# STRATEGIC DLAN

### fighting economic crime through intelligence





Gibraltar Financial Intelligence Unit

HM Government of Gibraltar



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### Foreword



I am excited to unveil our second 3-Year Strategic Plan and look forward to sharing our successes and implementing lessons learnt. As we look back at our accomplishments in our first strategic plan, we have also learnt from our weaknesses to improve.

Over the last three years, the GFIU has operated against the backdrop of unprecedented global events, navigating through the Covid-19 pandemic to the Financial Action Task Force (FATF) Post-Observation Period, to keeping up to date with the latest typologies to geopolitical changes that have impacted a range of targeted financial sanctions. This period has served as a reminder of the need for the GFIU to demonstrate innovation, agility and adaptability.

Our vision remains unchanged. This strategic plan is designed to serve as our road map for the future, delivering change and having a more impactful presence in the global fight against economic crime. It is a fundamental plan that ensures the GFIU achieves its vision providing a framework against an ever-changing threat landscape. It identifies the key areas we need to focus on, ensuring maximum effort to address our operational This plan incorporates our requirements. continued commitment to developing our staff's skills and capacities while effectively addressing new challenges through innovation and stakeholder engagement.

Our plan will build upon current momentum, shaped by our experience during the Moneyval and the FATF's process. We have aligned our priorities with the public and private sectors, focusing on enhancing our capabilities to identify and detect vulnerabilities exploited by criminals and terrorists to launder their ill-gotten gains. To achieve this, we intend to provide the best possible outcomes through adaptability and resilience. We will continuously improve ourselves through datadriven assessments and feedback. Project Nexus will continue to be the flagship outreach program, and we will embrace the support of all our internal and external partners to achieve more outstanding results.

The vision for the GFIU will only be possible with budgetary support that will set out our needs to become a unique global player. We will continue to exploit the opportunities from technological advancements and work with stakeholders to ensure we have the best innovative solutions. The plan will form the backbone of our digital transformation journey, using technology to assist us in achieving our high-level ambitions.

Finally, over the last three years, we have demonstrated our ability to achieve our strategic priorities. None of these achievements would have been possible without our staff's response and collaboration with our partners. The commitment and dedication to our vision will allow us to fulfil our core functions over the next three years.

I look forward to continuing collaboration with our partners and strive to achieve excellence through this new road map that will strengthen the GFIU for the future.

> Edgar Lopez Director of GFIU



### About us

#### **Roles and Responsibilities**

The Gibraltar Financial Intelligence Unit (GFIU) was established in January 1996 to gather, store, analyse and disseminate intelligence related to criminal conduct, (including but not limited to money laundering, the financing of terrorism and the proliferation of weapons of mass destruction), transacted or attempted to be transacted through relevant financial businesses in accordance with local legislation.

The GFIU functions in accordance with the Financial Action Task Force (FATF) Recommendations and Standards and is evaluated by the Council of Europe Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL). It is a full member of the Egmont Group of FIUs and adheres to the Egmont Group Statement of Purpose and its Principles of Information Exchange between FIUs.





### **Our Vision**

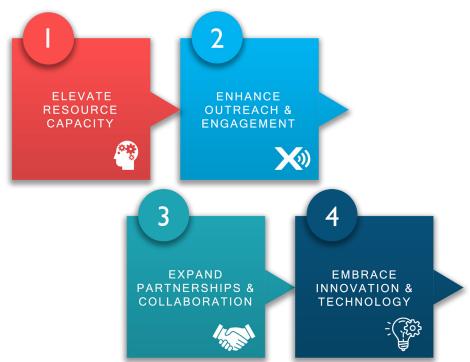
By developing our people and enhancing capacity building, we will strive to make Gibraltar a safer place to conduct business. We will work closely with our local and international partners to tackle economic crime and related offences.

"Fighting economic crime through intelligence."





### **Our Strategy**



The first step in our strategic process was to articulate our vision, but now we must utilize our core and enabling capabilities, which include our people, knowledge, partnerships, and technology, to deliver on that vision using the resources available to us.

Our 2023-26 GFIU Strategic Plan is based on four interconnected high-level priorities known as the Four E's, which describe how we intend to achieve our vision. This plan has been developed in response to new challenges we face, and we have taken into account feedback from the public and private sectors to shape it.

Our priorities reflect the successes we have had in restructuring and managing the unit over the last three years, as well as areas where we can improve. They align with Financial Action Task Force standards and provide a clear explanation of what we will do to focus on delivering our vision.

We believe that collaboration with our partners is essential to achieving our vision, and we are committed to being agile and flexible in the face of new threats.

To track our progress, we will use success measures and statistical data to monitor our performance against each strategic priority and the outcomes they are designed to achieve. By regularly tracking our progress, we can ensure that we continue to make progress towards our strategic aims and achieve our vision by 2026.



## **Priority One**



#### **Evaluate Resources Capability**

Over the last three years all our staff have undergone specialist training courses. We will build upon the progress we have made and equip our people with the skills they need to do their work. We will work together with other partners to look at new ways of learning, creating a collaborative approach that will support them in better understanding complex criminal activity.

A diverse and inclusive culture within the GFIU will ensure that we provide the appropriate working environment in which everyone is able to contribute and demonstrate their potentional. Our people are our most valuable asset and we commit ourselves to provide them with all available resources within our reach. We want them to be proud of the work that they do and that their contribution to the fight against economic crime is valued. In a competitive environment, we must ensure that we attract and retain our people by providing them with an excellent working experience.

#### Key outcomes:

- Continue to provide staff with regular feedback, listen to their views, develop and build confidence.
- Create an ethical, diverse, inclusive and supportive workplace culture where staff contribution is valued.
- Continue building on skills to meet current and future challenges.
- Develop a new training and development plan that is based on current and future needs.
- Continue to make improvements to our intelligence products through specialist skills, having a better understanding of the changing threat landscape.
- Encourage innovative improvements to working practices and processes to meet new demands and deliver better results.
- Review, analyse and monitor demand versus resources to maintain operational efficiencies
- Improve our strategic analysis capabilities.

#### **Measure of Progress:**

- Number of courses made available and staff trained
- Feedback from GFIU staff on personal development
- Statistical analysis on performance of GFIU products
- Number of strategic analysis reports published
- Number of intelligence reports produced



### **Priority Two**



#### **Enhance Outreach & Engagement**

Launched in 2017, Project Nexus has evolved into the GFIU's most successful initiative. We are committed to continue providing a sustainable and structured outreach and engagement program. We strive to improve our delivery and content through feedback and will encourage the private sector to actively collaborate and interact with us through new initiatives, projects or other opportunities. Through this we will be able to build our relationships and better understand their needs. The development of e-Nexus (e-learning) has created a new platform that provides an effective, resilient and innovative way of delivering our workshops. We will continue to explore new ways of making the content relevant, up-to-date and interactive to improve awareness of current trends and typologies in economic crime. Our trial on Engagement Clinics has demonstrated its effectiveness and we will commit to creating a sustainable program.

#### **Key outcomes:**

- Work collaboratively with the private sector, associations, think tanks, experts and academics to deliver a high-quality program of events
- Increase our awareness workshops, speaking engagements, Engagement Clinics, webinars and other forms of delivery in line with our Corporate Communication Strategy
- Use Project Nexus to expand our outreach beyond Gibraltar
- Create educational videos or updates to share via social media and other communication channels.

#### **Measure of Progress:**

- Number of courses, workshops and training opportunities made available to both private and public sectors
- Assess feedback from attendees in Project Nexus events
- Assess social media interactions



### **Priority Three**



#### **Expand Partnerships & Collaboration**

Public-Private Partnerships (PPP) have demonstrated that effective information sharing between stakeholders greatly improves the effectiveness of anti-money laundering, counter terrorist financing and proliferation financing measures. The establishment of Gibraltar's PPP through the Financial Liaison and Intelligence Network (FLINT) is a significant step in the development of our collaborative work to fight economic crime. An agreement signed between the Quad Island's FIUs and the UK's Joint Money Laundering Intelligence Taskforce (JMLIT+) will also facilitate exchanges of information increasing our capabilities.

Transnational crime knows no borders and we will continue to work on this to encourage an open dialogue and trust between the private and public sectors. Equally, we will focus on expanding our network beyond Gibraltar to strengthen our cooperation and improve our service delivery to foreign FIUs through the Egmont Group, our participation in the Quad Islands Forum of FIUs and our membership of the International Anti-Corruption Coordinating Centre.

#### **Key outcomes:**

- Continue working on developing more efficient intelligence exchanges though the Joint Financial Intelligence Tasking Group
- Proactively seek and develop new strategic partnerships
- Establish new regional partnerships to better understand organised crime groups operating around Gibraltar
- Work collaboratively within the Quad Islands Forum of FIUs to develop strategic analysis projects that impact our finance centres
- Boost resources to improve capacity in international liaison
- Support international bodies in providing capacity building to enhance international efforts to fight economic crime
- Share strategic intelligence products with FLINT members

#### **Measure of Progress:**

- Number of new partners
- Number of formal collaboration initiatives
- Evaluation of successful cases through FLINT
- Number of Joint Financial Intelligence Tasking Group cases
- Number of strategic intelligence products shared with FLINT
- Number of strategic analysis documents jointly published by the Quad Island Forum



### **Priority Four**



#### **Embrace Innovation & Technology**

Since our last strategic plan, we have made significant progress in acquiring new analytical tools, taking advantage of the latest technology to meet our demands. We will continue to foster a culture of innovation and ideas to improve our processes using new technologies to realise efficiencies. Technological advancements have improved our analysis, data management and information sharing, but they have also been exploited by criminals resulting in increasing complexities of economic crime. We must therefore ensure that we expand our technological capabilities to seek and identify criminal behaviour.

#### Key outcomes:

- Continue with our digital transformation to further streamline our work processes, creating a reliable and seamless system that can handle new challenges created by big data.
- Deliver an effective and engaging experience for all staff that will encourage new innovativation.
- Continue to work in partnership with the private sector and software developers to identify new ways of fighting economic crime.
- Sustain our investment in the GFIU's IT infrastructure to enable a wider range of digital approaches that include specialist analytical tools, and support delivery of our outreach program.
- Ensure effective data quality management and governance across our databases.
- Foster a culture where staff can understand their digital strengths and weaknesses that will allow them to improve their skills.
- Explore new opportunities through the use of Machine Learning and/or Artificial Intelligence software.

#### **Measure of Progress.**

- Evaluate the effect of improvements made to our digitals systems
- Number of courses to use GFIU specialist technology products
- Number of projects that focus on Machine Learning/ Artificial Intelligence systems
- Assess progress made that has had an effect on detecting/ identifying economic crime through innovation



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