

Mitigating AML/FT Risk through Public Private Partnerships

Presented by

Luke Baldacchino

Manager – Intelligence Analysis

2026 | ©Financial Intelligence Analysis Unit Malta

FIAU Public

FIAU

What is a Public Private Partnership?

According to the European Commission Staff Working Document on the use of public-private partnerships in the framework of preventing and fighting money laundering and terrorist financing

> **PUBLIC-PRIVATE PARTNERSHIPS ARE GENERALLY UNDERSTOOD TO IMPLY THE SET-UP OF A SPECIFIC FRAMEWORK FOR SHARING INFORMATION BETWEEN FIUS, LAW ENFORCEMENT AUTHORITIES AND THE PRIVATE SECTOR. WITHIN SUCH PARTNERSHIPS, INFORMATION NEED NOT NECESSARILY FLOW IN THE MANNER AND ORDER SET OUT ABOVE*, AS SOME PARTNERSHIPS MAY ENABLE THE EXCHANGE OF INFORMATION FROM OBLIGED ENTITIES TO LAW ENFORCEMENT AUTHORITIES AND VICE-VERSA.**
>
> **HOWEVER, THERE IS NO COMMONLY AGREED DEFINITION OF WHAT CONSTITUTES A PUBLIC-PRIVATE PARTNERSHIP IN THE FRAMEWORK OF PREVENTING AND FIGHTING ML/TF.**

*Standardised Request for Information

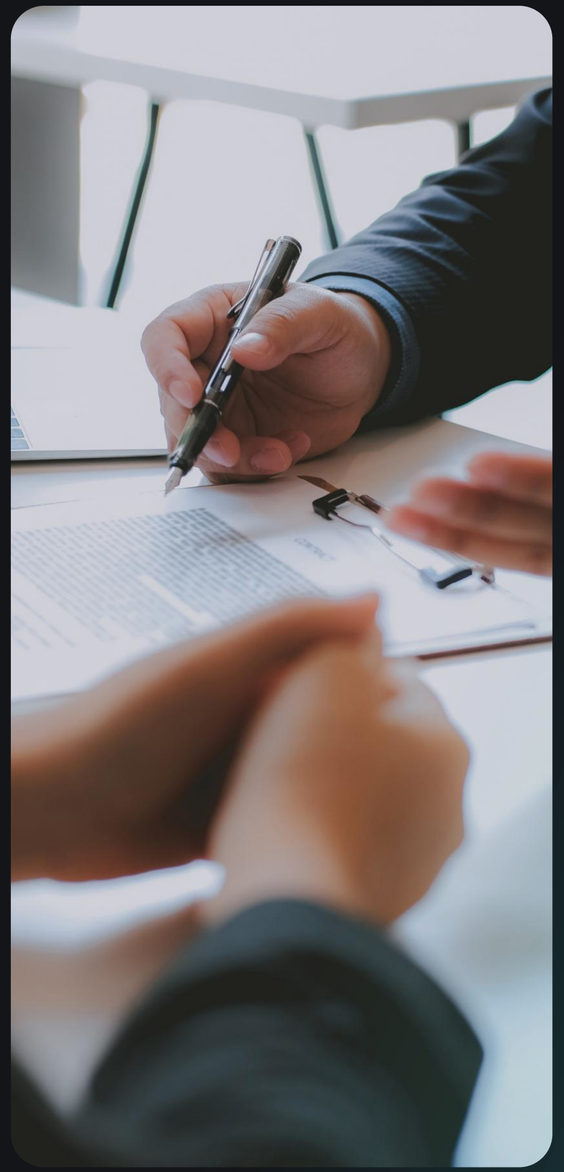


FIAU Public

What is a Public Private Partnership?

According to the European Commission Staff Working Document on the use of public-private partnerships in the framework of preventing and fighting money laundering and terrorist financing

- However, public-private partnerships that involve the sharing of information between law enforcement authorities, FIUs and the private sector are set up for two main reasons:
  - to exchange strategic information (e.g. typologies, trends, risk indicators, feedback on suspicious transaction and activity reports) between FIUs and obliged entities and does not usually include information on specific cases, persons or transactions;
  - to exchange operational information between public authorities and obliged entities on 'persons of interest' for law enforcement and would include data on known persons and transactions.



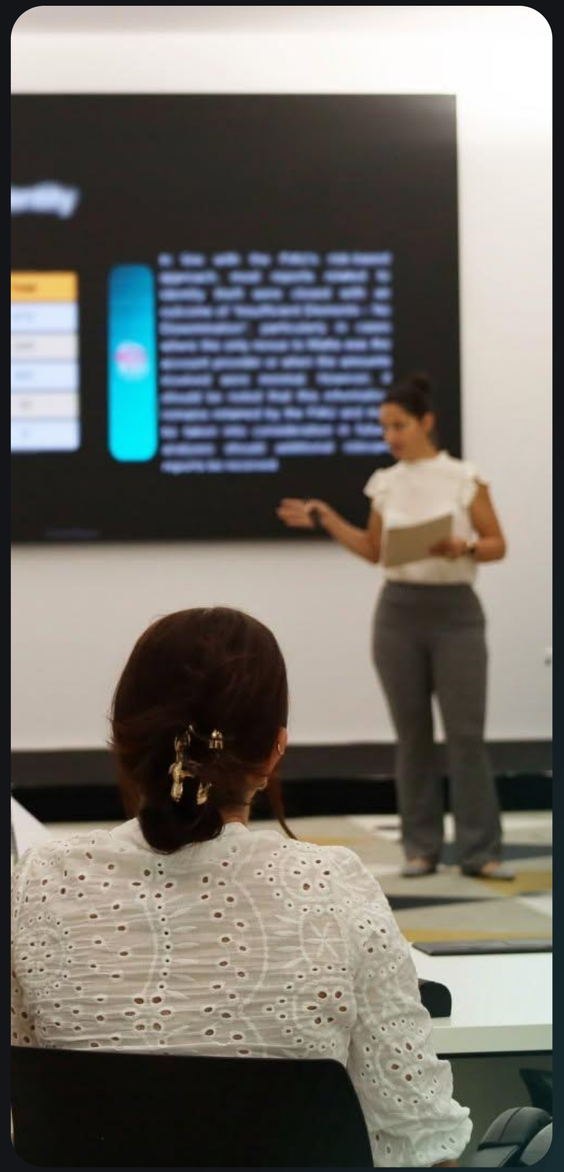
FIAU Public

FIAU

Opportunities and potential added value of Public Private Partnership

According to the European Commission Staff Working Document on the use of public-private partnerships in the framework of preventing and fighting money laundering and terrorist financing

- 1) Improve understanding of ML/TF risks and focus efforts in line with threats.
- 2) Improve the quality of STRs/SARs submitted by obliged entities.
- 3) Build trust among public authorities (FIUs, law enforcement, supervisors) and obliged entities.
- 4) Enable a more targeted intelligence picture.



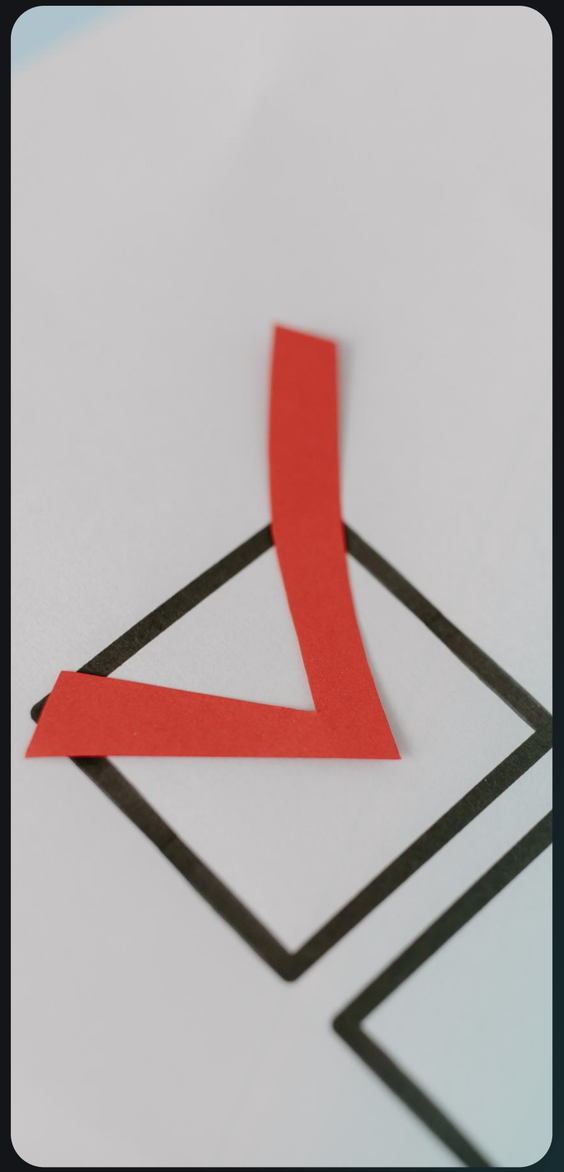
FIAU Public

FIAU

Opportunities and potential added value of Public Private Partnership

According to the European Commission Staff Working Document on the use of public-private partnerships in the framework of preventing and fighting money laundering and terrorist financing

- **1) Improve understanding of ML/TF risks and focus efforts in line with threats.**
- **2) Improve the quality of STRs/SARs submitted by obliged entities.**
- 3) Build trust among public authorities (FIUs, law enforcement, supervisors) and obliged entities.
- 4) Enable a more targeted intelligence picture.



The Power of Feedback



FIAU Public

FIAU

The Power of Feedback



Face to Face Meetings



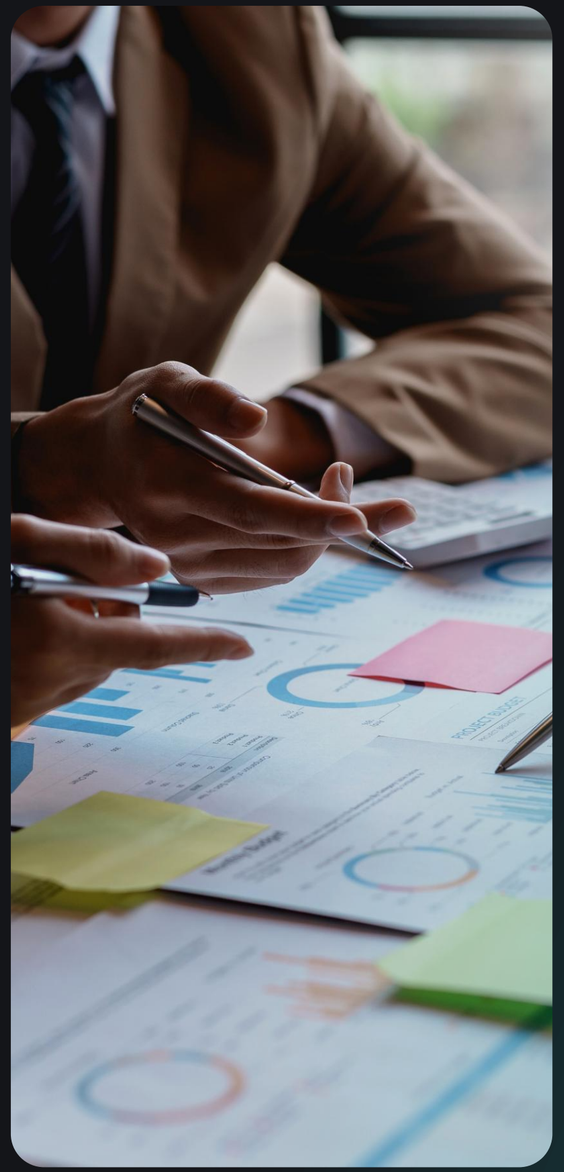
Feedback Quality Reports

FIAU Public

FIAU

Face to Face Meetings

- Every month, the **Total Number of Rejected Reports** and the **Report Technical Score** per Subject Person are assessed.
- SPs are then flagged for an individual meeting.
- During the meeting, common rejection reasons and report deficiencies are discussed.
- SP would then be subject to an evaluation period.



FIAU Public

FIAU

Feedback of Reports



Final Feedback Report

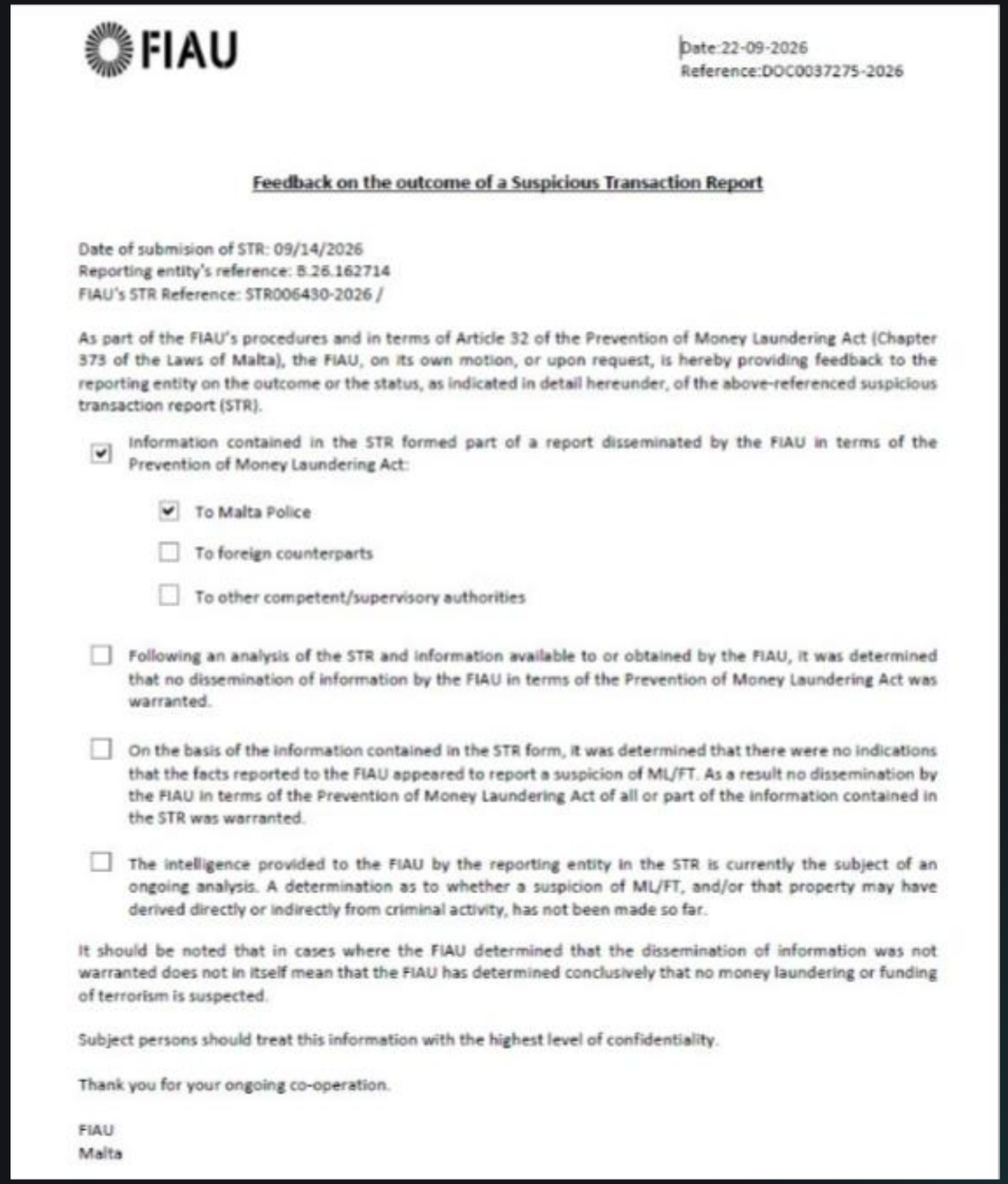


Annual Quality Feedback Report

FIAU Public

FIAU

Final Feedback Report



FIAU

Date:22-09-2026
Reference:DOC0037275-2026

Feedback on the outcome of a Suspicious Transaction Report

Date of submision of STR: 09/14/2026
Reporting entity's reference: B.26.162714
FIAU's STR Reference: STR006430-2026 /

As part of the FIAU's procedures and in terms of Article 32 of the Prevention of Money Laundering Act (Chapter 373 of the Laws of Malta), the FIAU, on its own motion, or upon request, is hereby providing feedback to the reporting entity on the outcome or the status, as indicated in detail hereunder, of the above-referenced suspicious transaction report (STR).

☑ Information contained in the STR formed part of a report disseminated by the FIAU in terms of the Prevention of Money Laundering Act:

- ☑ To Malta Police
- ☐ To foreign counterparts
- ☐ To other competent/supervisory authorities

☐ Following an analysis of the STR and information available to or obtained by the FIAU, it was determined that no dissemination of information by the FIAU in terms of the Prevention of Money Laundering Act was warranted.

☐ On the basis of the information contained in the STR form, it was determined that there were no indications that the facts reported to the FIAU appeared to report a suspicion of ML/FT. As a result no dissemination by the FIAU in terms of the Prevention of Money Laundering Act of all or part of the information contained in the STR was warranted.

☐ The intelligence provided to the FIAU by the reporting entity in the STR is currently the subject of an ongoing analysis. A determination as to whether a suspicion of ML/FT, and/or that property may have derived directly or indirectly from criminal activity, has not been made so far.

It should be noted that in cases where the FIAU determined that the dissemination of information was not warranted does not in itself mean that the FIAU has determined conclusively that no money laundering or funding of terrorism is suspected.

Subject persons should treat this information with the highest level of confidentiality.

Thank you for your ongoing co-operation.

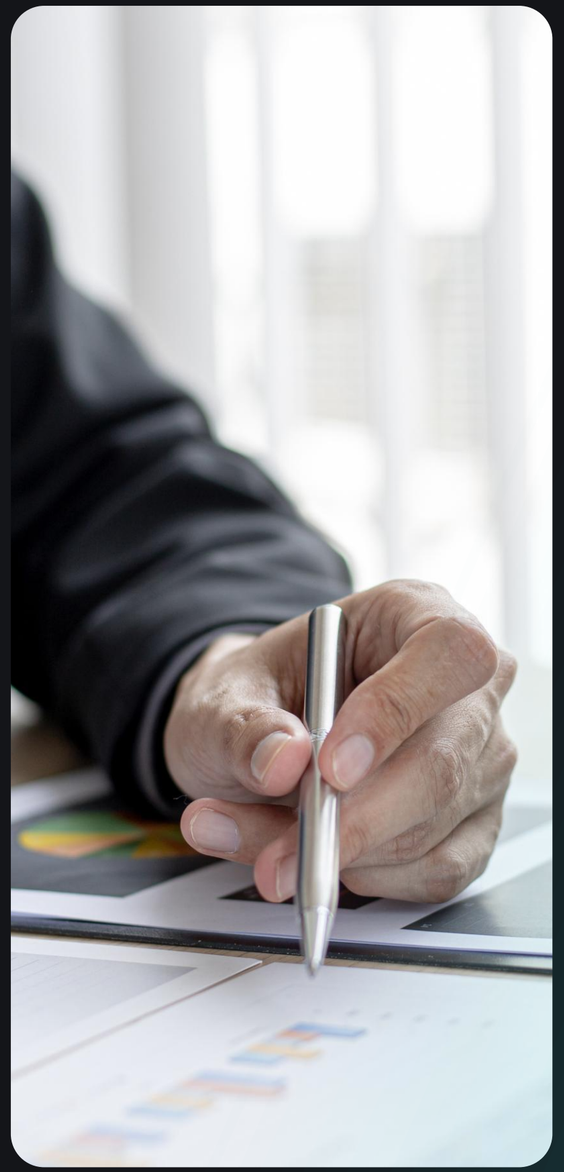
FIAU
Malta

FIAU Public

FIAU

Annual Quality Feedback Report under Development

- Insights on the SPs submission throughout that calendar year.
- Comparative insights with sector & previous years.
- Aggregated figures on reports, outcome, risk indicators identified, quality issues identified, accepted/rejected submissions.
- Will be sent automatically via GoAML message board once a year.



FIAU Public

FIAU

Annual Quality Feedback Report under Development

Received Reports

Year Under Review	Total	% Change from Previous Year
2025	231	47.13%
Total	**231**	**N/A**

Report Type	Total	%
STR	227	98.27%
SAR	2	0.87%
PEPTR	2	0.87%
Total	**231**	**100.00%**

Year Under Review	Sector Total	[redacted]	%
2025	3022	231	7.64%

Received TRNs & Outcome

Outcome	Total	%
Not Suspended	16	100.00%

Concluded Reports in Year Under Review

Outcome	Total	%
Insufficient elements with dissemination	105	39.92%
Insufficient elements with no dissemination	157	59.70%
Close case as sent to police	1	0.38%

Predicate Offences

Figures include indicators identified within the findings of the analysis

Predicate Offence Category	2025	Sector Total
Unknown	222	**1694**
Tax Crimes	5	**144**
Drug Trafficking	4	**252**
Illicit Arms Trafficking	1	**6**

Reason for Suspicion

Figures include indicators identified within the findings of the analysis

Reason for Suspicion Category	2025	Sector Total
CDD & onboarding red flags	207	**2218**
Source-of-funds/wealth mismatches	21	**933**
Reputation & risk profiling	7	**737**
Structuring & payment-flow anomalies	3	**724**
Gaming & gambling red flags	2	**164**
Cash-intensive behaviour & physical currency	1	**14**

Submissions Insights

Submission Status	2025	%
Processed	232	**90.27%**
Rejected	25	**9.73%**
Total Number of Submissions	**257**	

Quality Issues Identified

Report Quality Measure	Number of Reports
No quality issues identified	227
Suspicious transactions/activity reported in an incomplete and unclear manner	0
Missing/inaccurate account details	0
Missing core accounts	0
Background information on the relationship with the reported subject was not described in sufficient detail	0

FIAU Public

Why we are doing this?

1. Time is of the Essence
2. SPs may be in a position to know more on the subject & suspicion than the FIAU
3. Comparison with sector may identify overlooked trends and typologies which may create risks for the institution



FIAU Public



Questions?

FIAU Public

Thank you for your attention!

fiaumalta.org