

2020

STRATEGIC PLAN | 23

fighting economic crime
through intelligence



Gibraltar Financial Intelligence Unit

HM Government of Gibraltar

Content



<u>Content</u>	<u>02</u>
<u>Foreword</u>	<u>03</u>
<u>About Us</u>	<u>04</u>
<u>Our Vision</u>	<u>05</u>
<u>Our Strategy</u>	<u>06</u>
<u>Priority One</u>	<u>07</u>
<u>Priority Two</u>	<u>08</u>
<u>Priority Three</u>	<u>09</u>
<u>Priority Four</u>	<u>10</u>
<u>Priority Five</u>	<u>11</u>
<u>Priority Six</u>	<u>12</u>

Foreword



It gives me great pleasure to launch the Gibraltar Financial Intelligence Unit's (GFIU) first Strategic Plan for 2020-23. The purpose of this plan is to set the priorities for the next three years. In today's complex, interconnected world with unpredictable transnational crime and volatile geopolitics, preparing and executing a strategic plan that will lead us through the next three years, can be challenging.

The plan has been prepared taking into account our recent Moneyval evaluation and the recommended actions published in the Council of Europe's Mutual Evaluation Report for Gibraltar and in line with the Financial Action Task Force (FATF) Standards. It emphasises the areas where the GFIU wants greater focus.

We will ensure that we have the capabilities, knowledge and skills required to attain our functions pursuant to the Proceeds of Crime Act 2015. We will need to be flexible and resilient to an ever-changing threat landscape, with new challenges expected in the horizon. We will play a critical role in the fight against organised crime groups, terrorists and their activities.

I am committed to ensuring that we can achieve our desired outcomes by making the best use of our resources. This will involve investing in our greatest asset, our people, who we shall develop and train to the highest standards.

We will optimise our infrastructure, innovate where possible to disrupt criminal activity, and find ways and solutions to address new threats. Removing barriers to information sharing will be one of our targets and we will do this by promoting better sharing methods with the appropriate measures in place to securely transmit and protect sensitive data.

Through this strategy we will build on the excellent relationships we already have with the private sector, our local and international partners and will develop new ones, to find new ways to work together to fight economic crime. We will support the Royal Gibraltar Police and HM Customs (Gibraltar) to ensure that they have better intelligence products to detect and disrupt the exploitation of our finance centre by criminals.

As the world deals with the Covid-19 pandemic, the GFIU has ensured that its core functions and operational capacity has been maintained. The outbreak has demonstrated how important it is to have robust IT system so that reporting entities can continue submitting their suspicious activity reports as required by law. In these challenging circumstances, the GFIU has had an opportunity to test its limits through its newly drafted Resilience & Business Continuity Plan and learn about how the future may look like with new digital frameworks in place.

Finally, this strategic document sets out an ambitious plan that is not without its challenges. It will however encourage us to be more flexible, effective and professional and to build upon our achievements. As we look towards the future with a new structure I am confident that, through collaborative work with our partners, we will succeed in meeting our vision.

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.

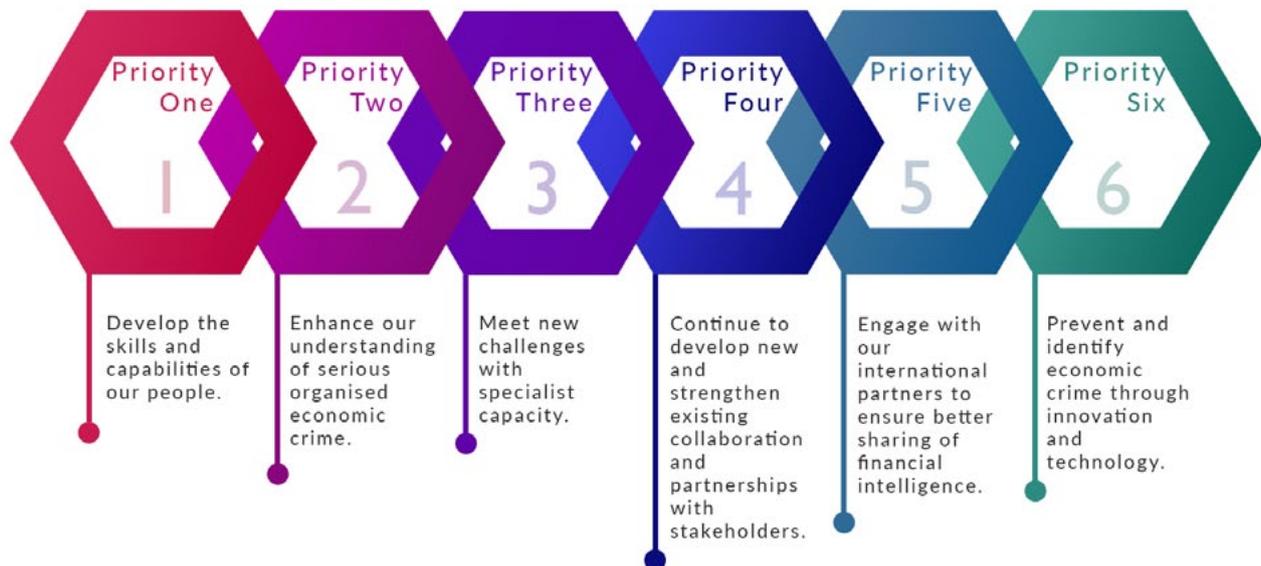
“Fighting economic crime through intelligence.”



Our Strategy

Delivering the GFIU's Strategic Plan 2020-23, can only be achieved by working together collaboratively with our partners and the private sector. We must therefore remain flexible in our response to the evolving threat landscape and future challenges. This strategic plan is intended to address these in a dynamic way but we must also recognise that not every desired resource will always be made available. Our main planning assumptions for this strategic plan are based on six priorities.

We will measure our progress against the priority goals of the plan through a combination of quantitative statistics, case studies and other data available to us, which will demonstrate the changes and improvements that have taken place. These measures are highlighted below each priority.



These priorities are informed by the findings of our Mutual Evaluation Report published by Moneyval (Council of Europe) and also in line with the FATF's Standards.



Priority One

Develop the skills and capabilities of our people.

In order to fully exploit financial intelligence opportunities, we must maintain an engaged workforce with the expertise and skills required to combat money laundering, terrorist financing and other economic related crimes. GFIU will review its training requirements and ensure that staff is motivated, engaged and working with acquired skills in financial intelligence.

With increasing demands and international obligations placed on us, a data analysis solution is being implemented. This will require analytical skills but will enable us to improve our capabilities to conduct tactical and strategic analysis.

Key outcomes:

- Create an engaging environment with regular meetings to follow progress
- Promote the GFIU's role in fighting economic crime to attract skills
- Determine areas of training needs for each role
- Revise and implement an annual training plan that will include operational and strategic analysis

Measure of Progress:

- Number of courses made available and staff trained
- Assess feedback from GFIU staff on personal development



Priority Two

Enhance our understanding of serious organised economic crime

As part of the GFIU's enhancement of capabilities, we will continue to develop our understanding of serious organised economic crimes. This includes; money laundering, terrorist financing, financing of human trafficking, proliferation financing and targeted financial sanctions. To do this we will reach out to international experts, our partners, and academia to ensure that

financial intelligence assists in protecting our national security and identify the movement of criminal assets and funds.

Armed with this financial intelligence and subsequent analysis, we will publish typologies and red flags to reflect the threat landscape and further strengthen the capacity of reporting entities.

Key outcomes:

- Develop our understanding of serious economic crimes
- Reach out to international experts, our partners and academia for advice on specific predicate offences
- Publish regular typologies that are sector specific
- Develop guidance on red flags that are sector specific

Measure of Progress:

- Increased detection and identification of serious economic crime
- Number of staff trained in specialist areas
- Number of products produced by GFIU that are shared with the private sector



Priority Three

Meet new challenges with specialist capacity building.

The rapid advances in technology has made globalisation possible in a way that has allowed criminals and terrorists to operate from greater distances and without borders. Most have taken advantage of new technologies and cyberspace to operate in anonymity, moving from the traditional physical environment to virtual ones. As we face these new global challenges there will be a need to address these with specialist skills to protect our finance centre from abuse. Our staff will come across more sophisticated criminal activities and will need to adapt our current capabilities to ensure that our resources can face these new challenges. We will need to have a

better understanding how others are using technology and complex company structures to commit crimes. Through strategic analysis and environmental scanning, we will be able to predict new trends and patterns that will assist us in identifying training needs and developing the required skills to tackle the evolving threat landscape. Additionally, as we prepare for the emergence of new threats that affect global security, we will have a leading role on proliferation financing, providing coordination of information related to proliferation and targeted financial sanctions.

Key outcomes:

- Improve our understanding of how criminals are using technology to commit crimes
- Adapt to emerging threats using strategic analysis
- Use strategic analysis to identify new skills requirements
- Lead as the coordinating body for intelligence on proliferation (PF) and sanctions (TFS)

Measure of Progress:

- Increased detection and identification of serious economic crime
- Number of staff trained in financial technologies
- Number of inter-agency meetings related to PF and TFS



Priority Four

Continue to develop new and strengthen existing collaboration and partnerships with stakeholders.

We will continue to develop new partnerships in order to extend our network of local partners. Increasing our network will ensure that through financial intelligence we will be able to support our national security and Gibraltar's general policing, including any nexus between the money laundering by Organised Crime Groups

(OCGs) and the funding of terrorism. Through Project Nexus, our successful outreach program, we will strengthen our collaboration and create a private/ public partnership (PPP) to effectively coordinate and share financial information.

Key outcomes:

- Strengthen existing partnerships and formalise them through MoUs with a focus on improved information sharing agreements
- Seek to develop new partnerships
- Conduct a sustainable program for Project Nexus
- Create a new private/ public partnership (PPP) initiative between critical reporting entities and public sector stakeholders
- Increase and improve our communications that will allow the public and private sector to work jointly towards tackling economic crime

Measure of Progress.

- Number of new local partners
- Number of Project Nexus events with analysis of feedback
- The creation of a formal PPP initiative by the end of 2021



Priority Five

Engage with our international partners to ensure better sharing of financial intelligence.

We will continue to place a significant emphasis on our international efforts in the Egmont Group by working closely with our international partners, sharing financial intelligence, providing a high standard of international cooperation to combat economic crime and disrupt international criminal networks. Our international links will form the basis of a better-integrated system of contacts for our law enforcement agencies, including the Royal Gibraltar Police and HM Customs (Gibraltar). We will also ensure that by enhancing our international

relationships we will also facilitate support for Mutual Legal Assistance (MLA) processes. Increasing our resource management of our international desk will make fundamental improvements to our response times and where necessary provide detailed feedback on the use of financial intelligence to our partners. Our departure from the EU will create new challenges and opportunities, so we will need to look at maintaining our close co-operation with our European partners.

Key outcomes:

- Develop new international strategic partners
- Greater emphasis in international cooperation
- Improved responses to requests
- Review and improve provisions and processes for feedback on quality of intelligence

Measure of Progress:

- Evaluate progress to determine if GFIU's intelligence products and the timely sharing has assisted international investigations
- Monitor the feedback received from FIUs via Egmont Secure Web
- Number of international partners



Priority Six

Prevent and identify economic crime through innovation and technology.

As illicit financial activities are uncovered, criminals and terrorists will evolve their modus operandi to continue their operations. Consequently, we will encourage our staff and partners to develop innovative ways and solutions to meet the challenges and opportunities we face. We shall look into all opportunities in order to

optimise our resources and tools to create a difficult environment for those who seek harm or wish to abuse our financial system. We will ensure that our innovative approach to tackle money laundering, terrorist financing and other serious economic crime, is an effective tool that will protect Gibraltar's finance centre.

Key outcomes:

- Develop our online reporting system and analytical software to exploit financial intelligence
- Encourage new innovative ideas to tackle economic crime
- Make smarter use of our data and technology to predict trends in economic crime
- Protect the reputation of Gibraltar's finance centre through innovation
- Work with the private sector to develop and support innovative ideas

Measure of Progress:

- Assess progress made that has had an effect on detecting/ identifying economic crime through innovation
- Evaluate the effect of improvements made to our digital systems to detect criminal conduct



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