

PUBLIC-PRIVATE PARTNERSHIPS

Role of FIUs in PPPs



Recognising the importance of public and private sector co-operation in the fight against financial crime, the 25th Egmont Group Plenary addressed the topic of Public-Private Partnerships (PPPs) from the perspective of Financial Intelligence Units (FIUs). The outcomes of the plenary discussions can be divided into three aspects – the contexts that PPPs may exist in, the challenges FIUs may face when establishing a partnership, and the opportunities that PPPs present.

CONTEXT

Forming a PPP is not a goal within itself.

No one size fits all! PPPs around the globe vary in:

- form;
- size;
- objectives;
- maturity level;
- scope of the exchanged information.

PPPs should:

- be set up in co-creation, starting strategically and taking small steps;
- be based on mutual trust and orientated to answer the needs of the FIUs;
- be goal-oriented on priorities, create mutual benefits and add value to all partners;
- complement the existing STR/SAR reporting regime.

CHALLENGES

LEGISLATIVE – amendments in legislation might be needed to allow partners to achieve their objectives;

SECURITY – protection of (classified) information and privacy of individuals;

TECHNOLOGY – compatibility of software between partners may hamper the timely exchange of (specific) information;

CAPABILITIES/KNOWLEDGE – differences in level of expertise;

CROSS-BORDER – sharing of foreign intelligence within PPPs and cross-border sharing between PPPs;

COSTS – prioritization of resources;

COMMUNICATION – sharing the appropriate information at the right moment with the appropriate partners;

PRACTICAL – ownership of information, selecting the relevant organisation, bringing together the relevant experts, etc.

OPPORTUNITIES

PPPs could:

- enhance trust in the relationship with the private sector;
- enhance the quality of reporting and additional informational input;
- help in designing common approaches, and identifying desired deliverables;
- foster access to information;
- enhance the level of expertise and knowledge for all partners;
- facilitate increased feedback to reporting entities;
- provide more flexibility, agility and opportunities to adjust to the fast-changing ML/TF threat environment;
- provide better understanding of ML/TF risks;
- provide advice on possible ways to enhance the existing AML/CFT framework;
- enhance the quality of analytical products (timeliness/relevance);
- lead to development of new (non-traditional partnerships) – both with private sector as well as public sector partners.

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