or were developing a financial information-sharing partnership model. 自 2017 年以來，FFIS 計劃發布了三個有關公私部門金融資訊共享夥伴關係用於打擊犯罪角色及經驗之國際比較研究。同時，FFIS 計劃已在多個已建立或正在開發金融資訊共享合作模式之司法管轄區舉辦了 50 多次高層公私部門研究及對話活動。

On 11 October 2019, the FFIS 'Conference of Partnerships' in Amsterdam convened public and private leaders involved in financial information-sharing partnerships from around the world to exchange knowledge at a leadership-level. The conference provided an opportunity to share experiences about the impact of partnerships and lessons identified through their development process. Since October 2019, a number of additional partnerships have been established in different jurisdictions and partnerships have continued to innovate, including in response to the worldwide COVID-19 pandemic.

2019 年 10 月 11 日，在阿姆斯特丹舉行的 FFIS 「合作夥伴會議」召集了來自世界各地參與金融資訊共享合作夥伴關係之公部門及私部門領袖，以領袖層級交流知識。該會議提供分享關於夥伴關係影響及透過其發展過程中所學經驗之機會。自 2019 年 10 月以來，其他合作夥伴關係已在不同的司法管轄區

建立了其他合作夥伴關係，且合作夥伴不斷創新，包括應對全球 COVID-19 的疫情。

In this context, the FFIS programme invited relevant law enforcement agencies, supervisors and Financial Intelligence Units (FIUs) involved in public-private financial information partnerships to engage in a research project to collate reference information about active partnerships worldwide in 2020. This report is the result of that project.

在此背景下，FFIS 計劃邀請了參與公私部門金融資訊合作夥伴之相關執法機關、監管機關和金融情報機構(FIU)參與彙整 2020 年全球積極合作夥伴關係參考資訊之研究計劃。本報告為該計劃之結果。

The project methodology relies primarily on interviews and a major international survey of public-private financial information sharing partnerships, which took place between April and June 2020.

本計劃研究方法主要依靠訪談以及於 2020 年 4 月至 6 月間針對公私部門金融資訊共享合作夥伴之大型國際調查。

The following national-level partnerships are represented in this paper:

以下為本報告中出現之國家層級夥伴關係：

1. The UK Joint Money Laundering Intelligence Taskforce (JMLIT)  
英國聯合洗錢情報工作小組(JMLIT)
2. The US FinCEN Exchange  
美國金融犯罪執法署
3. Joint Intelligence Group (JIG) Ireland  
愛爾蘭聯合情報團體(JIG)
4. The Australian Fintel Alliance  
澳洲金融情報聯盟
5. The Singapore Anti-Money Laundering and Countering the Financing of Terrorism Industry Partnership (ACIP)  
新加坡洗錢防制暨打擊資助恐怖組織產業夥伴關係(ACIP)
6. Hong Kong Fraud and Money Laundering Intelligence Taskforce (FMLIT)  
香港反詐騙及洗錢情報工作小組(FMLIT)
7. The Netherlands Terrorist Financing Taskforce (NL-TFTF)  
荷蘭資恐工作小組(NL-TFTF)
8. The Netherlands Serious Crime Taskforce (NL-SCTF)  
荷蘭重大犯罪工作小組(NL-SCTF)
9. The Netherlands Fintell Alliance (FA-NL)  
荷蘭金融情報聯盟(FA-NL)
10. Latvia Cooperation Coordination Group (CCG)  
拉脫維亞合作協調團體(CCG)
11. The Malaysia Financial Intelligence Network (MyFINet)  
馬來西亞金融情報網(MyFINet)
12. South African Anti-Money Laundering Integrated Taskforce (SAMLIT)  
南非洗錢防制整合工作小組(SAMLIT)
13. The Swedish Anti-Money Laundering Intelligence Taskforce (SAMLIT)  
瑞典洗錢防制情報工作小組(SAMLIT)
14. New Zealand Financial Crime Prevention Network (NZ-FCPN)  
紐西蘭金融犯罪防治網(NZ-FCPN)
15. Finnish AML/CFT Expert Working Group on a PPP basis  
芬蘭基於 PPP 基礎之洗錢防制/打擊資恐專家工作團體
16. Lithuania - Centre of Excellence in Anti-Money Laundering  
立陶宛洗錢防制專門中心

17. Argentina Fintel-AR  
阿根廷金融情報機構
18. Germany Anti Financial Crime Alliance (AFCA)  
德國防治金融犯罪聯盟(AFCA)
19. Austrian Public-Private Partnership Initiative (APPPI)  
奧地利公私部門合作倡議(APPPI)
20. Canadian 'Project' Initiatives to Combat Financial Crimes through Partnerships  
加拿大透過夥伴關係打擊金融犯罪計劃倡議

And the following trans-national information-sharing partnerships:

及以下跨國資訊分享夥伴關係：

21. The Europol Financial Intelligence Public Private Partnership (EFIPPP)  
歐洲刑警組織金融情報公私合作夥伴關係(EFIPPP)
22. United for Wildlife - Illegal Wildlife Trade (IWT) Financial Taskforce  
野生動物聯盟-非法野生動物交易(IWT)金融工作小組
23. The Global Coalition to Fight Financial Crime  
打擊金融犯罪全球聯盟

Through this paper and additional complementary activity, FFIS aims to encourage sharing of good practice and to facilitate collaboration between public and private stakeholders involved in partnership objectives.

透過本報告以及額外的補充活動，FFIS 旨在鼓勵分享良好之實踐並促進公共及私人夥伴關係目標中利害關係人之間之合作。

## Acknowledgements:

### 致謝

The FFIS programme would like to thank all those who contribute to the broader FFIS research programme, particularly our project sponsors Verafin, Oliver Wyman, Refinitiv, Western Union and the SWIFT Institute. The FFIS team is very grateful for the support of the programme [research advisory committee](#), who contribute in a personal capacity to guide the research process.

FFIS 計劃感謝所有使 FFIS 計劃更為廣泛做出貢獻之團體，特別是本計劃贊助商 Verafin、Oliver Wyman、Refinitiv、西聯匯款以及 SWIFT 組織。FFIS 團隊感謝計劃[研究諮詢委員會](#)以個人身分而指導本研究過程的貢獻。

The FFIS research programme would like to thank all those public agencies and financial institutions that participated in this research project. We hope that this collation and analysis of the current landscape of public-private financial information sharing to disrupt crime, as it exists in June 2020, will support the sharing of knowledge and insight in the field.

FFIS 研究計劃要感謝所有參本研究計劃之公部門及金融機構。我們希望現今打擊犯罪之公私金融資共享之整理及分析（於 2020 年 6 月）將繼續提供該領域知識及見解之共享。

**Partnership lead agencies responding to the survey for this paper:**

### 本報告研究之受訪夥伴關係主管單位

Partnership 夥伴	Survey respondent and case study authors 調查受訪者以及案例研究作者
The UK Joint Money Laundering Intelligence Taskforce (JMLIT)	UK National Crime Agency

英國聯合洗錢情報工作小組(JMLIT)	英國國家犯罪署
First Canadian 'Project' partnership initiative launched 加拿大透過夥伴關係打擊金融犯罪計劃倡議	The Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) 加拿大金融交易及報告分析中心 (FINTRAC)
The Australian Fintel Alliance 澳洲金融情報聯盟	Australian Transaction Reports and Analysis Centre (AUSTRAC) 澳洲交易報告及分析中心(AUSTRAC)
The Singapore Anti-Money Laundering and Countering the Financing of Terrorism Industry Partnership (ACIP) 新加坡洗錢防制暨打擊資助恐怖組織產業夥伴關係(ACIP)	The Monetary Authority of Singapore 新加坡金融管理局
Hong Kong Fraud and Money Laundering Intelligence Taskforce (FMLIT) 香港反詐騙及洗錢情報工作小組(FMLIT)	Hong Kong Police 香港警方
Joint Intelligence Group (JIG) Ireland 愛爾蘭聯合情報團體 (JIG)	Irish FIU (Garda National Economic Crime Bureau - GNECB) and Banking & Payments Federation Ireland 愛爾蘭金融情報中心( Garda 國家經濟犯罪局- GNECB) 及愛爾蘭銀行及支付聯盟
The Netherlands Terrorist Financing Taskforce (NL-TFTF) 荷蘭資恐工作小組(NL-TFTF)	The Netherlands Public Prosecution Service 荷蘭公共檢察署
The Europol Financial Intelligence Public Private Partnership (EFIPPP) 歐洲刑警組織金融情報公私合作夥伴關係(EFIPPP)	Europol 歐洲刑警組織
The U.S. FinCEN Exchange 美國金融犯罪執法署	U.S. Financial Crimes Enforcement Network (FinCEN) Department of the Treasury 美國金融犯罪執法網(FinCEN), 財政部
New Zealand Financial Crime Prevention Network (NZ-FCPN) 紐西蘭金融犯罪防治網(NZ-FCPN)	New Zealand Police 紐西蘭警方
The Global Coalition to Fight Financial Crime (GCFFC) 打擊金融犯罪全球聯盟	GCFFC Secretariat GCFFC 秘書處
Latvia Cooperation Coordination Group (CCG) 拉脫維亞合作協調團體(CCG)	FIU-Latvia 拉脫維亞金融情報中心
Austrian Public-private Partnership Initiative (APPPI) 奧地利公私部門合作倡議(APPPI)	FIU-Austria 澳洲金融情報中心
The Netherlands Fintell Alliance (FA-NL) 荷蘭金融情報聯盟(FA-NL)	FIU-NL 荷蘭金融情報中心
The Netherlands Serious Crime Taskforce (NL-SCTF) 荷蘭重大犯罪工作小組(NL-SCTF)	National Police of the Netherlands 荷蘭國家警方
Germany Anti Financial Crime Alliance (AFCA) 德國防治金融犯罪聯盟(AFCA)	FIU-Germany 德國金融情報中心
Argentina Fintel-AR 阿根廷金融情報機構	FIU of Argentina 阿根廷金融情報中心
The Malaysia Financial Intelligence Network (MyFINet) 馬來西亞金融情報網(MyFINet)	Bank Negara Malaysia 馬來西亞國家銀行
South African Anti-Money Laundering Integrated Taskforce (SAMLIT) 南非洗錢防制整合工作小組(SAMLIT)	South African Financial Intelligence Centre (FIU) 南非金融情報中心(FIU)

Finnish AML/CFT Expert Working Group on a PPP basis 芬蘭以 PPP 基礎之洗錢防制/打擊資恐專家網路團體	National Bureau of Investigation, Criminal Intelligence Division – FIU Finland 芬蘭金融情報中心- 國家調查局，金融情報部
The Swedish Anti-Money Laundering Intelligence Taskforce (SAMLIT) 瑞典洗錢防制情報工作小組(SAMLIT)	Swedish Anti-Money Laundering Intelligence Taskforce c/o Danske Bank 瑞典洗錢防治情報工作小組代表丹麥銀行
(Formal launch in August 2020) Lithuania - Centre of Excellence in Anti-Money Laundering (正式成立於 2020 年 8 月)立陶宛洗錢防制專門中心	Bank of Lithuania 立陶宛銀行

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有關 FFIS 計劃細節，詳見 [www.future-fis.com](http://www.future-fis.com)。



# Contents 內容

Page 頁碼

<b>Executive Summary 摘要</b>	<b>10</b>
<b>Chapter 1. A global overview of public–private financial information-sharing partnerships 第一章 公私部門金融資訊共享夥伴關係之全球概覽</b>	<b>15</b>
1.1. What are public–private financial information-sharing partnerships?	16
1.1 何謂公私部門金融資訊共享夥伴關係?	
1.2. Why form a public–private partnership to tackle financial crime?	16
1.2 為何組成公私部門合作夥伴關係以打擊金融犯罪?	
1.3. How have partnerships developed around the world?	12
1.3 世界上合作夥伴關係如何發展?	
1.4. What type of information is shared?	17
1.4 何種類型之資訊被分享?	
1.5. How are AML supervisors involved?	24
1.5 洗錢防制主管機關如何參與?	
1.6. Are partnerships specific to a single legal tradition?	26
1.6 夥伴關係是否為單一法律傳統	
<b>Chapter 2. The impact of public–private financial information sharing partnerships</b>	<b>31</b>
<b>第二章 公私部門金融資訊共享之影響</b>	
2.1. Which threats have been prioritised by partnerships?	32
2.1 何者為合作夥伴關係優先考慮的威脅?	
2.2. What impact has been achieved at the tactical level?	33
2.2 戰術層面產生之影響為何?	
2.3. How has reporting from the private sector been enhanced?	35
2.3 私部門之報告如何加強?	
2.4. How have partnerships responded to COVID-19 threats?	37
2.4 合作夥伴關係如何對抗 COVID-19 的威脅?	
<b>Chapter 3. The current scale of partnership activity and key topics affecting future growth</b>	<b>42</b>
<b>第三章 當前合作夥伴關係之規模及影響未來成長之關鍵主題</b>	
3.1. Understanding the current scale of partnership activity	43
3.1 瞭解合作夥伴關係活動之目前規模	
3.2. Key topics relevant to the future growth of partnerships	44
3.2 合作夥伴關係未來成長之關鍵主題	
<b>REFERENCE ANNEX: Public–private financial information sharing partnerships in June 2020</b>	<b>47</b>

參考附錄：2020年6月公私部門金融資訊共享夥伴關係

Europe	48
歐洲	
Austria	49
奧地利	
Finland	53
芬蘭	
Germany	53
德國	
Republic of Ireland	56
愛爾蘭共和國	
Latvia	59
拉脫維亞	
Lithuania	61
立陶宛	
Sweden	63
瑞典	
The Netherlands	65
荷蘭	
United Kingdom	78
英國	
South East Asia and Australasia	82
東南亞及大洋洲	
Australia	83
澳洲	
Hong Kong	88
香港	
Malaysia	90
馬來西亞	
New Zealand	93
紐西蘭	
Singapore	97
新加坡	
The Americas	100
美洲	
Argentina	101
阿根廷	
Canada	102
加拿大	
USA	110
美國	
Africa	113
非洲	
South Africa	114
南非	
Trans-national partnerships	120

跨國夥伴關係

# Executive Summary

## 摘要

In five years, from 2015 to 2020, the concept of intensive cooperation between public agencies and private financial institutions to detect crime has moved from an outlying innovation in the UK and the U.S., to become a mainstream component of how advanced liberal democracies tackle financial crime. This report charts the rise of this phenomenon and includes a comprehensive description of national and trans-national public-private financial information-sharing partnerships worldwide.

從 2015 年到 2020 年的五年間，公部門及私人金融機構透過密切合作偵查犯罪之概念已從英國及美國的遙不可及之創新，轉變成為先進自由民主國家如何打擊金融犯罪之主流要素。本報告描繪了此現象的興起，並全面描述全世界國家及跨國部門公私金融資訊共享夥伴關係。

This study is the product of a survey of 23 financial information-sharing partnerships. Collectively, these partnerships cover financial crime threats as diverse as organ trafficking and the illegal wildlife trade, to terrorist financing. These threats are now being addressed in collaborative, though somewhat exclusive, forums that bring major financial institutions into close dialogue with law enforcement and intelligence agencies to detect, disrupt and prevent underlying crime.

本研究是對 23 個金融資訊共享夥伴關係進行調查之結果。總結來說，這些資訊共享夥伴關係涵蓋了器官販運、非法野生動物貿易到資助恐怖主義等多種金融犯罪威脅。這些威脅現正透過合作論壇(儘管有些是專門會議)解決，提供主要金融機構與執法及情報機構於該論壇進行密切對話，進行偵測、破壞及預防潛在犯罪之形式被解決。

Such partnerships can support the sharing of tactical information, to enhance ongoing law enforcement investigations, and, at a strategic level, can enable the exchange of insights relating to financial crime threats and risks. At the strategic level, partnerships collaborate to develop financial crime typologies (sometimes referred to as 'alerts' or advisories) and to co-develop, test and refine financial indicators to improve regulatory reporting from the private sector.

該夥伴關係可以提供戰術資訊共享，以加強目前之執法調查，並且，可以在戰術層面上交流與金融犯罪威脅及風險相關之意見。在戰術層面，夥伴關係合作開發金融犯罪類型(有時稱為「警示」或建議)，並共同開發、測試和細緻化財務指標以改進私部門之監管報告。

Since 2015, led by the example of the UK Joint Money Laundering Intelligence Taskforce (JMLIT), an international shift in thinking at the policy-making level has gathered pace; driving an evolution in anti-money laundering and counter terrorist financing (AML/CFT) regulatory reporting processes to become more 'intelligence-led'. Partnerships have moved away from compliance 'tick-box' activity to place voluntary information sharing and collaboration across public and private sector partnership members at the heart of national efforts to detect and respond to financial crime risks.

自 2015 年以來，以英國聯合洗錢情報工作小組(JMLIT)為例，政策制定層面的國際思維轉變加速；防制洗錢/打擊資恐(AML/CFT)之監管報告流程之演變，使其更趨向「以情報為主導」。合作夥伴關係已從合法性的「檢視」活動轉移到公私部門合作夥伴關係成員間之自願共享資訊及合作，成為國家偵測和對抗金融犯罪風險工作的核心。

As at June 2020, countries with a national public-private financial information-sharing partnership account for 41% of world GDP and 20 out of the top 30 global financial centres are covered by a public-private financial information-sharing partnership.

截至 2020 年 6 月，擁有國家公私部門金融資訊共享夥伴關係的國家佔全世界 GDP 的 41%，全球前 30 大金融中心，有 20 個為獲得公私部門金融資訊共享夥伴關係所涵蓋。

Partnerships, to varying degrees, can now demonstrate benefits in terms of:

夥伴關係，在不同程度上可以展現以下之優點：

- An increase in the number of suspicious activity reports addressing threats prioritised by the respective partnership;  
處理合作夥伴分別優先列入威脅的可疑活動報告數量增加；
- More timely and relevant reporting in response to active investigations or live incidents;  
更多即時且相關報告回應進行中的調查活動或正在發生的事件；
- Improved quality and utility of suspicious reporting; and  
改進可疑活動報告之品質及效用；以及
- Improved law enforcement outcomes supporting investigations, prosecutions, asset recovery or other disruption of criminal networks.  
改善執法機關支援調查、起訴、資產追回已及其他破壞犯罪網路的活動之結果。

The UK, Hong Kong and Australian partnerships stand out in terms of the detail and breadth of the quantitative performance indicators that they record.

英國、香港以及澳洲夥伴關係在他們所紀錄之績效量化指標之細節及廣度方面表現突出。

By June 2020, the UK partnership had completed 750 cases; secured £56m in asset seizure or restraint and contributed to 210 arrests. Over 5000 suspect accounts linked to money laundering activity have been identified by JMLIT members and 49 'Alerts' (typology strategic intelligence products) have been produced. 截至 2020 年 6 月，英國夥伴關係已完成 750 個案例；並使有 5600 萬英鎊的資產遭到扣押或限制，並促成 210 人遭到逮捕。JMLIT 成員已經辨識了 5000 多個與洗錢活動相關的可疑帳戶，並做成 49 個「警報」（戰術類型情報產物）。

Between July 2018 to June 2019, the Australian 'Fintel Alliance' had completed 320 investigations through private sector members and contributed to the arrest of 108 persons of interest and the closure of accounts related to 90 high-risk customers. 87 potential victims have been identified or protected across Fintel Alliance operational activities over this period and over 2,500 credit card identities have been protected from fraudulent abuse.

2018 年 7 月至 2019 年 6 月間，澳洲金融情報聯盟透過私部門成員完成了 320 次調查，並協助逮捕了 108 名相關人員並關閉了與 90 名高風險客戶相關帳戶。在此期間，金融情報聯盟已識別或保護了 87 名潛在受害者，並保護了 2,500 多個信用卡身份免於遭到詐欺性濫用。

In Hong Kong, from May 2017 to June 2020, 108 cases have been presented to the 'Fraud and Money Laundering Intelligence Taskforce' (FMLIT) leading to the identification of 8,162 accounts, 379 persons and 513 companies relevant to investigations (previously unknown to police). These operations have contributed to HKD\$646.8 million of assets being frozen, restrained or confiscated; HKD\$105.6 million of loss to fraud being prevented; 250 persons being arrested; and 16 prosecution cases.

在香港，從 2017 年 5 月到 2020 年 6 月，已向香港反詐騙及洗錢情報工作小組(FMLIT)提交了 108 起案件，辨識了 8,162 個帳戶、379 名人員及 513 家與調查相關之公司（先前警方尚未發覺）。這些行動使 6.468 億港元的資產被凍結、限制或沒收；防止 1.056 億港元的詐欺損失；250 人遭到逮捕；並起訴 16 件案件。

New data, published in this study, reveals how the quality of regulatory reporting is enhanced through partnership collaboration. In the Netherlands, reporting from a public-private partnership focused on organised crime is 9.6 times more likely to include disclosable intelligence for law enforcement agencies, compared to the national average. A Canadian partnership focused on human trafficking saw a five-fold increase in disclosures by the Canadian FIU of actionable intelligence to law enforcement agencies. In Australia,

a dedicated Fintel Alliance campaign to detect financial activity associated to child exploitation led to a 580% increase in suspicious reporting of that activity.

本研究中發布的新資料顯示如何透過合作夥伴關係提高監管報告的品質。在荷蘭，專注於組織犯罪之公私夥伴關係的報告於包含可供執法機關利用之可揭露情報很可能較全國水準高出 9.6 倍。一個專注於人口販運的加拿大夥伴關係發現，加拿大金融情報中心向執法機關揭露的可利用情報增加了五倍。在澳洲，一項專門用於監控與剝削兒童相關金融活動之金融情報聯盟運動，使該活動的可疑報告增加了 580%。

For the first time, our study highlights how partnerships have responded to particular financial crime threats arising from the COVID-19 global pandemic. In the UK, a new 'OTELLO' COVID-19 Fusion Cell was established to respond to criminal activity related to the pandemic, bringing together experts from across sectors – including the financial sector, insurance companies, trade bodies, law enforcement, cyber industry and other public authorities in the UK. In Ireland, a specific operational theme was established to deal with COVID-19 related crimes, including to monitor activity pertaining to certain businesses and commercial entities that were purported to be closed as result of the COVID-19 lockdown restrictions. The U.S., Australia, Singapore, Hong Kong, Austria, the Netherlands, New Zealand and Europol have all produced strategic typology papers, advisories or alerts to support regulatory reporting of COVID-19 threats.

我們的研究首次提到夥伴關係如何面對 COVID-19 全球大流行中興起的特定金融犯罪。在英國，新的 "OTELLO" COVID-19 的合作單位被成立，以反應疫情大流行之相關犯罪活動，使跨產業專家-包括金融產業、保險公司、貿易實體、執法單位、網路產業以及其他英國的公部門整合。在愛爾蘭，成立一個特別行動單位處理 COVID-19 相關犯罪，包括監控聲稱因 COVID-19 封城而倒閉的某些企業和商業實體相關之活動。在美國、澳洲、新加坡、香港、奧地利、荷蘭、紐西蘭及歐洲刑警組織皆撰寫策略類型論文、建議或警示，以提供 COVID-19 威脅之監管報告。

However, despite promising indicators of impact, partnerships generally operate at a small scale, including with regard to their operational bandwidth; their membership (which tends to be focused on small numbers of the largest retail banks); and limited public sector resourcing of partnership efforts.

然而，除了正面的影響指標外，合作夥伴關係通常以小規模方式運作，包括在其業務廣度；其會員資格（往往集中在少數大型零售金融銀行）；以及有限且來自合作夥伴關係努力之公共部門資源。

Partnerships are currently constructed as voluntary, additional and parallel innovations to the principal obligations which arise from national AML/CFT regimes. From an investigative perspective, tactical-level partnerships generally deliver a specialist capability to advance high-end, or particularly challenging, cases. Production rates for typologies are limited due to the reliance on volunteerism from the private sector to contribute to the process. With the arguable exception of the UK and Australian partnerships, no partnership studied in this paper is resourced to provide a substantial, high-tempo or comprehensive response to financial crime.

合作夥伴關係目前是採取自願性、附加性以及平行創新之方式，且為國家防制洗錢/打擊資恐而構建。從調查的角度來看，戰術層面的合作夥伴關係通常提供專業能力來推動高端或特別具有挑戰性的案件。由於仰賴私部門自願的為此過程做出貢獻，因此各類型的生產率受到限制。除了英國和澳大利亞的合作夥伴關係爭議外，本文研究之任何合作夥伴關係皆無資源可對金融犯罪提供實質性、快速或全面的應對措施。

This report includes 12 key topics affecting the future development of public-private partnerships and the broader effectiveness of relevant AML/CTF supervisory regimes. These topics will be the subject of further FFIS policy papers and research activity.

本報告包括 12 個影響公私部門夥伴關係之未來發展及相關防制洗錢/打擊資恐之監管制度之更具廣泛有效性的關鍵主題。這些主題將成為進一步 FFIS 政策論文和研究之主題。

This report is structured as follows. In Chapter 1, we set out a global overview of the field of public–private partnerships; in Chapter 2, we summarise evidence relating to the impact of such partnerships in tackling financial crime; in Chapter 3, we highlight key factors relevant to the future growth of partnership models; and, in the report annex, we include all comprehensive references for the 23 individual partnerships, as submitted by lead partnership agencies.

本報告的結構如下。在第 1 章中，我們對公私部門夥伴關係領域進行了全球性的概覽；在第 2 章中，我們總結關於合作夥伴關係在應對金融犯罪方面的影響之相關證據；在第 3 章中，我們重點介紹了與合作夥伴模式未來發展相關的關鍵因素；並且，在報告附件中，總結了具領導性的夥伴關係機構所提交的 23 個單獨夥伴關係之所有綜合參考資料。

## Geographic coverage of partnerships surveyed in this paper

### 本文研究之夥伴關係所涵蓋之地理範圍

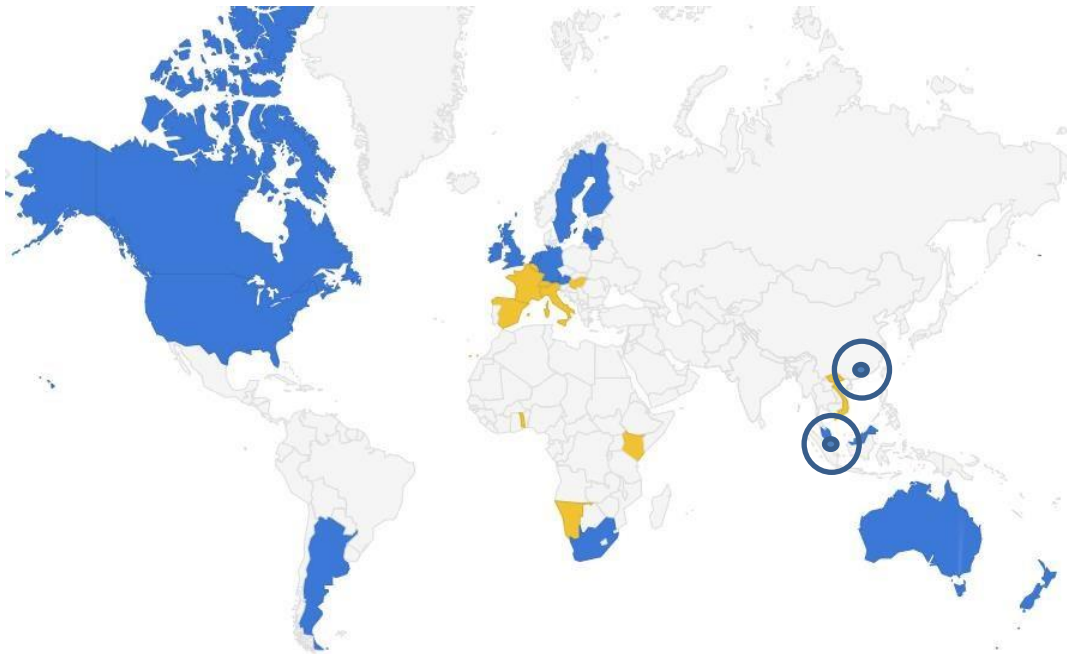
Table 1. Countries covered in this report

圖表 1: 本報告所涵蓋之國家

Jurisdictions with a national public–private financial information-sharing partnership in operation included in this paper 本報告所包含之運作中之國家公私部門金融資訊共享夥伴關係之司法管轄區		Other relevant jurisdiction to transnational public–private financial information-sharing partnership included in this paper 其他本報告內之跨國公私部門金融資訊共享夥伴關係之相關司法管轄區
<ul style="list-style-type: none"> <li>1. Argentina 阿根廷</li> <li>2. Australia 澳洲</li> <li>3. Austria 奧地利</li> <li>4. Canada 加拿大</li> <li>5. Finland 芬蘭</li> <li>6. Germany 德國</li> <li>7. Hong Kong 香港</li> <li>8. Ireland 愛爾蘭</li> <li>9. Latvia 拉脫維亞</li> <li>10. Lithuania 立陶宛</li> </ul>	<ul style="list-style-type: none"> <li>11. Malaysia 馬來西亞</li> <li>12. New Zealand 紐西蘭</li> <li>13. Singapore 新加坡</li> <li>14. South Africa 南非</li> <li>15. Sweden 瑞典</li> <li>16. The Netherlands 荷蘭</li> <li>17. United Kingdom 英國</li> <li>18. USA 美國</li> </ul>	<ul style="list-style-type: none"> <li>Belgium 比利時</li> <li>France 法國</li> <li>Hungary 匈牙利</li> <li>Italy 義大利</li> <li>Kenya 肯亞</li> <li>Luxembourg 盧森堡</li> <li>Malta 馬爾他</li> <li>Namibia 納米比亞</li> <li>Switzerland 瑞士</li> <li>Togo 多哥</li> <li>Vietnam 越南</li> </ul>

Fig 1. Map of jurisdictions with public–private financial information-sharing partnerships in this study

圖 1. 本研究所包含之公-私部門金融資訊共享夥伴關係之司法管轄權地圖



Legend 說明	
	National public-private financial information-sharing partnership in operation included in this paper 本報告之運作中國家公私金融資訊共享夥伴關係之司法管轄區
	Relevant jurisdiction involved in trans-national public-private financial information-sharing partnership included in this paper 本報告內之跨國公私部門金融資訊共享夥伴關係之相關司法管轄區



# Chapter 1. 第一章

## A global overview of public–private financial information-sharing partnerships

公私部門金融資訊共享夥伴  
關係之全球概覽

## 1.1. What are public–private financial information-sharing partnerships?

### 1.1 何謂公私部門金融資訊共享夥伴關係？

In this paper, we refer to financial information-sharing partnerships or ‘partnerships’ to mean:  
本報告中，金融共享夥伴關係或是夥伴關係意指：

Collaborative public and private sector forums that:  
公部門及私部門之合作論壇：

- Provide regularly convened dynamic public–private dialogue on financial crime threats, based on shared and agreed objectives and priorities;  
根據所共享及具有共識之目標及優先事項，定期舉辦就金融犯罪威脅之公-私部門的動態對話；
- Act within the law by making use of available information-sharing legislation, based on a shared public–private understanding of the legal gateways and boundaries of sharing information;  
基於公私部門對共享資訊之法律途徑及界線的共同瞭解，利用現有的資訊共享立法之範圍內行事；
- Can enable, to some degree, private–private sharing of information and knowledge between certain regulated entities; and  
能夠在一定基礎上實現私人間就受監管實體之資訊及知識共享；以及
- Address one or more of the following issues:  
處理以下一個或多個問題：
  - Sharing of tactical information, including the identities of entities of concern, to enhance ongoing investigations.  
共享戰術資訊，包括重要實體的辨識加強目前正在進行之調查。
  - Collaborative knowledge management processes to build understanding of threats and risks, for example through the co-development of typologies (sometimes referred to as ‘alerts’) and the development and testing of indicators, to improve reporting from the private sector.  
共同協作知識管理程序，以建立對威脅及風險的認知，例如透過共同開發類型（有時稱為「警示」）及開發及測試指標，藉以改進私部門之報告。

We also use the term ‘partnerships’, more generally, to refer to the public and private decision-makers behind financial information-sharing partnerships.

我們亦使用「夥伴關係」此詞彙，更廣泛的泛指金融資訊共享合作夥伴關係背後的公私部門決策者。

## 1.2. Why form a public–private partnership to tackle financial crime?

### 1.2. 為何組成公私部門合作夥伴關係以打擊金融犯罪？

AML/CFT regimes are based on a set of legal and supervisory obligations for financial institutions and other private sector service providers to proactively identify and report suspicions of the laundering of criminal proceeds and/or the facilitation of terrorist financing to government Financial Intelligence Units (FIUs). In order to produce these suspicious activity reports, regulated entities are required to identify suspicion of criminality within their business, using insight that they can develop or procure within their own institution.

防制洗錢/打擊資恐制度係立基於一系列法律及監管義務，此義務須由金融機構及其他私部門服務提供者主動識別並向政府金融情報中心(FIU)報告疑似洗錢及/或資助恐怖主義活動。為編寫該可疑活動報告，受監管之實體被要求利用機構內發展或獲得之觀察力，識別其業務中可疑的犯罪活動。

While the intention of the AML/CFT regime may be for regulated entities to identify suspicions of crime within their business, there are practical challenges in doing so outside of a partnership environment. Regulated entities can find it challenging to identify potential criminality without guidance from public agencies about patterns and trends in criminal behaviour and, indeed, which specific entities are under investigation for criminal activity. In addition, while criminal networks seek to conceal money laundering schemes through the use of multiple accounts, spanning multiple financial institutions, regulated entities are not generally permitted to share information with their counterpart financial institutions about financial crime risk.

雖然防制洗錢/打擊資恐制度之目的可使受監管之實體在其業務中識別犯罪嫌疑，但在夥伴關係之環境外之執行存在實際上之挑戰。受監管之實體會發現在沒有公部門指導關於犯罪行為的模式及趨勢之情況下，識別潛在之犯罪行為具有挑戰性，以及事實上哪些特定實體正在接受犯罪活動之調查。此外，雖然犯罪網路試圖透過使用跨越多個金融機構之多個帳戶以掩識洗錢計劃，但受監管之實體通常不可與其對應之金融機構共享金融犯罪風險之資訊。

Partnerships have developed in response to these challenges.

夥伴關係之發展即在回應該類挑戰。

Since 2015, various models of public-private financial information-sharing partnerships have been established. The early partnerships, led by the example of the UK Joint Money Laundering Intelligence Taskforce (JMLIT), drove a fundamental shift in thinking that placed information sharing and collaboration across public and private sector partnership members at the centre of efforts to detect and respond to financial crime risks.

自從 2015 年以來，各種公-私部門金融資訊共享夥伴關係之模型已得到發展。在早期的夥伴關係中，以英國聯合洗錢情報工作小組(JMLIT)為典範，其驅使了想法上的根本性轉變，將公-私部門合作夥伴之間的資訊共享與合作，置於偵測及應對金融犯罪風險之工作中心。

## 1.3. How have partnerships developed around the world?

### 1.3. 世界上合作夥伴關係如何發展?

Public-private financial information-sharing partnerships have grown from being a unique innovation in 2015, to becoming a mainstream component of the architecture to tackle financial crime in liberal democracies in 2020.

公-私部門金融資訊共享夥伴關係自 2015 年以來有長足的發展，成為 2020 年自由民主國家處理金融犯罪架構之主流部分。

As at June 2020:

在 2020 年 6 月:



<sup>1</sup> countries and 1 autonomous region (Hong Kong).  
國家及一個自治區(香港)

<sup>2</sup> Based on "GDP (current US\$)". World Development Indicators. World Bank. Retrieved 15 October 2019.  
根據「GDP(當前美元)」,世界發展指標。世界銀行。擷取 2019 年 10 月 15 日之資料。

<sup>3</sup> As defined in the twenty-seventh edition of the Global Financial Centres Index (GFCI 27) published on 26 March 2020. –  
<https://www.longfinance.net/publications/longfinance-reports/global-financial-centres-index-27/>  
根據 2020 年 3 月 26 日發布的第 27 版全球金融中心指數 (GFCI 27) 之定義。  
<https://www.longfinance.net/publications/longfinance-reports/global-financial-centres-index-27/>

**Fig 2. Timeline of partnership development:**

**圖 2. 夥伴關係發展時間序**

2015 年	The UK Joint Money Laundering Intelligence Taskforce (JMLIT) (Pilot in 2015, formally established in April 2016) 英國聯合洗錢情報工作小組(JMLIT)(初始於 2015，正式成立於 2016 年 4 月)
2016 年	First Canadian 'Project' partnership initiative launched 第一個加拿大合作夥伴計劃倡議發表
Mar 2017	Australian Fintel Alliance
2017 年 5 月	澳洲金融情報聯盟
Apr 2017	The Singapore Anti-Money Laundering and Countering the Financing of Terrorism Industry Partnership (ACIP) 新加坡洗錢防制暨打擊資助恐怖組織產業夥伴關係(ACIP)
2017 年 4 月	Hong Kong Fraud and Money Laundering Intelligence Taskforce (FMLIT)
May 2017	香港反詐騙及洗錢情報工作小組(FMLIT)
2017 年 5 月	Joint Intelligence Group (JIG) Ireland
Jun 2017	愛爾蘭聯合情報團體 (JIG)
2017 年 6 月	The Netherlands Terrorist Financing Taskforce (NL-TFTF)
Jul 2017	荷蘭資恐工作小組(NL-TFTF)
2017 年 7 月	The Europol Financial Intelligence Public Private Partnership (EFIPPP)
Dec 2017	月歐洲刑警組織金融情報公私合作夥伴關係(EFIPPP)
2017 年 12	The US FinCEN Exchange
Dec 2017	月美國金融犯罪執法署
2017 年 12	New Zealand Financial Crime Prevention Network (NZ-FCPN)
Dec 2017	月紐西蘭金融犯罪防治網(NZ-FCPN)
2017 年 12	The Global Coalition to Fight Financial Crim
Jan 2018	打擊金融犯罪全球聯盟
2018 年 1 月	Latvia Cooperation Coordination Group (CCG)
May 2018	拉脫維亞合作協調團體(CCG)
2018 年 5 月	Austrian Public-Private Partnership Initiative (APPPI)
Sep 2018	奧地利公-私部門合作倡議(APPPI)
2018 年 9 月	United for Wildlife - Illegal Wildlife Trade (IWT) Financial Taskforce
Oct 2018	月 野生動物聯盟-非法野生動物交易(IWT)金融工作小組
2018 年 10	The Netherlands Fintell Alliance (FA-NL)
Oct 2018	月荷蘭金融情報聯盟(FA-NL)
2018 年 10	The Netherlands Serious Crime Taskforce (NL-SCTF)
Aug 2019	荷蘭重大犯罪工作小組(NL-SCTF)
2019 年 8 月	Germany Anti Financial Crime Alliance (AFCA)
Sep 2019	德國防治金融犯罪聯盟(AFCA)
2019 年 9 月	Argentina Fintel-AR
Nov 2019	月阿根廷金融情報機構
2019 年 11	The Malaysia Financial Intelligence Network (MyFINet)
Nov 2019	月馬來西亞金融情報網(MyFINet)
2019 年 11	South African Anti-Money Laundering Integrated Taskforce (SAMLIT)
Dec 2019	月南非洗錢防制整合工作小組(SAMLIT)
2019 年 12	Finnish AML/CFT Expert Working Group on a PPP basis
Jun 2020	芬蘭基於 PPP 基礎之洗錢防制/打擊資恐專家工作團體
2020 年 6 月	The Swedish Anti-Money Laundering Intelligence Taskforce (SAMLIT)
Jun 2020	瑞典洗錢防制情報工作小組(SAMLIT)
2020 年 6 月	(Formal launch in August 2020) Lithuania - Centre of Excellence in Anti-Money Laundering (2020 年 8 月正式成立)立陶宛洗錢防制專門中心

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## 1.4. What type of information is shared?

### 1.4. 何種類型之資訊被分享？

In general, partnerships support two major types of information sharing and respective outputs:

基本上，夥伴關係提供兩種主要類型的資訊共享並且分別得到兩種結果：

- 1. Strategic intelligence sharing.** Public and private members of the partnership co-develop typologies or knowledge products covering financial crime threats and highlighting relevant behavioural indicators. Typically, these products do not contain confidential identifying information about specific suspects or entities, or individual clients or customers of financial institutions and, as such, do not require enabling legislation. It is generally intended that these knowledge products are made available to non-members of partnerships and are either published and accessible online (such as in the US or in Singapore), or are released through non-public distribution channels to regulated entities (such as in the UK or Hong Kong).
- 1. 策略情報共享。** 夥伴關係的公部門及私部門成員共同發展涵蓋金融犯罪威脅及標識相關行為指標的類型學或知識產物。通常，這些產物不包含特定嫌疑人或實體、個人客戶或金融機構客戶之機密識別資訊，因此不需要授權立法。這些知識產物通常用於提供給非合作夥伴成員，並得供線上公布及取得（例如在美國或新加坡），或者透過非公開分派管道向受監管實體公布（例如在英國或香港）。
- 2. Tactical information sharing.** Where legislation allows, partnerships have facilitated sensitive information relevant to law enforcement or national intelligence investigations to be shared with regulated entities. This information might include the names of specific individuals, legal entities or other identifying information relevant to a case. Member regulated entities can then use this awareness of priority threats, from the perspective of law enforcement or other public agencies, to search their systems in response to that identified suspicion or indicator. Depending on the legal gateway and format of the partnership, regulated entities can share sensitive information back with law enforcement either through formal reports or dynamically within the partnership.
- 2. 戰術情報共享。** 在法律允許之情形下，合作夥伴關係促進了與執法單位或國家情報調查單位相關之敏感資訊與受監管實體共享。該資訊可能包括特定個人、法律實體的姓名或與案件相關之其他識別資訊。受監管實體之成員得從執法或其他公家單位之角度利用此優先威脅之警示，以搜索他們的系統，回應已識別的可疑活動或指標。根據合作夥伴關係之法律途徑及形式，受監管機構實體可以動態的透過正式報告或在合作夥伴中內部，與執法部門分享敏感資訊。

**Fig 3. The nature of information exchange within current partnerships:**

**圖 3. 現有夥伴關係之資訊交換本質**

Tactically focused 戰術焦點	The US FinCEN Exchange 美國金融犯罪執法署
	Joint Intelligence Group (JIG) Ireland 愛爾蘭聯合情報團體 (JIG)
	The UK Joint Money Laundering Intelligence Taskforce (JMLIT) 英國聯合洗錢情報工作小組(JMLIT)
	The Australian Fintel Alliance 澳洲金融情報聯盟
	The Singapore Anti-Money Laundering and Countering the Financing of Terrorism Industry Partnership (ACIP) 新加坡洗錢防制暨打擊資助恐怖組織產業夥伴關係(ACIP)
	Hong Kong Fraud and Money Laundering Intelligence Taskforce (FMLIT) 香港反詐騙及洗錢情報工作小組(FMLIT)
	The Netherlands Terrorist Financing Taskforce (NL-TFTF) 荷蘭資恐工作小組(NL-TFTF)
Tactical and strategic intelligence co-development 戰術及策略情報合作發展	The Netherlands Serious Crime Taskforce (NL-SCTF) 荷蘭重大犯罪工作小組(NL-SCTF)
	The Netherlands Fintell Alliance (FA-NL) 荷蘭金融情報聯盟(FA-NL)
	Latvia Cooperation Coordination Group (CCG) 拉脫維亞合作協調團體(CCG)
	The Malaysia Financial Intelligence Network (MyFINet) 馬來西亞金融情報網(MyFINet)
	South African Anti-Money Laundering Integrated Taskforce (SAMLIT) 南非洗錢防制整合工作小組(SAMLIT)
	The Swedish Anti-Money Laundering Intelligence Taskforce (SAMLIT) 瑞典洗錢防制情報工作小組(SAMLIT)
	New Zealand Financial Crime Prevention Network (NZ-FCPN) 紐西蘭金融犯罪防治網(NZ-FCPN)
Strategic, with some support to tactical exchange 策略, 及支援部分戰術交換	The Europol Financial Intelligence Public Private Partnership (EFIPPP) 歐洲刑警組織金融情報公私合作夥伴關係(EFIPPP)
	United for Wildlife - Illegal Wildlife Trade (IWT) Financial Taskforce 野生動物聯盟-非法野生動物交易(IWT)金融工作小組
	Finnish AML/CFT Expert Working Group on a PPP basis 芬蘭基於 PPP 基礎之洗錢防制/打擊資恐專家工作團體
Strategic intelligence co-development only 僅有策略情報合作發展	Lithuania - Centre of Excellence in Anti-Money Laundering 立陶宛洗錢防制專門中心
	Argentina Fintel-AR 阿根廷金融情報機構
	Germany Anti Financial Crime Alliance (AFCA) 德國防治金融犯罪聯盟(AFCA)
	Austrian Public-Private Partnership Initiative (APPPI) 奧地利公私部門合作倡議(APPPI)
	Canadian 'Project' Initiatives to Combat Financial Crimes through Partnerships 加拿大透過夥伴關係打擊金融犯罪計劃倡議
Strategic / Policy 策略/政策	The Global Coalition to Fight Financial Crime 打擊金融犯罪全球聯盟



Partnerships vary in terms of their legal basis, their membership structures and their financial crime priorities and objectives. They also differ in the format of how they meet and exchange information.

夥伴關係在法律基礎、成員結構以及金融犯罪優先事項及目標方面各不相同。在會面和交換資訊之方式上也有所不同。

In relation to the partnerships covered in this paper, there are three major types of partnership format:  
 本文所涵蓋之夥伴關係主要為以下三種形式：

1. **Co-location of analysts / Secondment model** – In this format, public and private sector analysts sit side by side, typically in dedicated office space, and work collaboratively in real-time to support partnership objectives. Often, co-located analysts from the private sector are restricted from sharing information that they are exposed to, by virtue of their participation in partnership operations, back with their home financial institution.
  1. **分析人員共同辦公/派駐模式**- 在此模式，公部門及私部門分析人員並排坐在一起，基本上位於同一個辦公空間，以及即時合作支援夥伴關係目標。通常，共用場所中來自於私部門的分析人員通常不得分享因參與夥伴關係而回頭向其所屬之金融機構分享其因夥伴關係運作所接觸之資訊。
  2. **Convened meetings with non-permanent membership, at the direction of the FIU** – In this format, the FIU convenes the partnership on an irregular basis with no permanent membership from the private sector. Meetings typically focus on specific cases or financial crime threats, and membership for each meeting or project is chosen in response to the case at hand.
    2. **在金融情報中心指導下與非永久會員召開會議**-在此模式，金融情中心不定期召集私部門之非永久會員舉行會議。會議通常專注於特殊個案或金融犯罪威脅，以及依據目前發生的案例選擇每一場會議之會員或者計劃。
  3. **Regularly convened meetings** – In this format, partnership members convene on a regular basis, but do not co-locate for a prolonged amount of time. Participants involved in meetings in this model are typically more senior, than compared to co-location models. In contrast to co-location models, in general, private sector members of regularly convened meetings have the opportunity to share the information that they receive during the partnership meetings, back to appropriate colleagues in their financial crime intelligence or risk function at their home institution.
    3. **定期召開會議**-在此模式，夥伴關係成員定期召開會議，但不會長時間共同辦公。與共同辦公模式相比，參與此模式會議的參與者相較於共同辦公模式而言，通常更資深。與共同辦公模式相比，一般而言，定期召開會議的私部門成員有機會分享於夥伴關係會議中所獲得之資訊，並且回分享给其所在機構之金融犯罪情報或風險部門。

**Fig 4. Formats of information exchange in current partnerships:**

**圖 4. 現有合作夥伴資訊交換之形式**

Co-location of analysts / Secondment model 分析人員共同辦公/派駐模式	<ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #8B4513; margin-right: 5px;"></span> The Australian Fintel Alliance                          澳洲金融情報聯盟</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #8B4513; margin-right: 5px;"></span> The Netherlands Terrorist Financing Taskforce (NL-TFTF)                          荷蘭資恐工作小組(NL-TFTF)</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #8B4513; margin-right: 5px;"></span> The Netherlands Serious Crime Taskforce (NL-SCTF)                          荷蘭重大犯罪工作小組(NL-SCTF)</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #8B4513; margin-right: 5px;"></span> The Netherlands Fintell Alliance (FA-NL)                          荷蘭金融情報聯盟(FA-NL)</li> </ul>
Convened meetings with non- permanent membership, at the direction of the FIU 在金融情報中心指導下與非 永久會員召開會議	<ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #0070C0; margin-right: 5px;"></span> The US FinCEN Exchange                          美國金融犯罪執法署</li> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #0070C0; margin-right: 5px;"></span> Latvia Cooperation Coordination Group (CCG)                          拉脫維亞合作協調團體(CCG)</li> </ul>
Regularly convened meetings	<ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 15px; background-color: #D8BFD8; margin-right: 5px;"></span> The Europol Financial Intelligence Public Private Partnership (EFIPPP)</li> </ul>

定期召開會議

歐洲刑警組織金融情報公私合作夥伴關係(EFIPPP)  
The UK Joint Money Laundering Intelligence Taskforce (JMLIT)  
英國聯合洗錢情報工作小組(JMLIT)  
The Netherlands Fintell Alliance (FA-NL)  
荷蘭金融情報聯盟(FA-NL)  
The Global Coalition to Fight Financial Crime  
打擊金融犯罪全球聯盟  
Joint Intelligence Group (JIG) Ireland  
愛爾蘭聯合情報團體 (JIG)  
Canadian 'Project' Initiatives to Combat Financial Crimes  
through Partnerships  
加拿大透過夥伴關係打擊金融犯罪計劃倡議  
South African Anti-Money Laundering Integrated Taskforce  
(SAMLIT)  
南非洗錢防制整合工作小組(SAMLIT)  
Hong Kong Fraud and Money Laundering Intelligence Taskforce  
(FMLIT)  
香港反詐騙及洗錢情報工作小組(FMLIT)  
New Zealand Financial Crime Prevention Network (NZ-FCPN)  
紐西蘭金融犯罪防治網(NZ-FCPN)  
The Singapore Anti-Money Laundering and Countering the  
Financing of Terrorism Industry Partnership (ACIP)  
新加坡洗錢防制暨打擊資助恐怖組織產業夥伴關係(ACIP)  
Finnish AML/CFT Expert Working Group on a PPP basis  
芬蘭基於 PPP 基礎之洗錢防制/打擊資恐專家工作團體  
Argentina Fintel-AR  
阿根廷金融情報機構  
Germany Anti Financial Crime Alliance (AFCA)  
德國防治金融犯罪聯盟(AFCA)  
Austrian Public-Private Partnership Initiative (APPPI)  
奧地利公-私部門合作倡議(APPPI)  
The Swedish Anti-Money Laundering Intelligence Taskforce  
(SAMLIT)  
瑞典洗錢防制情報工作小組(SAMLIT)  
The Malaysia Financial Intelligence Network (MyFINet)  
馬來西亞金融情報網(MyFINet)  
Lithuania - Centre of Excellence in Anti-Money Laundering  
立陶宛洗錢防制專門中心

## 1.5. How are AML supervisors involved?

### 1.5 洗錢防制主管機關如何參與?

Partnerships differ in their organisational composition, including with regard to the status of AML supervisors in partnerships.

合作夥伴關係之組織構成各不相同，包括合作夥伴關係中防制洗錢監管單位之地位。

Some partnerships refer to the importance of AML supervisors being members of the partnership. Such membership can help ensure that the AML supervisor has a comprehensive view of the AML/CFT system and that supervisors are comfortable with the nature of information-sharing occurring within the partnership. To

an extent, supervisors have an opportunity to encourage and incentivise the use of partnerships and can resolve uncertainties by issuing guidance or other communications about their expectations. Further, supervisors have a system-wide responsibility, beyond partnership members. As such, they can help ensure that valuable learning, being generated within partnerships, is shared with a broader community of regulated entities outside of the partnership.

部分合作夥伴關係提起了防制洗錢監管者做為合作夥伴關係之成員的重要性。該會員身分得幫助確保防制洗錢監管者對防制洗錢/打擊資恐體系具有全面的了解，並且監管者對合作夥伴關係中所進行之資訊共享感到滿意。在某些程度上，監管者有機會鼓勵及驅使夥伴關係之利用，並且可以透過發布指引或傳達其期望以解決不確定性。此外，監管者負有高於合作夥伴關係成員之全體系廣度的責任。因此，它可以幫助確保有價值的學習在夥伴關係中產生，及在夥伴關係之外的其他受監管機構等更廣泛的群體，亦受分享。

However, supervisors may also have a ‘dampening effect’ on information sharing within a partnership. Regulated entities may experience an increased risk of regulatory compliance enforcement action if the AML supervisor is party to the information being exchanged. There is a risk for regulated entities that information and openness about their exposure to financial crime risk, which may have been shared in good faith to support a law enforcement investigation of underlying crime, may then be used in a regulatory compliance enforcement action against them.

然而，監管者亦可能在夥伴關係中的共享資訊產生「抑制效應」。如果防制洗錢監管者是交換資訊的參與者，受監管的機構可面臨更大的法令遵循執法風險。對受監管機構而言，關於金融犯罪風險曝險的資訊及公開，可能會因為支持執法單位調查潛在犯罪，而受到善意的分享，可能會被利用於針對它們的法令遵循執法行動。

This balance in the role of supervisors is a principal issue to address in the design of a partnership; in line with national circumstances, respective priorities and stakeholder perspectives.

符合國情、分別優先事項優先以及具有利害關係者的觀點，監管者角色的平衡是設計夥伴關係的主要議題。

**Table 2: Different partnership arrangements for supervisors, FIUs and law enforcement agencies:**

表二：監管者、金融情報中心以及執法機關於合作夥伴關係之不同設計。

	Supervisors participate as permanent operational members 監管者做為永久參與活動成員時	Supervisors <u>do not</u> participate as permanent operational members 監管者並非為永久參與成員時
FIU-hosted partnership (where the FIU is not also the AML supervisor) 金融情報中心主持合作夥伴關係(當金融情報中心並非是擔任洗錢防制監管者時)	<ul style="list-style-type: none"> <li>• Austrian Public–Private Partnership Initiative (APPPI)</li> <li>• 奧地利公私部門合作倡議(APPPI)</li> <li>• Finnish AML/CFT Expert Working Group on a PPP basis</li> <li>• 芬蘭基於 PPP 基礎之洗錢防制/打擊資恐專家工作團體</li> <li>• South African Anti-Money Laundering Integrated Taskforce (SAMLIT)</li> <li>• 南非洗錢防制整合工作小組 (SAMLIT)</li> </ul>	<ul style="list-style-type: none"> <li>• Joint Intelligence Group (JIG) Ireland</li> <li>• 愛爾蘭聯合情報團體 (JIG)</li> <li>• Latvia Cooperation Coordination Group (CCG)</li> <li>• 拉脫維亞合作協調團體(CCG)</li> <li>• The Netherlands Fintell Alliance (FA-NL)</li> <li>• 荷蘭金融情報聯盟(FA-NL)</li> <li>• New Zealand Financial Crime Prevention Network (NZ-FCPN)<sup>vi</sup></li> <li>• 紐西蘭金融犯罪防治網(NZ-FCPN)<sup>vi</sup></li> </ul>

<p><b>FIU-hosted (where the FIU is also the AML supervisor)</b>          金融情報中心主持          (當金融情報中心同時亦為防制洗錢監管者時)</p>	<ul style="list-style-type: none"> <li>• The US FinCEN Exchange</li> <li>• 美國金融犯罪執法署</li> <li>• The Australian Fintel Alliance</li> <li>• 澳洲金融情報聯盟</li> <li>• The Malaysia Financial Intelligence Network (MyFINet)</li> <li>• 馬來西亞金融情報網(MyFINet)</li> <li>• Argentina Fintel-AR</li> <li>• 阿根廷金融情報機構</li> <li>• Canadian 'Project' Initiatives to Combat Financial Crimes through Partnerships<sup>i</sup></li> <li>• 加拿大透過夥伴關係打擊金融犯罪計劃倡議</li> </ul>	<p>N/A 無</p>
<p><b>LEA or prosecutor hosted<sup>ii</sup></b>          執法機關或司法檢察署主持<sup>ii</sup></p>	<ul style="list-style-type: none"> <li>• The UK Joint Money Laundering Intelligence Taskforce (JMLIT)</li> <li>• 英國聯合洗錢情報工作小組(JMLIT)</li> <li>• Hong Kong Fraud and Money Laundering Intelligence Taskforce (FMLIT)</li> <li>• 香港反詐騙及洗錢情報工作小組 (FMLIT)</li> <li>• The Netherlands Terrorist Financing Taskforce (NL-TFTF)</li> <li>• 荷蘭資恐工作小組(NL-TFTF)</li> <li>• The Netherlands Serious Crime Taskforce (NL-SCTF)</li> <li>• 荷蘭重大犯罪工作小組(NL-SCTF)</li> </ul>	<ul style="list-style-type: none"> <li>• The Swedish Anti-Money Laundering Intelligence Taskforce (SAMLIT)</li> <li>• 瑞典洗錢防制情報工作小組 (SAMLIT)</li> <li>• The Europol Financial Intelligence Public Private Partnership (EFIPPP)<sup>iii</sup></li> <li>• 歐洲刑警組織金融情報公私合作夥伴關係(EFIPPP)</li> </ul>
<p><b>AML supervisor as a principal partnership host<sup>iv</sup></b>          洗錢防制主管機關主持夥伴關係<sup>iv</sup></p>	<ul style="list-style-type: none"> <li>• The Singapore Anti-Money Laundering and Countering the Financing of Terrorism Industry Partnership (ACIP)</li> <li>• 新加坡洗錢防制暨打擊資助恐怖組織產業夥伴關係(ACIP)</li> <li>• Lithuania - Centre of Excellence in AntiMoney Laundering</li> <li>• 立陶宛洗錢防制專門中心</li> </ul>	<p>N/A 無</p>

## 1.6. Are partnerships specific to a single legal tradition?

### 1.6. 夥伴關係是否專為單一法律傳統？

From 2015 to 2017, public-private financial information sharing partnerships tended to be established in 'Common-Law' jurisdictions. However, in recent years, a significant number of civil code (or civil-law) jurisdictions have also established partnership models.

從 2015 年到 2017 年，公-私部門金融資訊共享夥伴關係傾向於在「普通法」司法管轄區建立。然而，近年來，相當多的民法(或稱大陸法系)司法管轄區也建立了夥伴關係模式。

While there are important distinctions in a civil code framework - including incorporating the role of prosecutors - both tactical and strategic-level partnerships have successfully become established within civil code jurisdictions.

然而在大陸法系架構下建立重要區別，包括納入檢察官的角色，同時包含戰術及策略層面的合作夥伴關係已在大陸法系司法轄區內成功建立。

**Fig 5. Partnerships by legal tradition**  
**圖 5.不同法律傳統的合作夥伴關係**

Common-law legal tradition  
 普通法傳統

- The UK Joint Money Laundering Intelligence Taskforce (JMLIT)  
英國聯合洗錢情報工作小組(JMLIT)
- The Australian Fintel Alliance  
澳洲金融情報聯盟
- The Singapore Anti-Money Laundering and Countering the Financing of Terrorism Industry Partnership (ACIP)  
新加坡洗錢防制暨打擊資助恐怖組織產業夥伴關係(ACIP)
- Hong Kong Fraud and Money Laundering Intelligence Taskforce (FMLIT)  
香港反詐騙及洗錢情報工作小組(FMLIT)
- The Malaysia Financial Intelligence Network (MyFINet)  
馬來西亞金融情報網(MyFINet)
- The Netherlands Terrorist Financing Taskforce (NL-TFTF)  
荷蘭資恐工作小組(NL-TFTF)
- South African Anti-Money Laundering Integrated Taskforce (SAMLIT)  
南非洗錢防制整合工作小組(SAMLIT)
- New Zealand Financial Crime Prevention Network (NZ-FCPN)  
紐西蘭金融犯罪防治網(NZ-FCPN)
- Canadian 'Project' Initiatives to Combat Financial Crimes through Partnerships  
加拿大透過夥伴關係打擊金融犯罪計劃倡議
- Joint Intelligence Group (JIG) Ireland  
愛爾蘭聯合情報團體(JIG)

Common-law origin, civil code characteristic  
 源自於普通法但具有大陸法特徵

- The US FinCEN Exchange  
美國金融犯罪執法署

(With tactical information sharing)  
 (具有戰術資訊分享)

- The Netherlands Serious Crime Taskforce (NL-SCTF)  
荷蘭重大犯罪工作小組(NL-SCTF)
- The Netherlands Fintell Alliance (FA-NL)  
荷蘭金融情報聯盟(FA-NL)
- The Netherlands Serious Crime Taskforce (NL-SCTF)  
荷蘭重大犯罪工作小組(NL-SCTF)
- The Europol Financial Intelligence Public Private Partnership (EFIPPP)  
歐洲刑警組織金融情報公私合作夥伴關係(EFIPPP)
- The Swedish Anti-Money Laundering Intelligence Taskforce (SAMLIT)  
瑞典洗錢防制情報工作小組(SAMLIT)

Civil code legal addition  
 大陸法系傳統

- Latvia Cooperation Coordination Group (CCG)  
拉脫維亞合作協調團體(CCG)
- Finnish AML/CFT Expert Working Group on a PPP basis  
芬蘭基於 PPP 基礎之洗錢防制/打擊資恐專家工作團體
- Lithuania - Centre of Excellence in Anti-Money Laundering  
立陶宛洗錢防制專門中心

(Strategic intelligence co-development only)  
 (僅有策略資訊共同發展)

- Argentina Fintel-AR  
阿根廷金融情報機構
- Germany Anti Financial Crime Alliance (AFCA)  
德國防治金融犯罪聯盟(AFCA)
- Austrian Public-Private Partnership Initiative (APPPI)  
奧地利公私部門合作倡議(APPPI)

# Chapter 2.

## The impact of public–private financial information sharing partnerships

第二章 公私部門金融資訊共享之影響

## 2.1. Which threats have been prioritised by partnerships?

### 2.1. 何者為合作夥伴關係應先優先考慮的威脅?

Out of the 23 partnerships covered in this report, 15 have specific financial crime threats as stated priorities or as defined themes for strategic intelligence co-development.

在本文涵蓋的 23 個夥伴關係中，15 個具有特定的金融犯罪威脅，作為策略情報共同開發的既定優先事項或確定之主題。

The following table indicates the nature of that threat prioritisation. The threat prioritisation below is not a comprehensive record of all partnerships' activity, but outlines a level of defined priorities agreed and described by the partnership. Partnerships may engage in tactical cases that cover a threat outside of their strategic priorities.

下表指出該威脅之優先性。以下的威脅優先性並非所有合作夥伴關係活動之記錄，而是概述了合作夥伴關係所具有共識及描述之優先性級別。合作夥伴關係可能會涉及涵蓋其策略性優先事項外之威脅的戰術案例。

Each partnership priority below represents a significant marshalling of resources. For each threat, the respective number of partnerships have convened - typically - the largest relevant financial institutions together with public agencies to improve understanding of the threat and to enhance the effectiveness of efforts to prevent or disrupt that threat.

下圖中每個夥伴關係之優先性都代表了重要的資源整合。對於每一種威脅，合作夥伴都召集-通常是-最大的相關金融機構以及公部門機構，藉以提高對威脅的理解，並提高預防或破壞該威脅之努力的有效性。

**Fig 6. Partnership designated priorities in June 2020 (number of partnerships stating respective priority)**

**圖 6.2020 年 6 月合作夥伴關係指定之優先事項(分別列為優先事項的合作夥伴關係數量)**



Financial crime threat 金融犯罪威脅	Number of partnerships prioritising this threat 指定此為優先事項的合作夥伴 關係數量
Terrorist financing 資恐	8
Tax evasion 逃稅	6
Drug trafficking 販毒	5
Fraud 詐欺	5
COVID-19 新型冠狀病毒肺炎	5
Professional money laundering groups, including “Laundromat” schemes 專業洗錢組織包括「洗錢工具」模式	5
Corruption 貪腐	4
Human trafficking 人口販運	4
Child exploitation 兒童剝削	3
Virtual assets 虛擬資產	3
Casinos, real estate and high-value goods 賭場、不動產及高價值動產	2
Illegal gambling 非法賭博	2
Proliferation financing 武器擴散融資	2
Violent crimes 暴力犯罪	2
Misuse of legal persons (shell companies and trusts) 濫用法人制度 (空殼公司及 信託)	2
Trade-based money laundering 以貿易為基礎的洗錢	2
Wildlife and environmental crime 野生動物及環境犯罪	2
Money remittance 匯款	2
FinTechs 金融科技	1
Illegal mining proceeds 非法採礦	1
Capital markets 資本市場	1
Organ Trafficking 器官販運	1
Chinese organised crime 中國人組織犯罪	1

## 2.2. What impact has been achieved at the tactical level?

### 2.2. 戰術層面產生之影響為何?

In 2020, to varying degrees, public-private financial information-sharing partnerships can demonstrate benefits of partnership working in terms of:

在 2020 年，公私部門金融資訊共享夥伴關係可以顯示合作夥伴關係有以下不同程度之優點：

- An increase in the number of suspicious reports addressing threats prioritised by the partnership;
- 合作夥伴關係所提出之優先性威脅之可疑報告數量增加；
- More timely and relevant reporting in response to active investigations or live incidents;
- 更及時且更相關的報告，以回應主動調查或正在發生的事件；
- Improved quality and utility of suspicious reporting; and
- 提高可疑報告之品質及效用；以及
- Improved law enforcement outcomes supporting investigations, prosecutions, asset recovery or other disruption of criminal networks.
- 改善提供調查、起訴、資產回復或其他打擊犯罪網路之執法結果。

The following qualitative outcome benefits have also been cited by partnership participants:

以下是合作夥伴關係參與者亦提到以下定性結果所帶來的利益：

- The development of a more collaborative and constructive relationship between relevant public agencies and regulated entities;
- 在相關公共部門以及受監管實體間之更具合作性及建設性之發展。
- Heightened risk awareness in the private sector, including through the development of alerts and typologies; and
- 提高私部門的風險意識，包括透過制定警示以及分類；以及
- Increased understanding in the public sector about complex financial issues or services and their vulnerabilities to abuse.
- 增加公部門對於複雜金融問題、服務及上揭項目易受濫用之理解。

Details of individual partnership outputs and impacts can be found in the annex to this report.

個別合作夥伴關係的產出及影響之詳細資訊可參照本文附件。

It should be noted that measuring the value of an intelligence collection process is inherently a very challenging process. Qualitative impacts can be difficult to measure. Law enforcement or criminal justice impacts can take many years to materialise. More broadly, the full value of strategic and, even, tactical intelligence can mature over a long period. Users of intelligence may also fail to report back to producers of intelligence what value has accrued.

其中應該特別注意在衡量情報蒐集程序之價值，本質上是一個非常具有挑戰性的過程。質性上的影響難以衡量。執法或刑事司法影響的結果可能需要很多年才會實現。更廣泛來說，策略的完整價值甚至是戰術情報在很久一段時間後才會成熟。情報使用者亦可能無法向情報提供者回報其所產生之價值。

Accordingly, partnerships vary as to the way they measure performance and impact. In 2020, the UK, Hong Kong and Australian partnerships stand out in terms of the detail and breadth of the quantitative performance indicators that they record, with the latest available data set out below.

因此，合作夥伴關係衡量績效及影響的方式大不相同。在 2020 年，英國、香港及澳洲合作夥伴關係於其所紀錄之量化績效指標之細節及廣度方面，表現突出，最新可用資訊如下。

**Table 3. Quantitative indicators of impact of public-private financial information sharing partnerships**  
**表 3. 公私部門金融資訊共享合作夥伴關係之影響的量化指標**

		Quantitative indicators of impact 影響量化指標	Time period 期間
	<b>JMLIT</b> 英國聯合洗錢情報工作小組工作小組	750 cases <sup>4</sup> ; £56m in asset seizure or restraint; 210 arrests; over 5,000 suspect accounts linked to money laundering activity identified by JMLIT members that were not previously known to law enforcement (leading to closures of 3400 accounts by financial institutions); and 49 Alerts (strategic intelligence products) produced. 750 例 <sup>4</sup> ；5600 萬英鎊的資產扣押或限制；210 人被捕；超過 5,000 個與英國聯合洗錢情報工作小組成員辨識的洗錢活動有關的可疑賬戶，而這些賬戶此前並未為執法部門所知（導致金融機構關閉了 3400 個賬戶）；和 49 個警示（戰略情報產品）產生。	February 2015 to June 2020 2015 年 2 月至 2020 年 6 月
	<b>Fintel Alliance</b> 金融情報聯盟	320 investigations initiated through private sector members. AUSTRAC describes Fintel Alliance intelligence as contributing to the arrest of 108 persons of interest; the closure of accounts of in excess of 90 high-risk customers; 87 potential victims identified or protected across all operation activities; and over 2,500 credit card identities protected from fraudulent abuse. 透過私部門成員發起的 320 項調查。澳洲交易通報及分析中心形容金融情報聯盟之情報有助於逮捕 108 名相關人員；關閉超過 90 個高風險客戶之賬戶；在所有營運活動中辨識或保護了 87 名潛在受害者；以及 2,500 多個信用卡身份，以防止詐欺濫用。	July 2018 to June 2019 2018 年 7 月至 2019 年 6 月
	<b>FMLIT</b> 香港詐騙及洗錢情報工作小組(FMLIT)	108 cases have been presented to FMLIT, leading to the identification of 8,162 Accounts, 379 persons and 513 companies relevant to investigations (previously unknown to police). \$646.8 million HKD of assets have been frozen, restrained or confiscated; \$105.6 million HKD of loss to fraud has been actively prevented; 250 persons have been arrested; and 16 prosecution cases have been achieved as a result of FMLIT information sharing. 108 個案例被提供給香港反詐騙及洗錢情報工作小組，從而辨識出與調查相關之 8,162 個賬戶、379 名人員和 513 家公司（警方尚未知悉）。6.468 億港元資產被凍結、限制或沒收；1.056 億港元的詐欺損失獲得積極的預防；250 人被捕；通過香港反詐騙及洗錢情報工作小組共享資訊，已完成 16 起起訴案件。	May 2017 to May 2020 2017 年 5 月至 2020 年 5 月

## 2.3. How has reporting from the private sector been enhanced?

### 2.3. 私部門之報告如何加強？

Measuring improvements in the quality of relevant reporting from the private sector can be challenging. However, some quantitative data is available to indicate the level of improvement. This data typically comes from countries where the national FIU has a role as an intermediary to assess the quality of reporting from the private sector, before disclosing only relevant and actionable intelligence to law enforcement agencies from these raw reports.

衡量私部門相關報告品質之改進具有挑戰性。一些量化數據可顯示進步之程度。這些資料基本上來自於以國家金融情報中心作為中介角色以評估私部門報告品質之國家，在這之前其僅從原始報告中向執法機關揭露相關且可操作之原始情報。

<sup>4</sup> Referring to 'Section 7s' of the UK Crime and Courts Act 2013.

參考 2013 年英國犯罪及法庭法「第 7s 節」。

As an example, in the Netherlands, between July 2017 to June 2019, the Terrorist Financing Task Force (NLTFTF) resulted in 300 transaction reports from the private sector. Compared against the national average for such regulatory reporting, these reports were 6.4 times more likely to contain disclosable intelligence to law enforcement agencies.

例如，荷蘭在 2017 年 7 月至 2019 年 6 月期間，資恐工作小組(NLTFTF)製作 300 份來自於私部門的交易報告。與此類監管報告之全國水準相比，這些報告涵括可向執法機關揭露之情報可能高於 6.4 倍。

In the case of the Netherlands Serious Crime Taskforce (NL-SCTF), between October 2019 to June 2020, 195 transaction reports were filed by relevant financial institutions. Again, compared to the same national average, these reports were 9.6 times more likely to include disclosable intelligence to law enforcement agencies.

以荷蘭重大犯罪工作小組(NL-SCTF)為例，2019 年 10 月至 2020 年 6 月期間，相關金融機構提交了 195 份交易報告。同樣，與全國平均水準相比，這些報告涵括可向執法機關揭露之情報可能高於 9.6 倍。Quantitative output and outcome measures are also emerging with respect to the strategic intelligence process of producing alerts or typologies, and the corresponding impact on reporting from the private sector. 量化產出及結果方法亦與產生警報或類型之策略情報程序結合，並且與私部門報告產生相應之影響。

**Table 4. Partnerships’ rate of production of strategic intelligence products.**

**表 4. 合作夥伴關係策略情報產物之生產率**

		Strategic intelligence, typology or Alerts produced 策略情報、類型或警示之產生	Time period 期間
	<b>JMLIT</b> 英國聯合洗錢情報工作小組	49 ‘JMLIT Alert’ reports co-developed and shared with the private sector 49 個 JMLIT 警示報告私部門之共同發展及分享	February 2015 to June 2020 2015 年 2 月到 2020 年 6 月
	<b>ACIP</b> 新加坡洗錢防制暨打擊資助恐怖組織產業夥伴關係	4 typologies or practice notes form 4 種類型或實務筆記形式	April 2017 to June 2020 2017 年 4 月到 2020 年 6 月
	<b>FMLIT</b> 香港反詐騙及洗錢情報工作小組(FMLIT)	11 typology alerts disseminated 發布 11 種類型警示	May 2017 to May 2020 2017 年 5 月到 2020 年 5 月
	<b>AFCA</b> 德國防治金融犯罪聯盟	5 typologies / indicator products produced 5 種類型/指標產物產出	Jan 2020 to June 2020 2020 年 1 月到 2020 年 6 月
	<b>Project initiatives</b> 計劃倡議	5 strategic projects with indicators published 含指標之 5 種策略計劃發表	January 2016 to December 2019 2016 年 1 月到 2019 年 12 月



**EFIPPP**  
歐洲刑警組織  
金融情報公私  
合作夥伴關係

6 typology reports  
6 種類型報告

March 2019 to  
March 2020  
2019 年 3 月到  
2020 年 3 月

The Canadian typology co-development initiative Project Protect was launched in January 2016 and focused on developing and distributing risk indicators of human trafficking. FIU data indicates that the public-private typology development project resulted in a four-fold increase in the number of human trafficking Suspicious Transaction Reports after the first year of the project. In terms of quality indicators, these reports saw a fivefold increase in the disclosures by the Canadian FIU of actionable intelligence to law enforcement agencies.<sup>5</sup>

加拿大類型共同發展倡議保護計劃於 2016 年 1 月啟動，專注於制訂及分類人口販運風險指標。金融情報中心之數據顯示，在該計劃第一年之後，公-私部門類型發展計劃造成人口販運之可疑交易報告的數量增加了四倍。在品質指標方面，加拿大金融情報中心向執法機關<sup>5</sup>揭露的可用情報增加了五倍。

Other examples illustrate the quantitative link between a partnerships' thematic strategic intelligence work and reporting from the private sector. In the UK, trade-based money laundering (TBML) was identified as a challenging financial threat to detect and was designated as a priority area for JMLIT Expert Working Group analysis and typology co-development. JMLIT TBML typologies have been credited by the NCA with supporting a 20-fold increase over a three-year period in relevant suspicious reporting, from eight reports in the first quarter of 2015 to 163 reports in the first quarter of 2018.<sup>6</sup>

其他例子說明合作夥伴關係之主題戰略情報工作與私部門報告之間的量化聯繫。在英國，基於貿易的洗錢 (TBML) 被識別為需要受到偵測並且具有挑戰性的金融威脅，並被指定為英國聯合洗錢情報工作小組分析及類型共同開發之優先領域。NCA 認為英國聯合洗錢情報工作小組提供 TBML 類型相關可疑報告在三年期間增加了 20 倍，從 2015 年第一季的 8 份報告增加到 2018 年第一季<sup>6</sup>的 163 份報告。

In Australia, Fintel Alliance work and engagement on the use of financial intelligence to identify child exploitation has led to a 580% increase in the filing of suspicious matter reports over the comparative 2-year period prior.

在澳洲，金融情報聯盟使用金融情報以識別剝削兒童之進行及參與，使提供之可疑事件報告相較於前兩年增加了 580%。

Performance data and the issue of how to measure the impact of partnership activities remain a key development area of partnerships in general.

績效資料及如何衡量夥伴關係活動之影響的問題，在總體上仍然是合作夥伴關係之關鍵發展領域。

## 2.4. How have partnerships responded to COVID-19 threats?

### 2.4. 合作夥伴關係如何對抗 COVID-19 的威脅?

Partnerships reported the following actions to respond directly to COVID-19 financial crime threats.

合作夥伴報告了直接因應 COVID-19 金融犯罪威脅所採取之以下措施：

<sup>5</sup> The Financial Transactions and Reports Analysis Centre of Canada (FINTRAC), 'FINTRAC Tactical Intelligence: Project PROTECT', <<https://beta.theglobeandmail.com/files/editorial/News/0219-nw-na-trafficking/PROJECT-PROTECT.pdf>>, accessed 29 December 2018.

加拿大金融交易和報告分析中心 (FINTRAC), "FINTRAC 戰術情報：保護計劃", <<https://beta.theglobeandmail.com/files/editorial/News/0219-nw-na-trafficking/PROJECT-PROTECT .pdf>> · 2018 年 12 月 29 日。

<sup>6</sup> UK National Crime Agency (NCA) data presented at the FFIS 2018 Conference of Partnerships, 22 June 2018. 2018 年 6 月 22 日在 FFIS 2018 年合作夥伴會議上提交的英國國家犯罪署 (NCA) 數據。

**COVID-19 adaption**  
**COVID-19 之因應**



**UK National Economic Crime Centre (NECC)**  
英國國家經濟犯罪中心 (NECC)

A new 'OTELLO COVID-19 Fusion Cell', led by the NECC and co-sponsored by the private sector, has been established to bring together experts from across sectors – including the financial sector, insurance companies, trade bodies, law enforcement, cyber industry and wider public sector. The Cell aims to rapidly share information on changes to the economic crime threat related to COVID-19 and to proactively target, prevent and disrupt criminal activity, protecting businesses and the public. The COVID-19 Fusion Cell convenes weekly to discuss the economic crime threat picture related to COVID-19, underpinned by smaller tactical groups focused on specific threat areas. The Cell produces a weekly public-private threat dashboard, including high-level SARs trend data, to inform areas for proactive tactical development and disruptive action.

由英國國家經濟犯罪中心及私部門共同資助成立一個新的"OTELLO COVID-19 合作單位"，結合了各產業的專家，包括金融產業、保險公司、貿易實體、執法機關、網路產業以及更廣泛的公部門產業。該單位目標為快速分享與 COVID-19 相關經濟犯罪資訊威脅之變化以及主動瞄準、預防及打擊犯罪活動，保護商業及社會大眾。COVID-19 合作單位每週召開討論關於 COVID-19 相關之經濟犯罪類型，由專注於特定威脅領域之較小型戰術小組支援。該單位製作每週公-私部門威脅資料，包括高度可疑交易報告趨勢資料，以提供該領域積極的戰術發展及阻止行動之資訊。



**Australian Fintel Alliance**  
澳洲金融情報聯盟

At the time of preparing this study, Fintel Alliance is currently focusing operational efforts in support of the Australian Government response to the COVID-19 pandemic, working with industry partners to enable assistance to be provided to impacted groups in the community while mitigating the risk of fraud.

至本研究時為止，金融情報聯盟正著重於協助澳洲政府因應 COVID-19 疫情之運作，並與產業夥伴合作，提供對社群中之受影響團體提供幫助，同時減緩詐欺風險。



**Singapore ACIP**  
新加坡洗錢防制暨打擊資助恐怖組織產業夥伴關係

ACIP members discussed their adaptation to the operational challenges posed by COVID19 and steps taken to mitigate the impact on their AML/CFT effectiveness. The key insights were compiled in a practice note, which was shared with banks in Singapore. The practice note complements other relevant guidance and advisories, including a joint Alert that MAS and CAD had issued on emerging AML/CFT developments relating to COVID-19 and typologies.

防制洗錢暨打擊資助恐怖組織產業夥伴關係成員討論其所採行因應 COVID-19 之運作挑戰及減少對防制洗錢/打擊資助之有效性影響之方法。重點想法已收錄於實行紀錄，並提供給新加坡之銀行。實行紀錄補充了其他相關指引及建議，包括新加坡金融管理局及新加坡警方之商務部針對 COVID-19 相關新興防制洗錢/打擊資助發展及類型所發佈之共同警示訊息。



**FinCEN Exchange**  
美國金融犯罪執法署

Between March and July 2020, FinCEN published three notices related to COVID-19 threats and responsibilities of financial institutions regarding COVID-19; one Advisory on Imposter Scams and Money Mule Schemes Related to Coronavirus Disease 2019 (COVID19); and one advisory on Medical Scams Related to the Coronavirus Disease 2019 (COVID19).

在 2020 年 3 月至 7 月之間，金融犯罪執法署發布三則關於 COVID-19 威脅及金融機關之責任的注意事項；一則關於 COVID-19 之冒名頂替詐欺及錢驢之建議指引；及一則關於 COVID-19 醫療詐欺之建議指引。

	<b>JIG – Ireland</b> 愛爾蘭聯合情報團體(JIG)	<p>A specific operational theme was established to deal with COVID-19 related crimes, including to monitor activity pertaining to certain businesses and commercial entities that were purported to be closed as result of the COVID-19 lockdown Government restrictions. 成立特別行動單位處理 COVID-19 相關犯罪，包括監控聲稱因 COVID-19 封城限制而倒閉的某些企業和商業實體相關之活動。</p>
	<b>Hong Kong FMLIT</b> 香港反詐騙及洗錢情報工作小組(FMLIT)	<p>FMLIT has implemented an Operation Priority "COVID-19 related Deception", which focuses on the following five areas: -          反詐騙及洗錢工作小組執行優先行動「COVID-19 相關騙局」，包括下列五種領域</p> <ul style="list-style-type: none"> <li>• Raising awareness – (The dissemination of Alerts for sharing of information and typologies related to fraud linked to COVID 19.) 喚起注意-(發送警示訊息以分享與 COVID-19 相關詐騙之資訊及類型。)</li> <li>• Case-based Intelligence Exchange during Operations Group Meetings – (Cases related to COIVD-19 deception and scams are tabled for discussion during Operations Group meeting to strengthen the detection capability.) 運作團體會議時交換案例之情報-(以與 COVID-19 相關之詐欺及詐騙案例作為運作團體會議之討論議題，以強化偵測能力。)</li> <li>• Situation Appraisal – (An information brief outlining COVID-19 related deception situation in Hong Kong was compiled by the Hong Kong Police.) 情境分析-(香港警方彙整香港與 COVID-19 相關之詐騙情境摘要)</li> <li>• Knowledge Sharing – (FMLIT members are invited to share their experience and good practice in response to COVID-19, either during thematic presentation or in the form of guidance papers.) 知識分享-(邀請香港反詐騙及洗錢情報工作小組成員透過專題演講或指引文件的方式，分享應對 COVID-19 之經驗及指引。)</li> <li>• Publicity – (Anti-scam messages and publicity campaigns through Police and various social media platforms.) 公開性-(反詐騙訊息及公開活動透過警方及各種社群媒體平台進行。)</li> </ul>
	<b>German AFCA</b> 德國防治金融犯罪聯盟	<p>AFCA published a common paper on financial crime threats and risks related to COVID-19 in Germany.          防治金融犯罪聯盟發表德國與 COVID-19 相關金融犯罪威脅及風險之報告。</p>
	<b>Austria APPPI</b> 奧地利公私部門合作倡議 (APPPI)	<p>The Austrian FIU established a new working group created to focus on COVID-19 specific threats, involving the Austrian Chamber of Commerce and the Austrian Financial Market Authority.          奧地利金融情報中心成立一個新的工作小組，著重於 COVID-19 之特定威脅，奧地利商會及奧地利金融市場管理局皆有參與。</p>

	<p><b>Fintell Alliance</b> - NL 荷蘭金融情報聯盟 (FA-NL)</p>	<p>Due to the COVID-10 pandemic, when physically co-location was not possible, operations through the Fintell Alliance have continued using secure online tools for communication. Based on inputs from public and private partners, the FIU-NL distributed an advisory with specific COVID-19 red flags, based on the experiences of relevant public agencies and private sector partners.</p> <p>因為 COVID-19 疫情，無法進行實體上之共同辦公，金融情報聯盟之運作但仍然透過安全的線上工具溝通以持續合作。基於公-私部門夥伴關係之努力，荷蘭金融情報中心已能根據相關政府機構及私部門之夥伴的經驗，發送具體 COVID-19 之紅旗指標建議。</p>
	<p><b>EFIPPP</b> 歐洲刑警組織 金融情報公私 合作夥伴關係</p>	<p>Europol has been monitoring the situation regarding COVID-19 in the following ways: 歐洲刑警組織已透過以下方式監控 COVID-19 之情況:</p> <ul style="list-style-type: none"> <li>• As an information hub; • 作為資訊中心；</li> <li>• Providing operational and investigational support in diverse areas, mainly online fraud, cybercrime, counterfeit goods and against attacks specifically to healthcare facilities; • 提供不同領域之運作及調查之支援，主要為線上詐欺、網路犯罪、仿冒商品以及專門針對醫療機構之攻擊；</li> <li>• Coordination of different prevention campaigns on social media addressed to the general public; and • 整合在社群媒體上向公眾之不同預防措施；以及</li> <li>• Europol Strategic and specific reporting on COVID-19 • 歐洲刑警組織之 COVID-19 之策略性專屬報告。</li> </ul> <p>The EFIPPP partnership organised an extraordinary meeting to present the outcomes of the newly established ad-hoc Working Group on COVID-19. The Working Group consisted of 18 volunteers coming from different members of the EFIPPP and was used to prioritise and identify the most relevant crime types. Then, the WG members collected case studies, available internal and external information, and selected volunteers to draft different factsheets with typologies and indicators. The prioritised crime areas are the following: misuse of public funds, sale of counterfeited goods, investment fraud, BEC and CEO fraud, facilitators and money mules, non-delivery fraud. This information was presented and discussed in May 2020 to a virtual extraordinary meeting of the EFIPPP.</p> <p>歐洲刑警組織金融情報公私部門合作夥伴關係組織了一個特別會議，介紹新成立之 COVID-19 工作小組之成果。該工作小組由 18 個來自於歐洲刑警組織金融情報公司合作夥伴關係成員自願組成，以決定優先性及辨識最相關之犯罪類型。接著，工作小組成員蒐集案例研究、內部提供或外部資訊，以及選任自願者起草不同態樣及指標之說明書。在具有優先性之犯罪領域如下:濫用公共資金、銷售仿冒商品、投資詐欺、商務電子郵件詐欺及網路電子郵件攻擊、錢騾、非交付型詐欺。本資訊於 2020 年 5 月之歐洲刑警組織金融情報公私部門合作關係之虛擬特別會議公開並討論。</p>
	<p><b>NZ-FCPN</b> 紐西蘭金融犯罪防治網</p>	<p>When the New Zealand Government introduced a wage subsidy for companies and workers financially effected by the COVID-19 lockdown, the NZFIU released guidance to the FCPN on specific indicators to identify fraudulent applications. As of 23 July 2020, this has resulted in over 267 SARs being submitted to the NZFIU, which in turn have been passed onto the investigation team responsible for triaging COVID-19 wage subsidy fraud.</p>



當紐西蘭政府提供因 COVID-19 疫情期間封城而受影響之公司及勞工工資補助時，紐西蘭金融情報中心向金融犯罪防制網公布關於識別詐欺之具體指標。截至 2020 年 7 月 23 日止，有超過 267 份之可疑交易報告提交給紐西蘭金融犯罪情報中心，這些報告又移交給負責 COVID-19 工資補貼款詐欺之特別調查小組。

## Chapter 3. 第三章

# The current scale of partnership activity and key topics affecting future growth

合作夥伴關係活動之當前規模及影響未來成長之關鍵主題

## 3.1. Understanding the current scale of partnership activity

### 3.1. 瞭解合作夥伴關係活動之目前規模

Despite promising indicators of impact, partnerships generally operate at small scale, including with regard to: 儘管合作夥伴關係有良好的影響指標，但通常還是以小規模之形式運作，包括：

- A limited operational bandwidth;
- 有限運作廣度；
- Small numbers of private sector members, relative to the number of entities that are regulated for AML/CFT purposes;
- 相較於因防制洗錢/打擊資恐之目的受到監管的實體數量而言，私部門成員數量較少；
- A general focus on retail banking, with limited reach into non-banking sectors; and
- 以基本的態度關注零售銀行業務，對非銀行部門的延伸有限；以及
- Limited public sector resourcing of partnership efforts.
- 公部門對合作夥伴關係提供有限的資源。

From the perspective of regulated entities, partnerships are currently constructed as voluntary, additional and parallel innovations to the principal obligations which arise from national AML/CFT regimes. From an investigative perspective, tactical-level partnerships generally deliver a specialist capability to advance highend, or particularly challenging, cases. Production rates for typologies are limited due to the reliance on volunteerism from the private sector to contribute to the process.

自受監管實體之觀點而言，合作夥伴關係目前被建構為對各國防制洗錢/打擊資恐制度首要義務之自願性、額外的以及平行的創新體。從調查的角度來看，戰術層面的合作夥伴關係基本上提供專業能力以推進高端或具有特殊挑戰性的案件。這種類型的生產率通常受限於依靠私部門對於此程序的貢獻之自願性。

Partly as a result of the current or recent ‘pilot’ nature of several of the partnerships, they typically suffer from limited direct public funding. Limited resources for partnerships reduce the ability to invest in technology, to expand the operational bandwidth and to develop co-location arrangements within partnerships. With the arguable exception of the UK and Australian partnerships, no partnership studied in this paper is resourced to provide a substantial, high-tempo or comprehensive response to the financial crime.

部分現有或近期的幾個「先驅」性質的合作夥伴關係，其基本上受到有限的公共基金挹注。合作夥伴關係的有限資源降低其投資科技之能力、擴張運作廣度以及與合作夥伴關係發展共同辦公之安排。除了英國和澳洲的合作夥伴關係外，本文所提到的任何合作夥伴關係都沒有資源可以對金融犯罪提供實質性、快速或是全面的反應。

However, it remains that, at current operational levels, partnerships have demonstrated:

然而，在目前營運程度上，合作夥伴關係已經證明以下：

- That benefits can be achieved with relatively limited public sector resources;
- 可以透過相對有限的公部門資源實現利益；
- In-person briefing formats can facilitate effective engagement, given a manageable operational tempo and number of personnel involved;
- 面對面的簡報方式可以促進有效的參與，提供可控制的運作節奏以及參與人員數量；
- In many jurisdictions, due to the concentration of the retail banking market, a large proportion of the producers of suspicious activity reports can be involved in ‘in-person’ partnership models; and

- 在許多司法管轄區，因為零售銀行市場的集中，有很大一部分的可疑活動報告之製作者得參與面對面的合作夥伴關係模式；以及
- There are security and information-control benefits of small groups, within a trusted network, processing only small flows of information.
- 小團體在信任網路裡僅處理小流量的資訊時，具有許多安全及資訊控制上之優勢。

Policymakers and leaders in the regulated sectors may wish to achieve a greater magnitude of law enforcement impact with the support of partnerships, or to use partnerships to develop both tactical and strategic intelligence at a higher tempo. They may also wish to support more regulated entities and sectors to contribute to and benefit from membership of partnerships. Such development opportunities may allow for real-time information exchange and move beyond partnership models that are characterised by manual and slow information transfer, low technology, limited bandwidth to process operational cases and limited engagement from regulated sectors outside retail banking.

受監管產業的政策制定者及領導者，可能希望在合作夥伴關係之支援下，實現對執法機關產生更大程度的影響，或者利用夥伴關係以更快的速度發展戰術及策略情報。其亦希望支援更多受監管實體及產業成為夥伴關係的成員資格，做出貢獻並從中受益。該發展機會能做到即時資訊交換，並超越以手動及緩慢傳輸資訊、低戰術、有限的寬度以處理操作案例，以及零售銀行以外之有限參與之受監管產業之合作夥伴模式。

Several partnerships have stated development ambitions to increase their scope, membership or capacity. In the survey responses and partnership descriptions, published in this paper, many partnerships have also created 'legal reform' or 'regulatory reform' working groups. Through these groups and broader policy-reform processes, innovation in partnership development is set to continue.

幾個合作夥伴關係已經表明擴大發展其範圍、成員及能力之野心。在本文發表之調查回覆及合作夥伴關係之描述中，許多合作夥伴關係還創建了「法律改革」或「監管改革」工作小組。透過這些團體及更廣泛之政策改革進程，合作夥伴關係之發展將繼續創新。

In a major report in 2019, the FFIS programme identified 11 development themes<sup>v</sup> for partnership leaders to consider in terms of enhancing the scale of their partnerships. The following section in this report highlights key topics that the FFIS programme will be exploring in 2020 and 2021, responding to the latest growth and innovation in partnerships around the world, as described in this study.

在 2019 年的一份重要報告中，FFIS 計劃確定了 11 個發展主題<sup>v</sup>，供合作夥伴關係之領導人在擴大合作規模方面考慮之。本報告之以下部分著重介紹 FFIS 計劃將在 2020 年和 2021 年所探索之關鍵主題，以回應本研究中所描述之全球合作夥伴關係之最新發展及創新。

## 3.2. Key topics relevant to the future growth of partnerships

### 3.2.合作夥伴關係未來成長之關鍵主題

Building on this survey of public-private financial information-sharing partnerships worldwide, the following key topics relevant to the future growth of partnership models have been identified by FFIS.

基於對全球公私部門金融資訊共享夥伴關係的調查，FFIS 確認了以下合作夥伴關係未來相關發展之關鍵主題：

Future FFIS research papers in this series will explore and analyse the following key issues relevant to partnership development:

未來 FFIS 在本系列之研究，將探討及分析以下與合作夥伴關係發展相關之關鍵問題：

- i. The adequacy of legal gateways for information-sharing and respective policy reform processes;  
資訊共享及相關政策改革進程的法律途徑是否充足；
- ii. How partnerships prioritise threats and how knowledge is exchanged between partnerships on specific threats;  
夥伴關係如何決定威脅的優先性以及和合作夥伴之間如何就特定威脅交換知識；
- iii. Opportunities to enhance the impact of partnership strategic intelligence products, including options for supervisory recognition of partnership strategic intelligence products;  
增強合作夥伴關係策略情報產物之影響之機會，包括監管機關得認可合作夥伴關係策略情報產物。
- iv. Partnerships status within mainstream AML/CFT supervision, including the implications of partnership membership from a supervisory perspective, the integration of priorities of partnerships in a riskbased approach and the potential implications of mandatory participation in partnership activities;  
防制洗錢/打擊資恐主流監管制度之合作夥伴關係狀態，包括從監管角度看合作夥伴關係成員之影響、基於風險為基礎導向合作夥伴關係優先性之整合，以及強制參與合作夥伴關係活動之潛在影響。
- v. The capacity for membership growth within partnerships and corresponding information-security considerations;  
合作夥伴關係中成員之能力成長以及相應之資訊安全考量；
- vi. The use of technology in partnerships, including privacy preserving analysis<sup>7</sup>;  
在合作夥伴關係中使用科技，包括隱私保存分析<sup>7</sup>。
- vii. Pathways to enhance the benefit of partnerships to other regulated entities, outside of partnership members;  
提供增強合作夥伴關係對成員以外的受監管實體之利益；
- viii. Managing risk-displacement brought about by partnerships to non-partnership members;  
管理合作夥伴關係給非合作夥伴關係成員帶來的風險轉移；
- ix. Measuring and evaluating the performance of partnerships;  
衡量並評估合作夥伴關係之績效；
- x. The link between public–private partnerships with private–private information sharing;  
公-私合作夥伴關係私人間之資訊共享連結；
- xi. Governance, accountability and transparency of partnerships; and

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<sup>7</sup> See the FFIS Innovation and discussion paper: "Case studies of the use of privacy preserving analysis to tackle financial crime" (June 2020) - <https://www.future-fis.com/thepep-project.html>  
請參閱 FFIS 創新和討論文件：“使用隱私保護分析解決金融犯罪的案例研究”（2020年6月）- <https://www.future-fis.com/thepep-project.html>

合作夥伴關係之治理、問責性以及透明度；以及

- xii. Cross border collaboration between public–private financial information sharing partnerships.  
公-私部門金融資訊共享合作夥伴關係之跨國協作。

The FFIS programme invites feedback and engagement on these topics by innovators and stakeholders in public–private financial information sharing partnerships, as well as other stakeholders and researchers, outside of partnerships.

FFIS 計劃向公-私部門金融資訊共享合作夥伴關係之創新者及利害關係人徵求回饋及參與這些主題，包括合作夥伴關係外之其他利害關係人、研究學者。

For any information related to this study or to contribute to the topics listed above, please email [admin@future-fis.com](mailto:admin@future-fis.com).

對本研究或提供以上所列主題之相關資訊，請 email 至：[admin@future-fis.com](mailto:admin@future-fis.com)。

# REFERENCE ANNEX: Public–private financial information sharing partnerships in June 2020

參考附錄：2020年6月公私金  
融資訊共享合作夥伴關係

# Europe 歐洲



- **Austrian Public–Private Partnership Initiative (APPPI)**  
奧地利公私部門合作倡議(APPPI)
- **Finnish AML/CFT Expert Working Group on a PPP basis**  
芬蘭基於 PPP 基礎之洗錢防制/打擊資恐專家團體
- **Germany Anti Financial Crime Alliance (AFCA)**  
德國防治金融犯罪聯盟(AFCA)
- **Joint Intelligence Group (JIG) Ireland**  
愛爾蘭聯合情報團體(JIG)
- **Latvia Cooperation Coordination Group (CCG)**  
拉脫維亞合作協調團體(CCG)
- **Lithuania - Centre of Excellence in Anti-Money Laundering**  
立陶宛-洗錢防制專門中心
- **The Swedish Anti-Money Laundering Intelligence Taskforce (SAMLIT)**  
瑞典洗錢防制情報工作小組(SAMLIT)
- **The Netherlands Terrorist Financing Taskforce (NL-TFTF)**  
荷蘭資恐工作小組(NL-TFTF)
- **The Netherlands Serious Crime Taskforce (NL-SCTF)**  
荷蘭重大犯罪工作小組(NL-SCTF)
- **The Netherlands Fintell Alliance (FA-NL)**  
荷蘭金融情報聯盟(FA-NL)



## Austria 奧地利

### The Austrian Public–Private Partnership Initiative (APPPI)

#### 奧地利公私部門合作倡議(APPPI)



**Launched:** September 2018

成立：2018 年 9 月

#### Summary:

##### 摘要

During the FATF Private Sector Consultative Forum in April 2018, initial talks between the Austrian FIU (A-FIU) and relevant private sector entities took place about establishing a public–private partnership for information sharing on strategic threats. Subsequently, the A-FIU invited some selected participants to a first informal meeting. The first initial workshop of this initiative took place on the 13 September 2018 at the FIU premises, with representation from financial institutions as well as of the chambers of lawyers and notaries.

在 2018 年 4 月舉行的 FATF 私部門協商論壇期間，奧地利金融情報中心 (A-FIU) 與相關私部門機構就建立公私部門合作夥伴關係，以共享戰略威脅資訊進行了初步會談。隨後，奧地利金融情報中心邀請了一些選定的參與者參加第一次非正式會議。該倡議的第一次初始討論於 2018 年 9 月 13 日在金融情報中心辦公室舉辦，金融機構、律師公會及公證人公會代表參加了此次討論。

A second meeting took place in December 2018 with an extended group of participants, including the Financial Market Authority as the AML supervisory body for the Austrian financial market. In that meeting an attempt was made to bring law enforcement experts and compliance officers from different fields and with different expertise together, raising understanding and thus creating awareness of each other's demands.

有更多的團體參加於 2018 年 12 月的第二次會議，其中包括奧地利金融市場防制洗錢監管機關之金融市場管理局。該次會議試圖將來自不同領域和不同專業知識的執法專家和法律遵循官員聚集在一起，以增進了解，從而提高對彼此需求的認識。

In June 2019, a third meeting took place whereas the group was further extended to another sector, the gambling industry. At this third meeting, the partners agreed on the final version of a concept paper, which outlines each members' commitment to the initiative, and explains its purpose and aim.

2019 年 6 月舉行了第三次會議，而該小組進一步擴展到另一個領域，即賭博業。在第三次會議上，合作夥伴關係就概念文件的最終版本達成了共識，其中概述了每個成員對倡議的承諾並解釋其目的及目標。

The fourth meeting took place in November 2019, during which new members were invited, included consulting companies, law offices, the Federal Ministry of Finance, the Austrian Sports Betting Association and a sports betting company.

第四次會議於 2019 年 11 月舉行，會議期間邀請了新成員，包括顧問公司、律師事務所、聯邦財政部、奧地利運動賭博協會及一家運動賭博公司。

The Austrian Public–Private Partnership Initiative (APPPI) is now firmly established and delivering on a collectively developed workplan. To date APPPI is progressing on 36 collective actions, with several working groups each working on different matters.

奧地利公私部門合作倡議(APPPI)現已確實地成立，並且實施共同制定的工作計劃。迄今為止，奧地利公私部門合作倡議正在推進 36 項集體行動，並透過多個工作小組分別處理不同的問題。

**Format:**

**形式**

The APPPI convenes through expert meetings and project workshops. Up to June 2020, four APPPI meetings have taken place and the next meeting will be in the autumn of 2020.

奧地利公私部門合作倡議(APPPI)透過專家會議及專案工作坊。截至 2020 年 6 月為止，舉辦了四次奧地利公私部門合作倡議會會議，下次會議預訂於 2020 年秋天舉行。

**Membership:**

**成員：**

Austrian FIU, supervisory bodies and reporting entities from different sectors.

奧地利金融資訊中心、監管主體以及不同產業的報告機構。

**Priorities:**

**優先事項：**

In line with a RUSI study on 'The Role of Financial Information-Sharing Partnerships in the Disruption of Crime', all APPPI members agreed on five guiding principles, which are essential to maintain and develop the initiative: 根據皇家聯合研究所(RUSI)關於「金融資訊共享夥伴關係在打擊犯罪之作用」之研究中，所有奧地利公-私部門合作倡議之成員皆同意五項指導原則，這些原則對於維持及發展該倡議至關重要：

- 1) Leadership and trust;  
領導及信任；
- 2) Legislative clarity;  
明確的立法；
- 3) Governance;  
治理；
- 4) Technology and analytical capability; and  
科技及分析能力；以及
- 5) Adaptation and evolution.  
適應及進化。

In the June 2019 APPPI meeting, one or more recommendations emerged out of each principle and one or more actions plans were allocated to each of the recommendations.

在 2019 年 6 月的奧地利公-私部門合作倡議會會議上，針對每項原則派生了一項或多項建議，並為每項建議分配了一項或多項行動計劃。

**Resources:**

**資源**

No dedicated funding is available to the partnership.

該合作夥伴關係並無特別的資金來源。

**Performance indicators:**

## 表現績效：

Acknowledging the recent nature of the APPPI, the A-FIU monitors performance by tracking the number typologies, early warning notifications, guidance information, and thematic trend reports shared through APPPI as well as the content and participants in respective APPPI meetings. The partnership is considering how to measure the impact of information shared.

承認奧地利公私部門合作倡議近期之性質，奧地利金融情報中心透過追蹤奧地利金融情報中心所共享之數字類型、早期預警通知、指引資訊及主題性的趨勢報告，以及各自奧地利公私部門合作倡議會議之內容及參與者監控績效表現。該夥伴關係正在考慮如何評價共享資訊之影響。

## Distinctive characteristics:

### 特點：

Initial key conclusions of the APPPI include:

奧地利公私部門合作倡議初步關鍵結論包括：

- **Supervisory engagement.** The involvement the supervisory authority is believed to be an important foundation for the success of the partnership;  
**監管機關的參與**- 監管機關的參與被認為是合作夥伴關係成功的重要基礎；
- **Breadth of membership.** The inclusion of multiple sectors and types of entities in APPPI supports the opportunity for effective information-sharing; and  
**成員的廣泛性**- 奧地利公-私部門合作倡議中包含多個部門及實體類型，提供有效的資訊共享機會；
- **Skills and knowledge exchange.** Partnership meetings includes exercises to encourage exchange of skills and knowledge between law enforcement and compliance officers.  
**技能及知識交流**- 合作夥伴關係會議包括鼓勵執法人員及法令遵循人員間技能及知識之交流。

## COVID-19 adaption:

### COVID-19 之因應：

The Austrian FIU has engaged with different stakeholders to work on new emerging trends related to COVID19. During the talks with the Austrian Chamber of Commerce and the Austrian Financial Market Authority a new working group was established to take concrete actions against COVID-19 specific threats.

奧地利金融情報中心與不同利害關係者合作，研究與 COVID-19 相關之趨勢。與奧地利商會及奧地利金融市場管理局之會談期間，新的工作小組被成立，並針對 COVID-19 之特定威脅採取具體行動。

## Finland 芬蘭

### Finnish AML/CFT expert working group

芬蘭洗錢防制/打擊資恐專家團體

Established: 23 June 2020

成立：2020 年 6 月 30 日



## Objectives:

目標

The objectives of the Finnish AML/CFT expert working group are:

芬蘭洗錢防制/打擊資恐專家團體之目標為：

- To further support risk understanding in reporting entities;  
進一步提供報告實體之風險認識；
- To further enhance monitoring mechanisms, red flags and mitigating measures; and  
進一步加強監測機制、紅旗警示以及改善辦法；以及
- To facilitate the information exchange between and amongst reporting entities and between reporting entities and authorities, including enhanced feedback on the quality of Suspicious Transaction Reporting.  
促進報告實體間以及報告實體與主管機關間之資訊交流，包括加強對可疑交易報告品質之回饋。

**Threats addressed:**

針對之威脅：

All predicate crime, money laundering and terrorist financing cases can be addressed by the working group.  
所有工作小組針對可預測之犯罪、洗錢以及資恐案件。

**Membership:**

成員：

As at June 2020, the partnership consists of 20 members from financial institutions and the gambling sector, the FIU, the National Bureau of Investigation (NBI) and Finance Finland (FFI).

截至 2020 年 6 月，該合作夥伴關係由來自金融機構和賭博產業、金融情報中心、國家調查局 (NBI) 和芬蘭金融局 (FFI) 之 20 名成員組成。

**Format:**

形式

The Finnish AML/CFT expert working group operates at the strategic-level of threat information sharing, with meetings convened every two months and chaired by the FIU. Each meeting focuses on a specific financial crime theme.

芬蘭洗錢防制/打擊資恐專家團體運作於威脅資訊共享之策略層面，每兩個月召開一次會議，由金融情報中心主持。每次會議都著重於一個特定的金融犯罪主題。

Supervisory authorities and ministries participate in planning the meetings to support the selection of discussion topics and, also, take part as advisors and experts to the work when the agenda of the meeting requires their input.

監管機關及行政機關參與規劃會議以協助討論主題的選擇，並在會議議程需要他們提供意見時作為顧問和專家參與工作。

The main contents and outcomes of the meetings are disseminated to other reporting entities, i.e. those that do not participate in meetings directly.

會議的主要內容及成果會提供給其他報告實體，例如未直接參加會議之報告實體。

**Resources:**

資源：

No dedicated resourcing is available to the partnership. Activity is resourced out of existing budgets (FIU resources and on voluntary basis from reporting entities).

並無特定資金提供該合作夥伴關係。活動之資金來自於現有之預算（以金融情報中心之資源以及報告實體之自願提供為基礎）。

#### Record of outputs / Performance metrics:

工作成果/表現績效：

It is expected that the first meeting of the Finnish AML/CFT expert working group will be held in August 2020. The workplan envisages that the partnership will produce meeting summaries; information bulletins to reporting entities of the main outcomes; streaming engagement opportunities on expert hearings; and regular reports to relevant authorities.

芬蘭洗錢防制/打擊資恐專家團體第一次會議預計將於 2020 年 8 月舉行。工作計劃假設共享夥伴關係將製作會議摘要、資訊要點，向報告實體通報主要結果；在專家聽證會報告參與機會；並定期向相關主管機關報告。

## Germany

### 德國

## Anti-Financial Crime Alliance (AFCA)

### 德國防治金融犯罪聯盟(AFCA)



**Established:** September 2019

成立：2019 年 9 月

#### Summary:

摘要：

On 24 September 2019, the German Financial Intelligence Unit (FIU), the Federal Financial Supervisory Authority (BaFin), and the Federal Criminal Police Office (BKA) together with representatives of 15 German banks founded a public-private partnership (PPP) named the 'Anti Financial Crime Alliance' (AFCA). AFCA's objective is to establish a permanent platform for strategic cooperation in the fight against money laundering and terrorist financing in Germany.

2019 年 9 月 24 日，德國金融情報中心 (FIU)、聯邦金融監管局 (BaFin) 和聯邦刑事警察局 (BKA) 與 15 家德國的銀行代表共同成立了公私部門合作夥伴關係 (PPP)，命名為「防治金融犯罪聯盟」(AFCA)。防治金融犯罪聯盟的目標是為德國防制洗錢及打擊資恐的策略合作建立永久性平台。

#### Objectives:

目標

- Long-term strategic cooperation between public authorities and those obliged to combat money laundering and terrorist financing;  
政府機構與負有防制洗錢及打擊資恐義務的機構間之長期策略合作；
- Members use their respective strengths to achieve results and benefit from each members' respective skills and experience as part of long-term cooperation; and

成員利用各自的優勢取得成果，並從各成員各自的技能及經驗中受益作為長期合作之一部分；及

- The alliance supports active exchange of information related to financial crime phenomena, typologies and, where possible, entities.

該聯盟支持關於金融犯罪現象、類型以及在可能的情形下，包括實體相關訊息的積極資訊交換。

#### **Threats addressed:**

##### **針對之威脅**

The following threats are currently addressed by AFCA:

以下為 AFCA 目前針對之威脅：

- Risks related to the misuse of shell companies;  
與濫用空殼公司相關的風險；
- Human trafficking and child sexual abuse;  
人口販運及兒童性剝削；
- Risks stemming from Crypto Currencies;  
來自於加密貨幣的風險；
- Risks stemming from money service business providers and FinTechs;  
來自於貨幣服務事業提供者以及金融科技的風險
- Financial crime typologies and threats ensuing from the COVID-19 Pandemic;  
COVID-19 疫情所帶來的金融犯罪類型及威脅；
- Significant financial crime events (examining the exposure that Germany had to the Laundromats schemes); and  
重大金融犯罪事件(檢驗德國對洗錢工具之曝險)；以及
- Additional working groups covering topics of tax evasion; real estate and gambling (currently at initial stages).  
涵蓋逃稅、不動產以及賭博主題（目前仍處於初始階段）之其他工作小組。

#### **Format:**

##### **形式**

The Anti Financial Crime Alliance is composed of four bodies: Board, Management Office, Expert Group and the Working Groups.

防制金融犯罪聯盟由以下四個組織組成：董事會、管理辦公室、專家團體以及工作小組。

The AFCA Board is equally represented by three members of the private sector (Commerzbank AG, HSBC Trinkaus & Burkhardt AG and DZ Bank) and three members of the public sector (FIU, BaFin and the Federal Criminal Police Office (BKA)). Its members define AFCA's strategic objectives, performance indicators and subsequent evaluation and meet quarterly.

防制金融犯罪聯盟董事會公平的由三個私部門成員代表（Commerzbank AG, HSBC Trinkaus & Burkhardt AG 及 DZ Bank）以及三個公部門成員（德國金融情報中心、聯邦金融監管局和聯邦刑事警察局）。該成員定義了防制金融犯罪聯盟之策略目標、績效指標以及後續評估，且每季進行會議。

The Management Office provides support to the Board members and facilitates the communication between AFCA bodies and relevant stakeholders. It has an overseeing function, while also participating in the expert meetings and acting as an interface between the Board, Expert Group and the working groups.

The Expert Group is composed of obliged entities under the AML legislation and is chaired by a private sector entity.

管理辦公室支援董事會成員，並促進防制金融犯罪聯盟及相關利害關係人間之溝通。它具有監督職能，同時也參與專家會議並作為董事會、專家團體及工作小組間之連結。  
專家團體由法律規定的防制洗錢義務實體組成，並由私部門機構擔任主席。

The AFCA Working Groups are comprised of participants from all AFCA Members based on the respective working topic. There are currently two Working Groups, as follows:

防制金融犯罪聯盟工作小組由所有防制金融犯罪聯盟成員根據個別之工作主題所組成，目前有兩個工作小組如下：

1. The first working group led by HSBC & the FIU deals with governance matters (incl. exchange of information; future development and processes for sharing of typologies).  
第一個工作小組由 HSBC 及金融情報中心處理治理事務(包括資訊交換、未來發展及處理類型化之分享)。
2. Commerzbank AG, together with BaFin is co-leading the second working group on typologies. The members of the working group hold bi-weekly conference calls, whereby specific risk indicators, typologies and mitigation measures are discussed, while only exchanging strategic information.  
Commerzbank AG 及聯邦金融監管局共同在類型化上主導第二个工作小組。此工作小組成員每二週進行一次電話會議，討論特定風險指標、類型化以及抵減作法，僅交換策略資訊。

#### Membership:

##### 成員：

On part of the public sector, the following institutions are involved: the German FIU, the Federal Financial Supervisory Authority (BaFin) and the Federal Criminal Police Office (BKA)). The private sector comprises representatives from 15 financial institutions.

在公部門方面，包含以下機構：德國金融情報中心、聯邦金融監管局 (BaFin) 和聯邦刑事警察局 (BKA)。私部門由 15 個金融機構代表組成。

#### Record of outputs / Performance metrics:

##### 工作成果/表現績效：

Working Group 2 has recorded the following outputs in Q1 and Q2 2020. Since no formal evaluation has taken place at this time of this research paper, no information regarding the performance metrics is able to be provided.

第 2 工作小組在 2020 年第一季及第二季記錄了以下成果。由於本研究論文此時尚未進行正式評估，因此無法提供相關績效指標之資訊。

Outputs from Working Group 2 on Typologies 第 2 工作小組產出之類型	
Work stream on Emerging Risks 新興風險工作流程	<ul style="list-style-type: none"> <li>- Ad-hoc development and publication of typology paper (presentation) on current threats and financial crime risks related to COVID-19); and 現行與 COVID-19 相關威脅及金融犯罪風險類型化之論文 (報告) 之非常態發展及出版；以及</li> <li>- Exchange of typologies and risk indicators on Virtual Currencies, as well as creation of a common Search terms list for identification of transactions with relevance to crypto currencies. 交換虛擬貨幣之類型及風險指標，以及建立通用檢索字詞列表以識別與加密貨幣相關之交易。</li> </ul>

<p>Work stream on “Laundromats” 「洗錢工具」工作流程</p>	<ul style="list-style-type: none"> <li>- Deep-dive into the topic of misuse of corporate vehicles and relevant mitigation measures implemented by the banks, i.e. shell company identification tools; and 深入探討濫用公司之形式以及銀行採行之相關抵減措施；例如空殼公司之身分工具；以及</li> <li>- Completion of an Indicator Survey on most frequently observed financial crime patterns related to the Troika, Russian and Azerbaijani Laundromats. 完成關於 Troika、俄羅斯以及亞塞拜然洗錢工具之最常見金融犯罪模式之指標調查。</li> </ul>
<p>Work stream covering human trafficking and child exploitation 涵蓋人口販運及兒童剝削之工作流程</p>	<ul style="list-style-type: none"> <li>- Gathering and identifying location-based indicators; 蒐集及識別以地點為基礎之指標。 Identification of 600 international corridors as a basis for identifying high risk corridors for human trafficking and child sexual exploitation; and 識別出 600 個作為從事高風險人口販運及兒童性剝削之國際通道。  Establishing high-risk country lists and high-risk industry lists for KYC purposes. 為 KYC 目的發展高風險國家清單及高風險產業清單。</li> <li>- A number of project-relevant SARs have been filed. 提出可疑交易報告之計劃。</li> </ul>

**COVID-19 adaptation:  
COVID-19 之因應：**

During the early stages of the COVID-19 pandemic, the AFCA members recognised the important impact it could potentially have on the financial-crime landscape internationally and in Germany. In the framework of Working Group 2, the members gathered relevant know-how and observations and published a common paper on financial crime threats and risks related to COVID-19.

在 COVID-19 疫情初期，德國防制金融犯罪聯盟成員認識到疫情可能會對國際及德國之金融犯罪型態產生重要影響。在第 2 工作小組之框架內，成員們蒐集了相關的專業知識及觀察，並發表了一份關於 COVID-19 相關之金融犯罪威脅及風險之共同論文。

The development of the pandemic had little effect on the collaboration and information sharing within the Alliance. Due to the fact that the majority of meetings prior to the outbreak of the pandemic were taking place virtually, the Members already had strong operational readiness and information sharing channels in place.

疫情的發展對聯盟內部的合作和資訊共享影響不大。由於疫情爆發之前，大多數的會議都是透過虛擬方式舉行，因此成員們已經具備了強大的營運準備和資訊共享管道。

## Republic of Ireland

### 愛爾蘭共和國

## Joint Intelligence Group (JIG) Ireland

### 愛爾蘭聯合情報團體(JIG)

Established: June 2017

成立：2017 年 6 月





## Overview:

### 概覽：

This partnership between key financial services sector representatives and the Financial Intelligence Unit (FIU) of the Garda National Economic Crime Bureau, *An Garda Síochána* (national police) has been established to facilitate the collective and proactive sharing of intelligence to assist and support *An Garda Síochána* in the investigation, prosecution and prevention of serious and organised crime.

金融服務部門之關鍵代表，及來自國家警方(*An Garda Síochána*)之愛爾蘭經濟犯罪局(Garda National Economic Crime Bureau)的金融情報中心(FIU)間之夥伴關係已經建立，以促進集體和積極的情報共享，以在調查、起訴和預防重大組織犯罪方面，協助及支持國家警方(*An Garda Síochána*)。

The partnership provides a channel through which the FIU can provide pertinent information to financial services sector members to enable the members to be alert to typologies and activities, conduct intelligence led investigations and facilitate reporting as appropriate which will inform the prosecution and disruption of serious and organised crime. The 'JIG' priorities are driven by an understanding and assessment of the main threats identified in the Department of Finance National Risk Assessment (NRA) for Ireland.

該夥伴關係提供金融情報中心向金融服務部門成員提供相關情報之管道，使成員能夠對類型及活動保持警戒、依照情報進行調查，並且在適合時間將報告提交檢察機關，以瓦解重大組織犯罪。愛爾蘭金融情報團體之優先性係由對愛爾蘭財政部國家風險評估(NRA)中辨識之主要威脅之瞭解及審核所驅動。

## Objectives:

### 目標

- **Operationally** – enhance collective anti-money laundering detection capability and generate increased prevention and disruption opportunities relating to money laundering and terrorist financing activity in the Republic of Ireland;  
在操作上加強集體防制洗錢偵測能力，並增加預防及破壞愛爾蘭共和國洗錢及資恐活動相關機會；
- **Strategically** – increase the Republic of Ireland's resilience to serious and organised crime and continuously improve its reputation in this regard; and  
在策略上加強愛爾蘭共和國對重大組織犯罪之防禦能力，並且持續增強在此方面之聲譽；
- **Developmentally** – create a more sophisticated, collective Republic of Ireland response to money laundering and terrorist financing, driven by better informed FIU and financial services sector staff; this will enhance the quality of financial crime related information that is provided to relevant law enforcement agencies and inform the prosecution and disruption of Money Laundering.  
在發展上-透過金融情報中心及金融服務部門人員更好的推動，創造愛爾蘭共和國對洗錢及資恐更複雜、集體性之反應；加強提供給相關執法機關、檢察機關之金融犯罪相關資訊的品質以防制洗錢。

## Threats addressed:

### 針對之威脅：

The JIG currently has four priority areas of focus:

愛爾蘭聯合情報團體目前有四大優先專注領域：

- Tackling the laundering of the proceeds of human trafficking;  
解決人口販運之洗錢問題；
- Tackling the laundering of the proceeds of organised crime and drug trafficking;  
解決組織犯罪及毒品走私之洗錢問題；

- Tackling terrorist financing, which includes a focus on foreign terrorist fighters, international money flows that support terrorist funding and financing of the recruitment of terrorists; and 打擊資恐，包括關注外國恐怖份子、資助恐怖主義之國際資金流動及資助招募恐怖份子；以及
- COVID-19 related financial crimes, as a new operational theme in 2020. COVID-19 相關金融犯罪為 2020 年新的運作主題。

#### **Membership:**

##### **成員：**

The JIG comprises the following members: Head of FIU *An Garda Síochána* (Chair), Banking Payments Federation (co-chair & executive support), five retail banks participate and one MSB. Senior level support and attendance is a prerequisite.

愛爾蘭聯合情報團體由以下成員組成：金融情報中心主持單位國家警方(*An Garda Síochána*) (主席)、銀行支付聯盟 (聯席主席和執行協助)、五家零售銀行之參與者及一個貨幣服務業(MSB)。資深階層的支持以及參與是先決條件。

#### **Format:**

##### **形式：**

The JIG formally is convened on a bi-monthly basis to support tactical level exchanges. Ad-hoc or Emergency meetings can be called by the Chairman if/as required. Meetings are supported by intelligence briefings on investigations by the Chairman and his/her Garda colleagues to facilitate the financial services sector members to conduct investigations of their exposure and relevance to this intelligence. The results of these intelligence led investigations are provided to the Garda National Economic Crime Bureau.

愛爾蘭聯合情報團體每兩個月召開一次，以提供戰術層面之交流。主席可以在需要時召集臨時或緊急會議。會議由主席及/或其國家警方之同事提供調查簡報，以促進金融服務部門成員對其曝險以及相關之情報進行調查。這些情報調查的結果將提供給國家警方經濟犯罪局。

#### **COVID-19 adaptation:**

##### **COVID-19 之因應**

A specific operational theme was established to deal with COVID-19 related crimes, in particular pertaining to certain businesses and commercial entities that were purported to be closed as result of the COVID-19 lockdown Government restrictions.

建立特別行動主題處理 COVID-19 相關犯罪，特別是關於聲稱因 COVID-19 封城而倒閉的某些企業和商業實體。

## Latvia

### 拉脫維亞

## Latvia Cooperation Coordination Group (CCG)

### 拉脫維亞合作協調團體(CCG)



**Established:** 9 May 2018

**成立：**2018年5月9日

#### **Objectives:**

**目標：**

CCG meetings have three broad types, with specific purposes, as follows:

拉脫維亞合作協調團體會議分為三類，具體目的如下：

- CCG meetings in operational cases: to discuss and exchange information on operational issues for the effective prevention or investigation of a specific (potential) criminal offense.
- 拉脫維亞合作協調團體會議之運作案例：討論及交換有效預防或調查特定（或潛在）刑事犯罪的運作議題之資訊。
- CCG feedback meetings: the FIU Latvia provides obliged entities or supervisory and control authorities with feedback on the submission of STRs, indicating both technical and substantive deficiencies (if any) in the reports.
- 拉脫維亞合作協調團體回饋會議：拉脫維亞金融情報中心向義務實體或監管機關以及主管機關提供關於提交可疑交易報告之回饋，指出提交報告中之戰術及(如有之)實質缺陷。
- Other types of CCG meetings: exchange of information on strategic issues as well as other issues aimed at facilitating the effective fulfilment of the regulatory obligations (e.g., ML/TF/PF risk indicators and typologies, interpretation of legislation, security of information exchange, development of ML/TF/PF risk assessments).
- 其他種類的拉脫維亞合作協調團體會議：就策略議題之資訊交換以及其他旨在促進有效滿足監管義務的議題（例如洗錢/資恐/資助武擴風險指標及類型化、立法解釋、資訊交換安全、洗錢/資恐/資助武擴風險評估之發展）

#### **Threats addressed:**

**針對之威脅：**

Money laundering, financing of terrorism and proliferation, attempts to commit such criminal offences and any other related criminal offenses and suspicious transactions.

洗錢、資助恐怖主義及武器擴散，意圖進行該等犯罪以及任何其他相關之刑事犯罪及可疑交易。

#### **Membership:**

**成員：**

The FIU; bodies performing criminal intelligence (e.g. State Police); investigating institutions (e.g. State Police or Corruption Prevention and Combating Bureau); the Prosecutor's Office; the State Revenue Service; and obliged entities under the AML/CFT/CFP Law (e.g. banks, sworn advocates, consumer creditors etc.). Supervisory and control institutions may be invited as well. In practice, the composition of each CCG meeting

is different, depending on the issue to be discussed, information to be shared and the purpose of the meeting itself.

金融情報中心、執行刑事情報機構（例如國家警方）、調查機構（例如，國家警方、預防及打擊貪腐局）、檢察署、國家稅務局；以及防制洗錢、打擊資恐、反資助武擴法律規定之義務實體（例如，銀行、律師、借貸公司等）。監理機關及監督機關可能也會被邀請。在實務上，依據討論主題、分享的資訊以及會議之目的，每次參與合作協調團體會議之成員都不同。

**Format:**

形式：

CCG is a partnership that supports both tactical exchanges and strategic intelligence co-development. The CCG meetings are convened by the FIU of its own initiative or if suggested by at least one of the involved institutions. Within the FIU Latvia, a specific division was established in 2019 entrusted with the performance of the CCG function – the Cooperation Coordination Division of the FIU Latvia. CCG meetings can be convened in a matter of hours at which concrete criminal intelligence files or criminal cases may be examined. Such responsiveness and timeliness is believed to support the effectiveness of the CCG as tool of cooperation between the FIU, law enforcement agencies and obliged entities for the needs of combating ML/TF/PF.

合作協調團體為提供戰術交流及策略情報共同發展之夥伴關係。合作協調會議由金融情報中心主動召開，或至少依照一個相關機構之建議召開。在拉脫維亞金融情報中心內部，於2019年成立一個負責履行合作協調團體功能之專責單位—拉脫維亞金融情報中心合作協調部。合作協調會議可以在數小時內召開，以審查具體刑事情報檔案或刑事案件。這種反應能力以及即時性，相信可以使合作協調團體有效作為金融情報中心、執法機關以及義務實體間之合作工具，以滿足打擊洗錢/資恐/資助武擴的需要。

**Resources:**

資源：

No dedicated public funding. CCG partners resource their engagement out of existing budgets.

沒有專門的公共資金。合作協調組織夥伴從現有的預算中獲取資金。

**Record of outputs (2019):**

工作成果(2019年)

In 2019 (after establishment of Cooperation Coordination Division in the FIU Latvia), the FIU Latvia organised 107 CCG meetings, comprised of:

於2019年(設立拉脫維亞金融情報中心合作協調部後)，拉脫維亞金融情報中心組織107個合作協調團體會議，包括：

- 58 CCG meetings in operational cases;  
58次合作協調團體運作會議；
- 17 CCG feedback meetings; and  
17次合作協調團體回饋會議；及
- 32 other types CCG meetings.  
32次其他種類的合作協調團體會議。

The initiator of each meeting in 2019, is recorded as follows:

2019年各次會議之發起人，紀錄如下：

- 67 CCG meetings initiated by the FIU Latvia;  
67 次合作協調團體會議由拉脫維亞金融情報中心發起；
- 25 CCG meetings initiated by the involved institutions; and  
25 次合作協調團體會議由參與的機構發起；以及
- 15 CCG meetings initiated by obliged entities.  
15 次合作協調會議由義務實體發起。

#### COVID-19 adaptation:

#### COVID-19 之因應：

CCG has adapted to COVID-19 disruption. The number of CCG meetings has decreased, but, in cases of necessity, CCG was convened through virtual CCG meetings. CCG virtual meetings varied in terms of the number of participants: from a very limited number of members for operational needs, to larger membership to discuss ML/TF risk assessments with the supervisory and control institutions. Specific COVID-19-related ML threats and actual cases of suspicious transaction have been addressed in specific virtual CCG meetings.

合作協調團體已經因應了 COVID-19 造成的中斷。合作協調團體會議的數量有所減少，但於必要時，合作協調團體透過虛擬合作協調團體會議召開。合作協調團體虛擬會議在參與者數量方面有所不同：從非常有限，僅足以滿足營運需求之成員數量，到與監管機關討論洗錢/資恐風險評估之更多成員數量。特定的虛擬合作協調團體會議已解決與 COVID-19 相關之特定洗錢威脅及可疑交易之實際案例。

## Lithuania

### 立陶宛

#### Lithuania - Centre of Excellence in Anti-Money Laundering

#### 立陶宛洗錢防制專門中心

**Established:** (Currently in preparatory stages)

**成立:** (目前還在籌備階段)

#### Summary:

摘要：

The establishment of the Centre of Excellence in Anti-Money Laundering is in its initial stages. It is currently being designed as a distinct legal entity, with the Bank of Lithuania, the Ministry of Finance and commercial banks as founders. The centre was established due to a combination of factors, including the widespread use of modern technologies that are changing the face of the financial sector, recommendations of international organisations (International Monetary Fund, European Commission, Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL)) and the goal to implement the best and most effective AML practices in Lithuania.

洗錢防制專門中心的成立仍在初始階段。目前被設計為一個單獨的法律實體，由立陶宛銀行、財政部及商業銀行所創立。該中心之成立是由於多種因素，包括現今科技之廣泛運用改變金融產業的面貌、國際組織的建議（國際貨幣基金、歐洲聯盟理事會、評估防制洗錢措施及資助恐怖主義專家委員會（MONEYVAL））以及在立陶宛實施最佳及最有效防制洗錢措施之目標。

#### Objectives:



## 目標：

The AML Centre of Excellence objectives are to:

洗錢防制專門中心之目標為：

- Share information on the ML/TF typologies and set up a dedicated information exchange platform;  
共享有關洗錢及資恐類型化之資訊並建立專門之資訊交換平台；
- Carry out research, assessments and analyses, prepare summaries, guidelines, recommendations, methodologies and legislative initiatives to improve the AML/CFT framework in Lithuania;  
從事研究、評估及分析，準備摘要、指南、建議、方法及立法方向，以改進立陶宛的防制洗錢/打擊資恐框架；
- Assist private sector entities in conducting internal risk assessments;  
協助私部門實體進行內部風險評估；
- Strengthen the competence of public and private sector staff in the AML/CFT field, organise various related events, including trainings, seminars and conferences; and  
加強公部門及私部門員工防制洗錢/打擊資恐領域之能力，組織各種相關活動，包括培訓、研討會及會議；以及
- Publish information on cooperation and implementation of AML/CFT measures.  
發布有關合作及實施防制洗錢/打擊資恐措施之資訊。

## Membership:

### 成員：

The partnership includes the Bank of Lithuania, the Ministry of Finance of the Republic of Lithuania as well as commercial banks operating in the country. The Financial Crime Investigation Service, the Police Department, the State Tax Inspectorate and the Prosecutor General's Office are also expected to take part in the activities of the centre.

該夥伴關係包括立陶宛銀行、立陶宛共和國財政部以及在該國經營的商業銀行。金融犯罪調查處、警察局、國家稅務監察局和檢察長辦公室也將參與該中心的活動。

## Format

### 形式

Normal operating rhythms have not been established at the time of submission for this paper. It is planned that members will meet every two weeks, but enabling the participants to schedule the meetings in ad hoc cases. 在提交本報告時，尚未建立正常的運作節奏。預計成員將兩週會議一次，但允許參加者臨時安排會議。

Threat prioritisation will be developed in consultation with the FIU of Lithuania.

將與立陶宛金融情報中心協商決定威脅之優先次序。

Information sharing will take place at a strategic intelligence level and at a level of information about legal entities, which are not subject to national data protection requirements.

資訊共享在策略情報層次及與法人實體資訊之層次進行，不受國家資料保護要求之約束。

## Future development:

### 未來發展

The Centre will consider options for amendment of the legislation to include possibility to exchange personal data within the activities of the Centre.

該中心將考慮修法，將可能之個人資料交換包含在該中心業務範圍之內。

## Sweden

### 瑞典

## The Swedish Anti-Money Laundering Intelligence Taskforce (SAMLIT)

### 瑞典洗錢防制情報工作小組(SAMLIT)



#### Overview:

##### 概覽

The Swedish Anti-Money Laundering Intelligence Taskforce (SAMLIT) has been established as a public–private partnership with the objective of enabling improved effectiveness in the sharing of intelligence between several banks in Sweden and the National Police Authority (NPA) to support the detection, protection and disruption of money laundering and terrorist financing.

瑞典洗錢防制情報工作小組(SAMLIT)為已成立之公私部門夥伴關係，其目標是提高瑞典多家銀行與國家警察署(NPA)間情報共享之效率，以協助偵查、防禦及打擊洗錢和資恐。

#### Objectives:

##### 目標

The primary objectives of SAMLIT are to:

瑞典洗錢防制情報工作小組之主要目標為：

- Strengthen the banking sector in their cooperation with the NPA in line with regulatory requirements and improve the collective understanding of the money laundering / terrorist financing threats (Detect);  
加強銀行部門與國家警察署的合作，以符合監管機關之要求，並提高對洗錢/資恐威脅之集體瞭解（偵測）；
- Improve prioritisation of identified risks based on the cooperation and inform the banking sector how to strengthen systems and controls (Protect); and  
合作改進確立已識別風險之優先性的過程，並通知銀行部門如何加強系統及控制（保護）；以及
- Disrupt money laundering activity and allow law enforcement to establish a comprehensive understanding of financial information relating to a case (Disrupt).  
打擊洗錢活動並使執法部門全面瞭解與案件相關之財務資訊（打擊）。

**Threats addressed:** SAMLIT has been established to tackle the following key threats:

**針對之威脅：**瑞典洗錢防制情報工作小組之設立是為了應對以下主要威脅：

- Organised and complex money laundering networks; and  
有組織及複雜之洗錢網路；以及
- Active terrorist financing networks  
積極的資恐網路。

**Format:** SAMLIT provides a tactical and strategic level of information sharing and operates across three tiers:

形式：瑞典洗錢防制情報工作小組提供戰術及策略層級之資訊共享，並跨過三個層級運作：

- Steering Committee – Responsible for the prioritisation and oversight of SAMLIT activities.  
指導委員會-負責瑞典洗錢防制情報工作小組活動之優先次序及監督。
- Operations Committee – Responsible for the identification of current and emergent money laundering and terrorist financing threats & themes. Management of Operational Intelligence group activities.  
運作委員會-負責識別當前緊急之洗錢及資恐威脅及主題。管理運作情報小組活動。
- Operational Intelligence Group – Responsible for investigating / providing assessments on money laundering and terrorist financing cases raised within the SAMLIT forum. This forum is held every two weeks.  
運作情報小組-負責對瑞典洗錢防制情報工作小組論壇內所提出之洗錢及資恐案件進行調查/提供評估。該論壇每兩週舉行一次。

**Membership:** SAMLIT is currently comprised of five member banks (Danske Bank, Nordea, Handelsbanken, SEB, Swedbank) and representatives from NPA. Observers from the Swedish Bankers Association are also involved.

**成員：**瑞典洗錢防制情報工作小組目前由五家會員銀行（Danske Bank、Nordea、Handelsbanken、SEB、Swedbank）和國家警察署的代表組成。瑞典銀行家協會的觀察員也參與其中。

**Resources:** Specialist financial crime investigators per bank are assigned at analyst-level to the operational intelligence group meeting which is held every two weeks to support iterative tactical investigation support to NPA. Dedicated management and secretariat support exist for Operations and Steering Committees.

**資源：**每家銀行的金融犯罪專業調查員被分配為營運情報小組會議之分析師級別，該會議每兩週舉行一次，以協助對國家警察署之戰術調查。運作及指導委員會有專門的管理及秘書處提供協助。

**Recent developments:** SAMLIT has established a formal governance charter and implemented a standard operating procedure which has been approved by all relevant members. A 6-month pilot is currently underway to facilitate closer collaboration between member banks and FIPO (the FIU) / NPA to tackle complex money laundering and terrorist financing cases.

**近期發展：**瑞典洗錢防制情報工作小組已訂定正式的章程並實施所有相關成員同意之標準作業程序。目前正在進行為期6個月的測試，以促進銀行成員與FIPO（金融情報中心）/國家警察署間更密切之合作，以處理複雜的洗錢及資恐案件。



## The Netherlands

### 荷蘭



This report covers three different public–private partnership arrangements in The Netherlands; two public–private taskforces and one agile FIU-led intensive feedback mechanism. All of these public–private partnerships exist under the strategic direction of a public–public coordinating authority; the ‘Financial Expertise Centre’ (FEC). The FEC is a cooperative association of the Netherlands Authority for the Financial Markets (AFM), General Intelligence and Security Service, Tax and Customs Administration, De Nederlandsche Bank (DNB), Fiscal Intelligence and Information Service and Economic Investigation Service, Public Prosecution Service and the Police Force.

本報告涵蓋了荷蘭三種不同的公私部門夥伴關係制度；兩個公私工作小組及一個由靈活的金融情報中心領導的密集回饋機制。所有這些公私夥伴關係都在公部門間協調機構之策略指導之下；即「金融專業知識中心」(FEC)。金融專業知識中心是由荷蘭金融市場管理局 (AFM)、通用情報及安全局、稅務及海關總署、荷蘭中央銀行 (DNB)、財政情報及資訊服務局、經濟調查局、檢察署及警察局合作組織而成。

The partnerships covered below are:

夥伴關係包含下述：

- The Netherlands Terrorist Financing Task Force (NL-TFTF);  
荷蘭資恐工作小組(NL-TFTF)
- The Netherlands Serious Crime Task Force (NL-SCTF); and  
荷蘭重大犯罪工作小組(NL-SCTF)
- Fintell Alliance NL.

## The relationship between NL Task Forces and the Fintell Alliance NL

### 荷蘭工作小組及荷蘭金融情報聯盟間之關係

The Netherlands AML/CFT reporting regime relies on regulated entities filing Unusual Transaction Reports (UTRs) to the national Financial Intelligence Unit (FIU-NL), who then undertakes further analysis to determine whether a threshold of suspicion has been met.

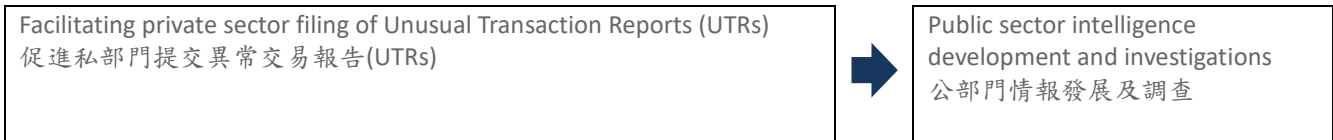
荷蘭防制洗錢/打擊資恐申報制度依靠受監管實體向國家金融情報中心 (FIU-NL) 提交異常交易報告 (UTR)，進行進一步分析以確定是否達到可疑的程度。

The public-private partnerships in the Netherlands generally operate at the stages prior to a regulated entity determining an unusual transaction, and aim to help ensure that a determination of 'unusual' is as valuable to public authorities' investigations as possible.


荷蘭的公私部門夥伴關係通常在受監管實體決定有異常交易前之階段運作，旨在幫助確保該「異常」的判斷對公部門之調查盡可能具有價值。

In this context, the Task Forces and the FIU-only Fintell Alliance play different and complementary roles. The table below sets out the distinction in more detail:

在這種情況下，工作小組及金融情報中心之金融情報聯盟扮演著不同及互補的角色。下表更詳細地列出了區別：



<b>Stage of regulated entity's AML investigative process:</b> 受監管實體之防制洗錢調查過程階段：	Initiate and conduct AML investigations to determine unusual transactions. 啟動並進行防制洗錢調查以確定異常交易。	Refining understanding of unusual transactions and receiving FIU feedback on filed unusual transaction. 重整對異常交易的瞭解，接收金融情報中心對異常交易的回饋。	Following the submission of UTRs, FIU-NL analyses UTRs independently and determines whether a threshold of 'suspicion' has been reached. The FIU-NL then disseminates intelligence related to suspicious transactions to relevant investigative agencies. 提交異常交易報告後，荷蘭金融情報中心獨立分析異常交易報告，確定是否達到可疑的程度。荷蘭金融情報中心接著向相關調查機關提供與可疑交易有關的情報。 At this stage, only relevant public
<b>Nature of public-private information-sharing:</b> 公私資訊共	Investigating agencies under Article 20 of the Dutch Police Data Act can provide subject information (and contextual information)	FIU-NL provides feedback to regulated entities to refine their understanding of unusual transactions prior to the filing of an Unusual Transaction Report (UTR) and	

<p><b>享之性質：</b></p>	<p>to regulated entities in the partnership to help them filter the unusual transactions that should be reported to the FIU. 根據荷蘭警方資料法第20條規定，調查機關可以向夥伴關係中的受監管實體提供主體資訊（及其相關資訊），以協助過濾應向金融情報中心報告之異常交易。</p>	<p>also to provide feedback after a UTR has been filed. 荷蘭金融情報中心向受監管實體提供回饋，以使其在提交異常交易報告（UTR）前更精確的瞭解異常交易，並於提交異常交易報告後提供回饋。</p>	<p>agencies are involved. 在此階段，只有相關公部門機構會參與。</p> 
<p><b>Partnership involved at this stage:</b> 此階段涉及之夥伴關係：</p>	<p>Task Forces (such as the Serious Crime Task Force and Terrorist Financing Task Force) and ad hoc working groups (with a focus on phenomena and MOs). 工作小組(例如重大犯罪工作小組及資恐工作小組以及機動工作小組(重點關注於現象及MOs))</p>	<p>Fintell Alliance NL 荷蘭金融情報聯盟</p>	
<p><b>Participants:</b> 參與者</p>	<p>Multiple public agencies and regulated entities. (More details on Serious Crime Task Force and Terrorist Financing Task Force set out below). 多個公部門機關及受監管實體。(有關重大犯罪工作小組及資恐工作小組之進一步資訊請參下述)</p>	<p>FIU-NL and regulated entities (no other public agencies permitted). 荷蘭金融情報中心以及受監管實體(沒有其他公部門被允許)</p>	

## The Netherlands Terrorist Financing Task Force (NL-TFTF)

### 荷蘭資恐工作小組 (NL-TFTF)

**Established:** July 2017

成立：2017年7月

**Summary:** This co-location taskforce model for tactical information exchange and typology development is focused exclusively on terrorist financing threats.

**摘要：**此共同辦公工作小組模式用於戰術資訊交換以及類型化發展，專注於資恐威脅。

#### *Threat-specific context (Terrorist Financing)*

## 特定威脅背景（資恐）

As context to the need for a partnership approach, public and private sector stakeholders identified the following challenges:

在需要夥伴關係途徑之背景下，公部門及私部門利害關係人識別了以下挑戰：

- Financial institutions historically struggled to identify terrorist financing through traditional customer due diligence and transaction monitoring, and the availability of effective typologies has been very limited.  
金融機構過去難以透過傳統的客戶盡職調查及交易監控以識別資恐，且提供之有效類型非常有限。
- In terrorist financing cases, the focus of investigations is not only on the origin of the money (which might very well be legal) but also on the destination thereof. Terrorist financiers can be separated by distance and layers of intermediaries from final payment (terrorist) destinations.  
在資恐案件中，調查的重點不僅在於資金的來源（可能是合法的），亦包含資金的流向。資助恐怖主義者與最終支付（恐怖份子）目的地間，可能有距離以及數層的中介。
- These factors are compounded when the case in question concerns relatively small amounts of money, which is often the case in terrorist financing.  
當案件涉及資金數額相對較小時，這些因素會變得複雜，這個情形常在資恐中出現。
- At the same time, the international standards and national legislation demand from financial institutions that they do identify these transactions and the terrorists that are involved with them.  
同時，國際標準以及國際上立法要求金融機構確認這些交易以及涉及該交易的恐怖份子。
- Law enforcement agencies have important information at their disposal, including personal data and relevant context information about people that are being considered as terrorists.  
執法機關掌控重要訊息，包括被視為恐怖份子的個人資料以及相關背景資訊。
- In response to the need for information-sharing to support closer cooperation and more effective outcomes, the NL-TFTF was set up to combat terrorist financing more efficiently and effectively.
- 為滿足資訊共享之需求以提供更密切的合作以及更有效的結果，荷蘭資恐工作小組被成立以更有效的打擊資恐。

## Objectives:

### 目標：

The purpose of the NL-TFTF is to enable cooperation between partners for the purpose of the preventive and criminal prosecution of terrorism financing, and to protect the integrity of the financial sector.

荷蘭資恐工作小組之目的在於促進夥伴間之合作，以預防及對資恐提起刑事追訴，並保護金融部門的健全。

## Threats addressed:

### 針對之威脅：

The NL-TFTF is focused exclusively on terrorist financing threats.

荷蘭資恐工作小組專注於資恐威脅。

## Membership:

### 成員：

The NL-TFTF comprises four large national banks, an insurance company, FIU-NL, National Police, FIOD and the National Prosecution Office.

荷蘭資恐工作小組由四大全國性的銀行、一間保險公司、荷蘭金融情報中心、國家警方、金融資訊及調查局(FIOD)以及國家檢察辦公室組成。

## Format:

### 形式：

A co-location format for tactical information sharing linked to typology co-development.

採用共同辦公的方式共享戰術資訊並連結至類型化發展。

Within the NL-TFTF, relevant information is shared between partners. This information is shared and further processed solely for the purpose of identifying, detecting and counteracting terrorism financing. Sharing investigative leads on persons related to TF helps financial institutions to identify and report terrorist financing leads to competent authorities more quickly, thoroughly and in a more targeted manner.

在荷蘭資恐工作小組內，相關資訊在夥伴間被分享。該資訊被分享及進一步之被用於處理識別、偵測及打擊資恐之目的。分享資恐相關人員的調查，有助於使金融機構更快速、完整以及更針對性的識別及向主管機關報告資恐線索。

## Resources:

### 資源：

No dedicated public funding is available to NL-TFTF. Taskforce partners resource their engagement out of existing budgets.

荷蘭資恐工作小組沒有專用的公共資金。荷蘭資恐工作小組夥伴自現有的預算中獲取資金。

## Record of outputs / Performance metrics:

### 工作成果/表現績效：

In their first year, the NL-TFTF has generated approximately 300 reports from regulated entities in response to 15 cases being briefed to co-located analysts in the NL-TFTF partnership.

在第一年中，荷蘭資恐工作小組自受監管實體產出 300 份報告，以回應荷蘭資恐工作小組夥伴關係中向共同辦公之分析師通報的 15 個案例。

In terms of available performance data, the NL-TFTF has disclosed the proportion of partnership-responsive reports that have met a threshold of suspicion set by the national FIU. Compared to a national average of 10% of standard reporting from regulated entities (i.e. 'unusual' reports) meeting a threshold of FIU-designation as 'suspicious', 64% of NL-TFTF -responsive reporting over a 12-month period met the FIU threshold for suspicion and onward intelligence development and disclosure to law enforcement agencies.

在可用的績效資料方面，荷蘭資恐工作小組揭露了符合國家金融情報中心設定的可疑程度之夥伴關係回應報告之比例。與全國平均 10% 之受監管實體的標準報告（即「異常報告」）符合金融情報中心指定為「可疑」之門檻相比，在 12 個月之期間內，64% 的荷蘭資恐工作小組回應報告達到了金融情報中心對可疑懷疑和後續情報發展以及揭露予執法機關的門檻。

## Distinctive elements

### 特點：

- **The requirement for a 'pressing need'.** The NL-TFTF makes use of a general article in the Netherlands police information act, which requires that there is an 'pressing need' and 'substantial public interest' before police can share investigative information with third parties in the Netherlands.  
「急迫需求」的要求。荷蘭資恐小組利用荷蘭警方資料法之通用條款，該條款要求警方在荷蘭與第三人共享調查資訊前，必須存在「急迫需求」以及「重大公共利益」。
- **Information security.** The information that is shared by the law enforcement agencies may not leave the NL-TFTF, and private sector taskforce analysts cannot share the information with a colleague who is not working within the taskforce. Only consequent unusual transactions that have been reported to the FIU-NL become visible to the rest of the compliance department of the relevant regulated entity.

**資訊安全。**執法機關共享的資訊可能不得於荷蘭資恐小組外散佈，且私部門工作小組分析師不得與非工作小組中之同事共享資訊。只有後續已向荷蘭金融情報中心報告的異常交易，才會被相關受監管實體之法令遵循部門所知悉。

- **Private–private sharing.** There is a limited opportunity for private–private sharing within the NL-TFTF. A financial institution is able to share information about an unusual transaction that they have identified with the financial institution where the counterpart of that transaction is being handled, if that financial institution is part of the taskforce. Within those constraints, members are able to map potential terrorist networks beyond a single regulated entity.

**私部門間共享。**在荷蘭資恐小組內進行私部門間資訊共享的機會有限。如果金融機構為工作小組的一部分，則該金融機構得與正在處理該交易之交易對手的金融機構分享已識別的異常交易資訊。在這些限制範圍內，成員能夠在單一受監管實體外，描繪潛在的恐怖主義網路。

#### **COVID-19 adaptation:**

#### **COVID-19 之因應：**

The NL-TFTF is focused exclusively on terrorist financing threats. Therefore, if COVID-19 threats that can be linked to TF occur, the NL-TFTF can respond to them.

荷蘭資恐小組專門針對資恐威脅。因此，如發生與資恐相關之 COVID-19 威脅，荷蘭資恐小組可以做出回應。

With regard to the work process in the NL-TFTF, operations were able to continue during the COVID-19 restrictions. Consultation, both within the working group and at steering and governance level, have taken place via the virtual communication.

在 COVID-19 之限制下，荷蘭資恐小組之工作流程能繼續運作。工作小組內部以及指導及治理層面之諮詢，均透過虛擬管道進行之。

## **The Netherlands Serious Crime Taskforce**

### **(NL -SCTF)**

### **荷蘭重大犯罪工作小組**

### **(NL-SCTF)**

**Established:** August 2019 成立：2019 年 8 月

#### **Summary:**

#### **摘要：**

The Serious Crime Taskforce (SCTF) is a public–private partnership that focuses on fighting serious crime and protecting the integrity of the financial sector. It aims to identify and prosecute the essential financial facilitators/brokers that offer their services to organised crime groups.

重大犯罪工作小組(SCTF)為專注於打擊重大犯罪及保護金融產業的健全之公私合作夥伴關係。

The SCTF-method consists of two work flows:

重大犯罪工作小組由兩個工作流程所構成：

- Work flow 1: focused on subjects and businesses; and
- 工作流程 1：專注於對象及業務；以及
- Work flow 2: focused on risks/modus operandi and may lead to improved transaction monitoring in banks

- 工作流程 2：專注於風險/操作方式，可能促使銀行改進其交易監控。

An important characteristic of the SCTF is that the subjects/businesses from work flow 1 are *not* allowed to be listed as a suspect in current investigations. SCTF interaction is at a pre-suspicion stage of concern. In line with the broader AML/CFT reporting framework in the Netherlands, in the event that financial institutions determine ‘unusual activity’ as a result of SCTF exchanges, the financial institution will file an unusual activity report to the FIU-NL. At this stage the FIU-NL, will further process the information to determine whether any suspicious activity exists, which would then be shared with appropriate public investigating authorities.

重大犯罪工作小組的一個重要特徵是不允許將工作流程 1 中之對象及業務列為正在調查中之嫌疑人。重大犯罪工作小組之工作是處於可疑交易之前階段。根據荷蘭更廣泛的防制洗錢/打擊資恐框架報告，如金融機構透過重大犯罪工作小組交換之結果認定為「異常活動」時，金融機構將向荷蘭金融情報中心提交異常活動報告。在此階段，荷蘭金融情報中心將該資訊進行後續處理，進而確認是否存在任何之可疑活動，而將與適當之公部門調查機關分享。

### Objectives:

目標：

- Fighting serious crime by focusing on financial brokers / professional money launderers; 透過專注於金融經紀商/專業洗錢者打擊重大犯罪；
- Protecting the integrity of the financial sector; and 保護金融產業的健全；以及
- Improving transaction monitoring of private partners. 促進對私部門夥伴之交易監控。

### Threats assessed:

威脅分析：

The SCTF focuses on identifying and prosecuting essential financial facilitators that offer their services to organised crime associated to:

重大犯罪工作小組專注於識別及起訴為下述相關組織犯罪提供服務的重要金融業者：

- Money laundering; 洗錢；
- Extreme violence; and 極端暴力；以及
- Corruption. 貪腐。

### Format:

形式

- The Fiscal Intelligence and Investigation Service, Police and Public Prosecution convene monthly to discuss input and output for the SCTF-NL; 財政情報及調查中心、警方及檢察機關每月召開會議，討論荷蘭重大犯罪工作小組投入及成果；
- The SCTF working group (banks and FIU) comes together twice a week to work on cases; and 重大犯罪工作小組工作團體(銀行及金融情報中心)一週集會 2 次進行案件工作；以及

- In order to prepare decision making within the board, results and current developments are presented to an advisory board (CPO) of the Financial Expertise Centre; a strategic public–private coordinating authority in the Netherlands.
  - 為了準備董事會內部的決策，將結果及當前之發展提交給金融專家中心(Financial Expertise Centre)之諮詢委員會(CPO) (其為荷蘭之策略性公私部門協調機構)。

### Membership:

成員

The SCTF consists of ten different parties:

重大犯罪工作小組由十個不同成員所組成：

- **National Police** (Nationale Politie)  
國家警方(Nationale Politie)
- **Financial Intelligence Unit - NL**  
荷蘭金融情報中心
- **Fiscal Intelligence and Investigation Service** (Fiscale Inlichtingen- en Opsporingsdienst)  
財政情報及調查中心(Fiscale Inlichtingen- en Opsporingsdienst)
- **Public Prosecution Service** (Openbaar Ministerie)  
檢察機關
- **Dutch Banking Association** (Nederlandse Vereniging van Banken)  
荷蘭銀行公會(Nederlandse Vereniging van Banken)
- **DNB** (De Nederlandsche Bank)  
荷蘭中央銀行
- **ING**  
ING 銀行
- **ABN AMRO**  
ABN AMRO 銀行
- **De Volksbank**  
De Volksbank 銀行
- **Rabobank**  
Rabobank 銀行

The partnership is under governance of the Financial Expertise Centre of the Netherlands.

該夥伴關係由荷蘭金融專家中心(Financial Expertise Centre of the Netherlands)管理。

### Resources:

資源：

The SCTF is partly funded by the Ministry of Justice and Security.

重大犯罪工作小組由司法及安全部出資。

### Performance metrics:

表現績效：

Since October 2019, five cases have been investigated by the SCTF working group. This had led to around 195 unusual transaction reports, of which 189 have been declared suspicious by the FIU. This number is still rising as the investigations are ongoing. In addition to suspicious transaction reports, the cases offer insight into criminal networks and modus operandi.



自 2019 年 10 月以來，重大犯罪工作小組已調查了 5 起案件。產生大約 195 份異常交易報告，其中 189 份已被金融情報中心宣佈為可疑案件。隨著調查的進行，這個數字仍在上升。除了可疑交易報告外，這些案例還提供了對犯罪網路及犯案方式之理解。

#### Distinctive elements:

##### 特點

- **The legal framework.** The SCTF makes use of Article 20WPG (the police information act), which allows the police and Fiscal Intelligence and Investigation Service to share investigative information with private partners.  
法律架構。重大犯罪工作小組利用 20WP 條款（警方資料法），其允許警方和財政情報及調查中心與私部門合作夥伴共享調查資訊。
- **Law enforcement leads.** The SCTF working group receives information from the police and/or Fiscal Intelligence and Investigation Service. This happens in agreement with the Public Prosecution Service.  
執法機關主導。重大犯罪工作小組自警方及/或財政情報及調查中心取得資訊。此與檢察機關有共識存在。
- **Information security.** The information that is shared by the law enforcement agencies may not leave the Taskforce, and private sector taskforce analysts cannot share the information with a colleague who is not working within the taskforce.  
資訊安全。執法機關分享的資訊限於工作小組內分享，私部門工作小組分析人員不得與工作小組以外之同事分享資訊。
- **FIU direction.** Private partners in the working group work under supervision of the FIU and may ask the FIU whether certain transactions are unusual or not. The final decision to report a transaction as unusual is up to the private partners.  
金融情報中心指導。工作小組中之私部門合作夥伴在金融情報中心之監督下工作，並可能會詢問金融情報中心某些交易是否異常。最後將由私部門合作夥伴決定是否將交易報告申報為異常交易。
- **Private-private sharing.** There is a limited opportunity for private-private sharing within the Taskforce (no multilateral sharing). A financial institution is able to share information about unusual transactions that they have identified with the financial institution where the counterpart of that transaction is being handled, if that financial institution is part of the taskforce. Within those constraints, members are able to map potential criminal networks beyond a single regulated entity.  
私部門間共享。在工作小組內進行私部門間共享之機會有限（無多邊分享）。如該金融機構是工作小組之成員，金融機構得與正在處理該交易之相對人金融機構分享其已識別之異常交易資訊。在這些限制範圍內，成員能夠發現單一受監管實體以外之潛在犯罪網路。
- **Strategic and tactical exchange.** The possibility to look both at individual cases and more generally at risks/modus operandi.  
策略及戰術交換。得以查看單一案例，亦可更廣泛的檢視風險/或犯罪模式。

#### COVID-19 adaptation

##### COVID-19 之因應

- The SCTF investigations are ongoing, despite the COVID-19 pandemic. The collaboration is mainly focused on bilateral exchange of information between the private partners (banks) and the advising role of the FIU. This is notably more difficult without physically being in the same room. The working group location has been adapted in line with requirements for 'COVID-19' mitigation

– before, 18 colleagues could work there, now the number has been reduced to 9. Possibilities to make use of a larger location are currently being examined.

雖然發生 COVID-19 疫情，但重大犯罪工作小組仍然持續進行調查。該合作主要側重於與私部門合作夥伴(銀行)間之雙邊資訊交換以及金融情報中心之諮詢角色。如果沒有在同一空間內工作，這些顯然會更加困難。工作小組的空間已依 COVID-19 因應措施之相關要求進行調整，在此之前，18 位人員得於該處工作，目前已經減少為 9 人。目前正在研究使用更大空間之可能性。

- The COVID-19 crisis is reported to have led to some difficulties in collaboration (including reduced efficiency).  
COVID-19 的危機據稱造成一些合作的困難(包括降低效率)。

The SCTF is a pilot with an initial duration of one year. At the time of this research, the pilot is expected to be extended by one year in order to fully run through the entire process of input, through to outputs and outcomes. The SCTF has been evaluated at six months (February 2020) and will be fully evaluated again at the end of the pilot, in order to decide whether the partnership becomes permanent.

重大犯罪工作小組是一個試驗，第一個期間為一年。於本研究進行時，為了可以完整瀏覽整個投入過程，預計試驗時間將延長一年。重大犯罪工作小組已在第六個月時(2020 年 2 月)進行評估，並且將在試驗結束時再次進行全面評估，以決定合作夥伴關係是否永久進行。

## The Netherlands – Fintell Alliance (FA-NL)

### 荷蘭-金融情報聯盟(FA-NL)

**Established:** October 2018

成立：2018年10月

#### Summary 概要

In the Fintell Alliance NL, four Dutch banks and the FIU of the Netherlands join forces to exchange knowledge and to strengthen the efficiency and effectiveness of the reporting obligation of banks, within the current AML/CFT framework.

荷蘭金融情報聯盟中，四家荷蘭銀行及荷蘭金融情報中心共同在現行防制洗錢/打擊資恐的框架下，交流知識及強化銀行通報義務之效率及效能。

The Fintell Alliance NL is a physical space where representatives of all partners come together on a daily bases and work together, being respectful to the limits as set in the Dutch legal AML/CFT framework. Information from the FIU (feedback on previous reports, red flags, MOs) can feed into the systems and ways of working of the participating banks, which leads to better, more specific reports from the banks to the FIU.

荷蘭金融情報聯盟是個實體空間，各夥伴的代表每天都會聚集在此工作，並遵循荷蘭法律上防制洗錢/打擊資恐框架之限制。金融情報中心的資訊(先前通報、紅旗指標、MOs 之回饋)可以融入參與銀行之系統及工作方式，使銀行能對金融情報中心提供更好、更具體的通報。

Fintell Alliance NL is a flexible arrangement that can service all relevant public-private Partnerships within the Dutch AML/FT framework, such as the Serious crime taskforce (SCTF) and the Terrorism financing taskforce (TFTF), where this is already the case.

荷蘭金融情報聯盟是個彈性的安排，可服務所有荷蘭防制洗錢/資恐框架中相關之公私部門合作夥伴，例如在案件發生時之重大犯罪工作小組(SCTF)及資恐工作小組(TFTF)。

The FIU manages, facilitates and coordinates the cooperation within the Fintell Alliance NL.

金融情報中心管理、促進及整合荷蘭金融情報聯盟的合作。

#### Objectives: 目標

The Fintell Alliance NL is aimed at exchanging knowledge and enhancing the effectiveness of the reporting of unusual transactions. The overall goals of the Fintell Alliance NL are to gain a better insight into criminal networks, facilitators, modus operandi used and the laundering of criminal assets.

荷蘭金融情報聯盟旨在交流知識及提升非常規交易通報之效能。荷蘭金融情報聯盟的整體目標為深入認識犯罪網路、促進者、作案手法及犯罪資產的洗錢過程。

Objectives of the partnership include:

夥伴的目標包括：

- Increase the level of knowledge on working methods from all partners, thereby increasing possible efficiency;  
提升夥伴間對工作方法的理解度，以提升效率；

- Effective feedback by FIU – NL to the private parties that participate in the Fintell Alliance NL, that can lead to scenarios that can contribute to detection and prevention of financial crime by these private parties;  
荷蘭金融情報中心對於參與荷蘭金融情報聯盟之私部門成員有效的回饋，可以促進私部門成員對金融犯罪偵測及預防；
- Enable more qualitative and faster analysis of specific unusual transaction reports, in order to make them more enriched as suspicious transaction reports available to the LEA, in order for them to use them for system-oriented interventions;  
使具體非常規交易通報上的分析更量化及快速，使提供給執法機關的疑似洗錢或資恐交易報告內容更為豐富，並將此用於其系統導向之干預；
- Developing knowledge products that can contribute to the level of knowledge throughout the whole AML/CFT domain;  
發展可以貢獻防制洗錢/打擊資恐知識領域的知識產物；
- Creating barriers to 'abuse of the financial system' (prevention) through the early identification of crucial (financial and business economic) links in criminal networks and the early adaptation of existing procedures;
- 透過犯罪網路關鍵(財務及商業經濟)連結之早期辨識及現行流程之採用，建立「金融系統濫用」的障礙(預防)；
- Using the process-based approach to create insight and an overview of criminal financial structures for the purpose of investigations, whether or not they are part of a PPP initiative; and
- 為調查之目的，使用流程基礎方法建立金融犯罪架構之認識及概念，不論是否為 PPP 倡議之一部分；及
- Connect to the existent and future development of transaction monitoring tools and KYC-utility projects of the banks.
- 連結現行及未來交易監控工具的發展及銀行認識客戶功能計劃。

These effects have been formed based on the experiences from the pilot phase of the Fintell Alliance NL. It is expected that during this PPP new insights will emerge with regards to other possible effects.

這些影響是基於荷蘭金融情報聯盟試行階段的經驗所產生，可以預期在 PPP 期間，將產生關於其他可能效果的新概念。

### **Threats addressed: 針對之威脅**

The Fintell Alliance NL aims to be agile in response to understanding evolving and emerging criminal patterns. 荷蘭金融情報聯盟旨在適時回應對發展中犯罪模式的理解。

### **Format 形式**

Tactical information can be exchanged, within the limits of the Dutch AML/CFT law, between partners.

戰術資訊得在荷蘭防制洗錢/打擊資恐法規之限制範圍內於夥伴間交換。

### **Membership: 成員**

The Fintell Alliance NL comprises four large national banks (ABN-AMRO, ING, Rabobank and Volksbank) and the FIU-the Netherlands.

荷蘭金融情報聯盟包含四家大型國家銀行(ABN-AMRO、ING、Rabobank 及 Volksbank)，以及荷蘭金融情報中心。

## Resources: 資源

No dedicated public funding is available. Fintell Alliance NL partners resource their engagement out of existing budgets.

無專屬之公共資金資助，荷蘭金融情報聯盟的夥伴們以其現有預算資助其參與。

## Record of outputs / Performance metrics: 工作成果/表現績效

In 2019 the Fintell Alliance NL has produced a number of intelligence and knowledge reports that were available for the FIU- the Netherlands, LEA as well as financial institutions. In its first year, besides facilitating the SCTF and TTF, the Fintell Alliance NL has performed analysis on topics such as human trafficking and the large import of cocaine.

於 2019 年，荷蘭金融情報聯盟製作許多情報及知識報告給荷蘭金融情報中心、執法機關及金融機構。第一年除了幫助重大犯罪工作小組及資恐工作小組，荷蘭金融情報聯盟還實施對於如人口販運、大宗古柯鹼進口的分析。

## Distinctive elements 特點

- In the Fintell Alliance NL, representatives of the participating organisations physically come together on a daily basis and work on cases, this within the boundaries as set in the legal AML/CFT framework. The representatives work in a closed environment. The representatives of banks are screened before they start to work in the Fintell Alliance.
- 在防制洗錢/打擊資恐法律框架的限制下，參與組織的代表們每天在荷蘭金融情報聯盟見面工作。代表們在封閉的環境中工作。銀行代表在金融情報聯盟工作前需經審查。
- Public – Private sharing: based on information the FIU can share with the participants, the bank representatives can send specific related unusual transaction reports. The FIU-NL can provide the bank representatives with specific feedback on the unusual transaction reports sent.
- 公私部門共享：基於金融情報中心分享給參與者之資訊，銀行代表得寄出特定之非常規交易相關通報。荷蘭金融情報中心得對寄出的非常規交易通報向銀行代表提供具體反饋。
- Private – Private sharing: Within the framework of the Fintell Alliance NL, bank employees can share information on an unusual transaction they have identified within their institution, only when the counterpart of that transaction is handled by another Fintell Alliance NL partner bank.
- 私部門間共享：在荷蘭金融情報聯盟的框架下，只有在交易相對人係由另一荷蘭金融情報聯盟夥伴銀行所處理時，銀行員工方得分享機構偵測到之非常規交易資訊。
- Information security: each participant can access the relevant databases of their own organisation. There is no access to each other's databases. Information on subjects shared, cannot leave the Fintell Alliance NL.
- 資訊安全：各參與者得進入其組織之相關資料庫。惟不能進入其他組織之資料庫。共享主題的資訊不能帶離荷蘭金融情報聯盟。

## Recent developments and COVID-19 adaptation: 近期發展及 COVID-19 之因應

Due to the COVID-10 pandemic, physically co-location was not possible, but cooperation continued, using secure online tools for communication. Based on inputs from public and private partners, the FIU – the Netherlands has been able to distribute an advisory with specific COVID-19 red flags, based on the experiences of relevant public agencies and private sector partners.

因為 COVID-19 疫情，實體共同辦公雖不可行，但仍然透過安全線上工具溝通以持續合作。有鑒於公私部門夥伴的努力，荷蘭金融情報中心已能基於公家機關及私部門夥伴的經驗，發送具體 COVID-19 之紅旗指標建議。

## United Kingdom 英國

### UK Joint Money Laundering Intelligence Taskforce (JMLIT) 英國聯合洗錢情報工作小組(JMLIT)



**Established:** as a pilot in early 2015, permanent since April 2016

**成立：**2015 年早期試成立、2016 年 4 月永久成立

#### **Summary:** 摘要：

The Joint Money Laundering Intelligence Taskforce (JMLIT) is an integral part of the UK National Economic Crime Centre (NECC) which is working to deliver a step change in the response to economic crime in the UK. The JMLIT enables collaboration between law-enforcement, Her Majesty's Government (HMG), the private sector and regulators to tactically target agreed priority economic, serious and organised crime threats (including terrorist finance) and identify longer term strategic vulnerabilities. Through sharing information, knowledge and expertise, the JMLIT uses financial intelligence to disrupt serious and organised crime and support high priority operations. It also develops and shares strategic intelligence and typologies to strengthen the UK's tactical response to illicit finance, money laundering and wider economic crime threats.

聯合洗錢情報工作小組(JMLIT)是英國國家經濟犯罪中心的一部分，其工作內容為改善對英國經濟犯罪之因應。聯合洗錢情報工作小組使執法機關、英國政府、私部門及監理機關合作，以技術性鎖定經一致同意之經濟、重大組織犯罪威脅(包括資恐)之優先性，及辨識長期策略弱點。透過共享資訊、知識及專業，聯合洗錢情報工作小組使用金融情報阻止重大組織犯罪，及支援有高度優先性的行動。其亦建立及分享策略情報及犯罪類型以強化英國對於非法金融、洗錢及更廣泛之經濟犯罪威脅之戰術回應。

#### **Objectives:** 目標：

- For the economic crime system as a whole: JMLIT partnerships help inform the overall understanding of the economic crime threat, and the best ways of tackling that threat. Through a collective understanding via the Taskforce, this enables partners to prioritise activity on key threats.
- 對經濟犯罪體系整體：聯合洗錢情報工作小組夥伴關係協助促進對經濟犯罪威脅之整體理解及對威脅處理之最佳方式。透過工作小組之集體理解，使夥伴能對關鍵威脅之行動排定優先順序。
- For law enforcement agencies (LEAs): information exchange via JMLIT helps to progress the investigation of those suspected to be involved in criminal activity.
- 對於執法機關：透過聯合洗錢情報工作小組之資訊交換，能幫助進行疑似涉及犯罪活動人員之調查。
- For private sector partners: JMLIT enables private sector partners to understand the current methods being adopted to undertake serious and organised crime. This understanding then provides a basis for private sector partners to proactively manage risk within their organisations, identify suspicious activity and refer matters for investigation, work with industry partners on cross industry vulnerabilities and develop an enhanced control environment. The private sector is also able to pro-actively support law enforcement in

tackling serious crime for the benefit of the public sector, private sector and the communities which we serve.

- 對私部門夥伴：聯合洗錢情報工作小組幫助私部門夥伴理解現行處理重大組織犯罪之方法。此理解提供私部門夥伴積極管理組織風險、辨識可疑活動及呈報調查案件、與產業夥伴共同處理產業弱點及發展強化控制環境之基礎。私部門也能積極支援執法機關處理重大犯罪，以維護所服務之公部門、私部門及社群之利益。
- For regulators: JMLIT helps develop a real time understanding of existing and emerging threats, and the changing nature of the risks facing the sectors they supervise in order to inform their risk-based approach to regulation and understand how they can enable the response and help mitigate the risks.
- 對監管機關：聯合洗錢情報工作小組幫助建立對現行及新興威脅，及監管部門面臨之風險變動本質的即時理解，以提供監管機關以風險基礎方法為監管之資訊，及理解其如何回應及幫助抵減風險。

### **Record of outputs / Performance metrics: 工作成果/表現績效**

Since its inception, JMLIT has supported and developed over 750 requests supporting law enforcement investigations which has directly contributed to over 210 arrests and the seizure or restraint of over £56 million. Through this collaboration, JMLIT private sector members have identified over 5,000 suspect accounts linked to money laundering activity, and leading to 3400 accounts being closed. Through financial sector-led expert working groups over 49 'JMLIT Alert' reports have been shared with the private sector to assist in focusing the identification and implementation of transactional monitoring system queries, in turn helping to mitigate the criminal methodologies used to exploit the UK's financial system.

自成立以來，聯合洗錢情報工作小組支援並建立超過 750 個支援執法機關調查之請求，並直接就超過 210 個逮捕及對超過 5600 萬英磅之扣押或限制作出貢獻。透過這些合作，聯合洗錢情報工作小組私部門成員已辨識出超過 5 千個疑似洗錢活動的帳戶，且造成 3400 個帳戶被關閉。經由金融部門主導專家工作小組，超過 49 份「聯合洗錢情報工作小組警示」被分享給私部門，以協助針對辨識及實施對交易監控系統的問題，幫助減緩破壞英國金融體系之犯罪手法。

### **Resources: 資源**

As of June 2020, the JMLIT is staffed by eleven full time NECC officers from the NCA working with personnel seconded from both HMRC and the private sector.

至 2020 年 6 月為止，聯合洗錢情報工作小組有 11 位 NCA 的國家經濟犯罪中心正職員工，以及 HMRC 及私部門派遣的人員。

### **Operating Model: 運作模式：**

JMLIT is a joint public-private sector partnership, hosted by the NECC within the NCA, resourced by both private and public sectors.

聯合洗錢情報工作小組是個公私部門之共同夥伴關係，由 NCA 中的國家經濟犯罪中心主持，公私部門共同資助。

### **Operations Groups 運作小組**

- Tactical information and intelligence are shared through the Banking Sector Operations Group (BSOG) and the Insurance and Investment Sector Operations Group (IISOG) utilising the information sharing gateway provided by Section 7 Crime and Courts Act 2013, at the discretion of operational participants.

藉由銀行部門運作小組(BSOG)與保險及投資部門運作小組(IISOG)進行戰術資訊及情報共享，並依參與運作之夥伴的全權決定，運用 2013 年犯罪及法院法第 7 章之資訊共享管道。

- Within these operations groups, vetted representatives from the public and private sectors meet weekly (with respect to BSOG) and monthly (with respect to the insurance and investment sector participants in IISOG) to exchange intelligence and analytical findings to support and develop investigations aligned to the JMLIT priorities.
- 在這些運作小組中，公私部門審查通過的代表每週 (BSOG 部分)及每月(IISOG 保險及投資部門之參與者的部分)見面，以交換情報及分析結果，並支持及發展聯合洗錢情報工作小組認為具有優先性的調查。
- Participation in the Operations Groups does not affect any disclosure of information required by law, and does not interfere with the legal obligations for reporters to submit Suspicious Activity Reports (SARs) under Part 7 Proceeds of Crime Act 2002 and Section 21 Terrorism Act 2000.
- 運作小組的參與不妨礙法律所要求的資訊公開，且不影響通報者依 2002 年犯罪所得法第 7 部分及 2000 年恐怖主義法第 21 節呈報疑似洗錢或資恐活動交易報告(SARS)的義務。

### Expert Working Groups (EWGs) 專家工作小組(EWGs)

JMLIT's Expert Working Groups, attended by representatives from industry, law enforcement, NGOs and academia, meet to share knowledge to support and develop increased understanding of existing and emerging threats and risks. The JMLIT publishes its conclusions as alerts, red flags and typologies which are shared with the wider regulated sector, government and law enforcement partners.

聯合洗錢情報工作小組的專家工作小組由各產業、執法機關、非政府組織及學術組織的代表參與，開會以分享知識，並進一步支持及增進對於現存及新興威脅及風險之理解。聯合洗錢情報工作小組發布如警示、紅旗指標及類型之結論，並與更廣泛範圍的監理機關、政府及執法機關夥伴分享。

Current EWGs: 現今的專家工作小組

- Trade Based Money Laundering 貿易洗錢
- Money Laundering Through Markets 經由市場之洗錢
- Organised Immigration Crime/Human Trafficking 組織性移民犯罪/人口販運
- Bribery and Corruption 賄賂及貪腐
- Terrorist Financing 資恐
- Future Threats 未來威脅
- Tax Evasion 逃稅

Intelligence Sharing Expert Working Groups (ISWEGs):

情報共享專家工作小組(ISWEGs)

- The Office for Professional Body AML Supervision (OPBAS) in the Financial Conduct Authority (FCA) together with the JMLIT have established two Intelligence-Sharing Expert Working Groups (ISEWGs) for the legal and accountancy sectors to strengthen intelligence and information sharing by professional body supervisors, statutory supervisors, and the NCA.

金融行為監管局(FCA)之專業法人防制洗錢監管辦公室(OPBAS)及聯合洗錢情報工作小組，已建立兩個情報共享專家工作小組(ISWEGs)，以供法律及會計部門強化專業監理機關、法定監理機關及 NCA 提供之情報及資訊共享。

- The ISEWGs are facilitating the exchange of information between professional body supervisors and law enforcement – enabling a greater understanding of the threat which supervisors can take account of in their supervisory activities.



- 情報共享專家工作小組使得專業監理機關及執法機關間的資訊交換更容易—其促進監理機關進行監理活動時，對威脅有更深入的理解。

### COVID-19 adaptation: COVID-19 之因應

In addition to JMLIT, the NECC has launched a new initiative, bringing law enforcement and government together with the private sector to tackle criminals seeking to exploit the COVID-19 crisis for financial gain.

除了聯合洗錢情報工作小組以外，國家經濟犯罪中心亦發布新的倡議，結合執法機關、政府及私部門一起對抗利用 COVID-19 危機獲取財務收益的犯罪。

The new 'OTELLO' COVID-19 Fusion Cell, led by the NECC and co-sponsored by the Private Sector, brings together experts from across sectors – including the financial sector, insurance companies, trade bodies, law enforcement, cyber industry and wider public sector. The Cell aims to share information on changes to the economic crime threat related to COVID-19 and to proactively target, prevent and disrupt criminal activity, protecting businesses and the public. This Cell is separate to JMLIT and builds on the existing public-private partnerships that exist in the National Economic Crime Centre, including through the JMLIT. The Fusion Cell will work in partnership with industry to identify new trends and threats and decide on the most appropriate way to tackle it, building on the expertise of both the public and private sectors.

新的「OTELLO 奧泰羅」COVID-19 合作單位，由國家經濟犯罪中心主導及私部門共同支持，聚集許多跨部門的專家—包括金融部門、保險公司、貿易實體、執法機關、網路產業及更廣泛的公部門。本單位旨在共享關於 COVID-19 帶來之經濟犯罪威脅的改變之資訊，並積極地鎖定、預防及阻止犯罪活動、保護商業及大眾。本單位獨立於聯合洗錢情報工作小組，並在現行國家經濟犯罪中心公私部門夥伴關係的基礎上建立，包括透過聯合洗錢情報工作小組。此合作單位仰賴公私部門的專業，與產業合作辨識新趨勢及威脅，並決定最適合的應對方式。

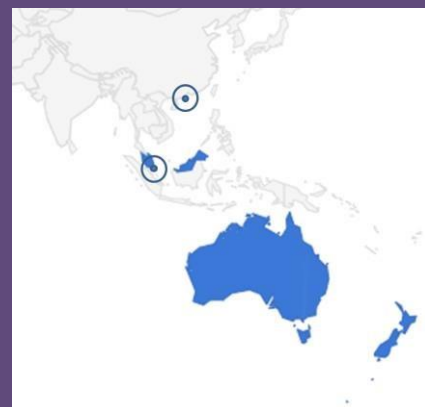
The COVID-19 Fusion Cell convenes weekly to discuss the economic crime threat picture related to COVID-19, underpinned by smaller tactical groups focused on specific threat areas. The Cell produces a weekly public-private threat dashboard, including high-level Suspicious Activity Report trend data, to inform areas for proactive tactical development and disruptive action.

COVID-19 合作單位每週討論關於 COVID-19 的經濟犯罪圖象，由專注於特定威脅領域的較小型戰術小組支援。該單位製作每週公司部門威脅數據表，包括高度疑似洗錢或資恐活動交易報告趨勢數據，以提供該領域積極戰術發展及阻止行動的資訊。

Insight from developing the OTELLO COVID-19 Fusion Cell has the potential to inform the approach to the further development of public-private working within the NECC. The NECC reports a longer-term ambition to develop the capability to identify and take preventative action to mitigate economic crime threats before they occur, with real-time insight and disruptive activity through public-private data sharing.

建立「OTELLO 奧泰羅」COVID-19 合作單位所取得之洞察，具有為國家經濟犯罪中心內公私部門之合作發展，提供方案的潛力。國家經濟犯罪中心展露出透過公私部門資料共享的即時理解及阻止行動，發展辨識能力及採行預防措施，以於事前減緩經濟犯罪威脅的雄心。

# South East Asia and Australasia



## 東南亞及澳洲

- The Australian Fintel Alliance 澳洲金融情報聯盟
- Hong Kong Fraud and Money Laundering Intelligence Taskforce (FMLIT) 香港反詐騙及洗錢情報工作
- The Malaysia Financial Intelligence Network (MyFINet) 馬來西亞金融情報網
- New Zealand Financial Crime Prevention Network (NZ-FCPN) 紐西蘭金融犯罪防治網
- The Singapore Anti -Money Laundering and Countering the Financing of Terrorism Industry Partnership (ACIP) 新加坡洗錢防制暨打擊資助恐怖組織產業夥伴關係

## Australia 澳洲

### The Australian Fintel Alliance 澳洲金融情報聯盟



**Established:** March 2017

成立：2017 年 3 月

#### Summary: 摘要：

The Fintel Alliance is an AUSTRAC-led initiative, established as a public-private partnership with the objective to help grow Australia's economy and protect it from criminal exploitation. The Fintel Alliance brings together experts from financial institutions, state and commonwealth law enforcement and intelligence agencies, as well as academic and research institutions.

金融情報聯盟是個澳洲交易通報及分析中心主導的倡議，由公私部門合作夥伴建立，目標在於幫助澳洲經濟成長及保護其不受犯罪侵擾。金融情報聯盟集合了金融機構、州與聯邦執法機關及情報機構，以及學術及研究機構的專家。

The purpose of the Fintel Alliance is to:

金融情報聯盟的目的為：

**Protect** the financial system from **criminal abuse and exploitation** by enhancing **information sharing** and innovative **capability development** through a **trusted, collaborative partnership** between government and industry.

透過政府及產業間可信賴的合作夥伴關係，提升資訊共享及創新能力發展，以保護金融體系不受犯罪侵擾與剝削。

The Fintel Alliance sees public and private sector organisations working together to share financial intelligence in order to combat crime.

金融情報聯盟讓公私部門組織共同分享金融情報以打擊犯罪。

#### Objectives: 目標：

The primary objectives of the Fintel Alliance are as follows:

金融情報聯盟之主要目標為以下：

- Equipping industry to be the first line of defence against criminal exploitation, by sharing financial intelligence, risk models and insights to reduce criminal activity;
- 使產業得以藉由分享金融情報、風險模型及觀念以避免被犯罪活動利用；
- Sharing information in close to real-time that is secure and targeted to ensure the right person has access to the right information when they need it;
- 盡可能即時並安全地分享資訊，並使其聚焦，確保對的人取得所需的對的資訊；
- Helping expand the establishment of public-private partnerships globally and leverage those partnerships in efforts to prevent, detect and disrupt criminal activity; and
- 協助擴展全球公私部門夥伴關係的建立，並利用該等夥伴關係預防、偵測及阻止犯罪活動；及
- Adopting new technologies and innovative ways to work with government and industry to improve the Alliance's ability to detect and disrupt crime and drive positive change in the financial sector.

- 採用新科技及創新方法，與政府及產業合作改善聯盟偵測、阻止犯罪及引領金融部門正向改變的能力。

**Threats addressed:** 針對之威脅

The Fintel Alliance adopted an approach that its efforts would be broadly directed at harms and impacts upon the Australian community and beyond in the following areas:

金融情報聯盟採用能廣泛針對下列對於澳洲社群產生傷害及影響的方法：

- **Crimes affecting the most vulnerable** – children, the elderly and the disabled.
- **影響最弱勢族群的犯罪**—兒童、長者及殘障人士。
- **Exploitation of government revenues** – focuses on crimes targeting Australia’s revenue base and government’s funding of services to the community - National Disability Insurance Scheme, child and day care services, and services for the elderly.
- **剝奪政府收入**—著重於鎖定澳洲收入基礎及政府對社群服務資助之犯罪—國家殘障保險計劃、兒童及日照服務及長者服務的犯罪。
- **Networked and complex financial crime** – criminals exploiting multiple businesses, including money mules, account layering, tax evasion, and the black economy.
- **盤根錯結及複雜的金融犯罪**—利用多元業務，包括錢驛、多重帳戶、逃稅及黑色經濟之犯罪者。
- **Nationally significant taskforces and important campaigns** – such as Australia’s Most Wanted, illicit drugs, transnational crime and firearms.
- **國家級重大專案及重要活動**—如澳洲重大通緝犯、非法毒品、跨國犯罪及火槍。
- **Responding to regional and community harms** – making an impact through assisting to address localised crime.
- **因應地區及社群危害**—透過協助處理在地化的犯罪製造影響力。
- **Technology and sophistication** – responding to the most challenging money-laundering efforts through innovative approaches to data and intelligence.
- **科技及複雜化**—透過數據及情報的創新方法因應最具挑戰性的洗錢。

**Format:** 形式：

The Fintel Alliance has two hubs:

金融情報聯盟有兩個中心：

- **Operations Hub** - A set of physical spaces where Fintel Alliance partners collaborate, exchange and analyse information and intelligence in close to real-time to create new analysis and intelligence products.
- **營運中心**-金融情報聯盟夥伴們合作、交流及分析資訊及即時情報以創造新分析及情報產品的一系列實體空間。
- **Innovation Hub** - Where Fintel Alliance partners collaborate, co-design and test new and innovative technology solutions to augment the operational requirements within the Operations Hub.
- **创新中心**-金融情報聯盟夥伴們合作、共同設計並測試新的創新科技解決方案以增強營運中心運作要求。

**Membership:** 成員：

As of June 2020, 29 government and private sector partners work together. Representatives from industry include domestic and international partners covering banking, remittance, and gambling.

至 2020 年 6 月為止，29 個政府及私部門夥伴共同合作。產業代表涵蓋來自國內與國際的銀行、匯兌及賭博業等相關夥伴。

Government partners: 政府夥伴：

- AUSTRAC 澳洲交易報告及分析中心(AUSTRAC)
- Australian Border Force 澳洲邊防署(Australian Border Force)
- Australian Competition & Consumer Commission 澳洲競爭與消費者委員會(Australian Competition & Consumer Commission)
- Australian Criminal Intelligence Commission 澳洲犯罪情報委員會(Australian Criminal Intelligence Commission)
- Australian Federal Police 澳洲聯邦警方(Australian Federal Police)
- Australian Government Treasury 澳洲財政部(Australian Government Treasury)
- Australian Securities and Investments Commission 澳洲證券及投資委員會(Australian Securities and Investments Commission)
- Australian Taxation Office 澳洲稅務局(Australian Taxation Office)
- Department of Home Affairs 澳洲內政部(Department of Home Affairs)
- New South Wales Crime Commission 新南威爾士犯罪委員會(New South Wales Crime Commission)
- New South Wales Police Force 新南威爾士警方(New South Wales Police Force)
- Queensland Police Service 昆士蘭警方(Queensland Police Service)
- Services Australia 澳洲民政部(Services Australia)
- Western Australia Police Force 西澳警方(Western Australia Police Force)

Industry partners: 產業夥伴

- Australia & New Zealand Banking Group Limited 澳盛銀行(Australia & New Zealand Banking Group Limited)
- Bendigo and Adelaide Bank Ltd 本迪戈及阿德萊德銀行(Bendigo and Adelaide Bank Ltd)
- Commonwealth Bank of Australia 澳洲聯邦銀行(Commonwealth Bank of Australia)
- HSBC Bank Australia Limited 澳洲滙豐銀行(HSBC Bank Australia Limited)
- Macquarie Bank Limited 麥格理銀行(Macquarie Bank Limited)
- MoneyGram 速匯金(MoneyGram)
- National Australia Bank Limited 澳洲國民銀行(National Australia Bank Limited)
- PayPal Australia Pty Limited 澳洲 PayPal (PayPal Australia Pty Limited)
- Tabcorp Ltd 泰博控股(Tabcorp Ltd)
- Western Union Financial Services (Aust) Pty Ltd 西聯匯款(澳洲)(Western Union Financial Services (Aust) Pty Ltd)
- Westpac Banking Corporation 西太平洋銀行(Westpac Banking Corporation)

International FIUs: 國際金融情報中心

- National Crime Agency (UK) 國家犯罪署(英國)
- New Zealand FIU 紐西蘭金融情報中心

Others: 其他：

- Australian Financial Crimes Exchange (AFCX) 澳洲金融犯罪情報交換所(AFCX)
- Deakin University 迪肯大學(Deakin University)

Resources: 資源：

The Fintel Alliance (Australia) is a secondment-based model at the analyst-level, enabling co-location of public-private intelligence analysts operating within the FIU. The model delivers tactical support to investigations, typology co-development and community education goals.

金融情報聯盟藉由派遣、借調分析師為基礎，使公私部門情報分析師在金融情報中心同地合作。本模型能為調查、共同發展類型化及社群教育目標給予戰術支持。

#### **Record of outputs / Performance metrics:** 工作成果/表現績效

Highlights, as reported in the Fintel Alliance 2018-19 Annual Report (July 2018 to June 2019), include:

重點摘要，如同金融情報聯盟 2018-19 年年報(2018 年 7 月至 2019 年 6 月)所載，包括：

- 11 international collaborations;  
11 個國際合作；
- Input into law reform processes in order to boost Alliance capabilities around information sharing;  
推動法律改革程序以促進聯盟資訊共享能力；
- Membership expanded from 25 to 29 private sector and government agencies;  
成員從 25 個擴展到 29 個私部門及政府機構；
- 131 intelligence products issued to law enforcement and intelligence partners;  
發行 131 個情報產品予執法機關及情報夥伴；
- 320 investigations initiated through private sector members;  
透過私部門成員發動 320 個調查；
- Fintel Alliance intelligence has contributed to the arrest of 108 persons of interest;  
金融情報聯盟之資訊幫助逮捕 108 位嫌疑犯；
- Closure of accounts of in excess of 90 high-risk customers; and  
關閉超過 90 個高風險客戶的帳戶；及
- 87 potential victims identified or protected across all operation activities with in excess of 2,500 credit card identities saved.  
自所有的運作活動辨識或保護 87 位潛在受害者，並保障超過 2,500 個信用卡身分。

During 2019, AUSTRAC has been focused upon how best to demonstrate value through measures of success. Key performance indicators and outcomes include those above. Beyond those, Fintel Alliance is working on presenting information on change in behaviour and priority reporting of industry on crime types. For example, Fintel Alliance work and engagement on the use of financial intelligence to identify child exploitation has led to a 580% increase in the reporting of suspicious matter reports over the comparative 2-year period prior. AUSTRAC produced an annual report on the operation and work of the Fintel Alliance which was made public in October 2019.

於 2019 年間，澳洲交易通報及分析中心專注於如何透過成功的措施展現最好價值。關鍵績效指標及結果包含上述。除此之外，金融情報聯盟致力於提供犯罪行為態樣改變及產業通報優先性的資訊。舉例而言，金融情報聯盟利用金融情報以辨識兒童受剝削的可疑事項，相較於前兩年，通報數增加 580%。澳洲交易通報及分析中心製作了一份關於金融情報聯盟運作及工作的年報，並於 2019 年 10 月公開。

#### **Distinctive elements:** 特點：

The Fintel Alliance includes the following characteristics:

金融情報聯盟包含下列特徵：

- Co-location of public-private intelligence analysts operating within the FIU, with partners provided access to FIU data.
- 公私部門之情報分析師與金融情報中心內提供金融情報數據的成員同地合作。

- The clearance of financial industry partners to view classified government information.  
容許金融產業夥伴閱覽機密政府資訊。

#### **Recent developments: 近期發展：**

In May 2019, the Australian Government provided a boost in funding to the Fintel Alliance of \$28.4 million over four years which would deliver the following expansion in capabilities in the Alliance:

於 2019 年 5 月，澳洲政府提供金融情報聯盟 4 年超過 2,840 萬的資助，以增強聯盟以下的能力。

- Develop a stronger shared understanding of the threats posed by money laundering, terrorism financing and serious financial crime;  
增進對於洗錢、資恐及重大金融犯罪等威脅更強的共同理解；
- Through the activities and learnings in the Fintel Alliance build resilience to serious financial crime by enhancing the capabilities of public and private partners and the broader regulated community;  
透過在金融情報聯盟的活動及學習，加強公私部門夥伴及廣泛受監理社群的能力，以阻絕重大金融犯罪；
- Pursue improved sharing and innovative exploration of information including by building supporting infrastructure between public and private partners;  
致力於改善資訊共享及創新取得，包括建立公私部門夥伴間的支持性基礎設施；
- Complete the money laundering and terrorist financing risk assessments program;  
完成洗錢及資恐風險評估計劃；
- Identify and pursue operational activities that will deliver broader socio-economic benefits to the Australian community in addition to the producing prevention and disruption outcomes; and  
在推動預防及阻止行動之外，辨識及推行能為澳洲社群創造更大社會經濟效益的運作活動；及
- Demonstrate and make visible the value of the Fintel Alliance through effective performance reporting and communication of outcomes.  
透過有效的績效報告與成果交流，顯示金融情報聯盟的價值。

#### **COVID-19 adaptation: COVID-19 之因應：**

As at the time of this research, Fintel Alliance is currently focusing operational efforts in support of the Australian Government response to the COVID-19 pandemic, working with industry partners to enable assistance to be provided to impacted groups in the community while mitigating the risk of fraud. Additional operational areas of focus include trade-based money laundering, scams impacting the community and understanding the role financial intelligence can play in combating illegal wildlife trafficking.

至本研究時為止，金融情報聯盟正著重在協助澳洲政府因應 COVID-19 疫情的運作改善，與產業夥伴合作，對社群中之受影響團體提供幫助，同時減緩詐欺風險。其他的運作重點領域包括貿易洗錢、影響社群之詐騙及理解金融情報在打擊非法野生動物販運能扮演的角色。

## Hong Kong 香港

# Hong Kong Fraud and Money Laundering Intelligence Taskforce (FMLIT) 香港反詐騙及洗錢情報工作小組(FMLIT)



**Established:** 26 May 2017  
**成立：**2017年5月26日

### **Summary:** 摘要：

On 26 May 2017, the Hong Kong Police Force and the Hong Kong Monetary Authority launched FMLIT as a pilot project. One and a half year later, FMLIT was formally established providing an environment in which the financial sector and the law enforcement can exchange and analyse financial intelligence. FMLIT adopts broadly the same governance model as the UK's JMLIT. FMLIT's mission is to enhance the detection, prevention and disruption of serious financial crime and money-laundering threats in Hong Kong, with a focus on tackling fraud. The main activity of FMLIT is to host collaborative development of intelligence at an operational level to support law enforcement investigations. Financial analysts from the banks engage with law enforcement investigators in secure Operations Group meetings. The co-development and dissemination of alerts also enhance the AML capability of the industry through the identification and mitigation of risks/threats.

於2017年5月26日，香港警務處(Hong Kong Police Force)及香港金融管理局(Hong Kong Monetary Authority)以試行計劃的方式設立香港反詐騙及洗錢工作小組。一年半後，香港反詐騙及洗錢工作小組正式成立，以提供金融部門及執法機關交換及分析金融情報的環境。香港反詐騙及洗錢工作小組廣泛地採用與英國聯合洗錢情報工作小組相同之治理模式，香港反詐騙及洗錢工作小組的任務是加強偵測、預防及阻止香港重大金融犯罪及洗錢威脅的能力，特別著重於對抗詐騙。香港反詐騙及洗錢工作小組之主要活動係於運作層面主導情報的合作發展以支援執法機關的調查。銀行的金融分析師將在安全的運作團體會議中與執法機關調查員合作。經由風險/威脅的辨識及減緩，警示的共同建立及發送將提升防制洗錢的能力。

### **Format & Membership:** 形式及成員：

Taskforce format for tactical information sharing linked to typology co-development. FMLIT is a collaboration between law enforcement, the Hong Kong Monetary Authority and 10 retail banks together with the Hong Kong Association of Banks under the leadership of the Commercial Crime Bureau of the Hong Kong Police Force. Expansion of membership is under consideration to widen the scope. The Independent Commission Against Corruption has recently joined FMLIT in February 2020 to fight against money laundering together.

工作小組係為進行類型化相關之戰術資訊分享而編制。香港反詐騙及洗錢情報工作小組係由香港警務處商業罪案調查科所領導的合作組織，涵蓋執法機關、香港金融管理局及10間零售銀行與香港銀行公會(Hong Kong Association of Banks)。為擴展範圍而擴張其成員。廉政公署近期於2020年2月加入香港反詐騙及洗錢工作小組以共同打擊洗錢。

### **Resources:** 資源

No dedicated public funding.



沒有專屬之公共資助。

**Performance metrics: 表現績效：**

Up to May 2020, 25 Operations Group Meetings had been held since May 2017.

2017年5月以來至2020年5月為止，舉行25個運作團體會議。

<b>HK FMLIT performance (26<sup>th</sup> May 2017 to 31<sup>st</sup> May 2020)</b> 香港反詐騙及洗錢情報工作小組績效(2017年5月26日至2020年5月31日)	
Cases presented 呈報案件	108
Response forms received 收到的回應	666
Entities screened 審查實體	3,640
Persons (previously unknown to Police) identified 辨識之個人(之前未被警方察覺)	379
Companies (previously unknown to Police) identified 辨識之公司(之前未被警方察覺)	513
Accounts (previously unknown to Police) identified 辨識之帳戶(之前未被警方察覺)	8,162
New STRs received 新收之疑似洗錢或資恐交易報告	471
Assets frozen, restrained or confiscated 凍結、限制或沒收之資產	\$646.8 million HKD 6億4680萬港元
Amount of loss prevented 避免之損失金額	\$105.6 million HKD 1億560萬港元
Intelligence-led operations 情報主導之行動	66
Persons arrested 逮捕人數	250
Prosecutions (cases) 起訴(案件數)	16
Typology alerts disseminated 發送之警示態樣	11

**COVID-19 adaptation: COVID-19 之因應**

With a view to consolidating the collective efforts of FMLIT members in identifying the financial risks and fraudulent activities stemming from the current global pandemic, FMLIT has implemented an operational priority focused on "COVID-19 related Deception", which includes the following five areas: -

為鞏固香港反詐騙及洗錢情報工作小組成員對於辨識目前之全球疫情衍生之金融風險及詐騙活動之努力，香港反詐騙及洗錢工作小組已著重將「COVID-19 相關騙局」作為優先行動，包括下列五種領域：

- Raising awareness 喚起注意
  - The dissemination of Alerts for sharing of information and typologies related to fraud linked to COVID 19. 發送警示以分享與 COVID-19 相關聯之詐騙資訊及態樣

- Case-based Intelligence Exchange during Operations Group Meetings 運作團體會議之案件基礎情報交換
  - Cases related to COVID-19 deception and scams are tabled for discussion during Operations Group meeting to strengthen the detection capability.
  - 將與 COVID-19 相關聯之騙局及詐騙案例作為運作團體會議之討論議題，以強化偵測能力。
- Situation Appraisal 情境分析
  - An information brief outlining COVID-19 related deception situation in Hong Kong was compiled by the Hong Kong Police.
  - 香港警方彙整 COVID-19 相關騙局之資訊摘要。
- Knowledge Sharing 知識共享
  - FMLIT members are invited to share their experience and good practice in response to COVID-19, either during thematic presentation or in the form of guidance papers.
  - 邀請香港反詐騙及洗錢情報工作小組成員透過專題演講或指引文件的方式，分享回應 COVID-19 的經驗及優良作法。
- Publicity 公開
  - Anti-scam messages and publicity campaigns through Police and various social media platforms.
  - 反詐騙訊息及公開活動透過警方及各種社群媒體平台進行。

**Editor's Note:** 編註：

This submission from the Hong Kong Police predates the introduction in the People's Republic of China Hong Kong 'National Security Law' (officially the Law of the People's Republic of China on Safeguarding National Security in the Hong Kong Special Administrative Region). It is unclear, at the time of publication of this research, how the implementation of this law will affect the Hong Kong Fraud and Money Laundering Intelligence Taskforce. 本文由香港警方於中華人民共和國香港「國家安全法」(正式名稱為中華人民共和國香港特別行政區維護國家安全法)公布前提交。尚不清楚本研究發布時，該法的實施將如何影響香港反詐騙及洗錢工作小組。

## Malaysia 馬來西亞

### The Malaysia Financial Intelligence Network (MyFINet) 馬來西亞金融情報網(MyFINet)



**Established:** November 2019

成立：2019 年 11 月

**Summary:** 摘要：

MyFINet is a public-private partnership initiated by Bank Negara Malaysia (BNM) in 2017 and was officially launched by the Prime Minister of Malaysia in November 2019. MyFINet is led by the Financial Intelligence and Enforcement Department, BNM (the FIU) in a joint partnership between law enforcement agencies and

financial institutions that are involved in combating money laundering, terrorism and proliferation financing and other serious crimes.

馬來西亞金融情報網係由馬來西亞國家銀行於 2017 年發起的公私部門合作夥伴組織，於 2019 年 11 月由馬來西亞首相公布。馬來西亞金融情報網由馬來西亞國家銀行金融情報及執法部門(FIU)所領導，並由涉及打擊洗錢、恐怖主義及資助武擴及其他重大犯罪的執法機關及金融機構組成共同夥伴關係。

**Objectives: 目標：**

This partnership serves as a platform to encourage sharing of intelligence based on the emerging trends and risks, and other current topical issues between law enforcement agencies and financial institutions in managing any significant threats to the nation. MyFINet aims to deepen and elevate the existing collaboration and bring sharing of information between the financial sectors and the law enforcement community to the next level, in the fight against financial crimes, terrorism and proliferation financing.

此夥伴關係得作為鼓勵執法機關及金融機構間分享基於新興趨勢及風險及其他現今議題之情報的平台，以管理對國家之任何重大威脅。馬來西亞金融情報網擬為打擊金融犯罪、恐怖主義及資助武擴，深化及提升既有合作，並將金融部門及執法社群間的資訊共享提升至另一個層次。

**Threats addressed: 針對之威脅：**

Currently, MyFINet is designed to assist the financial institutions in better detecting and reporting crimes which are difficult to detect through financial transactions alone. These include terrorism and proliferation financing, corruption, goods smuggling and other serious crimes that pose significant threats to the economic stability.

目前，馬來西亞金融情報網被設計用以協助金融機構更好地偵測及通報單透過金融交易本身難以偵測的犯罪。其包括恐怖主義及資助武擴、貪腐、走私及其他對經濟穩定性造成嚴重威脅之重大犯罪。

**Format: 形式：**

MyFINet operates as an Operational Working Group which focuses on tactical intelligence on specific cases as initiated by the law enforcement agencies. Under this initiative, the FIU facilitates discussions and meetings between the law enforcement agencies and the financial institutions. During these meetings, the respective law enforcement agencies will share specific intelligence information, red-flags and typologies with the selected financial institutions. Based on the information shared, the financial institutions will facilitate the law enforcement agencies in their investigations through better identification and reporting of suspicious transactions.

馬來西亞金融情報網以功能型工作小組的方式運作，並專注於執法機關提出之具體案件的戰術情報。在此計劃中，金融情報中心促成執法機關及金融機構間的討論及會議。在會議裡，各執法機關會與經選擇的金融機構分享具體情報資訊、紅旗指標及態樣。基於分享的資訊，金融機構將透過更好的可疑交易辨識及通報幫助執法機關的調查。

**Membership: 成員：**

At present, the members of MyFINet are the Royal Malaysia Police, the Malaysian Anti-Corruption Commission, the Royal Malaysian Customs Department, Securities Commission Malaysia and selected financial institutions and money services business providers.

目前馬來西亞金融情報網的成員為馬來西亞皇家警方(Royal Malaysia Police)、馬來西亞反貪污委員會(Malaysian Anti-Corruption Commission)、馬來西亞皇家關稅局(Royal Malaysian Customs Department)、馬來西亞證券監督委員會(Securities Commission Malaysia)以及指定之金融機構及貨幣服務事業提供者。

## **Resources: 資源：**

MyFINet operates a decentralised model where the relevant officers of the FIU, law enforcement agencies and financial institutions work on specific cases from their respective offices. Upon prior arrangement with the law enforcement agencies, relevant officers of the FIU, law enforcement agencies and financial institutions will convene for a meeting based on specific date and venue, where officers of the law enforcement agencies will share sensitive intelligence including identified subjects and other specific topical issues. This model primarily delivers tactical support for intelligence gathering and investigations. There is no dedicated funding for the operationalisation of MyFINet at the present time.

馬來西亞金融情報網以去中心化的方式運作，金融情報中心的相關人員、執法機關及金融機構在其各自的辦公室處理特定案件。在執法機關的之前安排中，金融情報中心的相關人員、執法機關及金融機構將在特定日期及地點召開會議，執法機關的人員將分享包括辨識主體及其他特定主題的敏感情報。此模式主要提供情報蒐集及調查的戰術支持。目前沒有對馬來西亞金融情報網運作的專屬資助。

## **Record of outputs / Performance metrics: 工作成果/ 表現績效：**

Since its initiation in 2017, MyFINet has assisted the financial institutions to effectively detect suspicious activities and submit STRs with highly valuable information that are useful for investigations by the law enforcement agencies. This has led to the arrest, prosecution and deportation of 22 individuals for their suspected involvement in terrorism and proliferation financing activities in Malaysia.

自 2017 年設立以來，馬來西亞金融情報網已協助金融機構有效偵測可疑活動，並遞交具有高價值資訊之疑似洗錢或資恐交易報告，其得用於執法機關的調查。此促成 22 位涉嫌於馬來西亞從事恐怖主義及資助武擴活動人士之逮捕、起訴及驅逐出境。

## **Recent developments and COVID-19 adaptation: 近期發展及 COVID-19 之因應：**

- Meetings with members have been conducted virtually via secured platform in view of the physical restriction amidst the COVID-19 pandemic.
- 有鑑於 COVID-19 疫情期間的實體管制，成員間的會議透過安全的平台虛擬進行。
- The FIU intends to further enhance the understanding of the partnership with the existing members to achieve its objective to the fullest extent possible.
- 金融情報中心擬進一步地加強既有成員對夥伴關係的理解，以盡可能地達成其目標。
- The branding and official launch of MyFINet in November 2019 facilitated interest from other members of public sector to participate in the partnership. Based on the positive feedback from participating law enforcement agencies and financial institutions, the FIU will continue to promote MyFINet and encourage the participation from law enforcement agencies who are in-charge of other serious crimes that may pose significant threats.
- 馬來西亞金融情報網於 2019 年 11 月命名並正式上路，使其他公部門成員有意加入夥伴關係。基於參與之執法機關及金融機構之正面回饋，金融情報中心將繼續推廣馬來西亞金融情報網，並鼓勵負責其他可能造成嚴重威脅之重大犯罪的執法機關加入。

## New Zealand 紐西蘭

# New Zealand Financial Crime Prevention Network (NZ-FCPN) 紐西蘭金融犯罪防治網 (NZ-FCPN)



**Established:** December 2017

**成立：**2017 年 12 月

### **Summary:** 摘要：

The NZ-FCPN is a public private partnership is to combine the resources and goodwill of all its members to strengthen resilience of the New Zealand economy against financial crime both domestically and internationally. Chaired by the NZ Police (the New Zealand Police Financial Intelligence Unit is a part of the NZ Police), it provides an environment in which the Reporting Entities and law enforcement agencies can exchange and analyse information and financial intelligence to detect, prevent and disrupt serious financial crime and wider economic crime threats against New Zealand.

紐西蘭金融犯罪防治網是一個公私部門夥伴關係，結合其所有成員的資源及努力，以加強阻絕對紐西蘭經濟之國內及國際犯罪。其由紐西蘭警方所領導(紐西蘭警方金融情報中心是紐西蘭警方的一部分)，提供報告實體及執法機關交換並分析資訊及金融情報以偵測、預防及阻止對紐西蘭之重大金融犯罪及更廣泛之經濟犯罪威脅。

### **Objectives:** 目標：

- Develop stronger relationships between New Zealand law enforcement agencies and the Reporting Entities to collectively address financial crime; and
- 建立紐西蘭執法機關及報告實體間更穩固的關係以共同處理金融犯罪；及
- Deliver and test the potential to realise a range of benefits to law enforcement and Reporting Entities including:
  - o The management of risks by the Reporting Entities; 通報實體之風險管理；
  - o Collective understanding of threat; 對威脅的共同理解；
  - o Securing the customer experience; 保障消費者體驗；
  - o Targeting and intervention activity by law enforcement agencies; and 執法機關之目標及干預活動；及
  - o Opportunities to learn from the other parties' approaches. 學習他人方法之機會。

### **Threats addressed:** 針對之威脅：

#### *Tactical* 戰術

The NZ National Risk Assessment of Money Laundering and Terrorist Financing (NRA) is the principal strategic document that drives the tactical response to crime threats and priorities. The principal money laundering

threats in the NZ context is drug dealing, followed by fraud. The highest risk money laundering typology is money remittance. Due to the greater social impact of drug dealing, along with the profile of those involved in the illicit business, most of the tactical response has been focussed on drug dealing and gangs and the principal typology of interest has been focused on money remitters. There is a small but significant resource directed towards terrorist financing.

紐西蘭洗錢防制及資恐國家風險評估(NRA)是推動對於犯罪威脅之戰術回應及其優先排序之主要策略文件。紐西蘭主要洗錢威脅是毒品交易，再來是詐騙。風險最高的洗錢態樣是金錢匯兌。由於毒品交易對於社會之影響更大，以及從事該非法事業的人物形象，多數戰術集中反應在毒品交易及幫派，而主要態樣著重在金錢匯兌。另有少部分但重要的資源針對資恐。

### *Strategic 策略*

Knowledge gaps in the NRA drives the strategic response to crime threats and priorities. The NZ-FCPN members are undertaking four joint products on the risk areas of child exploitation; trade-based money laundering; trust and company service providers; and virtual asset service providers, in the context of how these typologies affect NZ.

紐西蘭洗錢防制及資恐國家風險評估的知識落差促成對於犯罪威脅及優先事項的策略回應。就該等態樣是如何影響紐西蘭的脈絡下，紐西蘭金融犯罪防治網的成員負責處理兒童剝削、貿易洗錢、信託及公司服務業者；及虛擬資產服務提供商等四個風險領域。

### **Format: 形式：**

The NZ-FCPN Strategic Board provides governance to the group and meet at least every quarter. The Strategic Board provide approvals for any resource intensive strategic work. The NZ-FCPN Operational Board meets every month, and since November 2019 has had at least one pending covert operation presented to the group at each meeting. This is followed up with a document called an 'FCPN Alert' that is sent to members providing a summary of the offending and details of the parties involved. There are out-of-session FCPN Alerts also developed and distributed, as the operational need arises. Terrorist Financing FCPN Alerts are not normally distributed to the whole group and are kept on a need to know basis, with Alerts sent directly to affected members.

紐西蘭金融犯罪防治網策略委員會管理團隊且每季至少開會一次。策略委員會負責核准任何資源密集的策略工作。紐西蘭金融犯罪防治網營運委員會每月開會，自 2019 年 11 月開始每次會議都會收到至少一件進行中的秘密行動。後續並發送給成員稱為「金融犯罪預防網絡警示訊息」的文件，以提供違反行為的摘要及參與當事人之細節。需要時，會外的金融犯罪預防網絡警示訊息亦會被建立及發送。資恐金融犯罪預防網絡警示訊息通常不會被發送給整個團體，而僅發給需要知道的人，如直接寄送給受影響成員。

### **Membership: 成員：**

The membership of FCPN is comprised of the NZ Police, NZ Customs, and the five major banks (ANZ, ASB, BNZ, Kiwibank, and Westpac) who collectively have 89% of the NZ market share for banking. Unlike larger jurisdictions, NZ has one principal law enforcement agency – the NZ Police, which has 10,000 sworn officers. NZ Customs is the next largest with 1,000 Customs Officers and the other agencies with law enforcement responsibilities have a much smaller number of officers/investigators (for example the Serious Fraud Office). This gives the group streamlined access and coverage of the law enforcement work groups across a range of national and transnational offending. There are future plans to expand the NZ-FCPN membership beyond the banking sector.

金融犯罪預防網絡的成員由紐西蘭警方、紐西蘭海關及五個主要銀行(ANZ、ASB、BNZ、Kiwibank 及 Westpac)組成，該五家銀行合計占紐西蘭銀行市占率的 89%。不像其他更大的司法管轄區，紐西蘭有

一個主要的執法機關—紐西蘭警方，其擁有 1 萬名人員。紐西蘭海關有次多的 1 千名海關人員，其他負責執法的機構之人員/調查員(例如嚴重詐欺辦事處) 較少。這使團隊可以容易地接觸並涵蓋國內及國際犯罪之執法工作小組。未來計劃擴張紐西蘭金融犯罪防治網至銀行部門以外。

#### Resources: 資源：

There is no dedicated funding for the FCPN.  
沒有對於金融犯罪預防網絡的專屬資助。

#### Outputs/Performance Metrics: 成果/表現績效：

The FCPN operational activity developed since mid-2019 and is still in the process of developing the performance monitoring framework for outcomes following this operational activity. The FCPN Alerts have stimulated a range of relevant reporting that, in turn, supported covert operations. None of these operations have terminated and therefore monitoring is still ongoing as to determine the full impact of the relevant information-sharing. The FCPN has had success in using TF Alerts to support network analysis. In 2019 there were eight FCPN Alerts sent and up to June 2020 there have been 21 FCPN Alerts sent in total.

金融犯罪預防網絡的運作活動自 2019 年中期開始，即持續發展就運作活動之績效監控架構。金融犯罪預防網絡警示訊息激發相關通報，並同時支持秘密行動。這些活動尚未終結，因此監控仍持續進行，以判斷對於相關資訊共享之整體影響。金融犯罪預防網絡成功使用資恐警示訊息支援網絡分析。於 2019 年，有 8 個金融犯罪預防網絡警示訊息被送出，而直至 2020 年 6 月止，共送出合計 21 個金融犯罪預防網絡警示訊息。

#### Distinctive elements: 特點：

- **The FCPN can be very operationally responsive.** For example, in January 2020, an NZ Police National Organised Crime Operation came across a large commercial cannabis operation in a rural location. The cannabis was being tended to by a group of Vietnamese overstayers and there was an immediately rush to understand who owned the property and look to quickly restrain any assets before they could be disposed of. Within 1 hour of the discovery of the cannabis operation an FCPN Alert was sent that had the details of the property's location and names of the people apprehended. This was followed up later in the day with a more comprehensive FCPN Alert. There is a capability to monitor incoming FCPN generated SARs afterhours to forward to the relevant authority.
- **金融犯罪預防網絡之運作反應迅速。**舉例而言，於 2020 年 1 月，紐西蘭警方之國家組織犯罪行動部門在鄉間發現大型之商業用大麻產業。該大麻產業由一群越南籍逾期滯留者經營，當時非常迫切地需要瞭解誰擁有這些財產並且盡快在被處分前限制其所有財產。在大麻產業被發現後一小時內，金融犯罪預防網絡警示訊息即被發出，包含財產的位置及被逮捕之人的名字。第二天進一步發出更完整的金融犯罪預防網絡警示訊息。其具備監控金融犯罪預防網絡發出的疑似洗錢或資恐活動交易報告並在幾小時內提交給相關當局的能力。
- **The FCPN can support a short feedback loop on SARs.** A mortgage fraud operation commenced in October 2019. What was unique about this operation was that it was the first time that the NZ Police FIU shared SAR information from a range of reporting entities with the FCPN members. The FIU asked FCPN member banks to speak with their mortgage advisors and report (via SARs) instances where mortgage frauds (or attempts) were identified. Once the SARs were received and collated into a report, it was disseminated to members to stimulate a second round of SARs. This started an operation which is still ongoing.
- **金融犯罪預防網絡可以支援疑似洗錢或資恐活動交易報告之短反饋循環。**2019 年 10 月曾發生一起抵押詐欺案件。其特殊處在於這是紐西蘭警方金融情報中心首次自一系列金融犯罪預防網

絡成員的通報實體取得疑似洗錢或資恐活動交易報告之資訊。金融情報中心要求金融犯罪預防網絡成員銀行與其抵押顧問溝通，並於抵押詐欺(或其意圖)被辨識時進行通報(透過疑似洗錢或資恐活動交易報告)。一旦收到疑似洗錢或資恐活動交易報告且整合為報告，其將被發送至各成員以促成第二輪的疑似洗錢或資恐活動交易報告。這開啟了現仍持續進行的行動。

- **Integration of the FCPN as part of the national AML infrastructure.** The FCPN members met with the FATF Mutual Evaluation panel members during their on-site in March 2020 and there will be commentary on the FCPN in the FATF report.
- **整合金融犯罪預防網絡作為國家防制洗錢基礎建設的一部分。** 金融犯罪預防網絡成員於 2020 年 3 月與防制洗錢金融行動工作組織相互評鑑專家小組成員實體會面，防制洗錢金融行動工作組織報告中將評論金融犯罪預防網絡。

### COVID-19 adaptation: COVID-19 之因應

Following the introduction by the New Zealand Government of a wage subsidy for companies and workers financially effected by the COVID-19 lockdown, the NZFIU released guidance to the FCPN on specific indicators to identify fraudulent applications. As of 23 July 2020, this has resulted in over 267 SARs being submitted to the NZFIU, which in turn have been passed onto the investigation team responsible for triaging COVID-19 wage subsidy fraud.

隨著紐西蘭政府對因 COVID-19 封鎖而經濟受影響的公司及員工發放薪資補貼，紐西蘭金融情報中心對金融犯罪預防網絡發布辨識虛偽申請的具體指引。至 2020 年 7 月 23 日止，有 267 個疑似洗錢或資恐交易報告遞交給紐西蘭金融情報中心，並分案給負責 COVID-19 薪資補貼詐欺的調查小組。



## Singapore 新加坡

# The Singapore AML/CFT Industry Partnership (ACIP) 新加坡洗錢防制暨打擊資助恐怖組織產業夥伴關係(ACIP)



**Established:** April 2017

**成立：**2017年4月

### **Summary:** 摘要：

The Singapore AML/CFT Industry Partnership (ACIP) is a public–private partnership comprising the industry, regulators, law enforcement agencies and other government entities to combat financial crime.

新加坡洗錢防制暨打擊資助恐怖組織產業夥伴關係(ACIP)是個公私部門合作夥伴組織，包含業界、監理機關、執法機關及其他政府實體以對抗金融犯罪。

### **Format & Membership:** 形式及成員：

ACIP comprises a Steering Group, which look into specific risk areas and topics relevant to ML/TF/PF. The Commercial Affairs Department (CAD) of the Singapore Police Force and the Monetary Authority of Singapore (MAS) co-chair the Steering Group, which consists of eight banks and the Association of Banks in Singapore. The Steering Group identifies key ML/TF/PF risks and forms Expert Working Groups (WGs) or operational task force to assess and follow-up on these risks. Relevant industry participants, including non-bank experts from other financial sub-sectors, legal, accounting and company service providers have been invited to provide a wide-range of expertise and perspectives in the WGs.

洗錢防制暨打擊資助恐怖組織產業夥伴關係有一個督導委員會，負責調查關於洗錢/打擊資恐/資助武擴之具體風險領域及主題。新加坡警方商務部(CAD)及新加坡金融管理局(MAS)共同領導督導委員會，其包括八家銀行及新加坡銀行協會。督導委員會辨識重要洗錢/資恐/資助武擴風險並組成專家工作小組(WGs)或營運工作小組，以評估並追蹤這些風險。相關產業參與者，包括其他金融子部門的非銀行專家、法律、會計及公司服務提供者都被邀請在專家工作小組提供廣泛的專業及觀點。

### **Resources:** 資源

No dedicated public funding is available to ACIP.

沒有對於洗錢防制暨打擊資助恐怖組織產業夥伴關係的專屬資助。

### **Recent developments:** 近期發展

- Co-creation – Best practice papers, dialogues and workshops: 共同建立—最佳實務文件、對話及工作坊：
  - In 2018, ACIP published papers on typologies and best practices related to trade-based money laundering and the misuse of legal persons. Financial institutions then benchmark their own practices against these best practices and the Association of Banks in Singapore organised training workshops using the contents in these papers.

- 於 2018 年，洗錢防制暨打擊資助恐怖組織產業夥伴關係發布關於貿易洗錢及法人濫用之態樣及最佳實務的文件。金融機構基於最佳實務改進自身實施情況，而新加坡銀行協會也依此文件內容組織培訓工作坊。
- ACIP has also been encouraging the financial community to deploy new data analytics methods such as machine learning and artificial intelligence to better detect and disrupt financial crime:
- 洗錢防制暨打擊資助恐怖組織產業夥伴關係鼓勵金融社群採用新數據分析方式，如機器學習及人工智慧，以更好地偵測並阻止金融犯罪。
  - ✦ In 2018, an ACIP working group produced an information paper on the use cases for AML DA and the related implementation issues.
  - ✦ 於 2018 年，洗錢防制暨打擊資助恐怖組織產業夥伴關係工作小組製作關於防制洗錢數據分析案例及相關實施議題的資訊文件。
  - ✦ In 2019, ACIP held a data analytics workshop for industry to share experiences on effective DA execution and proper governance.
  - ✦ 於 2019 年，洗錢防制暨打擊資助恐怖組織產業夥伴關係舉辦數據分析工作坊，供業界分享有效數據分析執行及適當治理的經驗。
- In 2020, ACIP members discussed the steps they took to tackle the operational challenges posed by COVID-19 and mitigate the impact on their AML/CFT effectiveness. The key insights were compiled in a practice note, which was shared with banks in Singapore. The practice note complements other relevant guidance and advisories, including a joint Alert that MAS and CAD had issued on emerging AML/CFT developments relating to COVID-19 and typologies, and the FATF paper on COVID-19-related ML/TF risks and policy responses that was shared with financial institutions through MAS' website.
- 於 2020 年，洗錢防制暨打擊資助恐怖組織產業夥伴關係成員討論其所採行之對應因 COVID-19 所帶來之運作挑戰及減緩對防制洗錢/打擊資恐有效性影響的作法。重要觀點已收錄於實行紀錄，並分享給新加坡的銀行。實行紀錄補充其他相關指引及建議，包括新加坡金融管理局及新加坡警方商務部針對 COVID-19 相關新興防制洗錢/打擊資恐發展及態樣之共同警示訊息，及防制洗錢金融行動工作組織關於 COVID-19 相關洗錢/資恐風險的文件以及新加坡金融管理局網站上分享給金融機構的政策回應。
- ACIP advisories: 洗錢防制暨打擊資助恐怖組織產業夥伴關係建議
  - Advisories have been disseminated to financial institutions to enhance awareness of emerging typologies that are of priority concern to the Singapore authorities. ACIP members may also propose such advisories to the ACIP co-chairs, as a means to alert the wider industry of a material risk that they have has detected.
  - 建議已發送給各金融機構，以加強對新加坡當局主要擔憂之新興犯罪型態的意識。洗錢防制暨打擊資助恐怖組織產業夥伴關係成員亦得將該建議提案給洗錢防制暨打擊資助恐怖組織產業夥伴關係共同主席，作為提示其他產業其偵測風險的警告方法。
- Case-specific sharing and typologies: 具體案件分享及類型：
  - ACIP provides a platform for case-specific investigative collaboration between industry and law enforcement agencies. The pilot project related to Business Email Compromise scams and resulted

in successful seizure of illicit funds. ACIP members have since collaborated on other cases involving front and shell companies, including an ongoing one on trade-based money laundering.

- 洗錢防制暨打擊資助恐怖組織產業夥伴關係提供業界及執法機關間就具體案件調查合作之平台。關於商務電子郵件詐騙的先期計劃成功促成非法資金的扣押。洗錢防制暨打擊資助恐怖組織產業夥伴關係成員在涉及空殼公司的其他案件上合作，包含現正進行之貿易洗錢案件。

# The Americas

## 美洲



- Argentina Fintel-AR 阿根廷金融情報機構
- Canadian 'Project' Initiatives to Combat Financial Crimes through Partnerships 加拿大透過夥伴關係打擊金融犯罪計劃倡議
- The US FinCEN Exchange 美國金融犯罪執法署

## Argentina 阿根廷

### Fintel-AR<sup>8</sup> 阿根廷金融情報機構<sup>8</sup>

**Established:** 21 November 2019

**成立：**2019 年 11 月 21 日



#### **Summary:** 摘要：

Reported to be the first public-private partnership to combat financial crimes in Latin America, Argentina's Financial Intelligence Unit (FIU) established Fintel-AR in November 2019. Fintel-AR is a collaborative initiative developed between the FIU and its main reporting banks in order to exchange and analyse information about risks and strategic aspects of the anti-money laundering and counter-terrorism financing system (AML/CFT) in a prompt and effective manner. Fintel AR's initial agenda is focused on assessing risks to financial integrity in the banking sector, the development of typologies, the feedback to the financial system, and the discussion on the need for potential amendments to the domestic regulatory framework.

據報導為拉丁美洲第一個對抗金融犯罪的公私部門夥伴關係，阿根廷的金融情報中心在 2019 年 11 月成立阿根廷金融情報機構。阿根廷金融情報機構是由金融情報中心及其主要通報銀行建立之合作行動組織，以快速並有效地交換及分析防制洗錢/打擊資恐金融系統風險及策略層面之資訊。阿根廷金融情報機構初始工作事項著重於評估銀行部門的財務誠信、犯罪態樣之發展、對金融體系之反饋及討論國家監理框架可能之修正需求。

#### **Objectives:** 目標：

The objectives of the Fintel-AR are established as follows:

阿根廷金融情報機構之目標如下：

- To develop an operating environment for exchanging information in a secure and efficient manner; 發展安全有效交換資訊之運作環境；
- To evaluate emerging threats to the integrity of the financial system; 評估對金融體系誠信之新興威脅；
- To inform participants' understanding of a risk-based approach; 增進參與者對風險基礎方法之理解；
- To contribute to the development of a regulatory framework which delivers greater efficiency and adaptability to respond to threats, innovation and the needs of financial sector stakeholders; and 發展能有效因應威脅、創新及回應金融部門利害關係人需求之監理框架；及
- Contribute to the growth of Argentina's economy. 貢獻阿根廷之經濟成長。

#### **Format:** 形式：

Due to the lack of a specific legal gateway for tactical information-sharing, the Fintel-AR is initially geared towards strategic intelligence collaboration, covering crime typologies, trends and patterns, emerging threats, best-practices and awareness-raising. The engagement of the private sector is voluntary, additional and parallel to standard AML/CFT requirements.

由於缺乏戰術性資訊共享之具體法律手段，阿根廷金融情報機構一開始著眼於策略性情報合作、涵蓋之犯罪態樣、趨勢及模式、新興威脅、最佳實務及喚起意識。私部門之參與是自願的且在標準防制洗錢/打擊資恐要求之外並與其並行。

<sup>8</sup> Information provided by the FIU in Argentina at point of launch of partnership in November 2019. 本資訊由阿根廷金融情報中心於 2019 年建立該夥伴關係時提供。

Meetings are convened in response to ongoing project needs. 召開會議以因應持續的計劃需求。

Obligations of membership and due process in terms of participation, governance, information security, dispute resolution and external communications are described in a Memorandum of Understanding for the Fintel-AR. 阿根廷金融情報機構的瞭解備忘錄中記載成員義務及關於參與、治理、資安、爭端解決及外部溝通之正當程序以及外部通訊。

**Membership: 成員：**

Fintel AR was initially formed as a partnership between Argentina’s FIU, Banco Nación, Banco Galicia, Banco Provincia, Banco Supervielle, Banco Hipotecario and Banco Ciudad.

阿根廷金融情報機構一開始是由阿根廷金融情報中心、Banco Nación、Banco Galicia、Banco Provincia、Banco Supervielle、Banco Hipotecario 及 Banco Ciudad 所組成之夥伴關係。

**Resources: 資源：**

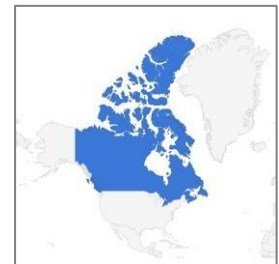
All financial resourcing of the Fintel-AR is borne by the Argentina’s FIU. Other participants contribution is exclusively in participants time and technical insight.

所有阿根廷金融情報機構的財務資助由阿根廷金融情報中心負擔。其他參與者則專注於時間上的參與及戰術專業。

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## Canada 加拿大

### Combating Financial Crimes through Partnerships: Canadian Collaboration in 2019/20 透過夥伴關係打擊金融犯罪：2019/20 加拿大合作聯盟



**Overview: 概覽：**

The following provides an overview of the awareness and targeted collaborative projects in focus for 2019/20 while also highlighting newly formed public-public partnerships. Additional details on public-private partnerships can be found within FINTRAC’s latest Annual Report.<sup>9</sup>

下述就 2019/20 年提高意識及著重之目標性合作計劃提供概覽，並且重點描述新成立的公私部門夥伴關係。其他公私部門夥伴關係的細節可以參考金融交易及報告分析中心最新年報<sup>9</sup>。

**Awareness Projects: 提高意識計劃**

Awareness projects leverage a public-private model and typically employ a dual mandate of heightening general awareness amongst relevant groups (e.g. regulatory, anti-money laundering professionals, etc.) and

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<sup>9</sup> See <https://www.fintrac-canafe.gc.ca/publications/ar/2019/1-eng>  
參 <https://www.fintrac-canafe.gc.ca/publications/ar/2019/1-eng>

increasing the number of STRs filed to FINTRAC on potential money laundering related to a specific predicate offence (e.g. human trafficking in the sex trade, fentanyl trafficking, etc.). These projects are designed with a vision to investigate the crime from a specific financial angle given the increased complexity of the predicate offences chosen.

提高意識計劃利用公私部門模型，且一般有雙重目標，包含提高相關團體(監管、反洗錢專家等)的整體意識及提升通報給金融交易及報告分析中心之與特定前置犯罪(性交易之人口販運、芬太尼販運等)相關之可能洗錢行為之疑似洗錢或資恐活動交易報告數量。鑒於特定前置犯罪的日漸複雜性，這些計劃被設計從特定金融角度調查犯罪。

The composition of the partners who participate in public-private awareness projects may vary based on the underlying predicate offence that is being

addressed. 參與公私部門提高意識計劃之夥伴組成可能因處理的前置犯罪而有所不同。

For example, Project Protect includes participation from non-governmental organisations (NGOs) that provide front line services to survivors of human trafficking. While Project Chameleon benefits from the participation of the Canadian Anti-Fraud Centre. 舉例而言，保護計劃有提供人口販運倖存者前線服務的非政府組織(NGOs)的加入。而變色龍計劃則受益於加拿大反詐騙中心的參與。

However, although certain participants can vary, major reporting entities in Canada, such as banks, the federal police (RCMP) and the national FIU (FINTRAC), are considered foundational partners for all awareness projects. 然而，儘管特定的參與者不同，加拿大主要的通報實體，例如銀行、聯邦警方(RCMP)及國家金融情報中心(FINTRAC)被認為是所有提高意識計劃中的基礎夥伴。



The diagram to the right lays out the composition of who could potentially participate in a given awareness project. 右方圖表說明參與提高意識計劃的組成。

Overview of active awareness projects: 現行之提高意識計劃概覽：

Project Code Name 計劃代號名稱	Year Launched 開始年度	Focal Predicate Offence 重點前置犯罪	Targeted Underlying Activity 目標潛在活動	Project Outputs 計劃成果
Protect 保護	2016	Human Trafficking 人口販運	Sexual Slavery and Forced Labour 性奴隸及強迫勞動	<ul style="list-style-type: none"> <li>Indicators <u>Published</u> 公布指標</li> <li>Partnership Overview <u>Published</u> 公布夥伴關係概覽</li> <li>In 2019-20, FINTRAC provided 251 disclosures of financial intelligence to Canada's police forces in relation to Project Protect 於 2019-20 年間，金融交易及報告分析中心提供 251 份關於保護計劃之金融情報揭露給加拿大警方。</li> <li>New Indicators to be published in 2020 2020 年將公布新指標</li> </ul>
Chameleon 變色龍	2017	Fraud 詐騙	Romance Fraud 浪漫詐騙	<ul style="list-style-type: none"> <li>Partnership formed between FINTRAC and the Canadian AntiFraud Centre 金融交易及報告分析中心與加拿大反詐騙中心成立夥伴關係</li> <li>Indicators <u>Published</u> 公布指標</li> <li>In 2019-20, FINTRAC provided 74 disclosures of financial intelligence to Canada's police forces in relation to Project Chameleon</li> <li>於 2019-20 年，金融交易及報告分析中心提供 74 份關於變色龍計劃之金融情報揭露給加拿大警方。</li> </ul>
Organ 器官	2017	Organ Trafficking 器官販運	Organ Trafficking or trafficking of persons for the purpose of organ removal. 器官販運或摘除器官為目的之人口販運	<ul style="list-style-type: none"> <li>Derivative of Project Protect. 保護計劃的延伸</li> <li>Indicators <u>published</u> via industry partner. 透過產業夥伴公布指標</li> <li>Project Organ will be presented at the OSCE's Expert Meeting On Combating Trafficking in Human Beings for the Removal of Organs in July 2020. 器官計劃將在 2020 年 7 月於歐洲安全及合作組織打擊摘除器官為目的之人口販運專家會議上報告。</li> </ul>



Guardian 守護者	2018	Drug Trafficking 毒品販運	Fentanyl Trafficking 芬太尼販運	<ul style="list-style-type: none"> <li>Partnership Overview <a href="#">Published</a> 公布夥伴關係概覽</li> <li>Indicators <a href="#">Published</a> 公布指標</li> <li>In 2019-20, FINTRAC provided 134 disclosures of financial intelligence to Canada's police forces in relation to Project Guardian.</li> <li>於 2019-20 年，金融交易及報告分析中心提供 134 份關於守護者計劃之金融情報揭露給加拿大警方。</li> </ul>
Athena 雅典那	2019	Fraud / Drug Trafficking 詐騙/毒品販運	Money Laundering via underground banking in casinos/ real estate, luxury vehicles and high-value goods. 透由賭場/不動產、豪華車輛及高價商品之地下金融進行洗錢	<ul style="list-style-type: none"> <li>Partnership Overview <a href="#">Published</a> 公布夥伴關係概覽</li> <li>Indicators <a href="#">Published (December 2019)</a> 公布指標(2019 年 12 月)</li> <li>In 2019/2020, FINTRAC provided 52 disclosures of financial intelligence to Canada's police forces in relation to Project Athena.</li> <li>於 2019-20 年，金融交易及報告分析中心提供 52 份關於雅典那計劃之金融情報揭露給加拿大警方。</li> </ul>
Shadow 影子	TBD (Fall 2020) 待定(2020 秋)	On-line Sexual exploitation 線上性剝削	Child pornography 兒童色情	<ul style="list-style-type: none"> <li>Partnership Overview (in draft) 夥伴關係概覽(草稿)</li> <li><a href="#">Indicators (in draft)</a> 指標(草稿)</li> <li>20 Disclosures since Fall 2019</li> <li>自 2019 年秋季起揭露 20 份</li> </ul>

\*\*All projects are public-private. 所有計劃皆是公私部門合作

### New Public Private Partnerships - 新公私部門夥伴關係-

#### **Project ATHENA: 雅典那計劃：**

Project ATHENA, a public-private partnership focused on combatting money laundering in Canada, initially began as a Combined Forces Special Enforcement Unit (CFSEU – British Columbia) probe into the use of bank drafts at casinos in Lower Mainland, British Columbia. Due to the Project's early findings which uncovered money laundering occurring beyond the casino sector and a strong desire to combat money laundering in other sectors, Project ATHENA expanded to a national focus and increased its scope to include real estate, luxury vehicles and high-value goods.

雅典那計劃，一個在加拿大專注於打擊的洗錢之公私部門夥伴關係，前身為結合運作特別執行中心(CFSEU – 英屬哥倫比亞)，偵查英屬哥倫比亞低陸平原之賭場使用銀行匯票。因該計劃之早期發現揭露發生在賭場業以外的洗錢，且強烈希望打擊其他行業的洗錢，雅典那計劃擴展為國家級重點，並擴張其範圍至涵蓋房地產、豪華汽車及高價值商品。

Information sharing across the public and private sectors is believed to increase awareness of current and emerging threats. This dynamic can lead to systemic and operational enhancements and to better detection, prevention and disruption of criminal activity. Moreover, the partnership approached is reported to foster an environment of collective ownership of activities that contribute to making Canada a less conducive environment for money laundering.

跨越公私部門的資訊共享被認為能提升對於既有及新興威脅之意識。本機制能強化系統性運作，並更好地偵測、預防及阻止犯罪活動。此外，夥伴關係方法被認為是能培養所有集體活動之環境，使加拿大成為較不利於洗錢的環境。

#### **Project SHADOW: 影子計劃：**

Project SHADOW is a bank-led initiative to combat money laundering associated with online child exploitation. FINTRAC has been invited to participate by providing operational guidance to Reporting Entities as well as the disclosure of potential tactical financial intelligence to disclosure recipients regarding the detection, facilitation and laundering of the proceeds of online child exploitation.

影子計劃是個以銀行為主導之打擊線上兒童剝削洗錢行動。金融交易及報告分析中心受邀參與提供通報作業運作指引及揭露潛在戰術金融情報，通報關於線上兒童剝削之偵測、促進、洗錢的收受者。

#### **Targeted projects: 目標計劃：**

Targeted projects in Canada refer to investigations traditionally launched by law enforcement for the purpose of investigating specific criminal organisations, enterprises or activities. These projects tend to flow in reverse of awareness projects; awareness projects begin with research and indicator creation to enhance reporting on underreported predicate offences and cumulate with targeted investigations, while targeted investigations are specifically launched to address a specific criminal offence suspected of being perpetrated. However, like awareness projects, targeted projects also leverage public-private or public-public partnerships to assist with investigations due to their transnational and/or complex nature. Additionally, targeted projects can also conclude with the creation of typologies or indicators that could spawn new investigations of a similar nature. Targeted projects see various forms of interaction between the public and private sectors, ranging from FINTRAC's proactive disclosure of STRs to law enforcement agencies, the issuance of court orders by law enforcement to private sector entities to obtain information directly and finally, briefings from law enforcement agencies on certain disclosable pieces of information pertaining to open investigations, to entities such as banks, to enhance the quality of intelligence submitted via STR.

加拿大的目標計劃意指傳統上由執法機關發起，針對具體犯罪組織、企業或活動的調查行動。這些計劃與提高意識計劃相反；提高意識計劃始於研究及指標，以強化潛在前置犯罪的通報及促進目標調查，而目標調查係為調查涉嫌違犯的特定犯罪。然而，如同提高意識計劃，目標計劃亦利用公私部門或公部門夥伴關係協助跨國及/或本質複雜之調查。此外，目標計劃亦能藉由態樣或指標的建立出具有類似性質之新調查的結論。目標計劃監管公私部門間不同型態的互動，從金融交易及報告分析中心對執法機關積極之疑似洗錢或資恐交易報告揭露、執法機關為直接取得資訊對私部門團體出具的法院命令、最終到執法機關對於諸如銀行等團體之特定公開調查可揭露資訊之簡報，以提升疑似洗錢或資恐交易報告提交之情報品質。

#### **Overview of successful 'Targeted Projects' executed in 2019/20: 於 2019/20 成功執行之「目標計劃」概覽**

Project Name 計劃名稱	Targeted Predicate Offence 目標前置犯罪	Primary Agencies Involved 涉及之主要機構	Overview 概覽
Hobart 荷巴特	Fraud, illegal Gambling 詐騙、非法賭博	Ontario Provincial Police (OPP), Canada Revenue Agency (CRA), FINTRAC 安大略省警方 (OPP)、加拿大稅務局 (CRA)、金融交易及報告分析中心	28 individuals charged with 228 offences including Hells Angels Seizure included: Seven residences and two vacation properties valued at just over \$8.1-million; financial accounts holding a total of more than \$1.2million; 18 vehicles. 28 人被起訴 228 件犯罪行為，包含地獄天使的扣押。包含：7 件住所及 2 件假期財產，其價值超過 810 萬；共持有超過 120 萬元之金融帳戶；18 輛汽車。  Official Press Release 官方報導 <a href="http://opp.ca/news/#/viewmediakit/5dfb8083e1ba8">http://opp.ca/news/#/viewmediakit/5dfb8083e1ba8</a>
Octavia 奧塔維亞	Fraud/ (telephone scam) 詐騙/(電話詐騙)	RCMP, Canada Revenue Agency (CRA), FINTRAC 皇家加拿大騎警、加拿大稅務局(CRA)、金融交易及報告分析中心	Media – Official Press Release. 媒體—官方新聞報導 <a href="https://www.rcmp-grc.gc.ca/en/news/2020/rcmparrest-scammers">https://www.rcmp-grc.gc.ca/en/news/2020/rcmparrest-scammers</a>
Highland 高地	Trafficking multiple kilograms of cocaine, opioids 數公斤之古柯鹼、鴉片販運	Winnipeg Police Service, OPP, FINTRAC 溫尼伯警方、安大略省警方、金融交易及報告分析中心	Ten adults were arrested and charged with 34 criminal code offences related to conspiracy and trafficking of a controlled substance, proceeds of crime, unlawful possession of cannabis. 10 位成人被逮捕，起訴 34 件關於共謀並販賣受管制物品、犯罪所得、非法持有大麻之刑事犯罪。  Media – Official Press Release 媒體—官方新聞報導  <a href="https://winnipeg.ca/police/press/2019/12dec/2019_12_23.aspx">https://winnipeg.ca/police/press/2019/12dec/2019_12_23.aspx</a>
Cairnes 凱恩斯	Trafficking of cannabis, fentanyl, cocaine, contraband tobacco 大麻、芬	OPP, the Royal Canadian Mounted Police, Ontario and British Columbia 安大略省警方、加拿大皇家騎警、安大略省及卑詩省	16 charged in OPP-led probe into trafficking of cannabis, fentanyl, cocaine, contraband tobacco 16 人在安大略省警方主導的行動中被起訴販運大麻、芬太尼、古柯鹼、私菸。  <a href="http://media.zuza.com/f/2/f2a978a7-f9a7-4f03-891bf279b2f7c127/ADDENDUM_OF_CHARGED_PERSONS__CAIRNES_FINAL.pdf">http://media.zuza.com/f/2/f2a978a7-f9a7-4f03-891bf279b2f7c127/ADDENDUM_OF_CHARGED_PERSONS__CAIRNES_FINAL.pdf</a>

	太尼、古柯鹼、私煙販運	ministries, and FINTRAC. 安大略省警方、皇家加拿大騎警、安大略及英屬哥倫比亞財政部及金融交易及報告分析中心	<a href="https://www.toronto.com/news-story/10020899-16charged-in-op-led-probe-into-trafficking-of-cannabisfentanyl-cocaine-contraband-tobacco/">https://www.toronto.com/news-story/10020899-16charged-in-op-led-probe-into-trafficking-of-cannabisfentanyl-cocaine-contraband-tobacco/</a>
Declass 解密	Drug trafficking network 毒品販運網絡	RCMP, FINTRAC, the Manitoba Liquor & Lotteries Corporation, the Seized Property Management Directorate, Health Canada, the Calgary Police Service, the Regina Police Service, as well as RCMP investigators in British-Columbia, Alberta, Saskatchewan, and Ontario. In addition to the DEA and CBSA. 皇家加拿大騎警、金融交易及報告分析中心、緬尼托巴酒類&樂透公司、扣押財產管理局、健康加拿大、卡加利警方、里	<p>The 16-month investigation led to nine search warrants, the arrest of eleven individuals, the seizure of five vehicles and over \$ 100 000 in financial seizures. It also resulted in the seizure of 22 kilograms of methamphetamine and 43 kilograms of cocaine, which have an estimated street value of \$6.5 million dollars.</p> <p>This represents the largest amount of methamphetamine seized in an organised crime investigation in Manitoba history.</p> <p>16 個月的調查促成 9 件搜索票、11 人的逮捕、扣押 5 輛車輛及超過 10 萬元的財務扣押。並促成扣押 22 公斤的甲基苯丙胺及 43 公斤的古柯鹼，估計市值 650 萬元。這也是緬尼托巴組織犯罪調查歷史上最大宗的甲基苯丙胺扣押。</p> <p><a href="http://www.rcmp.gc.ca/en/news/2019/federal-rcmpexecute-nine-search-warrants-seize-substantialamount-meth-and-cocaine">http://www.rcmp.gc.ca/en/news/2019/federal-rcmpexecute-nine-search-warrants-seize-substantialamount-meth-and-cocaine</a></p>

		賈納警方及英屬哥倫比亞、艾伯塔、薩斯喀徹溫及安大略皇家加拿大騎警調查員，以及緝毒局及加拿大邊境服務局。	
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## USA 美國

### The US FinCEN Exchange 美國金融犯罪執法署

**Established:** 4 December 2017

**成立：**2017 年 12 月 4 日



#### **Summary:** 摘要：

The FinCEN Exchange is the United States Financial Crimes Enforcement Network (FinCEN)'s voluntary public-private information-sharing partnership among law enforcement, financial institutions and FinCEN. The FinCEN Exchange model builds on the pilot model previously referred to in the FFIS study of 2017 as 'USA PATRIOT Act 314(a) Contextual Briefings'. Operating under FinCEN's legal authority under 31 U.S Code § 310(b)(2)(E), as well as other authorities ('FinCEN authorities') including PATRIOT Act 314(a), FinCEN created the FinCEN Exchange to provide financial institutions with additional information about priority issues on a more regular basis.

金融犯罪執法署是美國金融犯罪執法網中執法機關、金融機構及金融犯罪執法網之自願性公私部門資訊共享夥伴關係。金融犯罪執法網情報交換模型建立在 2017 年 FFIS 研究所提到「美國愛國者法案第 314 條第 a 項內容簡報」之試行模型上。由金融犯罪執法網依第 31 美國法案第 310 條第(b)項第(2)款第(E)目之法律授權，及其他授權(金融犯罪執法網授權)包括愛國者法案第 314 條第 a 項，金融犯罪執法網創立金融犯罪執法署以定期提供金融機構優先事項的額外資訊。

#### **Format:** 形式：

The FinCEN Exchange supports tactical information-sharing individual briefing events coupled with typology co-development activities led by FinCEN. Briefings take place every four to six weeks.

金融犯罪執法署支援戰術性資訊共享之個別簡報，以及金融犯罪執法網主導之犯罪態樣共同發展行動。簡報為每 4 至 6 週舉行。

#### **Membership:** 成員：

Membership of FinCEN Exchange is variable on a case-by-case basis, at the determination of FinCEN. Participation in FinCEN Exchange meetings is by invitation only, as determined by FinCEN and relevant law enforcement agencies specific to the case at hand.

金融犯罪執法署的成員依個案而有所不同，由金融犯罪執法網決定。因金融犯罪執法網之參與係由金融犯罪執法網及相關執法機關依手中具體案件，以邀請方式決定。

#### **Resources:** 資源

No dedicated public funding is available to the FinCEN Exchange.

沒有對金融犯罪執法署之專屬公共資助。

#### **Distinctive elements:** 特點：

- **Membership is non-permanent, by invitation on a case-by-case basis.** To convene a briefing, FinCEN, in consultation with law enforcement, will invite financial institutions to voluntarily participate when FinCEN has reason to believe that the financial institution may have, or may be capable of providing, information relevant to (or have an ability to support) a particular FinCEN Exchange briefing.
- **成員係個案邀請而非永久。**當金融犯罪執法網有理由認為金融機構已經或有能力提供(或有能力支援)關於特定金融犯罪執法網之情報交換中心資訊交換簡報，為進行簡報，金融犯罪執法網將諮詢執法機關並邀請金融機構自願參與。
- **Focused on prioritisation of AML resources by regulated entities.** The FinCEN Exchange is designed to help prioritise AML investigative resource allocation in the private sector, '[p]roviding financial institutions with key government–provided information allows financial institutions to focus on specific illicit finance and national security threats under their existing Bank Secrecy Act (BSA) compliance obligations and, when appropriate, file Suspicious Activity Reports (SARs)'.
- **專注於受監理實體防制洗錢資源的優先化。**金融犯罪執法署被設計來優先化分配給私部門之防制洗錢資源，「提供金融機構關鍵政府資訊使金融機構能專注於現行銀行秘密法(BSA)遵循義務所定義之特定非法金融及國家安全威脅，並視情形通報疑似洗錢或資恐活動交易報告(SARs)。」
- **Participation is linked with private–private sharing.** As part of a particular invitation, FinCEN will request, as appropriate, that the invited financial institution register under USA PATRIOT Act Section 314(b) before the financial institution participates in the FinCEN Exchange briefing. FinCEN oversees the registration of the 314(b) program, which is a voluntary private–private information-sharing gateway.
- **參與私部門間共享的連結。**作為特定邀請的一部分，金融犯罪執法網將視情形要求受邀金融機構於參加金融犯罪執法網情報交換簡報前依美國愛國者法案第 314 條第(b)項登記。金融犯罪執法網監督第 314 條第(b)項計劃的登記，這是個自願性的私人間資訊共享管道。
- **Supervisory credit is encouraged as a result of participation in FinCEN Exchange.** FinCEN has a commitment to communicate with other supervisors regarding FinCEN Exchange, including providing those supervisors with a list of FinCEN Exchange participants and a favourable acknowledgement of participation.
- **參與金融犯罪執法署之監管紅利是被鼓勵的。**金融犯罪執法網致力於與其他金融犯罪執法網之監管者溝通，包含提供監管者金融犯罪執法署參與者清單及其參與之認可。

#### COVID-19 adaptation (not directly related to FinCEN Exchange): COVID-19 之因應(非直接與金融犯罪執法署相關)

Between March and July 2020, FinCEN published three notices related to COVID-19 threats and responsibilities of financial institutions regarding COVID-19; one Advisory on Imposter Scams and Money Mule Schemes Related to Coronavirus Disease 2019 (COVID-19); and one Advisory on Medical Scams Related to the Coronavirus Disease 2019 (COVID-19).

在 2020 年 3 月至 7 月之間，金融犯罪執法網發布三則關於 COVID-19 威脅及金融機關責任的注意事項；一則關於 COVID-19 之冒名頂替詐欺及錢驛之建議；及一則關於 COVID-19 醫療詐欺之建議。

#### Editor's note: 編按：

The U.S. has a large number of public–private financial information sharing partnership operations at the U.S. state (non-federal) level and a number of threat-specific or adhoc collaborative forums established between various federal agencies and Departments and financial institutions, which deliver similar functions to a financial information-sharing partnership. However, for this report, we have focused on the national-level FIU-led partnership in the form the FinCEN Exchange. The U.S. also contains examples of private to private financial information-sharing partnerships, which are outside the scope of this report.

美國有許多州(非聯邦)層級之公私部門金融資訊共享夥伴關係，及許多由各式聯邦機構、部門及金融機構所組成之以具體威脅為導向或臨時的合作論壇，提供與金融資訊共享夥伴關係相似之功能。然而在此報告中，我們專注在國家級金融情報中心領導之夥伴關係，也就是金融犯罪執法署的形式。美國尚有私部門間金融資訊共享夥伴關係之例子，惟不屬本報告之範圍。



# Africa 非洲

- South African Anti Money Laundering Integrated Taskforce (SAMLIT).

南非洗錢防制整合工作小組



## South Africa 南非

### South African Anti-Money Laundering Integrated Taskforce (SAMLIT) 南非洗錢防制整合工作小組 (SAMLIT)



**Established:** 9 December 2019.

**成立：**2019 年 12 月 9 日

#### **Summary:** 摘要：

SAMLIT is a public-private partnership between certain public entities of the administration - represented by the Financial Intelligence Centre (FIC) and the Prudential Authority of the South African Reserve Bank (PA SARB) - and financial institutions registered in the South African banking sector. SAMLIT also includes banking association bodies in the form of the Banking Association South Africa (BASA) and South African Risk Information Centre (SABRIC).

南非洗錢防制整合工作小組是特定公共行政實體—由金融情報中心(FIC)及南非儲備銀行審慎監管局(PA SARB)代表-以及於南非銀行部門註冊之金融機構間的公私部門夥伴關係。南非洗錢防制整合工作小組尚包含銀行公會成員如南非銀行公會(BASA)及南非風險資訊中心(SABRIC)。

#### **Objectives:** 目標：

SAMLIT's principal objectives are:

南非洗錢防制整合工作小組主要目標是：

- assisting in the effective and efficient combatting of financial crime, and
- 協助有效及效率地打擊金融犯罪，及
- enhancing the collective understanding of financial crime trends, both nationally and internationally.
- 提升對國家及國際金融犯罪趨勢的集體認識。

#### **Threats addressed:** 針對之威脅：

The threats addressed are those identified on a national priority basis and processed through the SAMLIT Tactical Operation Group (TOG) mechanism. SAMLIT will focus on addressing the following criminal threats concerning:

針對之威脅是由南非洗錢防制整合工作小組技術運作小組(TOG)機制篩選且被識別的國家優先事項。南非洗錢防制整合工作小組專注處理下列犯罪威脅：

- Issues of national security (the safety of the community at large) and matters of national interest, including Terrorism and Terror financing, designated entities and persons subject to Targeted Financial Sanctions, arms and ammunition, and the Proliferation of Financing of Weapons of Mass Destruction
- 國家安全議題(社會安全占多數)及國家利益事項，包含恐怖主義、資恐、受目標性金融制裁之經指名之團體或人、槍械及彈藥、及資助大規模毀滅性武器之擴散。
- Violent crimes including, Cash in Transit heists, bank ATM service robberies, armed robberies, vehicle hijacking, murder and kidnapping;
- 暴力犯罪，包括搶劫在途現金、銀行 ATM 強盜、武裝強盜、劫持運輸工具、謀殺及綁架；

- Money Laundering arising from Organised Crime Syndicates and Racketeering, Narcotics, Human Trafficking, Wildlife and environmental crime, Fraud and Ponzi / Pyramid – investment schemes, theft, virtual asset transfers and cybercrime;
- 組織犯罪及敲詐勒索、毒品、人口販運、野生動物及環境犯罪、詐欺及龐氏騙局/金字塔型投資、竊盜、虛擬資產移轉及網路犯罪之洗錢；
- Corruption including serious corruption matters involving tender or procurement as investigated by the Anti-Corruption Task Team.
- 貪污，包含反貪腐工作小組調查之涉及政府採購之重大貪腐事項。
- Tax evasion and fraud relating to tax including VAT, import and export taxes, and trade in Illicit Tobacco products.
- 逃稅及稅務關聯的詐欺，包含增值稅、進出口稅及非法菸品交易。
- Illicit Financial Flows (IFFs) including electronic transfers, bulk cash smuggling, and cross border exchange control contraventions.
- 非法金流(IFFs)，包含電子劃撥、大筆現金走私、以及違反跨境匯兌管制。
- Illegal mining proceeds and dealing in precious metals and stones as well as copper and other nonferrous metals; and
- 非法採礦及處理貴金屬、礦物及銅及其他非鐵金屬；及
- Generally, criminal threats identified by trend, threat and vulnerability or typology analysis under the work of the SAMLIT Expert Working Group (EWG).
- 一般而言，透過南非洗錢防制整合工作小組之專家工作小組(EWG)做成之趨勢、威脅及弱點或態樣分析所辨識的犯罪威脅。

A comprehensive and objective case selection guideline has been developed to assist in the identification and selection of appropriate cases for escalation to the TOG, involving the following weighted key factors, as outlined below:

製作完整的目標案件選擇指引以協助辨識並選擇呈報給戰術運作小組的合適案件，該指引包含下列權重指標：

- 1 Number of financial institutions affected; 受影響的金融機構數；
- 2 Monetary value of alleged crime involved; 犯罪所涉貨幣價值；
- 3 Profile of alleged perpetrator(s) involved; 犯罪者檔案；
- 4 Profile of victim(s) involved; 受害者檔案；
- 5 Public and national interest; and 公共及國家利益；及
- 6 Actions required by the TOG (Product). 戰術運作小組(產品)要求之行動。

Further guidelines for each of the above factors are provided to assist in ensuring a comprehensive and accurate score, with only matters that exceed the designated threshold score being referred to the TOG process. 提供上述各因素的進一步指引以協助確認完整且精確的評分，只有超過指定門檻分數的事項方能被呈報至戰術運作小組的程序。

**Format: 形式：**

The SAMLIT has three functioning and operating structures:  
南非洗錢防制整合工作小組有三種運作及營運架構：

- Steering Committee (SteerCo) structure – The SAMLIT is run from an apex structure called the SteerCo, presided over by the Director of the FIC. The SteerCo convenes at least quarterly and is responsible for the administration of the SAMLIT and overseeing the implementation of its strategic objectives and operational priorities, and all its related functions and activities. The TOG and EWG report into the SteerCo on progress made in their areas.
- 領導委員會(SteerCo)架構--南非洗錢防制整合工作小組由稱為領導委員會的最上級架構運作，由金融情報中心的董事主持。領導委員會至少每季召開且負責南非洗錢防制整合工作小組的行政並監管其策略目標及運作優先事項的實施，以及所有相關的功能及活動。戰術運作小組及專家工作小組向領導委員會報告其負責領域的進展。

The SteerCo is constituted of the FIC, the PA SARB and ten duly elected banks. BASA and SABRIC are invitees to the SAMLIT SteerCo, without any voting rights. All SteerCo decisions are made by majority vote.

領導委員會由金融情報中心、南非儲備銀行審慎監管局及十家審慎選定的銀行組成。南非銀行公會(BASA)及南非風險資訊中心(SABRIC)被邀請以無表決權的方式加入南非洗錢防制整合工作小組領導委員會。所有領導委員會的決定由多數決作成。

- Tactical Operations Group (TOG) structure - The TOG is a flexible mechanism established by the FIC with each project to serve as a platform for cooperation, collaboration and speedy exchange of information on specific targets of interest among the SAMLIT membership. The main goals of the TOG are:
- 戰術運作小組(TOG)架構—戰術運作小組是由金融情報中心依各計劃所建立之彈性機制，以作為合作、協力、迅速交換特定目標資訊之平台。戰術工作小組的主要目標為：
  - a) To ensure effective and efficient investigations into specific financial crimes as identified by the Experts Working Groups, the Financial Intelligence Centre (FIC) or any member of SAMLIT requiring enhanced co-operation, collaboration and the exchange of timely information to effectively and efficiently combat specific types of financial crime; 確保對於專家工作小組、金融情報中心(FIC)、或南非洗錢防制整合工作小組成員所辨識之要求強化合作、協力及即時資訊交換之具體金融犯罪，進行有效且有效率的調查，以有效且有效率的方式打擊特定類型的金融犯罪；
  - b) To ensure the enhanced sharing of quality and complete intelligence or evidence and collaboration; and 確保強化有品質且完整之情報或證據的共享及合作；及
  - c) To ensure collection of relevant resources at one location to effectively and efficiently combat specific types of financial crime. 確保集合相關資源於同處以有效並效率地打擊特定類型金融犯罪。

TOGs are operated from the premises of the FIC and are constituted on a project by project basis, at the sole instance of the FIC, with the relevant banks at the intelligence gathering phase. Involvement in a particular TOG may also involve participation by certain law enforcement agencies (including the South African Police Service and National Prosecuting Authority), the South African Revenue Service, and the Investigative Unit in the Financial Surveillance Department of the SARB on cross border exchange control matters.

戰術運作小組在金融情報中心督導下運作，並在情報蒐集階段與關聯銀行以個別計劃為基礎組成。特定戰術運作小組可能包含特定執法機關(包含南非警方及國家檢察機關)、南非國稅局、及南非儲備銀行跨境外匯管制之金融監管部門調查單位的參與。

- SAMLIT Expert Working Group (EWG) – The EWG supports and adds value to the work of the SAMLIT by gathering information and conducting research to identify and analyse international and local trends, and threats and then develop typologies relating to financial crime, in particular money laundering, terrorist financing and the financing of the proliferation of weapons of mass destruction.

- 南非洗錢防制整合工作小組專家工作小組(EWG)—專家工作小組藉由蒐集資訊及進行研究，辨識及分析國際及當地趨勢與威脅，並發展金融犯罪相關態樣，特別是洗錢、資恐及資助大規模毀滅性武器擴散，來為南非洗錢防制整合工作小組的工作增添價值。

EWGs are convened by the FIC who chairs the EWG and involves the proposing SAMLIT member and any other bank member that would add value to the process. The EWG is also free to co-opt any other party outside SAMLIT that would add value to the process.

專家工作小組由金融情報中心召開，由其主導並參與提議南非洗錢防制整合工作小組成員及任何其他能為程序增添價值的銀行成員。專家工作小組亦能自由增選任何其他南非洗錢防制整合工作小組以外能為程序增添價值的成員。

#### **Membership: 成員：**

SAMLIT Membership is composed of public agencies in the form of the FIC (the lead FIU operational agency in South Africa), and the PA SARB being the AML/CFT supervisory body for registered banks, and private sector partners in the form of 22 domestic and international banks registered in South Africa, and bank industry associations being the Banking Association South Africa (BASA), the South African Banking Risk Information Centre (SABRIC).

南非洗錢防制整合工作小組成員包含公家機關如金融情報中心(南非領導性金融情報中心運作機關)、作為註冊銀行之防制洗錢/打擊資恐監管機構之南非儲備銀行審慎監管局、22家於南非註冊之國內及國際銀行私部門夥伴，及南非銀行公會(BASA)及南非風險資訊中心(SABRIC)等銀行產業聯盟。

The National Treasury as the national government department under the Ministry of Finance responsible for AML/CFT policy may be an invited member to SAMLIT, in relevant policy related matters.

國庫署身為財政部下負責防制洗錢/打擊資恐政策之國家政府部門，得受邀於相關政策事項作為南非洗錢防制整合工作小組成員。

#### **Resources: 資源：**

SAMLITs describes its most important resource is the commitment expressed by all its members to collectively fight financial crime. In accordance with the SAMLIT Charter, all members have undertaken to contribute the necessary resources (personnel, financial or otherwise) as and when required, to ensure SAMLIT operates successfully and effectively.

南非洗錢防制整合工作小組形容其最重要的資源是其成員共同打擊金融犯罪的承諾。依據南非洗錢防制整合工作小組憲章，所有成員需於受請求時貢獻必要資源(人員、財務或其他)，以確保南非洗錢防制整合工作小組成功且有效地運作。

#### **Record of outputs / Performance metrics: 工作成果/表現績效：**

At the time of this research, SAMLIT has only recently started operations. SAMLIT is working to develop performance metrics for measurable outputs so that the partnership can track and record tangible intelligence gathering, investigative, forfeiture and prosecutorial successes.

在本研究進行時，南非洗錢防制整合工作小組剛開始運作。南非洗錢防制整合工作小組努力為可量化的工作成果建立績效，使夥伴關係能追蹤並記錄有形情報、調查、沒收及起訴上的成功。

To date, SAMLIT has convened one Steering Committee meeting, where the strategic direction for SAMLIT, and the operational procedures for the TOGs and EWG were proposed and adopted.

至今為止，南非洗錢防制整合工作小組已召開一次領導委員會會議，南非洗錢防制整合工作小組策略方向、戰術運作小組及專家工作小組的運作程序也在此提議並通過。

The following topics were also proposed to the Steering Committee for the establishment of EWGs:

下列關於專家工作小組建立的主題也在領導委員會時被提出：

- Regulation and supervision of, and financial flows associated with, Virtual Asset Service Providers. 虛擬資產服務提供商之規範、監管及金流。
- Financial flows associated with the illegal wildlife trade in Southern Africa. 南非非法野生動物交易相關金流。
- Emerging COVID 19 financial crime threats and typologies. 新興 COVID 19 金融犯罪威脅及態樣。

Various TOGs have been operationalised, resulting in successful and effective collaboration between the relevant banks and law enforcement agencies. However, due to the sensitivity of these matters, further details cannot be divulged at this stage. 各式各樣的戰術運作小組已開始運作，促使相關銀行及執法機關成功及有效的合作。然而，基於這些事項的敏感性，無法在此階段提供更多細節。

### Distinctive elements: 特點

- **Policy engagement.** SAMLIT will leverage typology co-development insight to identify challenges in policy & strategic direction, and make recommendations to resolve those vulnerabilities to enhance operational effectiveness of the AML/CFT regime.
- **政策參與。** 南非洗錢防制整合工作小組將利用共同發展態樣的概念來辨識政策及策略方向的挑戰，以及提供解決其弱點以提升防制洗錢/打擊資恐運作效能的建議。
- **Responsiveness to intelligence users.** The FIC, as the FIU, has undertaken to be more responsive in producing quality intelligence and passing on credible, actionable and useful intelligence, and even evidence where required, to law enforcement, in a timely manner.
- **即時回應金融情報使用者。** 金融情報中心已努力更即時地提供有品質的情報，並傳遞可信賴、可操作及有用的情報，甚至是要要求的證據給執法機關。
- **End-to-end view of the value of intelligence.** It is a key objective of SAMLIT output to generate timely, useful and actionable intelligence to law enforcement agencies, and ultimately, collectively provide admissible evidence to facilitate timeous and effective law enforcement action – achieving successful prosecutions & recovery of assets both domestic and foreign.
- **金融情報始終如一的價值。** 南非洗錢防制整合工作小組的關鍵目標是，提供即時、有用、可操作的情報給執法機關是，並終局地共同提供合法證據以促成即時有效的執法行動--以成功起訴及回復當地及外國的資產。

### Stewarding the overall process from financial intelligence to evidence: 督導由金融情報到證據的整體程序：

It is believed by FIC that a key pillar of SAMLIT's success will be its ability to deliver rapid disruption of criminal networks, to enable the prompt arrest of offenders, and to facilitate proportionate and dissuasive civil and criminal sanctions being imposed; including the seizure of unlawful proceeds and the conviction of offenders. 金融情報中心相信南非洗錢防制整合工作小組成功的重要支柱在於快速打擊犯罪網絡，使違反者儘快被逮捕，並促成適當且具嚇阻性的民事及刑事處罰；包括扣押非法收益及使違反者定罪。

Accordingly, the FIC recognised the challenge faced by law enforcement agencies in converting information into admissible evidence that could be utilised to effectively combat financial crime.

據此，金融情報中心意識到執法機關將資訊轉化成能有效打擊金融犯罪合法證據的困難。

To assist in addressing this problem, the Financial Intelligence Centre Act 38 of 2001 was amended in 2016 to allow the FIC to apply for a judicial warrant authorising access to such relevant information as held by financial and other institutions, that would assist in investigating and prosecuting financial crime and forfeiting the proceeds thereof.

為協助解決此問題，2001 年金融情報中心法 38 於 2016 年修正，允許金融情報中心申請司法令狀，授權其取得由金融或其他機構持有的相關資訊，協助其調查及起訴金融犯罪並沒收犯罪收益。

Accessing such information, via a judicial warrant, renders such financial information as admissible evidence in a court of law.

透過司法令狀取得相關資訊，以提供該等金融資訊作為法庭上合法證據。

Having obtained a warrant, the FIC takes a further step by attesting to an affidavit that details its financial analysis of the judicially obtained financial information, which is attached to the affidavit. The affidavit then forms part of the criminal docket and is then utilised by law enforcement agencies to advance the criminal investigation.

取得令狀後，金融情報中心將分析由司法途徑取得之金融資訊，用以佐證並附加在聲明書上，聲明書將構成刑事卷宗的一部並由執法機關用以推進犯罪調查。

Through this process and with the assistance and co-operation of the SAMLIT members, the FIC has been able to successfully reduce the investigative burden on law enforcement agencies, resulting in a more effective and efficient response to tackling financial crime. Historically, the FIC obtained over 40 warrants and attested to numerous affidavits in support of the criminal investigation that assisted in the recovery of approximately R5 billion value of proceeds of crime since October 2017.

經由這個過程及與南非洗錢防制整合工作小組成員的合作，金融情報中心已能成功降低執法機關之調查負擔，帶來更有效及有效率之回應以打擊金融犯罪。自 2017 年 10 月始，金融情報中心已取得超過 40 令狀，並佐證無數證言，協助支持涉及價值 50 億南非幣之刑事調查。

#### **Recent developments and COVID-19 adaptation: 近期發展及 COVID-19 之因應：**

The COVID 19 pandemic and the resulting national lockdown have only restricted certain aspects of SAMLIT's operational activities.

COVID 19 疫情及其造成之封城僅限制南非洗錢防制整合工作小組特定層面的運作活動。

The COVID 19 pandemic has resulted in SAMLIT not convening any physical gathering for Quarterly Forums due to the restrictions on large gatherings during the pandemic. However, engagements have been conducted via virtual meetings. The SAMLIT Steering Committee meeting was successfully convened virtually.

由於疫情間對大型集會的限制，COVID 19 疫情使得南非洗錢防制整合工作小組不能召開任何季度的實體論壇。然而相關參與轉而透過虛擬會議進行。南非洗錢防制整合工作小組領導委員會會議已成功以虛擬方式召開。

The functioning of the TOGs has, however, not been hampered by the COVID 19 pandemic, with investigative and analytical work being conducted virtually.

然而，戰術運作小組的調查及分析工作改由虛擬方式進行的情況下，並未受到 COVID 19 疫情的妨礙。

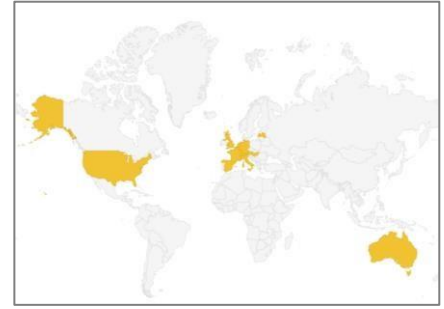
# Trans-national Partnerships

## 跨國夥伴關係

- The Europol Financial Intelligence Public Private Partnership (EFIPPP)
- 歐洲刑警組織金融情報公私部門夥伴關係
- United for Wildlife – Illegal Wildlife Trade (IWT) Financial Taskforce
- 野生動物聯盟非法野生動物交易金融工作小組
- The Global Coalition to Fight Financial Crim
- 打擊金融犯罪全球聯盟



# The Europol Financial Intelligence Public Private Partnership (EFIPPP) 歐洲刑警組織金融情報公私部門夥伴關係



**Established:** December 2017

**成立：**2017 年 12 月

## **Summary:** 摘要：

The EFIPPP is a partnership that enables cross-border typology co-development groups, coupled with a policy and legal research function. The partnership is convened by Europol, with membership including: public authorities from fifteen jurisdictions (Australia, Austria, Belgium, France, Germany, Hungary, Italy, Latvia, Luxembourg, Malta, the Netherlands, Spain, Switzerland, the UK, and the US); 25 financial institutions; and some national and EU supervisors participating.

歐洲刑警組織金融情報公私部門夥伴關係是一個促進跨境類型共同發展之夥伴關係，附帶政策及法律研究之功能。夥伴關係由歐洲刑警組織召開，成員包括 15 個司法管轄區之公部門實體(澳洲、奧地利、比利時、法國、德國、匈牙利、義大利、拉脫維亞、盧森堡、馬爾他、荷蘭、西班牙、瑞士、英國及美國)；25 個金融機構；及一些國家及歐盟監管機關的參與。

## **Objectives:** 目標：

The EFIPPP provides an operationally focused environment for cooperation and information exchange between Europol, law enforcement authorities, financial intelligence units (FIUs) and other competent authorities, as well as regulated financial services entities, with the support of their representative bodies. Moreover, the EFIPPP seeks to improve vertical and horizontal communication and promote the EFIPPP as a key strategic preventive arm for international AML/CFT efforts, with a specific focus on the European region.

歐洲刑警組織金融情報公私部門夥伴關係提供歐洲刑警組織、執法機關、金融情報中心(FIUs)及其他權責機關專注於合作及資訊交換的環境，以及提供受監管金融服務實體來自其代表實體的支援。此外，歐洲刑警組織金融情報公私部門夥伴關係試圖改善垂直及水平溝通，並推動歐洲刑警組織金融情報公私部門夥伴關係成為支持國際防制洗錢/打擊資恐之關鍵策略性預防，尤其是在歐洲地區。

The EFIPPP seeks to:

歐洲刑警組織金融情報公私部門夥伴關係試圖：

- Build a common strategic intelligence picture and understanding of the threats and risks, notably through the definition of risk indicators and sanitised case studies;
- 建立共同策略情報圖象及對威脅及風險之理解，特別是透過風險指標之定義及整理過的案例研究；
- Support domestic PPPs and act as a trans-national information sharing hub;
- 支援國內 PPPs 並扮演跨國資訊共享中心；
- Support, coordinate and initiate international actions;
- 支援、整合及發起國際行動；
- Facilitate, in accordance with the applicable legal frameworks, the exchange of operational or tactical intelligence associated with on-going investigations;
- 依據可行法律框架，促成關於現行調查之運作或戰術情報的交換；

- Identify gateways for information sharing in accordance with domestic and EU legal frameworks, and advocate for improvement of regulations on information sharing gateways for such exchange; and
- 依據國內及歐盟法律框架辨識資訊共享管道，及提倡資訊共享管道規範之改善；及
- Promote the use of new tools & technologies.
- 推動新工具及科技的使用。

**Threats addressed: 針對之威脅：**

The EFIPPP is designed to address any predicate offence of money laundering and terrorist financing, taking into account the priorities for serious and organised crime defined by the EU Justice and Home Affairs Council in December 2016, and priorities defined at a domestic level. In 2019 and 2020 the EFIPPP plenaries were focused on topics covering: terrorist financing, virtual assets and tax fraud. Typology papers with indicators were drafted and shared among the EFIPPP participants.

歐洲刑警組織金融情報公私部門夥伴關係之設計，是為了處理任何洗錢及資恐的前置犯罪，需考量歐盟法律內政理事會於 2016 年 12 月定義之重大組織犯罪優先事項，及國內定義之優先事項。2019 及 2020 年歐洲刑警組織金融情報公私部門夥伴關係全體會議著重主題涵蓋：資恐、虛擬資產及稅務詐欺。附帶指標的類型文件已完成撰稿並分享給歐洲刑警組織金融情報公私部門夥伴關係參與成員。

**Format: 形式：**

From 2017 to 2020, EFIPPP convened 10 meeting hosted in Europol Headquarters in The Hague. Meetings of EFIPPP are convened four times a year. The EFIPPP secretariat facilitate the organisation of EFIPPP meetings.

自 2017 至 2020 年，歐洲刑警組織金融情報公私部門夥伴關係於歐洲刑警組織海牙總部舉辦 10 場會議。歐洲刑警組織金融情報公私部門夥伴關係一年召開四次會議，歐洲刑警組織金融情報公私部門夥伴關係秘書處協助歐洲刑警組織金融情報公私部門夥伴關係會議的組織。

EFIPPP working groups are developed in line with the priorities set by a Steering Group. Each working group must be co-chaired by one competent authority member and one financial institution member.

歐洲刑警組織金融情報公私部門夥伴關係配合領導小組訂定的優先事項。每個工作小組需由一個權責機關成員及一個金融機構成員共同主持。

Documents are shared through a dedicated page for the EFIPPP on the Europol Platform for Experts (EPE). Restricted sections are available for members of the different working groups to share information.

文件透過歐洲刑警組織平台之歐洲刑警組織金融情報公私部門夥伴關係專用頁面共享給專家(EPE)。不同工作小組成員可取得受限制的章節以分享資訊。

**Membership: 成員：**

The EFIPPP brings together 25 financial institutions with an international footprint. Those banks have their presence in the 15 participating countries:

歐洲刑警組織金融情報公私部門夥伴關係聚集 25 個國際性之金融機構。該等銀行存在於 15 個參與國：

- 12 EU Member States: Austria, Belgium, France, Germany, Hungary, Italy, Latvia, Luxembourg, Malta, the Netherlands, Spain, the United Kingdom<sup>10</sup>; and
- 12 個歐盟成員國：奧地利、比利時、法國、德國、匈牙利、義大利、拉脫維亞、盧森堡、馬爾他、荷蘭、西班牙、英國<sup>10</sup>；及
- 3 non-EU Member States: Switzerland, the United States and Australia.

<sup>10</sup> The post-Brexit arrangement for the UK is yet to be confirmed. 脫歐後英國的安排仍待確認。

- 3 個非歐盟成員國：瑞士、美國及澳洲。

Representatives from the Financial Intelligence Unit and from law enforcement authorities for each of those countries participate, with other competent authorities joining according to the topic (domestic supervisory authorities and judicial authorities).

各參與國金融情報中心及執法機關實體之代表，及其他依主題參與之權責機關(國內監管機關及司法機關)。

A dozen observers regularly attend to contribute with their expertise on an ad-hoc basis: including supranational supervisors, supranational banking federations, international policy developers, international organisations and research institutes.

十二名觀察員定期參與視案件貢獻專業：包含超國界監理機關、超國界銀行聯盟、國際政策發展者、國際組織及研究機構。

A clear distinction is made between members, other bodies, and observers. Members are representatives of competent authorities (LEAs/FIUs) and financial institutions (obliged entities) and they will participate in operational and tactical working groups. Observers are mainly think-tanks, research institutes and other relevant organisations.

成員、其他實體及觀察員間有明顯區別。成員為權責機關的代表(執法機關/金融情報中心)及金融機構(義務實體)，其將參與運作及戰術工作小組。觀察員主要是智庫、研究機構及其他相關組織。

#### **Resources: 資源：**

No fees are required from participants.

參與者未被要求任何費用。

As at June 2020, a Secretariat for the EFIPPP is planned to be established to provide day-to-day support and will be formed of the following: Secondees from, respectively, an FIU (one staff member), financial institutions (two staff members), law enforcement agency (one staff member), along with a Europol staff member. The secretariat will be hosted at Europol HQ.

於 2020 年 6 月，歐洲刑警組織金融情報公私部門夥伴關係計劃成立秘書處以提供每日支援，其由下列組成：一個金融情報中心(一名員工)、金融機構(二名員工)、執法機關(一名員工)借調的員工，及一名歐洲刑警組織員工。秘書處將設於歐洲刑警組織總部。

Europol's policies on the reimbursement of travel costs apply for EFIPPP participants representing competent national authorities for EU Member States. Other participants must resource their own attendance at EFIPPP meetings.

歐洲刑警組織旅費報銷政策適用於代表歐盟成員國權責國家機關之歐洲刑警組織金融情報公私部門夥伴關係參與者。其他參與者應自行負擔參與歐洲刑警組織金融情報公私部門夥伴關係會議之費用。

#### **Distinctive elements: 特點：**

The EFIPPP has jointly developed detailed typologies based on recent investigations carried out by Europol and competent authorities to improve the detection of suspicious transactions. Those up-to-date typologies comprise detailed risk indicators, including specific geographical indicators, but no personal data.

歐洲刑警組織金融情報公私部門夥伴關係共同依據歐洲刑警組織及權責機關之現行調查發展細節類型，以改善可疑交易的偵測。即時類型涵蓋細節風險指標，其包含具體地理指標，但沒有個人資料。

During each quarterly meeting, participants share and discuss case studies that feed a subsequent typology report. In 2019 and 2020, EFIPPP worked on Chinese organised crime – criminal and money laundering trends, financial flows related to “Laundromats”, virtual currencies, terrorist financing, tax fraud and COVID-19 related fraud.

在每個季度會議期間，參加者分享並討論構成後續態樣報告之案例研究。於 2019 及 2020 年，歐洲刑警組織金融情報公私部門夥伴關係處理中國組織犯罪—犯罪及洗錢趨勢、「洗錢工具」金流、虛擬貨幣、資恐、稅務詐欺及 COVID-19 相關犯罪。

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The EFIPPP working group on legal issues has conducted a mapping exercise on legal gateways to share information within a financial institution (intra-group), between EU member states, between EU member states and countries with equivalent personal data-protection rules, and with countries with non-equivalent personal data-protection rules.

歐洲刑警組織金融情報公私部門夥伴關係法律議題工作小組進行金融機構內(內部)、歐盟成員國間、歐盟成員國與具備相同個資保護規範之國家間、及與未具備相同個資保護規範之國家間之資訊共享的法律管道之確認。

#### **Recent developments: 近期發展：**

In September 2019, it was agreed to review the governance of the EFIPPP to establish up-to-date practices in order to fulfil the evolving mandate of the project.

於 2019 年 9 月，同意審查歐洲刑警組織金融情報公私部門夥伴關係之治理，建立即時的實務做法以完成計劃裡演進中的目標。

#### **COVID-19 related threats: COVID-19 相關威脅：**

Europol has been monitoring the situation regarding COVID-19 since the start of its outbreak in different ways: 歐洲刑警組織自 COVID-19 爆發以來即以不同方式監控該情況：

- As an information hub; 以資訊中心的方式；
- Providing operational and investigational support in diverse areas, mainly online fraud, cybercrime, counterfeit goods and against attacks specifically to healthcare facilities;
- 提供多元領域之運作及調查支援，主要是線上詐欺、網路犯罪、仿冒商品及打擊針對醫療機構的攻擊；
- Coordination of different prevention campaigns on social media addressed to the general public;
- 整合社群媒體上對大眾的不同預防活動；
- Europol strategic and specific reporting on COVID-19.
- 歐洲刑警組織對 COVID-19 之策略及具體報告。

In May 2020, the EFIPPP organised an extraordinary meeting to present the outcomes of the ad-hoc Working Group on COVID-19. The Working Group (WG) consisted of 18 volunteers coming from different members of the EFIPPP. Initially, the WG prioritised and identified the most relevant crime types. Then, the members collected case studies, available internal and external information, and selected volunteers to draft different factsheets with typologies and indicators. The prioritised crime areas by the WG were: misuse of public funds, sale of counterfeit goods, investment fraud, BEC and CEO fraud, facilitators and money mules and nondelivery fraud. These typologies were circulated to members and discussed at the May 2020 extraordinary virtual meeting of the EFIPPP.

於 2020 年 5 月，歐洲刑警組織金融情報公私部門夥伴關係組織特別會議，以報告 COVID-19 臨時工作小組的成果。工作小組(WG)包含 18 位來自歐洲刑警組織金融情報公私部門夥伴關係不同成員的志願者。一開始，工作小組決定優先順序及辨識最相關的犯罪態樣。然後，成員蒐集案例研究、可取得之內部及外部資訊、及選擇志願者撰寫犯罪態樣及指標之不同狀況說明書。被工作小組視為優先之犯罪領域為：公共資金的濫用、販售仿冒商品、投資詐欺、商務電子郵件詐騙及執行長詐騙、促進者與錢鏢及非交付型詐欺。這些態樣已周知各成員並在 2020 年 5 月的歐洲刑警組織金融情報公私部門夥伴關係虛擬特別會議中討論。

## U nited for Wildlife IWT Financial Taskforce 野生動物聯盟非法野生動物交易金融工作小組

Established: 10 October 2018  
成立：2018 年 10 月 10 日



### Summary: 摘要：

On 10 October 2018, approximately twenty financial institutions (“FIs”) signed a Declaration to support the principles and commitments of the United for Wildlife Illegal Wildlife Trade (“IWT”) Financial Taskforce (the “Taskforce”). The Taskforce was convened by His Royal Highness the Duke of Cambridge through United for Wildlife, a conservation collaboration led by The Royal Foundation, and is chaired by former British Foreign Secretary Lord Hague of Richmond. David Fein, Group General Counsel of Standard Chartered Bank, is Vice Chair.

於 2018 年 10 月 10 日，將近 20 個金融機構(FI)簽署支持野生動物聯盟非法野生動物交易(IWT)工作小組(工作小組)之原則及承諾之聲明。工作小組由劍橋公爵透過野生動物聯盟召開，由皇家基金會領導合作保育行動，並由英格蘭前外交大臣威廉·海格勳爵閣下擔任主席。渣打銀行集團總顧問大衛芬恩為副主席。

### Objectives: 目標：

United for Wildlife’s mission statement is to make it impossible to use members’ infrastructure to facilitate the financing and transportation of IWT products with impunity.

野生動物聯盟之任務目標是，讓利用成員的基礎設施以免除資助及運輸非法野生動物交易之產品責任的行為成為不可能。

The Taskforce has three specific priorities: (i) escalating IWT as a significant but overlooked financial crime; (ii) creating a better understanding of the financial flows associated with IWT to assist in better identification and reporting of suspicious activity; and (iii) building a broad, transnational coalition of members that will work with financial intelligence units and law enforcement to follow the money and prevent and disrupt the international organised crime networks fuelling the trafficking.

工作小組有三個具體優先事項：(i)將非法野生動物交易升級為重要但受忽視的金融犯罪；(ii)建立對非法野生動物交易相關金流更好的認識，以協助更好地辨識及報告可疑交易活動；及(iii)建立廣泛的跨國成員聯盟，與金融情報中心及執法機關合作以追蹤金錢及預防及打擊引發販運之國際組織犯罪網絡。

### **Structure: 架構：**

The Taskforce has a secretariat which acts as the central contact point for members and partners and a central intelligence team which distributes strategic intelligence bulletins and specialist red flags.

工作小組有秘書處作為各成員的中央聯絡點，以及一個中央情報團隊發送策略情報公告及特殊紅旗指標。

### **Format & Membership: 形式及成員：**

As at June 2020, the Taskforce consists of approximately 40 financial institutions as members, across major source, transshipment and demand markets for the trade. The Taskforce members are headquartered across Africa, Asia, Australia, the Americas and Europe. The Taskforce also works alongside a wide range of United for Wildlife partners from across the private, public and third sectors.

至 2020 年 6 月止，工作小組有將近 40 個金融機構成員，橫跨貿易之主要來源、轉運及需求市場。工作小組成員之總部橫跨非洲、亞洲、澳洲、美洲及歐洲。工作小組亦廣泛地與橫跨私、公及第三部門之野生動物聯盟夥伴合作。

### **Recent developments: 近期發展：**

In June 2019, a federal grand jury in New York charged four men with operating a money laundering scheme and international network that trafficked 190 kilograms of rhino horn and more than ten tons of elephant tusks from various countries in East Africa, including Kenya, Tanzania and Uganda, to buyers located in the US and countries in Southeast Asia, as well as large quantities of heroin. Two of the men charged were extradited immediately, the third was arrested in July 2020, and the fourth is still at large. This enforcement action was supported by the Taskforce and confirms that IWT is a significant financial crime linked to other transnational organised crimes.

於 2019 年 6 月，聯邦大陪審團在紐約起訴運用洗錢計劃及國際網絡販運 190 公斤犀牛角及 10 多噸象牙來自東非，包含肯亞、坦尚尼亞及烏干達等國家的象牙給美國及東南亞國家之買方，以及販運大量海洛因的四人。兩位被起訴者已立即被引渡回國，第三人於 2020 年 7 月被逮捕，第四位仍在逃。這項執法行動由工作小組支援，其證實非法野生動物交易是與其他跨國組織犯罪相關聯的重要金融犯罪。

In July 2020, a Malawi court sentenced nine members of a Chinese wildlife trafficking syndicate to lengthy terms of imprisonment. The syndicate members were convicted of money laundering and trafficking pangolins, rhino horn and ivory. The Taskforce played a supporting role in the investigation.

於 2020 年 7 月，馬拉威法院判決 9 名中國野生動物販運集團的成員長期徒刑。集團成員被控以洗錢及販運穿山甲、犀牛角及象牙。工作小組在調查中扮演支援的角色。

The Taskforce has convened four IWT Learning Academies to date; in Hong Kong in August 2019, Nairobi in October 2019, Beijing in November 2019, and Johannesburg in January 2020. These events brought together experts and stakeholders from the public, private and third sectors to share knowledge and perspectives on the problem of IWT in those regions and what the financial and other sectors can do to combat it.

至今為止工作小組已召開四場非法野生動物交易學習學苑；2019 年 8 月在香港、2019 年 10 月在奈洛比、2019 年 11 月在北京、及 2020 年 1 月在約翰尼斯堡。這些活動聚集公、私及第三部門之專家及利害關係人，分享關於各地區非法野生動物交易問題之知識及觀點，以及金融及其他部門如何打擊該問題。

### **COVID-19 adaptation: COVID-19 之因應：**

Through the pandemic quarantine period, United for Wildlife has hosted a series of webinars, including on the impact of the COVID-19 pandemic on IWT activity and the link between zoonotic diseases and the wildlife trade, along with steps needed to eradicate IWT.

在疫情隔離期間，野生動物聯盟舉辦一系列線上研討會，包括 COVID-19 疫情對非法野生動物交易的影響，及人畜共通傳染病與野生動物貿易之關聯，以及根除非法野生動物交易之必要行動。

# Global Coalition to Fight Financial Crime 打擊金融犯罪全球聯盟

(GCFFC) (GCFFC)

**Established:** January 2018

成立：2018 年 1 月

## **Summary:** 摘要：

A policy and international best-practice sharing focused partnership. Founded in 2018 by Europol, the World Economic Forum and Refinitiv, the Coalition brings together 13 different key stakeholders across the antifinancial crime ecosystem and seeks to achieve its overarching purpose of mitigating financial crime by identifying key weaknesses in current AML and other anti-financial crime frameworks and advocating for tangible policy reforms in order to make such frameworks more effective.

政策及專注國際最佳實務共享之夥伴關係。2018 年由歐洲刑警組織、世界經濟論壇及路孚特(Refinitiv) 成立，聯盟聚集反金融犯罪生態圈中 13 個不同重要利害關係人，藉由辨識現行防制洗錢及其他反金融犯罪架構中之關鍵弱點，達成降低金融犯罪的多重目標，並提倡明確的政策改革以使該框架更為有效。

## **Objectives:** 目標：

The objectives of the Coalition are to bring together organisations from both the public and the private sector who are proactively engaged in the fight against financial crime in their jurisdiction(s) to:

聯盟目標在於聚集各司法管轄區內積極參與打擊金融犯罪之公、私部門的組織，以：

- Raise global awareness of financial crime as a critical challenge with grave financial, societal and human consequences; 提升將金融犯罪視為對於金融、社會、人類的重要挑戰的全球意識；
- Promote more effective information sharing between public and private entities on a coordinated and global level that can enhance the efficient fight against financial crime; 提倡公、私團體間更有效的全球整合層級資訊共享，以提升打擊金融犯罪的有效性；
- Propose mechanisms to reduce weaknesses in current anti-money laundering regimes globally, as well as identify emerging threats and best practices to develop more robust anti-money laundering systems and controls; and 提議能降低現今全球防制洗錢弱點的機制，並辨識新興威脅及最佳實務以發展更穩建的防制洗錢系統及內控；及
- Support initiatives to assist governments and law enforcement to effectively identify and seize the assets of financial criminals. 支持協助政府及執法機關有效辨識及扣押金融犯罪資產的行動。

The Coalition aspires to become a central hub for knowledge and information sharing between Members and to amplify their important work as part of the Coalition's mission to make fighting financial crime more effective globally. In so doing, the Coalition aims to serve all public and private sector actors engaged in the fight against financial crime as a point of reference for knowledge resources and best-practice sharing.

聯盟期許成為成員間知識及資訊共享的中心，並將加強他們的重要工作當作聯盟有效打擊全球金融犯罪任務的一部分。對此，聯盟以服務所有參與打擊金融犯罪之公、私部門成員為目標，並作為知識資源提供及最佳實務共享的參考。

## **Membership:** 成員：



The Coalition Members are: Atlantic Council, Crime Stoppers International (CSI), the European Banking Federation (EBF), Europol, the Future of Financial Intelligence Sharing programme (FFIS), the Freedom Seal, Global Financial Integrity (GFI), the Institute of International Finance (IIF), the MENA Financial Crime Compliance Group, Rani's Voice, Refinitiv, the Royal United Services Institute (RUSI), and the World Economic Forum (WEF). FleishmanHillard Brussels provides secretariat support to the Coalition.

聯盟成員為：大西洋理事會(Atlantic Council)、制止犯罪國際組織(CSI)、歐洲銀行聯盟(EBF)、歐洲刑警組織、未來金融情報分享計劃(FFIS)、自由標章(Freedom Seal)、全球金融誠信組織(GFI)、國際金融協會(IIF)、中東及北非金融犯罪法遵團體(the MENA Financial Crime Compliance Group)、Rani's Voice、皇家聯合研究所(RUSI)、世界經濟論壇(WEF)。布魯塞爾福萊國際傳播諮詢公司提供聯盟秘書服務支援。

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## ENDNOTES 終註

- i. Initially private sector-led, with strong FIU engagement thereafter 一開始由私部門領導，後來由金融情報中心強勢參與
- ii. Typically with FIU involvement as participants 通常有金融情報中心參與
- iii. Representatives from the Financial Intelligence Unit and from the law enforcement authorities from member countries participate, some of those respective FIUs are also supervisors. Other competent authorities participate according to the topic (domestic supervisory authorities and judicial authorities); and observers regularly attend to contribute with their expertise on an ad-hoc basis: supranational supervisors, supranational banking federations, international policy developers, international organisations, research institutes. 成員國金融情報中心及執法機關的代表參與，有些金融情報中心也是監管機關。其他權責機關依主題參與(國內監管機關及司法機關)；觀察員亦會定期參與依個案貢獻專業：超國界監管機關、超國界銀行聯盟、國際政策發展者、國際組織、研究機構。
- iv. As chair or co-chair of the respective partnership. 作為各自夥伴關係的主席或共同主席。
- v. See Maxwell, N (2019) 'Expanding the capability of financial information-sharing partnerships' RUSI Occasional Paper - <https://www.future-fis.com/thoughtleadership-in-partnership-development.html> 請見 Maxwell, N(2019) 「擴展金融資訊共享夥伴關係之能力」皇家聯合研究所論文--  
<https://www.future-fis.com/thoughtleadership-in-partnership-development.html>
- vi. The Reserve Bank of New Zealand sits on the FCPN Strategic Board, but not on the Operational Board. 紐西蘭儲備銀行參與金融犯罪預防網絡策略委員會，而非營運委員會。

This project is part of the Future of Financial Intelligence Sharing (FFIS) programme, delivered by the [RUSI Centre for Financial Crime & Security Studies and NJM Research](#) 本計劃是未來金融情報分享計劃的一部分，由皇家聯合研究所金融犯罪及安全研究中心以及 NJM 研究所共同研究

*Founded in 1831, the Royal United Services Institute (RUSI) is the world's oldest and the UK's leading defence and security think tank. Its mission is to inform, influence and enhance public debate on a safer and more stable world. RUSI is a research-led institute, producing independent, practical and innovative analysis to address today's complex challenges. London | Brussels | Nairobi | Doha | Tokyo | Washington, DC*

### 皇家

國防安全聯合研究所(RUSI)設立於 1831 年，是全球最古老以及英國具領導性之國防及安全智庫。其任務為提供訊息、影響以及加強公共辯論以促進更安全以及穩定的世界。RUSI 為研究導向之機構，提供獨立、務實以及創新之分析，以解決當今複雜之挑戰。倫敦 | 布魯塞爾 | 奈洛比 | 杜哈 | 東京 | 華盛頓特區

*The Future of Financial Intelligence Sharing (FFIS) programme leads independent research into the role of public-private financial information-sharing partnerships to detect, prevent and disrupt crime. The FFIS programme is a research partnership between the RUSI Centre for Financial Crime & Security Studies and NJM Research.*

未來金融情報分享計劃領導公私部門金融資訊共享夥伴關係扮演之角色之獨立研究，用以偵測、預防並且打擊犯罪。未來金融情報分享計劃為皇家聯合研究所金融犯罪及安全研究中心以及 NJM 研究所之共同研究計劃。

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The International Advisory Committee for the Future of Financial Intelligence Sharing programme:  
未來金融情報分享計劃(FFIS)之國際諮詢委員會

- Laure Brillaud, Transparency International EU.
- Laure Brillaud，歐盟透明國際
- Brendan Brothers, Co-Founder, Verafin.
- Brendan Brothers，Verafin 共同創辦人
- Anthony Charrie, Principal, Public Policy, Oliver Wyman.
- Anthony Charrie，奧緯諮詢公司(Oliver Wyman)公共政策長
- Jennifer Shasky Calvery, Global Head, Financial Crime Threat Mitigation, HSBC.
- Jennifer Shasky Calvery，降低金融犯罪威脅全球長，香港上海滙豐銀行
- Duncan DeVillie, SVP Global Head of Financial Crimes Compliance, Western Union.
- Duncan DeVillie，全球金融犯罪法遵總部副總經理，西聯匯款
- Matt Ekberg, Senior Policy Advisor for Supervisory Affairs, Institute of International Finance.
- Matt Ekberg，資深監理事務政策顧問，國際金融協會
- Max Heywood, Tackling Grand Corruption Programme, Transparency International Global Secretariat.
- Max Heywood，打擊重大貪污計劃，透明國際全球秘書
- Paul Horlick, Director, Head of Financial Intelligence Unit (FIU) at Barclays Bank.
- Paul Horlick，巴克萊銀行(Barclays Bank)金融情報中心(FIU)主席、董事
- Tom Keatinge, Director of the RUSI Centre for Financial Crime and Security Studies.
- Tom Keatinge，皇家聯合研究所金融犯罪及安全研究中心董事。
- Professor Louis de Koker, La Trobe University, Melbourne.
- Louis de Koker 教授，墨爾本樂卓博大學
- Nick Lewis OBE, Head, Integrated Intelligence and Investigations, Financial Crime Compliance, Standard Chartered Bank.
- Nick Lewis OBE，金融犯罪法遵整合情報及調查長，渣打銀行
- Rick McDonell, Executive Director of ACAMS
- Rich McDonell，ACAMS 執行長
- Jody Myers, Chief Risk Officer (CRO) at Western Union.
- Jody Myers，西聯匯款首席風險官(CRO)
- Tracy Paradise, Executive Secretary, the Wolfsberg Group.
- Tracy Paradise，沃夫斯堡組織執行秘書
- Bill Peace, Former Director of the UK FIU, Honorary Senior Research Associate, UCL.
- Bill Peace，前英國金融情報中心(FIU)董事，榮譽資深研究員，倫敦大學學院(UCL)
- Lisa Quest, Partner, Oliver Wyman.
- Lisa Quest，奧緯諮詢公司(Oliver Wyman)合夥人
- Che Sidanius, Global Head of Financial Crime & Industry Affairs, Refinitiv.
- Che Sidanius，路孚特(Refinitiv)金融犯罪&產業事務全球長
- Ben Trim, Head of Financial Crime Policy, Group Public Affairs, HSBC.
- Ben Trim，香港上海滙豐銀行集團公共事務金融犯罪政策長
- Tony Wicks, Head of Financial Crime Compliance, SWIFT.
- Tony Wicks，環球銀行金融電信協會(SWIFT)金融犯罪法遵長
-

Global strategic partners of the FFIS programme: 未來金融情報分享計劃全球策略夥伴關係：

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