



**INSTITUTE OF BANKING AND FINANCE
OF TRINIDAD AND TOBAGO**

Newsletter

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**Pg 1: FEATURE ARTICLE: AI in AML Transaction Monitoring:
From Rules to Risk-Based Intelligence**

Pg 4: Educational Programmes Opportunities

Pg 7: Upcoming Training

AI in AML Transaction Monitoring: From Rules to Risk-Based Intelligence

(2 Part Series)

by: *Candice Huggins, Compliance and AML Consultant*



Artificial intelligence (AI) is no longer a futuristic concept for compliance teams; it is steadily becoming a core enabler of how financial institutions manage money-laundering risk and regulatory obligations. Across the AML value chain, from onboarding and screening through to investigations and reporting, AI and machine learning (ML) are transforming long-standing processes that have historically relied on static rules and manual analysis. Nowhere is this more evident than in transaction monitoring, where institutions can realise some of the most immediate and tangible benefits.

The Limitations of Traditional AML Monitoring

Conventional AML transaction monitoring systems were designed in an era when volumes were lower, payment channels were simpler, and expectations around data and analytics were more modest. Typically, these systems are:

- Primarily rule-based, relying on pre-set thresholds and scenarios
- Characterised by high false-positive rates, generating large volumes of alerts that do not represent true risk
- Operationally inefficient, requiring considerable human intervention and driving up cost

The result is a familiar pattern: overworked analysts, alert fatigue, and a monitoring posture that struggles to keep pace with increasingly sophisticated financial crime.

How AI Changes the Monitoring Paradigm

AI and ML support a more dynamic, risk-sensitive approach to transaction monitoring. Instead of rigid rules, AI-enabled systems leverage a range of mechanisms that collectively improve detection, efficiency, and scalability:

- 1. Machine Learning Algorithms:** ML models can learn from historical data—alerts, investigations, SARs—and continuously refine their understanding of what constitutes truly suspicious behaviour. They can identify non-linear patterns and combinations of indicators that traditional scenarios simply cannot capture.
- 2. Behavioural Analytics:** Rather than assessing transactions in isolation, AI tools construct behavioural profiles over time—at customer, segment, or even network level. Abrupt changes, anomalies, and unexplained deviations become triggers for closer review, aligning more closely with how money launderers actually operate.
- 3. Natural Language Processing (NLP):** NLP can process unstructured data such as narrative fields, KYC notes, open-source intelligence, and even internal correspondence to enrich risk assessments and investigations.

4. Real-Time Monitoring Engines: AI models

embedded in real-time or near-real-time engines enable earlier detection of suspicious activity, giving institutions the opportunity to intervene before losses escalate or regulatory breaches occur.

- 5. Risk Scoring and Prioritisation:** By aggregating factors—customer risk, transaction behaviour, geography, products, counterparties—AI systems assign risk scores that help teams prioritise the most material alerts. This supports a more strategic allocation of scarce compliance resources.

Key AML Typologies Addressed by AI

With adequate data and proper model design, AI-enabled transaction monitoring can address a broad range of money-laundering typologies, including:

- **High-risk jurisdictions and cross-border activity:** Patterns of movement into and out of sanctioned or high-risk countries, including complex routing through multiple intermediaries.
- **Domestic funnel accounts and pass-through activity:** Rapid in-and-out flows through personal or business accounts that act as conduits rather than genuine operating accounts.
- **Shell companies:** Entities with opaque ownership structures, limited legitimate business activity and transaction flows inconsistent with their stated profile.
- **Structuring or smurfing:** Breaking down large amounts into smaller transactions designed to avoid reporting thresholds.
- **Money muling:** Third-party accounts used, knowingly or unknowingly, to move illicit funds on behalf of organised crime groups.

As data quality improves and institutions integrate additional sources (KYC, trade data, device data), the typology coverage and sophistication of AI models can increase correspondingly.

The Business Case: Benefits of AI in Transaction Monitoring

For financial institutions, the business case for AI in AML monitoring rests on both risk reduction and tangible operational gains. Properly implemented, AI can deliver benefits in several key dimensions:

1. Operational Efficiency

- ✓ Significant reductions in false positives, often up to 90% in some implementations
- ✓ Automated alert triage and prioritisation, which reduces manual triage and review effort

2. Cost Savings

- ✓ Fewer hours spent on low-value manual reviews
- ✓ Lower overall expenditure on investigating and closing false alerts
- ✓ Reduced exposure to regulatory fines as the quality and consistency of monitoring improves

3. Improved Detection

- ✓ Enhanced capability to uncover complex, previously unknown patterns of money laundering and fraud
- ✓ Adaptive learning as the models are retrained with new data and typologies

4. Scalability

- ✓ Ability to handle rising transaction volumes and new channels without linear increases in headcount
- ✓ Flexibility to respond to new products, regulatory demands, and market expansion

5. Faster Response Times

- ✓ Near-real-time risk assessments that enable earlier internal escalation and reporting
- ✓ Reduced financial loss and reputational damage when issues are caught earlier in the lifecycle

A hypothetical “Alpha Bank” illustration highlights the potential: false positives reduced from 95% to 20%, analyst time per alert cut from 30 minutes to 5 minutes, a 60% reduction in compliance headcount, and material declines in fraud losses and regulatory fines.

Understanding the Cost Side of the Equation

While the benefits are compelling, institutions must approach AI adoption with a clear view of the cost components and their ongoing obligations:

1. Initial Investment

- ✓ Platform licensing or bespoke development
- ✓ Infrastructure upgrades such as cloud services, secure data storage, and connectivity
- ✓ Integration with existing core banking, case management, and data warehouses

2. Training and Talent

- ✓ Recruitment of data scientists, ML engineers, and model risk specialists
- ✓ Upskilling of existing compliance and audit staff to understand model outputs and limitations

3. Ongoing Maintenance

- ✓ Periodic model retraining, validation, and recalibration
- ✓ Continuous regulatory compliance reviews and internal audit oversight
- ✓ System patching, upgrades and support arrangements

4. Data Privacy and Model Risk

- ✓ Controls around the handling of large volumes of sensitive personal and transactional data
- ✓ Cost of addressing model bias, drift, and miscalibration
- ✓ Investment in robust model-risk-management frameworks and governance

This is not a one-off technology purchase; it is a long-term operating commitment that must be embedded into the institution’s broader risk-management framework.

Ready to peek into the future of AML, where AI takes us from rule books to real-time risk intelligence? If this sparks your curiosity, then you definitely don’t want to miss our upcoming workshop!

Scan the QR code on page 7 and save your seat before it’s gone.

Workshop: *Anti-Money Laundering and Financial Crime: Opportunities, Risks and Challenges*

Date: Jan. 14th, 2026 | **Facilitator:** Ms. Candice Huggins | **Time:** 9:00 am – 4:00 pm | **Delivery:** Online

Cost: \$2,000.00 plus VAT | **CPD Hours:** 6

IBF's Educational Programme Opportunities



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”

Marsha Elizabeth Basant
Supervisor – Sales and Service
Trinidad and Tobago Unit Trust Corporation



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- Obtain an industry-recognized professional qualification that can improve opportunities for career-advancement.
- Self-study format, beneficial for busy professionals.



EXAMINATION PERIOD: APRIL 27TH - MAY 1ST, 2026

REGISTRATION DEADLINE: FEBRUARY 20TH, 2026

Ideal for busy professionals!

IBF's List of Training Topics 2026

Anti-Money Laundering and Financial Crime: Opportunities, Risks and Challenges

Date: Jan. 14th, 2026; Facilitator: Ms. Candice Huggins; Time: 9:00 am - 4:00 pm;
Delivery: Online; Cost: \$2,000.00 plus VAT; CPD Hours: 6

Supervisory Excellence: Driving Team Efficiency and Success

Date: Jan. 20th, 2026; Facilitator: Ms. La-Toya Griffith; Time: 9:00 am - 4:00 pm;
Delivery: In-person; Cost: \$2,000.00 plus VAT; CPD Hours: 6

Professional Makeover: Strategies for Work and Life Effectiveness

Date: Jan. 28th, 2026; Facilitator: Ms. Joel-Ann Cook-Walcott; Time: 8:30 am - 4:00 pm;
Delivery: In-person; Cost: \$2,100.00 plus VAT; CPD Hours: 6.5

Credit Analysis and Loan Assessment for Microfinance Lending

Dates: Feb. 25th & 26th, 2026; Facilitator: Mr. Andre Falby; Time: 8:30 am - 4:00 pm;
Delivery: In-person; Cost: \$2,625.00 plus VAT; CPD Hours: 6.5

Debt Recovery and Delinquency Management

Dates: March 25th & 26th, 2026; Facilitator: Mr. Andre Falby; Time: 8:30 am - 4:00 pm;
Delivery: In-person; Cost: \$2,625.00 plus VAT; CPD Hours: 6.5



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Explore cutting-edge AML/CFT strategies, tech-driven compliance, and regional case studies in our one-day workshop tailored to financial institutions in the Caribbean and beyond. Understand the rapidly evolving AML landscape and learn practical tools to strengthen compliance and mitigate financial crime risks.

WHO SHOULD ATTEND?
Professionals from across the banking and financial services sector, including compliance, auditing, legal, and staff from institutions such as banks, credit unions, and investment firms.

14th January, 2026
9:00 AM - 3:00 PM

Online Delivery
CPD HOURS: 5.5

\$2,250 VAT Inclusive

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- People Management in the Age of AI
- Supervisory Training

Technical

- Advanced Treasury Management
- AML/CFT for Non-Profit Organizations
- Analysing Financial Statements
- Anti-Money Laundering/Counter Financing of Terrorism
- Credit Analysis & Loan Assessment for Microfinance Lending
- Credit Assessment and Proposal Writing
- Debt Recovery and Delinquency Management
- Enterprise IT Security & Cyber Security in the Cloud
- Enterprise Risk Management
- Project Management
- Environmental, Social & Governance Fundamentals
- Ethics for Financial Service Providers
- Financial Planning
- Foreign Exchange and Derivatives
- Introduction to Accounting & Finance for Non-Financial Professionals
- Investment Management
- Mastering Policy Development: A Practical Guide to Clarity & Compliance

Holiday Closing Dates 2025-2026

Please be advised that our office located on:

Level 1 Invader's Bay Tower, Invaders Bay,
Off Audrey Jeffers Highway,
Port of Spain

would be closed from:

Thursday 25th December, 2025 - Friday January 2nd, 2026

Season's Greetings

from the Management and Staff of the
Institute of Banking and Finance of Trinidad and Tobago



INSTITUTE OF BANKING AND FINANCE
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