EGMONT GROUP
OF FINANCIAL INTELLIGENCE UNITS

IEWG
INFORMATION EXCHANGE
WORKING GROUP

# The Role of FIUs in the Preparation of Strategic Intelligence

An Egmont Group Project
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## Executive Summary

This report presents the analytical findings derived from the Information Collection Questionnaire developed under the Egmont Group Information Exchange Working Group (IEWG) project on *The Role of Financial Intelligence Units (FIUs) in the Preparation of Strategic Intelligence*. The questionnaire was distributed to Egmont Group member FIUs and structured across five thematic areas: (A) mandate and institutional environment; (B) human resources and analytical capacity; (C) strategic products and outputs; (D) impact and integration into national frameworks; and (E) overall effectiveness and forward-looking capability.

The report synthesizes cross-jurisdictional responses to identify systemic patterns, capability gaps, and emerging good practices. Findings are presented through a combination of quantitative indicators, qualitative insights, and comparative analysis, with the objective of informing policy development and strengthening strategic intelligence functions across FIUs.

In this report, *strategic analysis* is defined as the structured, forward-looking use of financial intelligence to identify patterns, trends, and systemic ML/TF risks, and to translate these insights into policy-relevant and decision-support outputs.

FATF Recommendation 29 sets the formal expectation that FIUs conduct strategic analysis but treating that requirement as the ceiling rather than the floor underestimates what strategic intelligence actually does inside an FIU. In practice, strategic intelligence is the layer that connects individual case work to policy, supervision, and the National Risk Assessment (NRA). It is what allows an FIU to move from reactive triage of suspicious transaction reports (STRs) to a proactive posture that informs typologies, sectoral guidance, supervisory priorities, and the national AML/CFT strategy itself. When FIUs invest seriously in strategic intelligence, they shift from being a financial intelligence node in the law enforcement chain to being a knowledge institution at the centre of the financial integrity architecture.

This is why the trend toward establishing dedicated strategic analysis units, advanced analytical tooling, and structured engagement with policy stakeholders is more than an organisational fashion. It reflects a maturing understanding that the value of FIU work compounds only when individual signals are aggregated, contextualised, and projected forward in time.

The report identifies that FIUs occupy a position no other AML/CFT actor occupies. They sit at the intersection of reporting entities information submission, law enforcement requests, supervisory cooperation, and international exchange through the Egmont Group network. That vantage point gives FIUs visibility into patterns that no single law enforcement, prosecutor, or reporting institution can see in isolation. Strategic intelligence is the discipline of turning that vantage point into useful knowledge about emerging typologies, exposure of specific sectors or corridors, effectiveness gaps in the system, and geopolitical or technological developments that change the ML/TF threat landscape.

This positioning also makes the FIU uniquely placed to test the operational reality of the FATF standards on the ground. Strategic products that surface what is and is not working in a jurisdiction are direct inputs to mutual evaluations, follow-up assessments, and the iterative refinement of the standards themselves. The Egmont Group network's added value here is precisely the aggregation of those national reality checks into evidence the global standard setter can act on.

### Summary Statistics (Illustrative Composite)

| | | | |
|---|---|---|---|
| **100%** FIUs with legal mandate for strategic intelligence | **81%** FIUs with a dedicated strategic analysis Team | **4.2/5** Average FATF Rec. 1 & 29 alignment score | **81%** FIUs reporting engagement in awareness and stakeholder outreach |

*⚠ Note: Quantitative figures in this report are composite analytical estimates derived from the questionnaire framework and illustrative response distributions. This is because not all Egmont Group members provided their response to the information collection questionnaire.*

## Key Findings at a Glance

- Legislative gaps remain a primary barrier: while all surveyed FIUs report that their framework permits strategic intelligence work, approximately one-third of surveyed FIUs operate without an explicit statutory authority for strategic intelligence production, which could make the coherent strategic intelligence production challenging. In these FIUs, the function is based on broad analytical powers or institutional practice rather than clear legal wording. This means that, although strategic analysis is universally permitted across responding FIUs, it is not always explicitly and unambiguously anchored in primary legislation, a gap that has implications for resourcing, data access, and institutional authority. Without an unambiguous mandate, strategic analysis competes for attention with operational casework, depends on the personal commitment of leadership, and remains vulnerable when priorities shift. The clear legal framework also protects FIU's operational independence to produce and disseminate strategic findings on sensitive sectors, products, or institutional vulnerabilities, without political interference or external pressures that may limit the analytical scope of its work. The statutory anchor matters because it underwrites resourcing decisions, data access entitlements, and the legitimacy of strategic products vis a vis policy stakeholders. Closing this gap is among the highest-leverage interventions available, and it is largely cost-free in budgetary terms.

- Human resource constraints are the most consistently cited practical challenge, with many FIUs relying on hybrid analyst roles rather than dedicated strategic analysis functions. The prevalence of hybrid analyst roles, where the same staff member moves between tactical case support and strategic projects, is the most honest signal in the survey. It tells that even where the mandate exists, capacity is thin. Hybrid roles have advantages, since strategic insight benefits from operational grounding, but this carries the risk that operational outputs take precedence over strategic outputs. A sustainable model requires either a protected core of dedicated strategic analysts or, more realistically for smaller FIUs, ringfenced strategic time backed by clear leadership protection and measured outputs. Strategic analysis also demands a distinct and unique skill set (e.g., critical thinking, quantitative methods, and big-data handling).
- Data access: while most FIUs report solid access to STR/SAR/CTR data, access lags significantly for key datasets such as beneficial ownership information, customs and trade data, and cross-border financial flows. These gaps cannot be closed by FIUs acting alone; they require structured cooperation with domestic authorities (e.g., company registries, customs and trade authorities, tax administrations) and with foreign FIUs. At this stage of the maturity curve, the strategic analyst's frustration is less about STR access or volume and more about the absence of the contextual data that give STRs meaning. Access to these complementary datasets is essential for holistic perspective, identify cross-sectoral patterns used by criminal actors, and pinpoint systemic vulnerabilities.
- Dissemination and feedback mechanisms remain underdeveloped, limiting the measurable policy impact of strategic products. A strategic product that does not reach a decision maker, or that reaches one but produces no observable response, has no measurable impact. Underdeveloped dissemination channels, weak feedback loops with policy ministries and supervisors, and the absence of structured evaluation of strategic outputs all conspire to make impact assessment difficult. This dimension is particularly important because it reflects the distinct institutional role of the FIU: strategic intelligence may identify sensitive vulnerabilities, emerging risks, or control weaknesses within specific sectors or institutions.
- There is a strong appetite for capacity building, shared typology libraries, and regional collaboration frameworks. This indicates that FIUs could effectively absorb additional capacity-building support. The main constraint no longer appears to be awareness, but rather the availability of collective goods, such as shared libraries, regional analytical hubs, and joint typology projects, which may generate more systemic improvements than isolated national-level capacity-building initiatives. This is precisely the space where the Egmont Group, FATF, FSRBs, IMF, UNODC, The World Bank and donors can coordinate to multiply impact and support convergence toward higher strategic-intelligence maturity.

# 1. Introduction and Methodology

## 1.1 Project Background

The IEWG project on The Role of FIUs in Preparation of Strategic Intelligence was initiated to examine how FIUs across Egmont Group member jurisdictions develop, coordinate, and disseminate strategic financial intelligence. Strategic intelligence, distinguished from operational case-driven analysis, encompasses macro-level assessments of money laundering and terrorist financing (ML/TF) threats, typologies, and systemic vulnerabilities intended to inform policy, regulation, and National Risk Assessment (NRA) processes.

In this report, the term "strategic analysis" is used in the sense of FATF Recommendation 29, while "strategic intelligence" refers to the broader set of institutional processes, capabilities, and outputs that build on strategic analysis (e.g. typology production, risk assessments, and policy-oriented intelligence products). The terms are closely related and, where appropriate, used interchangeably, but "strategic intelligence" emphasises the institutional function and impact.

The FATF Recommendation 29[1] defines "Strategic analysis" as a process that *uses available and obtainable information, including data that may be provided by other competent authorities, to identify money laundering and terrorist financing related trends and patterns. This information is then also used by the FIU or other state entities in order to determine money laundering and terrorist financing related threats and vulnerabilities. Strategic analysis may also help establish policies and goals for the FIU, or more broadly for other entities within the AML/CFT regime.*

In a broader sense strategic intelligence, for the needs of this report and in an FIU setting, is the systematic aggregation, analysis, and interpretation of financial information and contextual data to identify trends, patterns, vulnerabilities, and emerging threats across money laundering, terrorist financing, and predicate criminality, and to convert that understanding into knowledge products that inform FIU working methods and policies, as well as other national and international procedures, regulations and national/Supranational Risk Assessments, and the strategic direction of the AML/CFT system itself.

Three elements make this definition specifically FIU-relevant. First, the underlying material is principally financial intelligence, that is STRs/SARs, CTRs, cross-border declarations, supervisory data, and Egmont exchanges, enriched with open source, law enforcement, and other government data. Second, the orientation is forward-looking and system-level rather than case-level. Third, the primary consumer sits outside the operational chain:

- FIU management setting analytical priorities
- Governmental policy structure
- Supervisor designing an inspection plan
- Law enforcement partner

[1] https://www.fatf-gafi.org/content/dam/fatf-gafi/recommendations/FATF%20Recommendations%202012.pdf.coredownload.inline.pdf?nocache=true

- National Risk Assessment coordinator,
- International body,
- The private sector through typology guidance, or
- Other relevant stakeholders.

Strategic analysis may use the same source of information used in operational or tactical analysis. However, with different scope and objective. Operational intelligence is the analysis of financial information, typically initiated by an STR/SAR, a foreign request or spontaneous disclosure, a law enforcement inquiry, or an FIU-driven lead, that supports a specific investigation, prosecution, and /or asset tracing. Its purpose is to identify the who, what, when, where, and how of a particular suspected scheme, network, or transaction set, to enrich an existing investigative picture, or to trigger one. The output is normally a dissemination to a competent authority:

- A financial intelligence report, and /or
- an Egmont Group reply/spontaneous disclosure.

The time horizon is short, the granularity is high, and success is measured in outputs that move a case forward.

The cleanest way to draw the distinction is across six dimensions, namely:

- **Object of analysis.** Operational intelligence focuses on a specific subject, network, or transaction. On the other hand, strategic analysis cannot be confined to specific cases or number of cases, nor can be reduced to the elaboration of generic narrative on data and information, whatever their size. Strategic intelligence focuses on a phenomenon, a sector, a method, a corridor, or a system-level question.
- **Time horizon.** Operational intelligence is short cycle, often days or weeks, sometimes hours when an asset is at risk. Strategic intelligence is medium to long cycle, with products typically built over months and intended to remain relevant for a year or longer.
- **Level of aggregation**. Operational intelligence works case by case. Strategic intelligence aggregates across hundreds or thousands of cases, looking for the regularities that no individual case reveals. Methodologically, strategic analysis work increasingly depends on statistical and econometric analysis, typology construction, geospatial and network analytics, and machine-learning techniques that can detect non-obvious relationships and weak signals at scale. Together, these approaches move strategic analysis from simple aggregation of cases toward the development of explanatory and, increasingly, predictive models of financial crime risk.
- **Analytical method.** Operational analysis is largely deductive and entity-driven, building outward from a known or suspected actor. Strategic analysis is more inductive and pattern-driven, drawing on statistical, typological, geospatial, network, and increasingly machine-learning techniques to surface what would otherwise remain invisible at the case level. Analytical method and reasoning approaches. It starts from

a known or suspected actor, transaction, or network and applies specific hypotheses ("does this behaviour fit a known typology?", "does this account belong to X?") to support investigations, prosecutions, and asset recovery. Strategic analysis, by contrast, operates at a higher level of abstraction and relies on a combination of inductive and abductive reasoning. Inductively, strategic analysts generalise from large volumes of case-level material and STRs to identify recurring patterns, trends, and typologies across sectors, products, and geographic corridors. Abductively, they infer the most plausible underlying explanations for observed anomalies and configurations in the data, constructing and iteratively refining hypotheses about criminal business models, systemic vulnerabilities, and emerging ML/TF threats in the face of incomplete and noisy information.

- **End recipient.** Operational intelligence consumers are law enforcement, prosecutors, asset recovery offices, and counterpart FIUs. Strategic intelligence recipients are policy ministries, supervisors, the NRA process, international assessment bodies, law enforcement authorities, the private sector through typology publications, and FIU leadership itself.
- **Measure of success.** Operational intelligence is judged by contribution to investigations, prosecutions, convictions, developing risk indicators and updating reporting entities monitoring systems, improving quality and timeliness of reporting based on an understanding of the risks and recovered assets. Strategic intelligence is judged by influence on policy decisions, regulatory change, supervisory prioritisation, sectoral risk awareness, and the quality of the national risk picture. The latter is harder to measure, which is one reason it is often under-resourced.

| Characteristic | Operational Analysis | Strategic Analysis |
|---|---|---|
| **Object of analysis** | specific subject, network, or transaction | focuses on a phenomenon, a sector, a method, a corridor, or a system-level question |
| **Time horizon** | short cycle, often days or weeks, sometimes hours when an asset is at risk | medium to long cycle, with products typically built over months and intended to remain relevant for a year or longer |
| **Level of aggregation** | case by case | aggregates across hundreds or thousands of cases, looking for the regularities that no individual case reveals; increasingly depends on statistical and econometric analysis, typology construction, geospatial and network analytics, and machine-learning techniques that |

| | | |
|---|---|---|
| | | can detect non-obvious relationships and weak signals at scale |
| **Analytical method** | largely deductive and entity-driven, building outward from a known or suspected actor | more inductive and pattern-driven, drawing on statistical, typological, geospatial, network, and increasingly machine-learning techniques to surface what would otherwise remain invisible at the case level |
| **End recipient** | law enforcement, prosecutors, asset recovery offices, and counterpart FIUs | policy ministries, supervisors, the NRA process, international assessment bodies, law enforcement authorities, the private sector through typology publications, and FIU leadership itself |
| **Measure of success** | judged by contribution to investigations, prosecutions, convictions, developing risk indicators and updating reporting entities monitoring systems | judged by influence on policy decisions, regulatory change, supervisory prioritisation, sectoral risk awareness, and the quality of the national risk picture |

Distinction between operational and strategic intelligence matters because conflating the two leads to predictable pathologies. When strategic work is treated as a residual of operational work, it never gets done, since operational demand is always urgent and strategic demand rarely is. When operational analysts are asked to deliver strategic products without protected time and different methods, the result tends to be extended case summaries rather than genuine pattern intelligence. When strategic products are written with operational consumers in mind, they fail to land with policy stakeholders who need a different register, different framing, and different evidence standards.

A mature FIU manages the boundary deliberately. It protects strategic capacity from operational displacement, equips strategic analysts with different tools and different data access, and matches the product to the consumer.

The distinction is not a wall. The two functions reinforce each other when the boundary is well managed. Operational casework feeds the empirical base from which strategic patterns are derived. Strategic intelligence feeds back into operational work by sharpening typologies, redirecting analytical attention to higher-risk patterns, and informing the indicators that drive triage and prioritisation. The Egmont Group network operates this loop at international scale, where operational exchanges generate the data that strategic projects then aggregate and feedback as guidance and typology products.

Based on the above, the project was designed to deliver: (i) a conceptual framework distinguishing operational from strategic financial intelligence; (ii) a comparative study of FIU mandates and capabilities; (iii) recommendations for enhancing FIU contributions to AML/CFT frameworks; and (iv) a good practice guide featuring exemplary strategic products and analytical techniques.

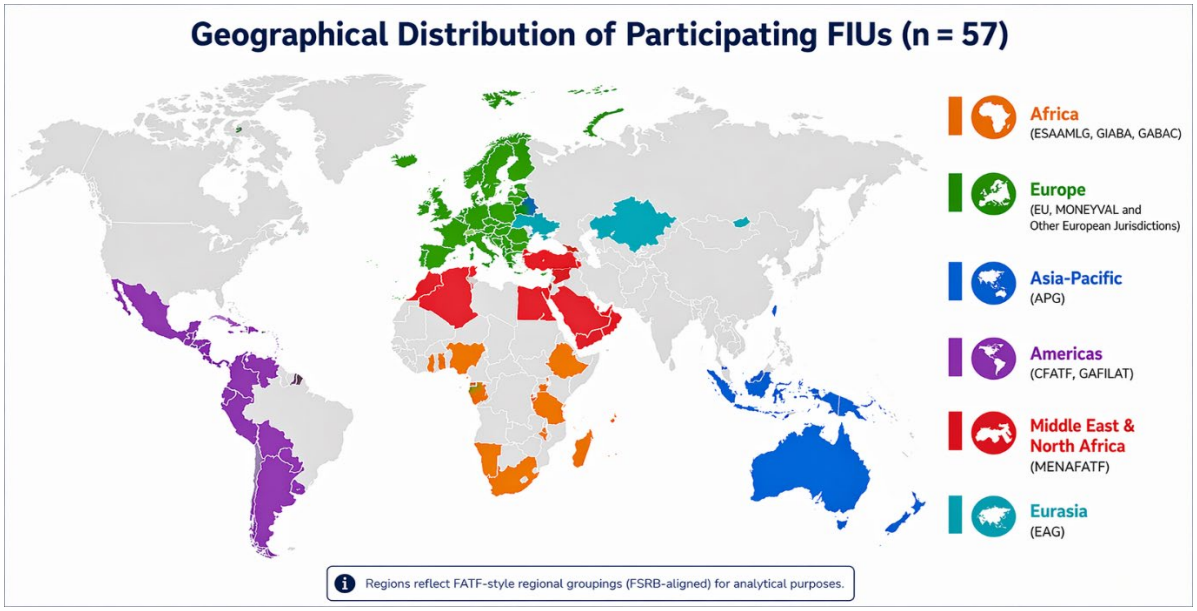
## 1.2 Questionnaire Design and Distribution

The Information Collection Questionnaire was structured across five thematic sections aligned with the project objectives. Questions employed a combination of dichotomous (Yes/No) responses, Likert-scale ratings (1–5 or categorical scales), multi-select checklists, and open-ended qualitative fields. The questionnaire was distributed electronically to all Egmont Group member FIUs, with a submission deadline of 16 January 2026.

## 1.3 Participating Jurisdictions

This report draws on responses from Financial Intelligence Units (FIUs) across a diverse set of jurisdictions participating in the Egmont Group questionnaire. The responding jurisdictions reflect a broad geographic distribution spanning Africa, Europe, the Americas, the Middle East, and the Asia-Pacific region, illustrating the global scope of engagement on strategic analysis and intelligence production. The Egmont Group serves as an international network that facilitates cooperation and information exchange among FIUs worldwide, supporting efforts to combat money laundering and terrorist financing through shared intelligence and best practices. Within this context, the jurisdictions represented in this study provide valuable insights into the evolution, practices, and maturity of strategic analytical functions across different regulatory and operational environments.

The map below presents the geographic distribution of responding jurisdictions included in this study. The response rate is close to the usual for IEWG questionnaires (of 60 responses received per questionnaire).



## 1.4 Analytical Approach

This report applies a mixed-methods analytical approach, combining:

- Descriptive statistical analysis of Likert-scale and categorical responses to identify central tendencies and distributions across jurisdictions.
- Thematic coding of open-ended qualitative responses to identify recurring themes, challenges, and good practices.
- Comparative benchmarking across geographic regions and FIU typologies (administrative, judicial, law enforcement, hybrid) where response data permits.
- Integration of findings with the FATF Recommendations framework, particularly Recommendations 1 (risk-based approach) and 29 (FIU mandate), as well as the Egmont Group's Strategic Analysis Concept Note.

> ***i*** *All findings are presented in aggregate form. Individual FIU responses are not attributed to specific jurisdictions to preserve confidentiality and encourage candid disclosure.*

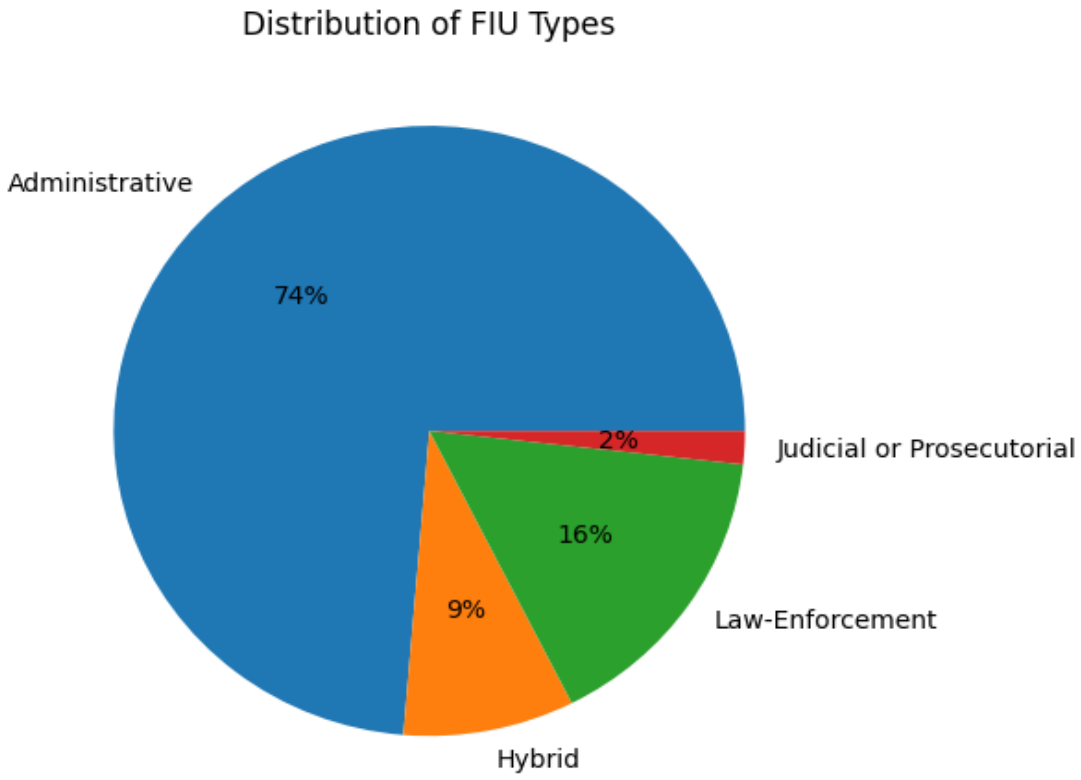
## 1.5 Shortcomings/limitations of the questionnaire

The project was designed to deliver: (i) a conceptual framework distinguishing operational from strategic financial intelligence; (ii) a comparative study of FIU mandates and capabilities; (iii) recommendations for enhancing FIU contributions to AML/CFT frameworks; and (iv) a good practice guide featuring exemplary strategic products and analytical techniques.
While the information collection phase, initiated by this questionnaire, provided sufficient information on the delivery sections (i-iii), the following shortcomings/limitations were recognized regarding delivery section iv.
The findings of this initial information collection questionnaire regarding to exemplary strategic products and analytical techniques need to be explored in more depth together with those Egmont Group member FIUs who have already introduced specific products and techniques and are willing to share further details. In order to establish a good practice guide on strategic products and analytical techniques, the means of this initial information collection questionnaire are not sufficient.

# 2. Section A: FIU Type, Mandate, Environment, and Strategic Intelligence Foundations

## 2.1 Type of FIU

The responses indicate a clear dominance of the administrative model, which accounts for approximately three-quarters (or approximately 74%) of responding FIUs. This reflects the global preference for FIUs operating as independent analytical bodies, typically positioned outside direct law enforcement structures. Law enforcement-type FIUs represent approximately 16%, indicating that a notable minority of jurisdictions retain a more investigative and enforcement-oriented structure. Hybrid models account for approximately 9%, demonstrating an effort in some jurisdictions to combine analytical and investigative functions within a single institutional framework. Finally, judicial or prosecutorial FIUs are very limited (approximately 2%), highlighting that this model remains relatively uncommon.




## 2.2 Legislative Framework and Mandate

The existence of a clear legislative mandate is a foundational prerequisite for FIU engagement in strategic intelligence production. The questionnaire queried whether the operative legislative framework explicitly authorises strategic intelligence work and whether AML/CFT legislation contains a formal definition of strategic analysis.

### A.1 — Legislative Authorisation for Strategic Intelligence

| Question / Indicator | Yes | No / Unclear |
|---|---|---|
| Legislative framework authorises strategic intelligence production | 100% | 0% |
| AML/CFT legislation contains a formal definition of strategic analysis | 53% | 47% |

All responding FIUs (100%) indicated that their legislative or institutional framework permits the production of strategic analysis or strategic intelligence. This reflects a strong global recognition of strategic analysis as a core function of FIUs and aligns with international standards, particularly the FATF Recommendations and Egmont Group Principles for Information Exchange between FIUs (The Principles).

However, this near-universal functional mandate is not matched by equivalent legal clarity. Only a slight majority of jurisdictions (approximately 53%) reported that their AML/CFT legislation contains an explicit definition of strategic analysis, while a substantial proportion (approximately 47%) operate without a formally codified definition. This indicates that, in many jurisdictions, strategic analysis is practiced in the absence of precise legislative articulation, relying instead on broad analytical mandates, institutional interpretation, or secondary instruments such as guidelines and internal frameworks.

This divergence highlights a structural gap between **practice and legal formalization**. While FIUs are operationally empowered to conduct strategic analysis, the lack of explicit definitions in nearly half of the responding jurisdictions may affect the consistency, scope, and institutional positioning of strategic outputs. In particular, the absence of formal definitions may pose challenges for inter-agency coordination, resource prioritization, and the integration of strategic intelligence into national policy processes. Among the jurisdictions that do provide a formal definition, there is a notable degree of conceptual convergence despite variations in legislative wording.

Common elements across definitions include:

- the use of available and obtainable financial and non-financial information;
- the identification of trends, patterns, typologies, and risks related to money laundering and terrorist financing; and
- the contribution of strategic analysis to policy development, risk assessment, and the strengthening of national AML/CFT frameworks.

The alignment of the FIU views with the FATF Standard reinforces a shared global understanding of the function and signals a deliberate choice to anchor domestic mandates in the language and conceptual perimeter set by the standard setter. It also produces a harmonization effect that facilitates peer review, cross-border cooperation, and mutual evaluation, since assessors and counterparts can rely on a common reference point rather than reconcile divergent national constructs. In this respect, transposition of the Interpretive

Note of R.29 functions as more than a compliance exercise, but it operates as an integration mechanism that places the national FIU on the same conceptual map as its peers.

The same alignment, however, has a quieter consequence. Where jurisdictions transpose the Interpretive Note of R.29 closely, they tend to inherit not only its strengths but also its emphasis. A clear pattern in the surveyed definitions is that fewer of them explicitly reference forward-looking, predictive, or intelligence-led approaches. Most concentrate on descriptive and diagnostic functions, mostly related to the identification of trends and typologies. In this case, the vocabulary is largely retrospective in character: what has happened, what patterns have emerged, what methods have been observed in past cases.

This matters because it points to an asymmetry between what strategic analysis is widely understood to be and what it is increasingly expected to deliver. The foundational elements, namely the identification of patterns and the production of typologies, are well embedded in legislative frameworks. The more advanced applications, including anticipatory risk modelling, proactive threat identification, scenario analysis, horizon scanning, and intelligence-led prioritization of analytical effort, are far less consistently captured in statute. They are visible in a number of FIUs in practice, often pioneered through technology projects, partnerships with academia, PPPs or the initiative of analytical leadership, but they are rarely written into laws or regulations as part of the core mandate.

The gap between practice and statute carries practical consequences. Without an explicit predictive or anticipatory mandate, FIUs that wish to deploy advanced analytics, machine learning, or scenario-based methods may face questions about legal basis, data protection compatibility, and interagency legitimacy. They may also struggle to justify the resourcing such methods require, since budget conversations tend to follow the wording of the statutory (legal) mandate rather than the ambition of FIU leadership.

Subtler consequences are conceptual. Definitions shape institutional self-understanding. An FIU whose statutory definition emphasizes trends and typologies will tend to organize itself around the production of trend reports and typology studies, with strategic analysis treated as a descriptive output. An FIU whose definition incorporates anticipatory and intelligence-led elements will tend to organize itself around informing decisions, with strategic analysis treated as a forward-leaning input into risk management, policy planning, and national AML/CFT strategy.

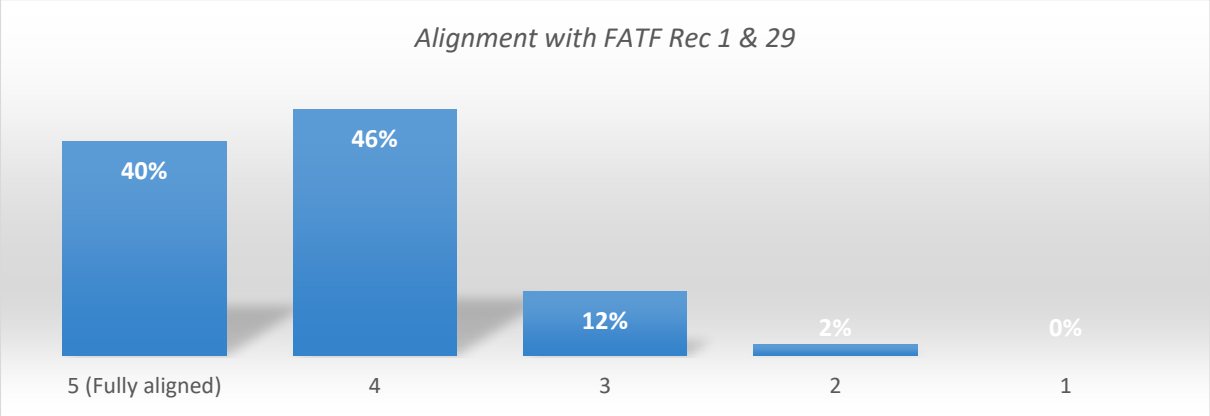
Closing this gap does not require redrafting every definition from scratch. It can be addressed through targeted statutory updates, complementary regulatory guidance, or strategic documents adopted by the FIU that expand the working interpretation of the mandate. Whichever route is chosen, the direction is clear. A strategic analysis function that captures only the descriptive and diagnostic dimensions falls short of what the contemporary AML/CFT environment demands, and arguably also falls short of what the FATF standards themselves, read through their effectiveness lens, ultimately expect.

## 2.3 FATF Recommendations Alignment

Respondents were asked to self-rate the degree of adoption of FATF Recommendations 1 and 29 in their jurisdiction on a five-point scale. These recommendations are foundational to the strategic intelligence mandate: Recommendation 1 establishes the risk-based approach (RBA) framework, while Recommendation 29 defines FIU functions, including strategic analysis.

**Alignment with FATF Recommendations 1 & 29**

| Dimension | 1 | 2 | 3 | 4 | 5 | Score |
|---|---|---|---|---|---|---|
| FATF Rec. 1 & 29 — RBA and Strategic analysis mandate adoption | ■ | ■ | ■ | □ | □ | 4.2/5 |




The results indicate a high level of reported alignment, with the majority of responses concentrated at the upper end of the scale (average **4.2/5**). This suggests that, at a structural level, most jurisdictions have incorporated the core principles underpinning strategic intelligence into their legal and institutional frameworks. The strong clustering around ratings 4 and 5 reflects broad recognition of the importance of risk-based analysis and the formal positioning of FIUs within national AML/CFT systems.

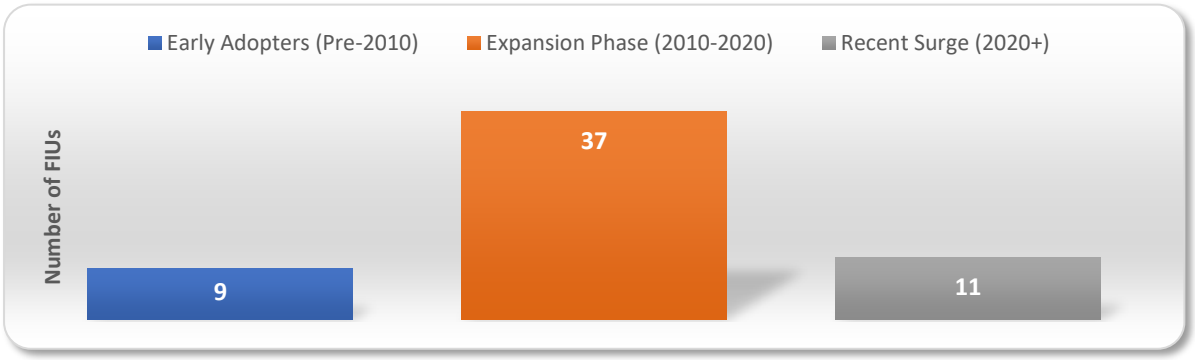
However, this high level of self-reported adoption primarily reflects **compliance at the framework level**, providing an important baseline for understanding subsequent findings. As explored in later sections, the extent to which these principles are operationalized in practice, particularly in areas such as analytical capability, data integration, and impact measurement, varies considerably across jurisdictions.

## 2.4 Strategic Intelligence Production History

Respondents were asked to indicate when their FIU began producing strategic analysis or strategic intelligence products. The responses reveal a **clear temporal clustering with a strong expansion phase**, rather than a purely bimodal distribution:

- **Early adopters (pre-2010):** A relatively small number of FIUs began producing strategic analysis before 2010, with isolated starts as early as 1998 and the early 2000s. These jurisdictions are likely more institutionally mature, having integrated strategic analysis alongside operational intelligence at an earlier stage. Their early adoption suggests stronger analytical capacity, longer exposure to AML/CFT frameworks, and alignment with evolving international standards.

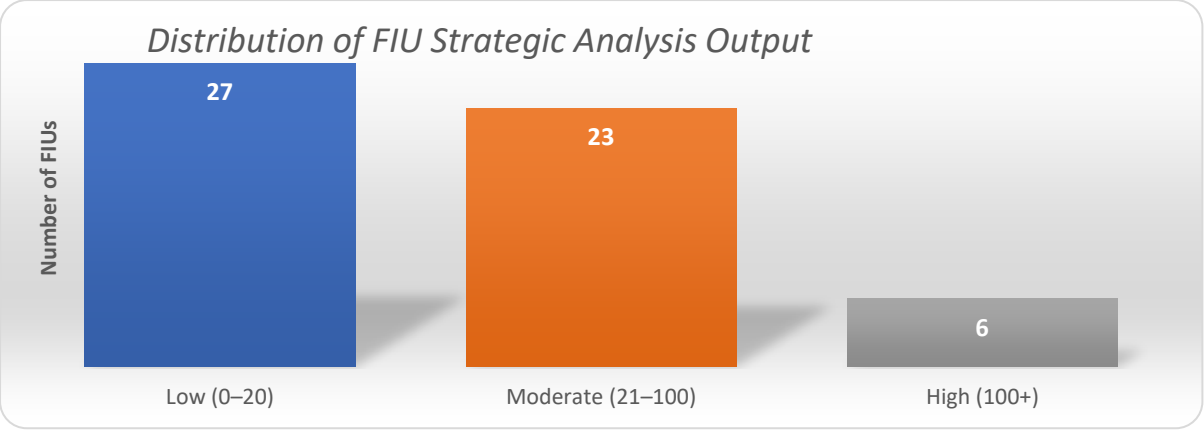
- **Expansion phase (2010–2020):** The majority of FIUs fall within this period, with a **notable concentration between 2013 and 2020**, representing the peak of adoption. This phase reflects the **global institutionalization of strategic analysis**, likely driven by FATF mutual evaluations, increasing emphasis on risk-based approaches, and the growing recognition of strategic intelligence as a policy tool. The clustering around these years indicates that strategic analysis became a standard expectation rather than a niche capability.
- **Recent surge and consolidation (2020+):** A continued stream of FIUs reporting start dates from 2020 onwards indicates ongoing uptake, though at a slightly reduced intensity compared to the peak period. These jurisdictions may represent **late adopters or systems undergoing reform**, where strategic analysis is being formalized in response to international pressure, capacity-building initiatives, or domestic AML/CFT strengthening efforts.




## 2.5 Production Patterns of Strategic Analysis Across FIUs

Respondents were asked to indicate both the total number of strategic analysis products produced since inception and the frequency of production. Although, this alone cannot be serve as a sole basis of comprehensive assessment, the findings reveal significant variation in both output volume and production models, suggesting differing levels of institutional maturity and analytical capacity across FIUs. A substantial proportion of FIUs fall within the moderate to high output range, with several jurisdictions reporting production volumes exceeding 100 products. Notably, a small number of FIUs demonstrate very high output levels (200+ products), indicating well-established analytical functions with sustained production over time. However, given the absence of detailed information on product length, scope, and format, these figures should be understood primarily as evidence of frequency and regularity of output, rather than as a direct proxy for analytical comprehensiveness or impact[2].

[2] Future IEWG work could differentiate between product types (e.g. comprehensive assessments, thematic studies, short advisories, dashboards) and capture basic information on scope and audience, allowing for a more nuanced analysis of production patterns and their relationship to impact.

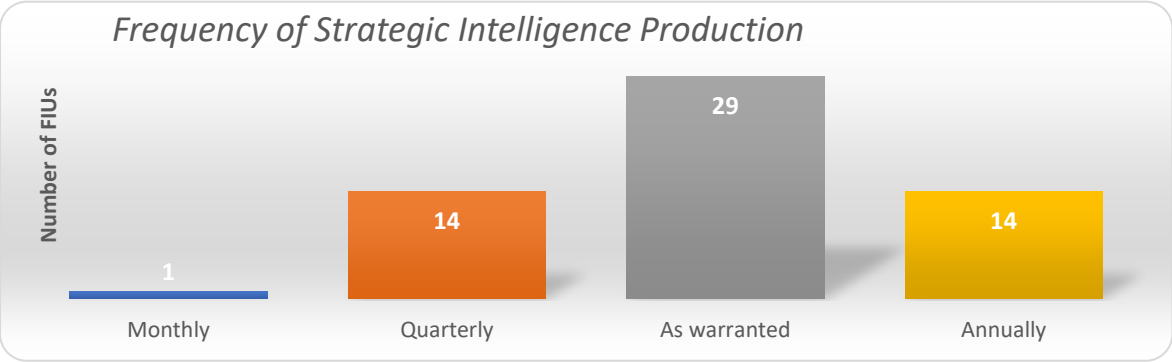



In terms of frequency, the "as warranted" model is the most prevalent, reflecting a demand-driven approach to strategic analysis. This suggests that many FIUs prioritize flexibility, producing strategic outputs in response to emerging risks, intelligence needs, or policy demands rather than adhering to fixed publication cycles.

FIUs operating on quarterly and annual cycles tend to demonstrate more structured production frameworks, often aligned with institutional reporting obligations, National Risk Assessments, or periodic intelligence outputs. These models are frequently associated with moderate to high production volumes, indicating a degree of organizational maturity and planning.

Interestingly, high-output FIUs are not exclusively tied to fixed production cycles. Several jurisdictions with significant output levels also operate on an "as warranted" basis, suggesting that mature FIUs can combine high capacity with operational flexibility.

At the lower end of the spectrum, FIUs with minimal or zero reported outputs are predominantly associated with either recently established analytical functions or resource constraints, reinforcing the earlier finding that strategic analysis capacity is unevenly developed across jurisdictions.



## 2.6 Mandate, Barriers and Cooperation

Respondents were asked to rate legal barriers, practical (resource, process, systems) barriers, and the quality of cooperation mechanisms supporting strategic intelligence production.

### A.2 — Barrier and Cooperation Ratings

| Dimension | Rating | Most Common Response | Key Gap |
|---|---|---|---|
| Legal barriers to strategic intelligence | Low–Moderate | Very Low / Low (the majority) | Lack of explicit legal clarity and mandate articulation |
| Practical (resource/process/systems) barriers | Moderate–High | Moderate–High (the dominant) | Capacity constraints (staffing, tools, data systems) |
| Quality of cooperation mechanisms | Adequate–Strong (mixed) | Adequate ( the most frequent) | Limited formalisation and consistency |
| Cross-agency cooperation | Adequate–Strong | Adequate (the most frequent) | Weaknesses in structured data-sharing frameworks |

### Thematic Findings: Changes to Reduce Barriers

Open-ended responses across legal, practical, and cooperation-related questions reveal a strong convergence around **five core reform areas**, reflecting both structural and operational constraints affecting FIUs globally;

***1.Legal and Regulatory Clarity***

Respondents consistently emphasized the need for **clearer and more enabling legal frameworks** to support strategic analysis. Key proposals include:

- Explicit recognition of strategic analysis within AML/CFT legislation
- Clarification of data usage provisions, particularly regarding non-STR, administrative, and open-source data
- Establishment of legal gateways for inter-agency and cross-border data sharing
- Modernization of data protection and privacy frameworks to enable secure data integration

***2. Human, Financial, and Technical Capacity***

A dominant theme across responses is the need to strengthen institutional capacity to sustain strategic analysis functions:

- Increased staffing levels and specialized analytical expertise (data scientists, financial analysts, sector experts)
- Dedicated budget allocations for strategic analysis units

- Investment in advanced analytical tools, including data visualization, big data systems, AI, and network analysis software
- Continuous training and capacity-building programs

***3. Data Access, Integration, and Quality***

Many jurisdictions highlighted systemic challenges related to data availability and usability:

- Direct or automated access to government and regulatory databases
- Improved data standardization and interoperability
- Transition from manual or fragmented systems to integrated digital platforms
- Ensuring timely, machine-readable, and high-quality data inputs

***4. Institutionalization and Process Formalization***

Respondents emphasized the importance of embedding strategic analysis within structured and sustainable processes:

- Development of formal methodologies, guidelines, and quality assurance frameworks
- Establishment of dedicated strategic analysis units or divisions
- Integration of strategic outputs into policy, supervisory, and National Risk Assessment cycles
- Clear tasking, prioritization, and dissemination frameworks

*5.* ***Strengthening Cooperation and Coordination Mechanisms***

Across both domestic and international dimensions, responses highlight the need for more structured and formalized cooperation frameworks:

- Establishment and expansion of MoUs and legal agreements for data sharing
- Creation of permanent coordination platforms, working groups, and joint analytical initiatives
- Strengthening public–public and public–private partnerships
- Development of two-way feedback loops and joint strategic products
- Increased regional and cross-border collaboration among FIUs

# 3. Section B: Human Resources, Skills, Capacity & Tools

## 3.1 Staffing, Roles, and Structure

The availability of dedicated analytical capacity is a critical determinant of strategic intelligence quality. The questionnaire examined whether FIUs maintain dedicated strategic analysis teams, the size of those teams, and the allocation of workforce between strategic and operational functions.

**B.1 — Dedicated Strategic Analysis Team**

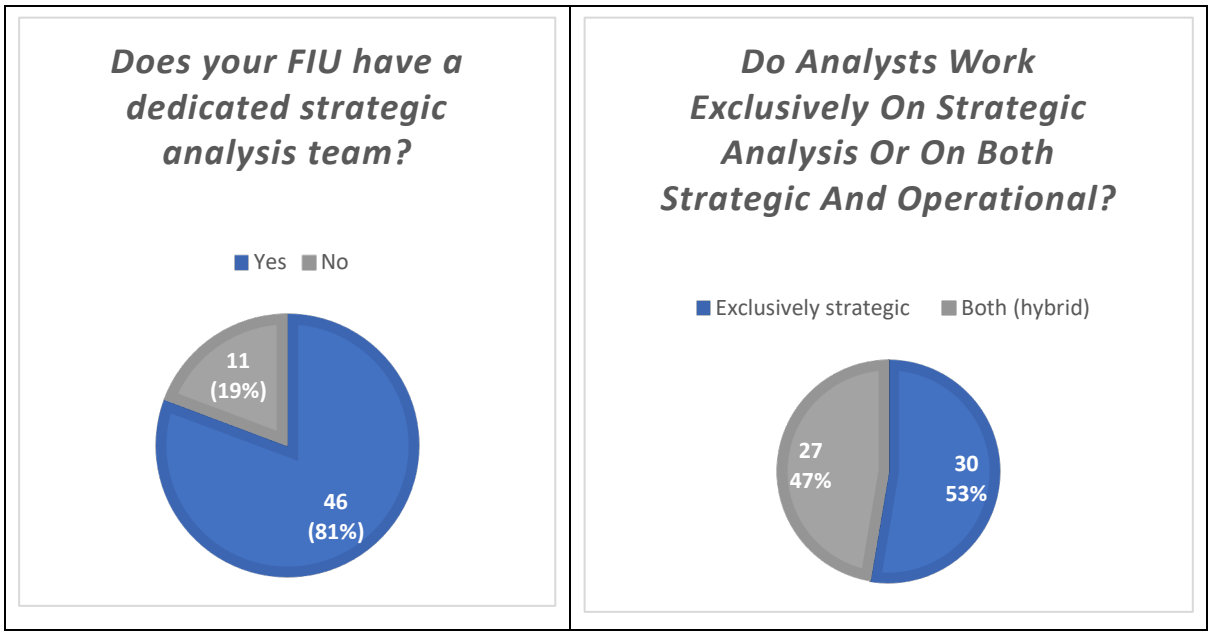
| Indicator | Value | Notes |
|---|---|---|
| FIUs with a dedicated strategic analysis team | 81% | 19% rely on hybrid or no dedicated structure |
| Typical size of strategic analysis teams | Median: 5 FTEs | Average: ~7.5; range: 1–53 |
| Analysts working exclusively on strategic analysis | 53% | 47% perform hybrid roles |
| % of workforce assigned to strategic analysis | Median: 10% | Average: ~12%; range: 0–70% |
| % of workforce assigned to operational analysis | Median: 40% | Average: ~45%; range: ~0–100% |

The distribution of analyst roles indicates a **near parity between exclusively strategic and hybrid functions** (this could, however, be related to some of the shortcomings of the information collection questionnaire as mentioned above), with a slight majority of FIUs assigning analysts solely to strategic work. Notwithstanding this, the continued prevalence of hybrid roles (47%) suggests that strategic analysis is still frequently conducted alongside and, in practice, often subordinated to operational casework. This dual-function arrangement introduces inherent structural tension. Operational demands, which are typically time-sensitive and resource-intensive, tend to displace longer-cycle strategic analysis, particularly in smaller FIUs where limited staffing necessitates role consolidation. As a result, strategic outputs may be episodic, reactive, or deprioritized in favor of immediate operational needs.

This dynamic is reinforced by workforce allocation patterns. While a majority of FIUs report on the existence of dedicated strategic teams, these units are generally modest in size (median: 5 FTEs) and account for a relatively small proportion of overall staffing (median: 10%), compared to significantly higher allocations to operational analysis (median: 40%).

Taken together, these findings suggest that the establishment of dedicated structures has not yet been fully translated into functional independence. Where strategic analysts operate within hybrid roles or under resource constraints, the ability to sustain consistent, forward-looking analysis is likely to remain limited. Conversely, FIUs with clearly delineated roles and

dedicated capacity, even at a relatively small scale, are better positioned to produce more regular, diverse, and policy-relevant strategic outputs. This is illustrated in the charts below;

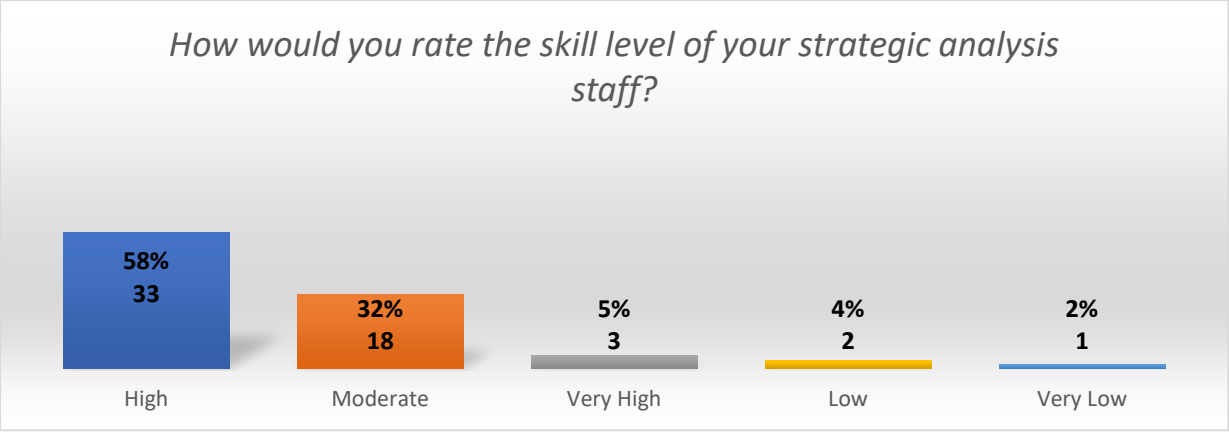



## 3.2 Skill Levels and Profiles

Respondents were asked to self-rate the skill level of their strategic analysis staff overall, and to rate proficiency across five specific analytical competency domains on a 1–5 scale.

*Overall skill level*

The overall assessment of strategic analysis staff's capability across FIUs is generally strong, but uneven, with relatively few jurisdictions demonstrating advanced or highly specialised expertise.




*Analytical Competency*

The data reveals a clear and systematic imbalance in analytical capability across FIUs, with stronger performance in interpretive domains and comparatively weaker capacity in technical, data-driven disciplines.

Critical thinking and policy analysis are rated highest, reflecting the traditional qualitative orientation of financial intelligence work- centered on interpretation, contextualization, and

policy relevance. However, data science and econometrics receive consistently lower scores, with risk forecasting occupying only a marginally stronger position.

This asymmetry is significant. While FIUs demonstrate a solid foundation in descriptive and interpretive analysis, their ability to undertake quantitative, model-based, and predictive analysis remains comparatively underdeveloped. In practice, this limits the extent to which strategic analysis can move beyond retrospective assessments toward more forward-looking, intelligence-led insights.

The implications are increasingly material. Modern strategic intelligence is progressively shaped by statistical modelling, machine learning, and large-scale data integration, particularly in identifying emerging risks, detecting complex patterns, and supporting anticipatory policy responses. The relatively modest capability levels observed in these areas suggest that most FIUs are not yet fully equipped to leverage these approaches at scale.

**B.2 — Analytical Competency Ratings (1 = Very Weak; 5 = Very Strong)**

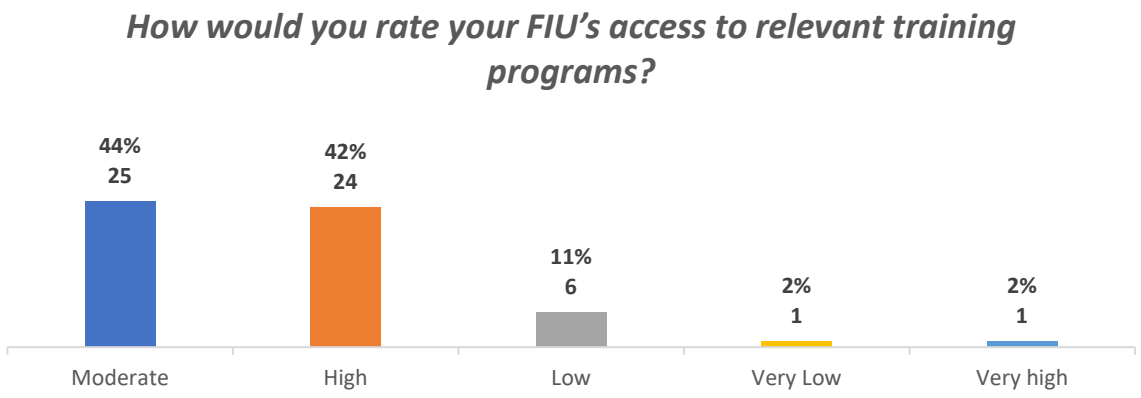
| Dimension | 1 | 2 | 3 | 4 | 5 | Score |
|---|---|---|---|---|---|---|
| Critical thinking / analytical reasoning | ■ | ■ | ■ | ■ | □ | 4.0/5 |
| Policy analysis | ■ | ■ | ■ | □ | □ | 3.7/5 |
| Risk Forecasting | ■ | ■ | ■ | □ | □ | 3.5/5 |
| Data Science | ■ | ■ | ■ | □ | □ | 3.3/5 |
| Econometrics | ■ | ■ | □ | □ | □ | 3.3/5 |

## 3.3 Training and Capacity Development

Access to relevant training and the types of training received provide important indicators of capacity development trajectories. The questionnaire asked respondents to rate access to training and to identify the types of training their staff had received.

### Access to relevant Trainings

The data indicates a moderate level of access to training across FIUs, with responses concentrated between moderate and high ratings. This suggests that while training opportunities are generally available, they are not consistently advanced or specialized. This is significant in light of earlier findings on skill gaps. Despite adequate access, current training provision does not appear sufficient to address weaknesses in data science, econometrics, and predictive analysis.




### B.3 — Training Types Received (Multiple Selections Permitted)

FOUNDATIONAL (High Coverage)

Strategic methodology (79%)

Writing (59%)

Critical thinking (55%)

TECHNICAL (Declining Coverage)

Big data (40%)

ADVANCED (Low Coverage)

Machine learning (26%)

Traditional analytical training including strategic analysis methodology (79%), report writing (59%), and critical thinking (55%) has reached a majority of FIUs.

However, training in more technical domains remains less widespread. Big data analytics is reported by 40% of respondents, while machine learning training is limited to approximately one-quarter, indicating that advanced, data-driven capabilities are not yet broadly institutionalized. Consistent with this pattern, overall access to training is assessed as moderate, with earlier responses suggesting uneven distribution across jurisdictions. In particular, FIUs with stronger institutional linkages, including participation in regional or international training programs, appear better positioned to access more specialized and advanced training opportunities.

## 3.4 Data Access and Analytical Tools

Effective strategic intelligence requires access to a diverse and high-quality data ecosystem. The questionnaire assessed the range of data sources available to FIUs, their access to government and registry databases, and the adequacy of technical tooling.

**B.4 — Data Source Access (% of FIUs with Access)**

| Data Source | Availability | Access Level |
|---|---|---|
| STR/SAR/CTR data | 100% | Universal / Core |
| Open-source intelligence (OSINT) | 96% | Near-universal |
| Customs / trade data | 86% | Widely available |
| Law enforcement information | 81% | Widely available |
| Beneficial ownership registers | 77% | Moderate–High |
| Commercial databases (e.g., LexisNexis) | 70% | Moderate |
| Supervisory / regulatory data | 68% | Moderate |
| Academic research | 58% | Limited–Moderate |

Access to STR/SAR/CTR data[3] is universally accessible across all responding FIUs, reflecting its central role within financial intelligence mandates. Access to open-source intelligence is also near-universal, further reinforcing the availability of core analytical inputs.

However, access to broader data ecosystems, particularly beneficial ownership registers, customs and trade data, and academic research, is comparatively lower and less consistent. While these sources are available to a majority of FIUs, they are not yet uniformly integrated across jurisdictions. This is significant, as these datasets are critical for strategic typology development, network analysis, and risk forecasting. In particular, beneficial ownership data despite its prominence within international AML/CFT standards, is not consistently accessible or effectively leveraged across all FIUs. Taken together, the findings suggest that while foundational data access is well established, the depth and integration of complementary data sources remain uneven, with implications for the sophistication and forward-looking nature of strategic analysis.

[3] An overload of defensive, incomplete, duplicated, or low-quality reports may contaminate databases, increase analytical noise, and hinder the identification of relevant strategic patterns. Therefore, the quality of the accessed information is also of key importance.

### B.5 — Access to administrative and Government Data Sources

| Data Source | % of FIUs | Number of FIUs | Access Level |
|---|---|---|---|
| **Company registers** | **93%** | 52 | Near-universal |
| **Land / property registers** | **82%** | 46 | Widely available |
| **Vehicle registries** | **79%** | 44 | Widely available |
| **Tax authority data** | **77%** | 43 | Widely available |
| **Criminal records** | **75%** | 42 | Widely available |
| **API / passenger travel data** | **63%** | 35 | Moderate |

Company registers are near-universally accessible, reflecting their central role in financial investigations and corporate transparency frameworks. Access to other administrative datasets including land and property registers, vehicle registries, tax data, and criminal records is also widely reported across FIUs.

However, access declines for more dynamic and movement-based datasets, particularly API/passenger travel data. These sources are critical for tracing cross-border activity, mobility patterns, and complex financial flows, yet remain less consistently available. This distribution is significant. While FIUs appear well-equipped with static and registry-based data, access to datasets that enable behavioral, network, and cross-border analysis is more limited. These are precisely the data sources most relevant for advanced strategic analysis, including typology development and risk forecasting.

### B.6 — Technical Capabilities Rating

| Dimension | 1 | 2 | 3 | 4 | 5 | Score |
|---|---|---|---|---|---|---|
| Technical capabilities (analytics, visualisation, AI tools) | ■ | ■ | ■ | □ | □ | **2.9/5** |
| Innovative practices (big data, AI, OSINT) | ■ | ■ | ■ | □ | □ | **2.5/5** |
| Availability of Data Science | ■ | ■ | ■ | □ | □ | **3.1 /5** |

Technical capabilities are rated around or slightly below the midpoint of the scale, reflecting widespread recognition that existing tooling is inadequate for the demands of modern strategic intelligence. Specific tools cited as needed by respondents include network analysis platforms, natural language processing tools for STR narrative mining, automated typology detection systems, and visualisation dashboards for senior stakeholder communication. While a number of FIUs report the availability of analytical tools and systems, their practical application remains more limited.

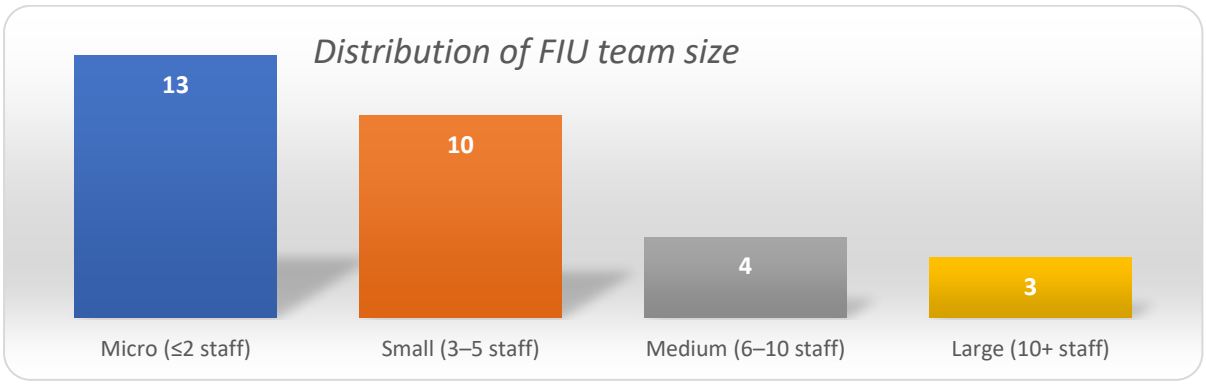
This gap is further explained by structural factors. Although over half of FIUs report the presence of data science or analytics teams, these are typically small in scale, with a median of three staff and significant variation across jurisdictions. In practical terms, this means that many FIUs operate with only a handful of personnel responsible for delivering data-driven analysis, often alongside other competing priorities.

**B.7 — FIU Team Size**

| Team Size Category | Number of FIUs | Share |
|---|---|---|
| Micro (≤2 staff) | 13 | 43% |
| Small (3–5 staff) | 10 | 33% |
| Medium (6–10 staff) | 4 | 13% |
| Large (10+ staff) | 3 | 10% |

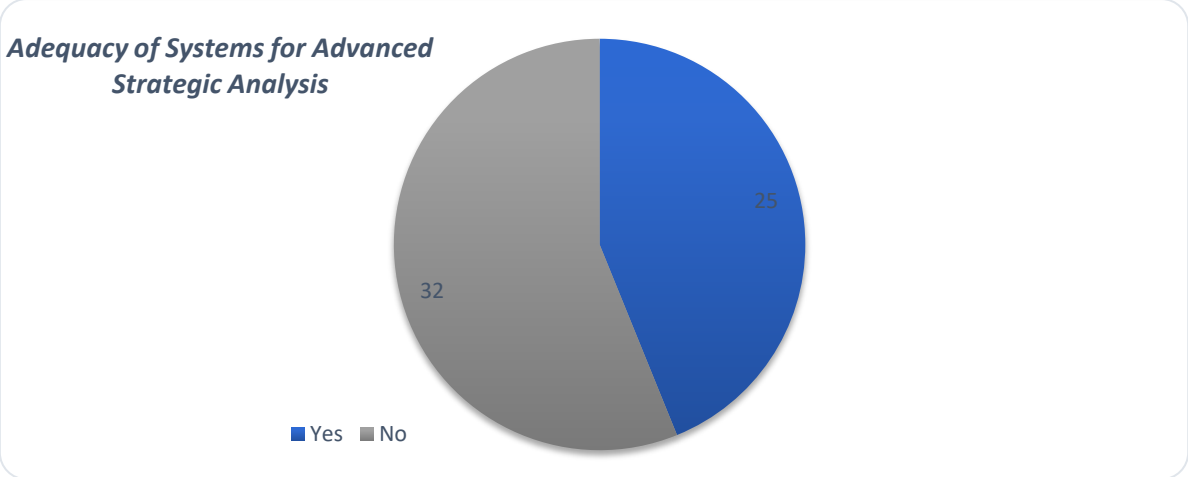
The distribution of team sizes is highly uneven. While a small number of FIUs report relatively large and specialized teams in some cases exceeding 20 or even 50 staff these represent outliers. The majority of FIUs fall within the lower range, with teams of between one and five staff, and in some instances less than one full-time equivalent dedicated to analytical functions.

This disparity has important implications. Small teams inherently limit the ability to develop specialized expertise, sustain advanced analytical workflows, and scale the use of tools such as machine learning or large-scale data integration. As a result, even where technical capabilities or tools are available, the human resource capacity required to operationalize them consistently remains constrained.



## Adequacy of Existing Systems

A majority of FIUs report that their existing systems are not adequate for advanced strategic analysis, with over half indicating limitations in their current technological environment. While a substantial minority consider their systems sufficient, the overall distribution points to systemic constraints in analytical infrastructure. This finding reinforces earlier results on technical capability and the use of innovative practices. Even where data is available and analytical teams exist, system limitations may restrict the ability to process, integrate, and analyze data on a scale, particularly for more advanced or data-intensive applications.
Overall, the findings indicate that while foundational analytical systems are broadly established, most FIUs continue to face significant constraints in scaling advanced, data-driven strategic intelligence capabilities.




Open-ended responses indicate that FIUs employ a range of analytical tools and systems, from basic reporting platforms (e.g. goAML, Excel, BI dashboards) to more advanced environments incorporating SQL, Python, and network analysis tools such as i2 Analyst's Notebook. A smaller number of FIUs report more sophisticated infrastructures, including machine learning models, big data platforms, and integrated data ecosystems supporting end-to-end analytical workflows.

However, these capabilities are not uniformly distributed. While some FIUs operate relatively advanced, multi-layered analytical environments including data warehouses, cloud-based processing, and AI-driven tools many others rely on more limited or evolving systems. Several respondents noted that existing platforms are adequate for descriptive and trend analysis, but face constraints in handling large-scale data integration, automation, and predictive modelling.

A recurring theme across responses is the challenge of integrating diverse data sources and scaling analytical capacity. Even where tools such as SAS, Power BI, or proprietary systems are in place, limitations persist in managing complex datasets, incorporating emerging risk areas (e.g. virtual assets), and deploying advanced analytics in a systematic manner.

Importantly, multiple FIUs highlighted that their systems are under development or undergoing enhancement, with planned investments in data science capabilities, new analytical platforms, and expanded technical infrastructure. This suggests a broader transition phase, where foundational systems are established but not yet fully optimized for advanced, data-driven strategic intelligence.

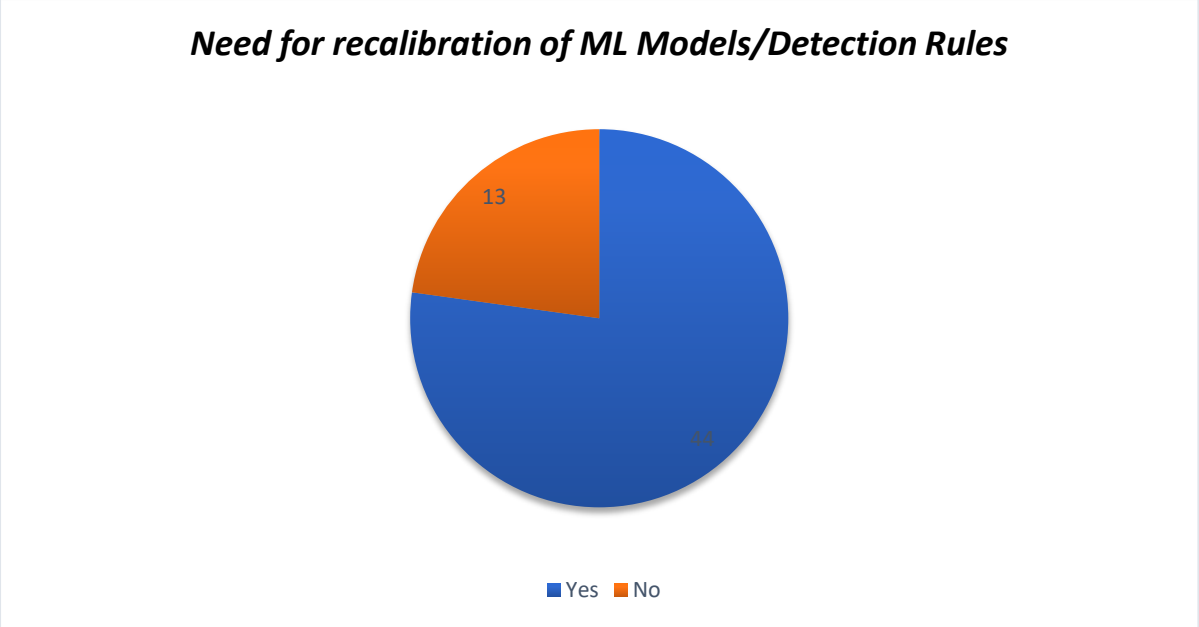
## Recalibration of Detection Rules

Recalibration of analytical models is essential to ensure that detection systems remain aligned with evolving financial crime risks. As typologies shift, particularly in technology-driven and cross-border environments, models and rule-based frameworks must be continuously updated to remain effective and relevant.

Against this backdrop, a clear majority of the responding FIUs (77%) report the need to recalibrate their machine learning models and/or detection rules. This points to a common challenge: while analytical tools are in place, they are not always sufficiently adaptive or regularly refined to keep pace with changing risk dynamics.

The finding highlights a broader issue in model lifecycle management. It suggests that many FIUs are still developing the processes, infrastructure, and expertise required to **continuously update, validate, and optimize analytical models**, limiting their effectiveness over time.

To sum up, limited recalibration capacity reduces the effectiveness of detection systems over time and constrains the ability of FIUs to adapt to emerging ML/TF typologies and evolving transactional behaviors



## Emerging Demand for Advanced Analytical Capabilities

Open-ended responses reveal a strong and consistent demand for advanced analytical technologies, particularly those enabling large-scale data processing, automation, and pattern detection.

Across jurisdictions, the most frequently cited needs center on Artificial Intelligence (AI), machine learning (ML), and big data analytics platforms. These tools are viewed as critical for enhancing anomaly detection, identifying complex transactional patterns, and moving beyond rule-based systems toward more adaptive and predictive analytical models. Several FIUs specifically highlighted the importance of natural language processing (NLP) and large language models (LLMs) to extract insights from unstructured data such as STR narratives and open-source intelligence.

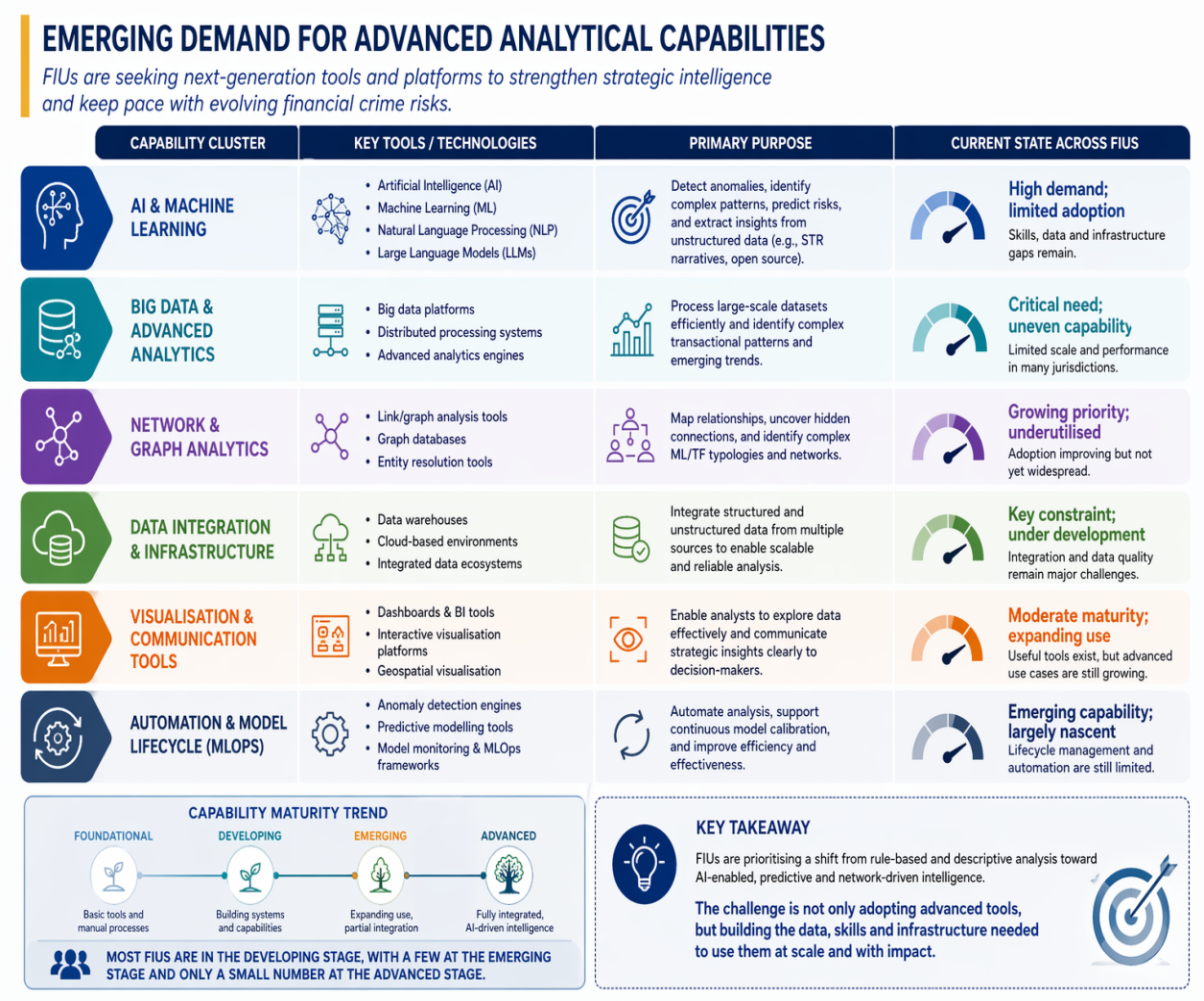
A second prominent theme is the need for network and graph analytics capabilities, including tools that can map relationships between entities, uncover hidden connections, and support the identification of complex laundering typologies. This reflects a growing recognition that financial crime is increasingly network-driven and cross-border, requiring more sophisticated analytical approaches.

FIUs also emphasized the importance of data integration and scalable infrastructure, including data warehouses, cloud-based environments, and platforms capable of combining structured and unstructured datasets. The ability to process large volumes of data efficiently and to integrate multiple sources remains a key constraint for many jurisdictions.

In addition, respondents highlighted the need for advanced visualization tools and interactive dashboards, enabling analysts to explore data more effectively and communicate strategic insights. This is complemented by calls for automated systems, including anomaly detection engines, predictive modelling tools, and model monitoring frameworks (e.g. MLOps), to support continuous calibration and improve analytical efficiency.

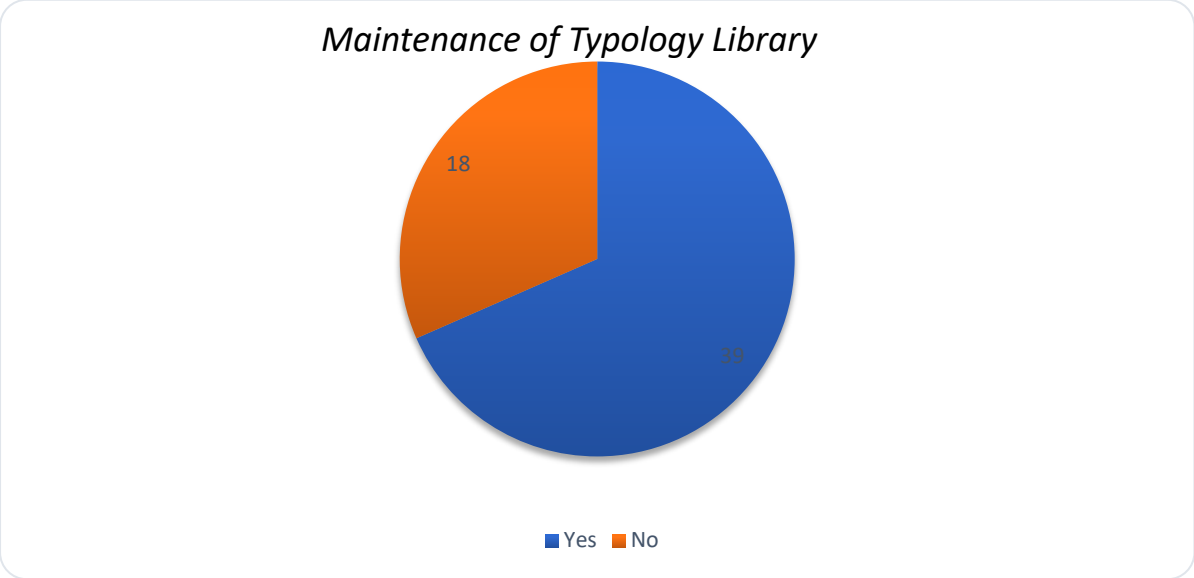
Notably, a small number of FIUs reported already operating relatively advanced analytical ecosystems, incorporating AI-driven models, big data platforms, and integrated analytical pipelines. However, these cases remain exceptions. The majority of responses reflect a transitional stage, where foundational systems exist but require significant enhancement to support advanced, data-driven strategic intelligence.

Advanced analytical capabilities are increasingly essential for identifying cross-border laundering networks, detecting hidden transactional relationships and supporting predictive risk identification.




## Maintenance of Typology Library

A majority of FIUs (68%) report maintaining a typology library, indicating that structured knowledge management of ML/TF trends is relatively well established across jurisdictions. However, a significant minority (32%) do not maintain such repositories, suggesting gaps in the systematic documentation and reuse of strategic insights.



Responses indicate that typology libraries are maintained through a mix of formalized systems and ad hoc practices, with varying levels of sophistication across FIUs.

At the most basic level, many FIUs rely on manual processes, including analyst-driven updates based on STR analysis, case investigations, and emerging trends. These are often stored in shared folders, internal repositories, or standalone databases, reflecting a relatively decentralized and analyst-dependent approach.

A second group of FIUs demonstrates more structured practices, maintaining centralized repositories or databases that are periodically updated. These updates are typically informed by a combination of operational intelligence, National Risk Assessments, inter-agency collaboration, and international typology reports (e.g. FATF, Egmont, regional bodies). In several cases, typologies are also published externally through annual reports, websites, or guidance documents, supporting dissemination to reporting entities.

More advanced approaches integrate typology libraries into analytical systems and workflows, including linkage to red-flag indicators, reporting systems, or broader data ecosystems. These models often incorporate risk-based updating, classification frameworks, validation processes, and restricted access controls, reflecting a more mature and institutionalized knowledge management function.

However, a recurring theme across responses is the lack of standardization and consistent update mechanisms. Many FIUs update their libraries on an ad hoc or event-driven basis, rather than through systematic review cycles. This creates variability in quality, timeliness, and usability, and limits the ability to fully leverage typologies for predictive analysis and model development.

The absence of standardized review cycles limits the reliability, consistency and operational usability of typology libraries. Thus, reducing their effectiveness in supporting predictive analysis and strategic prioritization.

# 4. Section C: Strategic Analysis Products & Outputs

## 4.1 Types of Strategic Outputs

The diversity and regularity of strategic output types provide a measure of FIU strategic intelligence maturity. The questionnaire asked respondents to identify the types of strategic products they produce.

C.1 — Types of Strategic Products

| Output Type | Prevalence | Interpretation |
|---|---|---|
| **Typology reports** | **Near-universal** | Core strategic product across all FIUs |
| **Trend studies** | **Very high** | Widely used for monitoring evolving risks |
| **Strategic intelligence assessments** | **Very high** | Central to higher-level analytical outputs |
| **Risk indicators / red flags** | **Very high** | Strong linkage to operational use and reporting entities |
| **Advisories / guidance** | **High** | Common but slightly less consistent |
| **Other outputs (e.g. NRA, sectoral studies, dashboards, AI-driven outputs)** | **Limited / specialized** | Produced by more advanced FIUs |

Responses indicate a strong convergence around a core set of strategic intelligence products, with typology reports, trend studies, strategic assessments, and risk indicators forming the backbone of FIU outputs across jurisdictions. These products reflect a well-established focus on descriptive and diagnostic analysis, as well as support of reporting entities through red flags and guidance.

Advisories are also widely produced, though slightly less consistently, suggesting some variation in how FIUs engage external stakeholders. Beyond these core outputs, a smaller number of FIUs report more advanced and specialized products, including National Risk Assessments, sector-specific diagnostics, dashboards, and data science–driven analytical tools. These outputs are typically associated with more mature analytical environments and stronger technical capacity.

C.2 — Strategic Output Types (% of FIUs Producing)

| Output Type | Prevalence | Primary Audience |
|---|---|---|
| | | |
| **Typology reports** | Annually | Law enforcement agencies, supervisory authorities, FIU network |
| **Trend studies** | Quarterly / Annually / Ad hoc | Reporting entities, supervisory authorities, law enforcement agencies, policy makers |
| **Advisories** | Ad hoc / As needed | Reporting entities, supervisory authorities, law enforcement agencies, government bodies |
| **Feedback Loop** | Annually / Ad hoc | Competent authorities, policy makers, reporting entities, law enforcement agencies |

Strategic outputs across FIUs remain anchored in traditional products, particularly typology reports and advisories, which are widely produced and relatively well established. In contrast, more comprehensive strategic intelligence assessments arguably produce the most policy-relevant and impactful outputs but are less consistently produced and often supplemented by ad hoc or periodic dissemination. This suggests that while many FIUs are actively engaged in intelligence-related activities, a significant proportion have yet to fully transition toward integrated, forward-looking strategic intelligence functions.

More mature FIUs distinguish themselves not only through output volume, but through the analytical sophistication, policy relevance and forward-looking nature of strategic intelligence products.

## 4.2 Dissemination and Feedback Mechanisms

Effective dissemination and systematic feedback loops are essential for maximising the policy impact of strategic intelligence. Notably, a strong majority of FIUs (86%) report the presence of a feedback loop, indicating that the function is now widely embedded across jurisdictions.

C.3 — Dissemination Channels (% of FIUs)

| Channel | % of FIUs |
|---|---|
| Reporting entities / obligated entities | ~90% |
| Law enforcement agencies (LEAs) | ~70% |
| Supervisory/regulatory authorities | ~70% |
| Government/policymakers | ~60% |
| Public/general audience | ~30% |
| International partners (FIUs, networks) | ~20% |
| FIU internal stakeholders | ~20% |

Feedback mechanisms are primarily directed toward **reporting entities**, reflecting their central role in improving reporting quality and operational effectiveness. Law enforcement agencies and supervisory authorities also feature prominently, indicating that feedback is used to support both enforcement outcomes and regulatory oversight. Engagement with government bodies and policy makers is moderately prevalent, suggesting a role for feedback in informing broader AML/CFT strategies. In contrast, feedback directed toward the public and international partners is less consistent, while internal feedback mechanisms are present but not uniformly structured across FIUs.

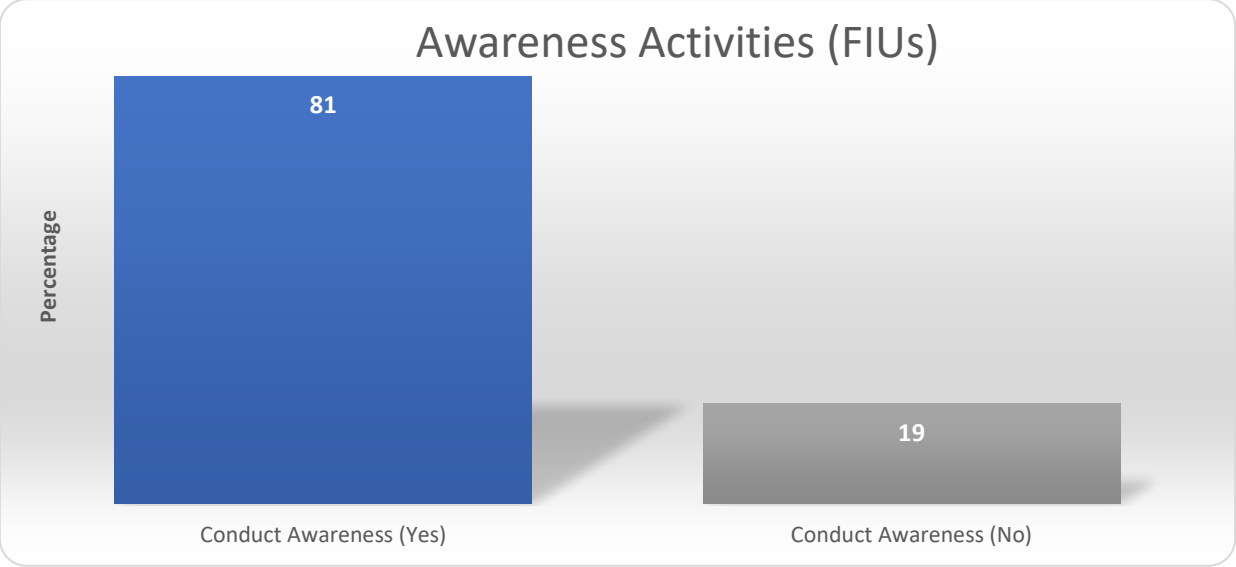
Although awareness activities are widely implemented, relatively few FIUs maintain structured mechanisms to assess whether dissemination activities result in measurable improvements in reporting quality, policy development or operational outcomes.

## 4.3 Awareness of Strategic Products

A large majority of FIUs (81%) report conducting awareness sessions or workshops to disseminate their findings, indicating that stakeholder engagement is widely recognized as an integral component of strategic intelligence functions. These activities are primarily directed toward reporting entities, supervisory authorities, and law enforcement agencies, reflecting their role in improving reporting quality, compliance, and operational outcomes.

However, despite this high level of adoption, awareness activities are largely non-standardized in both frequency and delivery. Most FIUs adopt a demand-driven approach, with sessions conducted on an ad hoc basis in response to emerging risks, analytical outputs, or stakeholder needs. While some jurisdictions maintain more structured engagement cycles, typically quarterly or annual, these are often supplemented by additional, event-driven outreach. In terms of delivery, FIUs employ a multi-channel approach, combining in-person workshops, virtual webinars, and hybrid formats. These are frequently complemented by targeted meetings, public-private partnership forums, conferences, and sector-specific briefings, allowing for flexible engagement across different audiences.

| Dimension | Key Finding | Interpretation |
|---|---|---|
| **Existence of awareness activities** | 81% of FIUs conduct awareness sessions/workshops | Widely embedded across jurisdictions |
| **Frequency of delivery** | Ad hoc / Quarterly / Annual | Predominantly demand-driven and non-standardized |
| **Delivery methods** | In-person workshops, webinars, hybrid sessions, meetings, conferences, PPP forums | Multi-channel and flexible engagement approach |
| **Primary audience** | Reporting entities, supervisory authorities, law enforcement agencies, and stakeholders | Strong operational and compliance focus |
| **Level of maturity** | Mixed (structured in some FIUs, ad hoc in others) | Uneven institutionalization across jurisdictions. |



# 5. Section D: Impact, Usefulness, and Integration into National Frameworks

## 5.1 Stakeholder Use of Strategic Outputs

Respondents were asked to describe how stakeholders use their strategic analysis outputs. Open-ended responses converged around several core use cases:

- **National Risk Assessment and risk frameworks:** Strategic analysis is extensively used to support national and sectoral risk assessments, providing the evidentiary basis for understanding ML/TF threats, vulnerabilities, and trends, and informing risk-based approaches across jurisdictions.
- **Policy and regulatory development:** Outputs are used to guide legislative amendments, regulatory updates, and the development of AML/CFT strategies, including decisions on sector designation, reporting thresholds, and preventive measures.
- **Law enforcement and operational prioritisation:** Strategic intelligence supports investigative focus, case prioritisation, and operational planning by enabling authorities to identify patterns, networks, and emerging typologies.
- **Reporting entity compliance and risk management:** Reporting entities integrate typologies, red flags, and risk indicators into transaction monitoring systems, customer due diligence processes, and internal risk assessments, improving detection capabilities and the quality of STR submissions.
- **Supervisory and oversight functions:** Supervisory authorities use strategic outputs to inform risk-based supervision, guide inspection priorities, and identify sector-specific vulnerabilities and compliance gaps.
- **Capacity building and awareness:** Strategic products are used for training, awareness-raising, and knowledge development across both public and private sector stakeholders, enhancing overall understanding of ML/TF risks.
- **International cooperation and knowledge sharing:** Outputs contribute to information exchange, regional typology exercises, and multilateral assessments, supporting cross-border collaboration and alignment with international standards.

## 5.2 Impact Ratings

D.1 — Impact and Integration Ratings (1 = Very Low; 5 = Very High)

| Dimension | 1 | 2 | 3 | 4 | 5 | Score |
|---|---|---|---|---|---|---|
| Contribution to National Risk Assessment (NRA) | ■ | ■ | ■ | ■ | □ | 4.3/5 |
| Engagement in regional/bilateral threat assessments | ■ | ■ | ■ | □ | □ | 3/5 |
| Effectiveness measurement (KPIs, feedback loops) | ■ | ■ | □ | □ | □ | 3.2/5 |
| Ability to identify emerging / forward-looking risks | ■ | ■ | ■ | □ | □ | 3.6/5 |
| Influence on policy change or regulatory amendments | ■ | ■ | ■ | □ | □ | 3.7/5 |

The strongest performance is observed in the contribution to National Risk Assessments (4.3/5), reflecting the well-established, institutionalized role of FIUs in supporting national ML/TF risk identification processes. Ratings for policy influence (3.7/5) and forward-looking risk identification (3.6/5) are also relatively high, indicating that strategic intelligence is increasingly informing decision-making and anticipating emerging threats, albeit with some variation across jurisdictions.

By contrast, engagement in regional and bilateral threat assessments (3/5) and, more notably, effectiveness measurement (3.2/5) scores lower. The latter highlights a persistent gap in the systematic use of performance frameworks, including KPIs and structured feedback mechanisms, to assess the real-world impact of strategic outputs. This limits FIUs' ability to demonstrate value, refine analytical approaches, and allocate resources based on evidence, suggesting that, while strategic capabilities are advancing, their measurement and optimization remain underdeveloped.

## 5.3 Policy Influence

Respondents were asked whether their FIU's strategic intelligence had influenced policy changes or regulatory amendments. Findings:

- **Yes (documented examples): 70% of FIUs** confirmed that strategic intelligence had contributed to policy or regulatory change, with examples including AML/CFT legislative amendments, sector-specific supervisory guidance updates, and national ML/TF strategy revisions.
- **Not yet: 30%** reported no documented policy influence, though several noted that influence is expected to materialize in forthcoming NRA or policy review cycles.

## 5.4 NRA Integration

The degree to which NRAs incorporate FIU strategic analysis is a key measure of system-level integration. Therefore, respondents were asked to what extent National Risk Assessments (NRAs) incorporate their FIU's strategic analysis. Findings:

• **To a large extent: 58% of FIUs** reported that strategic analysis is extensively integrated into NRA processes, reflecting a well-established and structured role for FIUs in national risk identification and assessment.

• **To some extent: 37%** indicated partial integration, suggesting that while strategic inputs are recognized, their use may be selective or not fully embedded across all components of the NRA.

• **Not yet: 5%** reported no current incorporation, though this is likely to evolve as strategic analysis functions mature and NRA processes are updated.

> ★ *Best Practice: FIUs reporting the highest NRA integration scores are characterised by formal inter-agency protocols, co-authorship arrangements with NRA coordinating bodies, and dedicated analytical resources assigned to NRA support.*

Overall, weak performance measurement frameworks reduce the ability of FIUs to demonstrate institutional value, prioritize analytical resources and refine strategic methodologies based on measurable outcomes.

## 5.5 Strategic Analysis and FIUs' Operational Independence and Autonomy

While strategic analysis often involves consultation and coordination with policy makers and other authorities, such engagement should not extend to directing the FIU's analytical conclusions. Operational independence protects the FIU's ability to determine what it analyses, how it analyses it, and what findings it reaches, even when those findings are subsequently integrated into multi-agency products.

The relationship between strategic analysis and FIUs' operational independence and autonomy is one of the under-examined corners of the FIU mandate. Operational independence is most often discussed in the context of case-by-case operational analytical work, that is, the freedom of the FIU to decide whether to receive, analyze, request, retain, and disseminate financial information without external direction. There are several other elements that are included in the operational independence and autonomy, but they are all related to the proper functioning of the FIU as a national center to receiving, analyzing and dissemination of operational financial intelligence. Strategic analysis, because it is more visible, more policy-relevant, and frequently produced from anonymized or aggregated material, sometimes attracts the assumption that it sits in a different governance category. That assumption is mistaken, and the consequences of leaving it unexamined are significant.

The Interpretive Note to R. 29 frames operational independence and autonomy broadly. The FIU should be able to carry out its functions freely, including the autonomous decision to analyze, request, forward, or disseminate specific information. It does not draw a governance line between operational and strategic analysis when it sets that protection. The function is "analysis", and that function is protected in its entirety. Strategic analysis, as one of the two analytical functions explicitly recognized in the standard, is therefore covered by the same operational independence regime as case-level analysis.

That reading aligns with the longstanding position of the Egmont Group. Egmont Group treats the analytical output of an FIU, including its strategic products, as the FIU's own work,

and protects the conditions under which that work is produced. An FIU that publishes a strategic report whose conclusions have been directed by a ministry, an oversight body, or any other external actor is not exercising the independence the standard requires, regardless of how the underlying data were processed.

Anonymization does not move the function outside the independence perimeter. The fact that strategic analysis often relies on anonymized or aggregated data is sometimes invoked to suggest that the function sits closer to general analytical or research activity, and therefore further from the independence concerns that apply to operational casework. This is a misreading of what operational independence protects.

Operational independence and autonomy are not a doctrine about data sensitivity. It is a doctrine about analytical autonomy, namely who decides what is studied, how it is studied, and what conclusions are drawn. Anonymization changes the data protection profile of the work, but it does not change the analytical character of the function. The judgement applied to identify a typology, characterize a sectoral vulnerability, or attribute a pattern to a particular method is the FIU's analytical judgement, and it is precisely that judgement that operational independence protects from external pressure.

To put the point sharply, a strategic report produced from fully anonymized and aggregated data, but written under instruction from outside the FIU, is more problematic from an independence standpoint than a case-level analysis using identifiable data conducted under the FIU's own analytical direction. The first compromises the function, while the second exemplifies it.

Where the application of operational independence to strategic analysis is left implicit, several predictable pressures tend to emerge.

**The first is topic capture.** Policymakers, oversight bodies, or governance actors may have legitimate interest in particular themes and may attempt to direct the strategic agenda accordingly. A certain degree of demand articulation is healthy, even desirable, but the line between expressing a need and dictating an output can erode quickly without explicit ground rules.

**The second is conclusion shaping.** Strategic intelligence may identify sensitive vulnerabilities, emerging risks, or control weaknesses in certain sectors or institutions. Without clear protection, drafts may be subjected to revision pressures that have less to do with analytical accuracy than with political acceptability. This is the most corrosive form of influence, because it is rarely explicit and rarely documented.

**The third is publication control.** Even where the analysis itself proceeds unimpeded, decisions about whether and when to publish, in what form, and through what channels can be used to neutralize inconvenient findings. An FIU that produces excellent strategic intelligence which never reaches its intended audience is, for practical purposes, an FIU whose strategic capacity has been disabled.

These pressures do not require bad faith on anyone's part to materialize. They are the natural consequence of a function that produces consequential knowledge in a politically textured

environment. FIUs' operational independence and autonomy protections exist precisely to keep those pressures at a manageable distance.

The legitimate counterweight argument is that the risk-based approach is national in scope and requires coordination. NRAs aggregate inputs from multiple authorities, supervisory priorities depend on a shared risk picture, and the private sector needs consistent guidance. A strategic analysis function that claimed full independence in the sense of insulating itself from any coordination would fail the system in a different way.

Therefore, the FIU should retain autonomy over what it analyses, how it analyses, and what conclusions it reaches. However, it contributes those conclusions to coordinated processes such as the NRA, the national AML/CFT strategy, sectoral risk assessments, and inter-agency typology work. Those processes may legitimately ask the FIU to address specific questions, may aggregate FIU findings with those of supervisors and law enforcement, and may produce a national risk picture that reflects negotiated language. None of this displaces the FIU's analytical independence, provided the FIU's own findings remain its own and are accurately represented when incorporated into multi-agency products.

The same logic applies in reverse. The FIU should not impose its strategic conclusions as binding on policy makers, as it provides input, not direction. Operational independence and autonomy protect the integrity of the input, not the right of the FIU to determine downstream policy outcomes.

Several safeguards reinforce the application of FIUs' operational independence and autonomy to strategic analysis in practice.

**The first is statutory clarity.** Where the law explicitly assigns the strategic analysis function to the FIU, including the determination of analytical priorities and the autonomy to publish findings, the legal protection is strongest. Where the function is implicit or shared with another body, the protection is correspondingly weaker.

**The second is internal governance.** Documented analytical methodologies, quality assurance procedures, and clear authorship attribution within the FIU make it harder for external pressure to alter conclusions invisibly. A strategic product whose method and authorship are transparent is easier to defend.

**The third is publication policy.** A clear, pre-agreed framework for the publication of strategic products, including timing, format, and dissemination channels, reduces the discretion available for ad hoc suppression or delay. Public commitments at the strategic level, for example to an annual typology report or a sectoral risk brief, also serve this function by raising the visibility cost of interference.

**The fourth is peer benchmarking.** Engagement with the Egmont Group's community, FATF and FSRBs creates an external reference point against which the FIU's strategic work can be calibrated and provides an additional layer of soft protection for analytical independence.

# 6. Section E: Overall Assessment and Way Forward

## 6.1 Core Requirements for Effective FIU Strategic Analysis

To complement the quantitative findings, respondents were asked to identify the core requirements for effective strategic analysis within FIUs. The responses reveal a high degree of convergence, pointing to a set of interdependent structural, technical, and institutional enablers. These requirements extend beyond individual capabilities, reflecting the need for a **system-wide approach** in which data, skills, tools, and governance frameworks align.

| # | Requirement | Illustrative Respondent Perspectives |
|---|---|---|
| 1 | Clear legal mandate and institutional positioning | A well-defined legal basis is essential to formalise the strategic analysis function, ensure access to data, and clarify roles across stakeholders. Respondents emphasised that explicit legislative authority removes ambiguity, supports operational independence, and enables strategic outputs to inform national policy and regulatory processes. |
| 2 | Dedicated, adequately resourced analytical capacity | Strategic analysis cannot be treated as a secondary function. Respondents highlighted the need for dedicated teams with sufficient FTEs, multidisciplinary expertise (AML/CFT, data science, statistics), and continuous training. The separation at least functionally between operational and strategic analysis was frequently cited as critical for maintaining a forward-looking focus. |
| 3 | Access to comprehensive, high-quality and integrated data | Effective analysis depends on access to diverse datasets, including STR/SAR data, tax, customs, law enforcement, beneficial ownership, and open-source intelligence. Respondents stressed that without data integration and standardisation, analysis remains fragmented and unable to capture complex financial crime patterns or emerging risks. |
| 4 | Advanced analytical tools and technological infrastructure | Manual analysis is insufficient in the face of growing data volumes and complexity. Respondents pointed to the need for big data platforms, AI/ML capabilities, network analysis tools, and data visualisation systems to enable scalable, timely, and deeper analytical insights. |
| 5 | Structured inter-agency cooperation and information sharing | Strong collaboration frameworks both domestic and international are essential. Mechanisms such as MoUs, joint task forces, PPPs, and secure data-sharing protocols enable access to critical information and ensure that strategic analysis reflects a holistic view of ML/TF risks. |

| # | Requirement | Illustrative Respondent Perspectives |
|---|---|---|
| 6 | Effective dissemination and feedback mechanisms | Strategic analysis must reach the right stakeholders and generate actionable outcomes. Respondents emphasised that outputs should be clearly communicated, tailored to users, and supported by feedback loops to assess impact, refine products, and enhance relevance over time. |
| 7 | Robust governance, coordination, and policy linkage | Strategic analysis must be embedded within broader AML/CFT governance frameworks, including national coordination committees and risk assessment processes. Clear pathways are required to translate analytical findings into policy decisions, supervisory actions, and resource allocation. |
| 8 | Continuous adaptation and forward-looking capability | Respondents highlighted the importance of adaptability, including updating typologies, integrating emerging risk domains (e.g. virtual assets), and continuously refining methodologies. Strategic analysis should be dynamic, not static, evolving alongside financial crime risks. |

# 7. Cross-Cutting Analysis: Maturity Framework

## 7.1 FIU Strategic Intelligence Maturity Levels

Based on the composite analysis of the questionnaire responses across all five thematic areas, FIUs can be broadly categorised into four strategic intelligence maturity levels. This framework is intended as an analytical tool to contextualise findings and inform targeted recommendations, not as a formal assessment or ranking of jurisdictions. These proportions are approximate analytical estimates, derived from composite scoring across the questionnaire dimensions, and are intended to illustrate broad patterns rather than provide a precise classification of individual FIUs.

| Level | Label | Characteristics | Approximate % of Respondents |
|---|---|---|---|
| Level 1 | Foundational | Limited or no dedicated strategic function; weak data access; minimal formal outputs; low integration into NRA or policy processes | ~15-20% |
| Level 2 | Developing | Hybrid analyst roles; basic typologies/advisories; partial legislative or institutional framework; limited tools and data integration; ad hoc outputs | ~40-45% |
| Level 3 | Established | Dedicated or semi-dedicated teams; regular strategic outputs; strong NRA integration; moderate technical capacity; some feedback and stakeholder engagement mechanisms | ~30-35% |
| Level 4 | Advanced | Fully institutionalised strategic intelligence function; advanced analytics (AI/ML); integrated data ecosystem; measurable policy impact; strong domestic and international coordination | ~5-10% |

The distribution of FIUs across maturity levels indicates that while foundational structures for strategic intelligence are widely in place, most jurisdictions remain in transitional stages of development. The largest proportion of FIUs operate within a "developing" model characterised by hybrid roles, limited analytical infrastructure, and uneven integration of strategic outputs into decision-making processes. Only a small subset demonstrates fully institutionalised, data-driven strategic intelligence capabilities.

## 7.2 Key Correlations and Cross-Cutting Themes

Analysis of responses across sections reveals several significant cross-cutting patterns:

- **Legislative mandate ↔ Output volume and consistency:** FIUs operating under an explicit legislative mandate for strategic analysis report higher output volumes and more regular production cycles. A formal mandate appears to provide the institutional clarity and authority required to prioritise strategic work and allocate resources accordingly.
- **Dedicated analytical capacity ↔ Product diversity and sophistication:** The presence of dedicated strategic analysis teams is strongly associated with greater product diversity and depth. FIUs with specialised teams are more likely to produce not only typology reports, but also trend studies, risk assessments, and forward-looking intelligence products, reflecting a shift from descriptive to analytical outputs.
- **Data access ↔ Analytical depth and forward-looking capability:** Access to a broader data ecosystem—particularly beneficial ownership registers, tax data, customs/trade data, and commercial databases—is closely linked to higher analytical capability and more advanced outputs. FIUs with limited data access tend to rely on STR-driven analysis, constraining their ability to identify complex or emerging risks.
- **Technical capability ↔ Innovation and predictive analysis:** FIUs with stronger technical infrastructure and access to advanced analytical tools (e.g. data science, AI/ML, network analysis) demonstrate greater capacity for pattern detection, anomaly identification, and forward-looking risk analysis. Conversely, limited technical capability reinforces reliance on manual and retrospective approaches.
- **Feedback mechanisms ↔ Policy influence and impact:** FIUs that maintain structured feedback loops with stakeholders are more likely to report tangible policy and regulatory impact. The presence of feedback mechanisms enables validation of findings, strengthens stakeholder engagement, and facilitates the translation of strategic outputs into actionable decisions.

Progression between maturity levels is typically characterized by increased analytical specialization, improved data integration, stronger governance frameworks and the institutionalization of strategic intelligence production cycles.

# 8. Recommendations

## 8.1 Legislative and Mandate Reforms

### Priority: Foundational and Developing FIUs

- **Recommendation 1.1:** FIUs without explicit legislative authorisation for strategic intelligence should advocate for the inclusion of a clear strategic analysis mandate within primary AML/CFT legislation or FIU-enabling law, aligned with FATF Recommendation 29. This could also be achieved through the introduction secondary instruments that may be more readily updated when legislative reform is slow or challenging. Examples include FIU strategic plans, internal regulations, organizational structures, manuals of organization and functions, and other internal governance and policy documents that can support the institutionalization of strategic intelligence practices.
- **Recommendation 1.2:** Jurisdictions should consider incorporating a formal statutory definition of strategic analysis into AML/CFT legislation, distinguishing it from operational intelligence and specifying permissible data use, inter-agency sharing, and product dissemination authorities.
- **Recommendation 1.3:** FIU leaders should engage with national legislators and AML/CFT policy bodies to ensure that FATF Mutual Evaluation recommendations related to strategic intelligence are reflected in legislative reform agendas.

## 8.2 Institutional Capacity and Human Resources

### Priority: Developing and Established FIUs

- **Recommendation 2.1:** FIUs should establish dedicated strategic analysis units with protected staffing allocations, minimum analytical competency requirements and clearly separated reporting structures from operational case teams.
- **Recommendation 2.2:** The Egmont Group, through the IEWG and working in partnership with FSRBs, should develop a standardised competency framework for FIU strategic analysts, incorporating both traditional analytical skills and emerging data science competencies.
- **Recommendation 2.3:** A targeted training programme on advanced analytical methods including analysis tradecraft, data science, network analysis, and machine learning applications in financial intelligence should be developed and made available to Egmont member FIUs, with priority access for lower-capacity jurisdictions.
- **Recommendation 2.4:** The Egmont Group, through the IEWG should support a phase II of this project to help FIUs operationalize the insights from this initial study with the four main dimensions outlined below.

## 8.3 Data Access and Technical Infrastructure

### Priority: All Maturity Levels

- **Recommendation 3.1:** FIUs should actively pursue formal agreements (statutory gateways or MoUs) with national authorities responsible for beneficial ownership registers, tax records, customs/trade databases, vehicle registries, and land registers to enable their use in strategic analysis.
- **Recommendation 3.2:** Advanced FIUs should share their technical architecture and tool procurement experience with peers through the Egmont network, including evaluations of analytics platforms, OSINT tooling, and AI-assisted STR analysis systems.
- **Recommendation 3.3:** The Egmont Group Secretariat should explore the feasibility of a shared technology and analytics platform accessible to lower-capacity member FIUs, potentially modelled on existing regional FIU cooperation frameworks.

## 8.4 Strategic Products and Dissemination

### Priority: Developing and Established FIUs

- **Recommendation 4.1:** FIUs should develop and publish annual strategic intelligence reports as a baseline product, supplemented by event-driven advisories and quarterly trend bulletins where capacity permits.
- **Recommendation 4.2:** All FIUs should establish both formal and informal feedback mechanisms for their strategic intelligence products, including structured post-publication engagement with primary audiences and documented outcome tracking.
- **Recommendation 4.3:** FIUs should consider public dissemination of appropriately classified strategic products via official websites to enhance transparency, support reporting entity compliance, and contribute to broader public awareness of ML/TF risks.

## 8.5 Impact Measurement and Integration

### Priority: All Maturity Levels

- **Recommendation 5.1:** FIUs should develop and implement a strategic intelligence KPI framework, tracking metrics such as: number of strategic products published; stakeholder engagement levels; documented instances of policy or regulatory change attributable to FIU intelligence; and NRA integration depth.
- **Recommendation 5.2:** Governments should formalise the role of FIU strategic intelligence in NRA processes through statutory or regulatory frameworks, ensuring that FIU products are systematically incorporated as primary inputs into national ML/TF risk assessments.
- **Recommendation 5.3:** The IEWG should develop a model NRA integration protocol for use by member FIUs, specifying the types of strategic intelligence most relevant to NRA processes and the mechanisms for their incorporation.

# 9. Conclusion

This report presents a comprehensive analytical synthesis of the IEWG questionnaire on the role of FIUs in the preparation of strategic intelligence. The findings confirm that while meaningful progress has been made across the Egmont Group network, with the majority of FIUs now producing at least some form of strategic output, substantial gaps remain in legislative foundations, analytical capacity, data access, technical tooling, and impact measurement.

The central challenge facing the FIU community is not a lack of awareness of the importance of strategic intelligence, but rather the structural, resource, and institutional barriers that prevent translating aspirations into consistent, high-quality strategic product delivery. Legislative ambiguity, hybrid analyst roles, limited data ecosystems, and underdeveloped feedback mechanisms combine to constrain FIU strategic intelligence to the Foundational or Developing level for the majority of network members.

The recommendations advanced in this report are grounded in the evidence collected through the questionnaire and are calibrated to the maturity gradient across the Egmont network. They are intended to be pragmatic, actionable, and proportionate — recognising that the pathway to advanced strategic intelligence capability will differ across jurisdictions, while affirming the common standards and principles that should guide the journey.

The Egmont Group, through the IEWG project, is well positioned to catalyse this development by elaborating a conceptual framework, a comparative good-practice guide, and targeted capacity-building initiatives. The sustained commitment of member FIUs, national governments, and international partners will be essential to realising the full potential of strategic financial intelligence as a cornerstone of effective AML/CFT frameworks globally.

Future effectiveness will increasingly depend on the ability of FIUs to integrate advanced analytics, cross-border intelligence cooperation, and predictive risk identification into core strategic intelligence functions.

## 9.1. Potential Future IEWG Work

Looking ahead, the evidence collected through this project points clearly to the need for a second phase focused less on diagnosis and more on practical guidance and implementation support. The present report has clarified the institutional landscape, highlighted common constraints, and outlined core requirements for effective FIU strategic analysis. What many member FIUs now require is structured assistance in translating these findings into concrete practices, tools, and products.

A Phase Two of the project could therefore concentrate on operationalising the insights of this study along four main dimensions:

1. Clarifying strategic analysis products and use-cases:

The survey revealed significant variation in how FIUs classify and count "strategic products", and in how comprehensive or granular those products are. A follow-up phase could develop a practical typology of FIU strategic outputs: for example, distinguishing between typology reports, sectoral risk assessments, thematic studies, early-warning briefs, dashboards, and contributions to NRAs. This typology could be accompanied by guidance on appropriate scope, level of aggregation, target audiences, and minimum quality standards, helping FIUs design product portfolios that are both realistic and impactful.

2. Methodological guidance and analytical approaches:

While this report describes the broad distinction between operational and strategic analysis, it does not prescribe specific methods. A second phase could elaborate methodological guidance tailored to FIU realities, including:

- Approaches to building and maintaining typology libraries and red-flag indicators.
- Practical frameworks for inductive and abductive reasoning in strategic analysis.
- Options for incorporating statistical, geospatial, network, and machine-learning techniques at different capacity levels.
- Templates for integrating FIU strategic analysis into NRA processes and sectoral risk assessments.
- Such guidance could be tiered by maturity level, recognising that foundational, developing, established, and advanced FIUs will adopt different methodological starting points.

3. Compilation and dissemination of good practices and success stories:

The questionnaire surfaced a number of innovative practices: from advanced data-science teams and integrated data platforms to effective dissemination models and robust feedback loops, but these are only briefly referenced in aggregate form. A Phase Two workstream could systematically document case studies from member jurisdictions, illustrating:

- How specific FIUs have built strategic analysis units and protected them from operational displacement.
- How access to particular datasets (e.g., beneficial ownership, customs, tax) has transformed strategic outputs.
- How strategic products have concretely influenced legislation, supervisory practice, or national strategies.
- How FIUs have navigated the balance between operational independence and multi-agency coordination.

- Presenting these experiences in a structured "good practice compendium" would provide members with concrete models that can be adapted to different institutional and resource contexts.

4. Practical tools, templates, and capacity-building modules:

Finally, a second phase could develop practical tools that FIUs can deploy directly, such as:

- Template outlines for different strategic products (e.g. typology reports, sectoral studies, strategic intelligence briefs).
- Sample indicator sets and basic KPIs for measuring the impact of strategic analysis.
- Checklists for data-access arrangements and inter-agency cooperation relevant to strategic work.
- Training modules or curricula on strategic analysis tradecraft, including the use of data-science techniques at varying levels of sophistication.
- These tools could be delivered through a combination of written guidance, workshops, regional seminars, and peer-to-peer exchanges facilitated by the Egmont Group and partner organisations.

Taken together, such a Phase Two would move the project from "what is" to "how to": from mapping the current state of FIU strategic intelligence to equipping member FIUs with the concrete instruments, examples, and methodologies needed to strengthen their own practice.

# Annex A: Questionnaire Structure Overview

The following table provides a reference overview of the five thematic sections of the Information Collection Questionnaire and their principal analytical themes.

| # | Section | Key Areas | Question Types |
|---|---|---|---|
| A | Mandate, Environment & Foundations | Legislative framework; FATF alignment; production history; barriers; cooperation | Yes/No; Likert; open-ended |
| B | HR, Skills, Capacity & Tools | Staffing; skill profiles; training; data access; analytical tools; typology library | Yes/No; Likert; multi-select; open-ended |
| C | Strategic Products & Outputs | Output types; frequency; audiences; dissemination; feedback loops; workshops | Multi-select; open-ended |
| D | Impact & National Integration | Stakeholder use; NRA integration; policy influence; effectiveness measurement | Yes/No; Likert; open-ended |
| E | Overall Assessment & Way Forward | Core requirements for effective strategic analysis; institutional priorities | Open-ended |

# Annex B: Glossary of Key Terms

| Term | Definition |
|---|---|
| Strategic Intelligence | Macro-level analytical products that synthesise financial intelligence data to identify systemic ML/TF risks, typologies, trends, and patterns, intended to inform policy, regulation, and NRA processes rather than support individual case investigations. |
| Operational Intelligence | Case-specific financial intelligence products developed to support individual investigations or prosecutions, typically involving disclosure of financial intelligence reports to law enforcement. |
| FIU | Financial Intelligence Unit — a central national authority responsible for receiving, analysing, and disseminating financial intelligence related to money laundering, terrorist financing, and other financial crimes. |
| NRA | National Risk Assessment — a structured government-led process to identify, assess, and understand the ML/TF risks facing a jurisdiction, required under FATF Recommendation 1. |
| FATF Rec. 29 | The FATF Recommendation establishes core FIU functions, including the authority to receive STRs/SARs, undertake financial analysis (operational and strategic), and disseminate financial intelligence to competent authorities. |
| Typology Report | A strategic intelligence product documenting the methods, techniques, patterns, and schemes used by criminals to launder proceeds or finance terrorism, typically illustrated with anonymised case examples. |
| RBA | Risk-Based Approach — the principle, established under FATF Recommendation 1, that AML/CFT measures should be proportionate to the identified risks, enabling resources to be focused on higher-risk areas. |
| EDA | Exploratory Data Analysis — a statistical approach involving initial investigation of datasets to discover patterns, anomalies, and hypotheses, prior to formal modelling or analysis. |
| SRA | Sectoral Risk Assessment – refers to strategic analysis conducted for specific sectors of the AML/CFT system, e.g. financial and non-financial. The SRA typically focuses on assessing inherent risks specific to the assessed sector before any AML/CTF controls have been applied to reduce the risk (residual risk). |

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