Comparative Study of International Financial institutions "anti-money laundering Regulatory Information Management System

Wang yanwei ouyang Chao Gao Zeng ' an

(School to Economics and Management , Southwest Jiaotong University, Chengdu 6100310)

Abstract: [purpose/significance] improving the anti-money laundering regulatory Information management system of Chinese financial. Institutions would help improve the efficiency of anti-money laundering Regulation, fully utilize the limited resources, and ensure the successful implementation of the RMB internationalization strategy. [method/process] taking the international financial institutions " Anti-Money Laundering Regulatory Information Management system as the study objective, social network analysis as the main Comparative analysis of the Anti-Money Laundering Regulatory information Management system in three MA Jor international financial institutions from mainland, SAR, and the Kong United are States out. [result/conclusion] The findings in thisstudy can Help realize the potential value of financial institution ' customers, academic s, and effectively activate the intrinsic motivation in financial institutions for improved anti-money laundering RY Information Management.

Keywords: International financial institutions Anti-Money Laundering Social Network analysis information management System

Introduction

as China's financial sector continues to expand , , especially people Currency internationalization strategy steps forward , making cross-border Transactions of our financial institutions way , Trading objects , total volume of transactions increased significantly , in the statistics The has also been fully validated 1. Progressive Opening of financial industry , to gold

Financial Regulation also raises an urgent requirement , proactively conduct proactive research , to hold continue to provide scientific protection for healthy development . current , has three aspects of supervision is internationally recognized and consensual : Anti-money laundering , Anti-terrorism financing and avoidance Paradise tax evasion" [2 . (According to relevant academic research conventions , article The is collectively called anti-Money laundering .)2009 year , people 's bank of China on " China 2008- Year anti-money laundering strategy report , doing a lot of content on intelligence

Explicit Requirements [3] . 2013 year , at People's Bank of China anti-money laundering as an inter-ministerial joint meeting for the sixth meeting to further clarify the anti-money laundering regulation up to national strategic level , improve intelligence management system become heavy content . Continuous opening of our financial sector ,making financial institutions participate Anti-Money laundering regulatory intelligence management system with increasing number of stakeholders , all related Square collaboration , coupling , Share , Relationships like feedback tend to be complex , Network The trend is becoming more pronounced . drill-down Research results , Research My country Information Management in financial institutions anti-money laundering regulatory system The results of this area are more than less .

International View , in the international Anti-Money Laundering Regulatory Organization FATF (International anti- Money Laundering Financial Action Task Force) in2014 fourth-round at the beginning of the year Evaluation (FATF Fourth Round , aml/cft Mutual evaluations) in , The primary assessment is its , year-national " " risk is this (risk-based approach , RBA) Anti-Money Laundering Regulation System's synergies and effectiveness , specifically highlights the importance of intelligence managementstatus [4-5]. FATF "" risk-oriented "" Anti-Money Laundering regulatory system get The other international anti-Money Laundering organization, the Monterey Group (fius) ,Wolff Fort Lauderdale Group (the Wolfsberg Group); International Monetary Fund (IMF) etc full recognition and advocacy [6-8] . can be considered ,FATF proposed "" Risk text Anti-money laundering regulation concept will become global anti-money laundering A revolutionary shift in the regulatory field , has epoch-making significance . compared to previous evaluation criteria " risk-oriented " Anti-money laundering regulatory system highlights the importance of intelligence management , Especially for elevation information Administrative effectiveness and international cooperation effects become important assessment criteria [Ten . has been studied at home and abroad ,Social network Analytics (Social network Analysis , SNA) already promoting money laundering clue Discovery The model of money laundering transaction and the analysis of data monitoring , get initially to Fruit [one]. on FATF fourth round money Laundering risk assessment programmatic file in , List Australia , United States , UK , "" Risk to this ""Anti-Money Laundering Regulatory System , fully enhanced and upgraded intelligence controls rationale [4]. then ,FATF on its risk is this Anti-money laundering controlSeries reports , and explicitly compare , for reference by financial institutions Administrative mode , make full use of limited anti-money laundering regulatory Resources , is current an important task of anti-money laundering regulation in countries and regions [a.

In-depth study of anti-money laundering Supervision information management system of financial institutions , System Consolidation Central bank levy letter , Account admin , Internal letter for foreign exchange Management on the basis of , improve intelligence gathering and analysis capabilities , will anti-corruption , by case with anti-money laundering work closely combined , enforce with public security , Sea off , monitors , the degree of cooperation of discipline inspection agencies , Its research value and meaning The semantics further highlights the [a]. China as FATF Member States , with FATF The fourth round of peer review dates are approaching , promoting financial institutions builds with risk is this Anti-Money-laundering Regulatory intelligence management system price The value is further highlighted .

1. Analysis of the international financial institutions ' anti-money Laundering supervision information Management system

1.1. International financial institutions anti-money laundering Regulatory Intelligence Basic System

based on the data and data received , drill down , Analyze our mainland , Three international financial institutions such as Hong Kong and the United States Anti-Money laundering regulatory Intelligence Management system , can be considered international financial institutions anti-money laundering Supervision Intelligence Management Body The system can be divided into four levels . : target layer (Target layer,) Concept Layer (Concept Layer)and mechanism level (mechanism layer) and operation layer (Operation layer) (See diagram 1). target layer , main include Public awareness , such as various financial institution customers , Anti-Money laundering academic researchinvestigate agency , expert scholar, etc. . concept layer , main include FATF to core heart , include fius, The Wolfsberg Group , APG , IMF , Ba - sel , World The Bank etc international community organization etc , such as FATF To make the , " compliance " ' Risk Text concepts such as . mechanism layer , referring to countries setting National Anti-Money Laundering Administration system , such as national level and local line administrative bodies , Various types of government intelligence analysis agencies , and related forex , Tax , customs , Justice , Public Security , Intelligence and other administrative bodies . action layer , mainly refers to Various anti-money laundering enforcement agencies of financial institutions , such as internal control

compliance Department ,,, , risk officer etc Departments .

1.2. Comparison of the international financial institutions ' anti-money laundering supervision and information management system

In recent years , China Financial institutions anti-money Laundering supervision information Management System Day Refine . based on collected information , Mainland China a large financial institution Information Management system mainly includes the People's Bank of China Anti-Money Laundering Bureau, etc. First Components (See table 1).

Hong Kong as an international financial centre , Its financial institutions intelligence Tube The system features a distinct , and is worth the benefit of . based on collected data , The incense Large international financial institutions in Hong Kong anti-money laundering supervisory intelligence management system mainly from the Financial Services and the Treasury Bureau of Hong Kong, etc. A A related party composition (See table 2. century , United States Anti-money laundering comprehensive strengthening , in Country International has a profound impact , Its intelligence management system is strict , results . based on collected data , The United States a large international financial institution Anti-money laundering supervisory intelligence management system mainly from FinCEN (US finance law Enforcement Network) etc ? Group of related parties (See table 3).

2. Research methods and data sources

Anti-money Laundering supervisory information management based on social network analysis

System social networking analysis in the social sciences research , main structure , Unlike regular social statistics processing is attribute data , embodies

handles relational data , The Central concern of is the between the data Out of the ontology , The uniqueness of epistemology and methodology , helps to help from

Relationship , Research and analyze various phenomena and organizations from a relational perspective Multiple angle analysis , Research issues M . current , Social network analysis

Money Report and safe database ; Large financial institutions in Hong Kong Intelligence Management data source , mainly from public financial institutions listed Annual report Hong Kong United Fortune Investigation Intelligence Unit Open Database ; U.S. large Financial Institutions Intelligence management data source , mainly from its public finance Institutional listing ,FinCEN site databases and case studies ; its remainder individual data from FATF, FIUs International Organization web site . based on data availability and Reliability , Information Management of financial institutions in the case of the Intercept between 2011-2014 year .

3. International financial institutions anti-money Laundering Supervision information Management Social network analysis

3.1. Visual analysis of information management on anti-money-laundering supervision of financial institutions

in 2011-2014 years , Anti-money-laundering watchdog of a large financial institution in China Manage Intelligence Management system form on related parties , is a Lineof the column 1- modulo matrix . use ucinet6.0 Software , for Our country Information management system of anti-money laundering supervision of large financial institutions social network relationship (See figure 2). can see , Full network density level is very strong , density great difference ,FATF , and so on , Central Bank anti-Money Laundering Bureau , Internal Controls compliance three organization " Center status Obvious , chief risk officer , Risk Management Department , Gold Market Department ,China Anti-Money Laundering monitoring and analysis Center in second level , Other institutions are essentially in the edge area .

in 2011-2014 years , Anti-money laundering of a large financial institution in Hong Kong Regulatory Intelligence Management System form related , To form a Line of the column 1- modulo matrix . use Ucinet6.0 software , to get the incense Hong Kong a large anti-money laundering regulatory intelligence Management

System social network relations (See diagram 3. can see , Overall network hierarchy clear , FATF etc , Risk Control Department , Financial Supervision Department , Customer Four departments are in a central position , scholar , academic institution , customs ,, Security Bureau Narcotics Division , Chairman, etc in the three levels , the rest of the organization is at the second level .

in 2011-2014 years , Anti-money laundering in a large U.S. financial institution The regulatory Intelligence Management system has formed a - Related parties , is a Line , Columns 1- modulo matrix . use Ucinet6.0 software , available for us A large anti-money-laundering regulatory intelligence Management System social network relationship (See figure 4). the entire anti-money laundering regulatory Intelligence Management System , network density reasonable , Integrity highlighting .

3.2. Financial Institutions anti-money laundering supervision and information management

Overall network secret degree in the intelligence management system of a large financial institution in mainland China , net The envelope density and its standard deviation are . 116% and 938% , data Lower , shows extremely uneven network connectivity, Overall network density very low , urgent need to be enhanced , combination diagram 2 , also proves this . Middle network Envelope Center potential , close to Network center potential , feature vector etc three indicators respectively to 4. 447% , 51.973% and No . 961% , Description This network is weak network connection diagram , Some related parties strong independence (See table 4).

Information Management Social network in a large financial institution in Hong Kong Body Network structure , network density and its standard deviation is 164% and15.035%, Union chart 3 analysis , Lower Data , Entire Network density Lower , network nodes with sparse-density levels are significantly . Middle network Envelope Center potential , close to Network center potential and eigenvector, etc. three indicators not to 5. 332%,,004% , and . 920% , indicates a weak network Envelope Connection diagram , Part of the Information management related party in the entire network system with no obvious (See table 5.

Information Management Social network in a large U.S. financial institution Body Network structure , network density and its standard deviation is 45. 887%

and 20.383%, Union diagram 4 parsing , data is moderate , Entire Network density moderate , no obvious highlights , indicates that all relevant parties act evenly , As a wholeis reasonable . Middle Network Center potential , close to Network center potential and features to The quantity is three indicators, respectively 3. 30%, 062% and 973%, can see strong connection diagram , All relevant parties in the network are tightly connected , Form a more complete overall (See table 6) .

3.3. Financial Institutions anti-money laundering supervisory

Intelligence Management related Party center Degree Center of our financial institutions (degree centrality) =Mark , The top three institutions are FATF , and so on , Internal Controls compliance Department , Central Bank anti-Money Laundering Bureau , describes their impact in social networking relationships Strongest First level , respectively up to , and ; chief risk officer , Financial Markets Department , China Anti-Money Laundering monitoring and Analysis Center , in charge Vice President , Risk Management Department , Regional Central Bank anti-Money Laundering Bureau Branch Office , Board RiskAdministrative Committee , President , The Operations Management Department totals , To form a second layer times , strong influence ; The remaining intelligence management-related parties are only , To form the first three levels , impact less on influence . Middle-center sex (betweenness) indicator , FATF , Central Bank anti-Money Laundering Bureau , Internal Controls Compliance Three department data very high , total up to ? out , and many other The department can even be ignored , indicates that these three departments are the entire network on " core " , has an enormous "" ' " in anti-money laundering Supervision Intelligence management Right Force . near center(closeness centrality) indicator ,FATF etc , Control Compliance Department , Central Bank anti-Money Laundering Bureau three institutions data highest , respectively up to. 667 , 194 and . 875 , describes anti-money laundering regulations report admin , These three departments themselves have resource-rich , can be minimized Most resources are

called within the time . Vector Center (eigenvector) indicator ,, Central Bank anti-Money Laundering Bureau ,,FATF and so on and control compliance is in front column ,all above , indicates that these three institutions are in the core of the entire network Heart Status .

Hong Kong financial Institutions dot Central (degree centrality) indicator , Risk Control Department ,FATF etc , Financial Supervisory Authority , Financial Institutions guest users , Auditing and risk management Management Authority in the forefront of data , Other phases customs influence descending . Middle-center sex (betweenness)refers to Mark , FATF wait , Risk Control Department ,, Auditing and risk Management committee data Top column , all ten above , become Entire Network "" Right "" firstlevel , Financial Supervision Bureau , financial institution customer , taxes ,, Chairman and Customs to form a second level , The remaining information management related Parties form the third level . close to center (Closeness centrality) indicator , Risk Control Department ,FATF , and so on , Financial Supervisory Authority , Financial institution customer , Federated Wealth Check Intelligence Group , anti- Corruption agency data in the forefront , five departments Anti-Money laundering regulation resource rich ,Invoke resource convenience . Vector Center ((Eigenvector) indicator , except Customs , Security Bureau Narcotics Division , Academic Machine construct and expert scholar outside , the rest of the Organization's data are not very volatile , More All value .

US financial institution Dot Central (degree centrality) indicator , RCD,CRO, FinCEN , FATF , DIR , dcibr related parties decreasing in descending , remaining bodies descending , But no significant changes . Middle Center sex (betweenness) indicator , usdj,RCD, FinCEN, CRO Four institutional advantages obvious " power " The effect is more pronounced . connect near center (closeness centrality) indicator , RCD , CRO , FinCEN , FATF , DIR Higher organization data , describes these departments The IS relatively rich with resources . Vector Center (eigenvector) indicator , RCD,CRO, FinCEN,FATF, organizations with DIR have relatively high power across the network . overall ,also indicates that each organization is mutually constituted - relative Balance , interconnected Intelligence Management network overall , Structure to reasonable .

4. Epilogue

This article takes the international large financial institutions anti-money laundering Supervision Intelligence management Body To Research objects , using social network analysis as the main research method , Pass Compare analysis China , Hong Kong and the United States three agencies anti-money laundering regulation report The main related party contacts . from a social network relationship can be view, network density , Center Depth social networking relationships parsing , anti-washing of Chinese financial institutions in the context of improving RMB internationalization Money Regulatory Intelligence Management system has important reference value .

Review The existing anti-money laundering regulatory intelligence Management System of the Edge edge mechanism , play as financial customer , Academic research institutions and experts and scholars The potential value of . FATF in the fourth round of mutual assessment guidance for Member States report , explicitly puts emphasis on the financial client in intelligence management , Section Research academic institutions and experts and scholars Cooperation and coordination , help improve sentiment Report efficiency of administration [[] . Current anti-money laundering Supervisory Intelligence Management System , FATF etc , Central Bank anti-Money Laundering Bureau , Internal Control Compliance Department three institutions single large , Other [] occupied resources , The sum of the center and the total resources even the is less than the three institutions . This leads directly to the remaining Resource effects cannot be fully played , affect intelligence management Body is the performance of the overall network . so , as the RMB internationalization steps advance , China's financial institutions anti-money laundering supervisory intelligence management system needs re-launch " top-level design especially focus on playing the rest of the Love Report The role of a related party , properly extend their functions and permissions .

effectively activates the internal dynamics of financial institutions , actively promote Intrinsic Drive dynamic

governance "" Construction of intelligence management mode . Create anti-money laundering Regulatory Intelligence letter

Sharing System , effectively activates the internal dynamics of financial institutions , helps promote the scientific and efficient regulation of anti-money laundering in our country . compared to, Hong Kong , U.S. financial institutions anti-money laundering regulatory Intelligence Management System , More focus on internal intelligence management related parties coordinated governance , To form a Close high , Cooperative network , essentially represents a Intrinsic Drive dynamic governance " mode ; and in our anti-money-laundering regulatory Intelligence Management System , FATF and other international anti-money laundering organizations effect , powerful , Domestic reverse-wash Money Organization and financial institutions internal anti-money Laundering Intelligence Management related party tightness low , Too few resources ,represents the essence of external push for governance mode , Urgent Need to be improved .

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