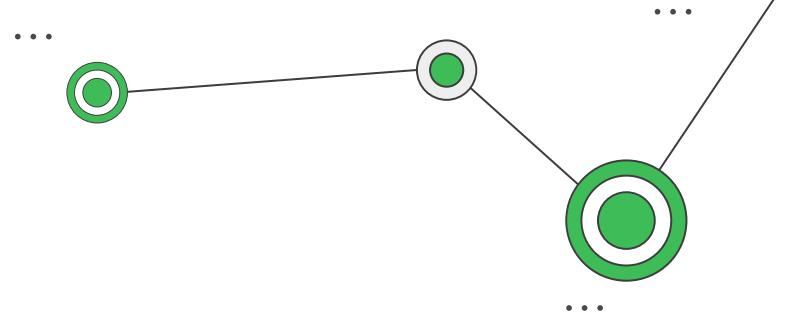


# Deloitte.



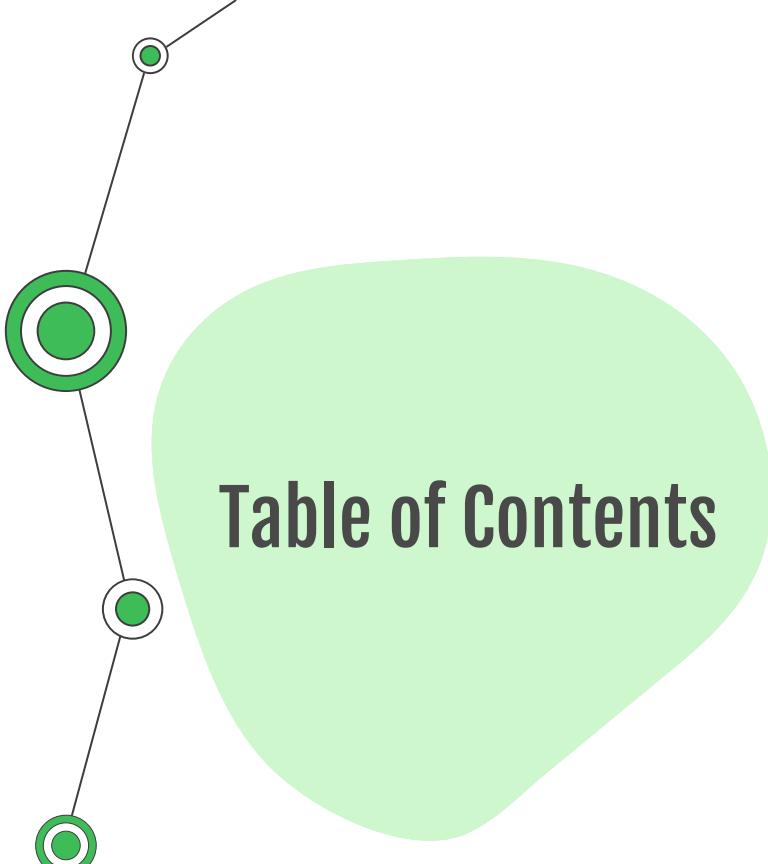
# Lumbago Edge Bank

Investigating Fraud Utilising Advanced Analytical Techniques

NBS BAC Hackathon

VSLAM

Ananya Balehithlu | Bai Shun Yao | Max Tan Zheyuan  
Tan Kit Hon, Luke | Vinay Krishnaa Vinod



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## Recommendations

Tackling risk profiles



## Laundering Detection

Proposed approach



# 01

## Scope

Scope

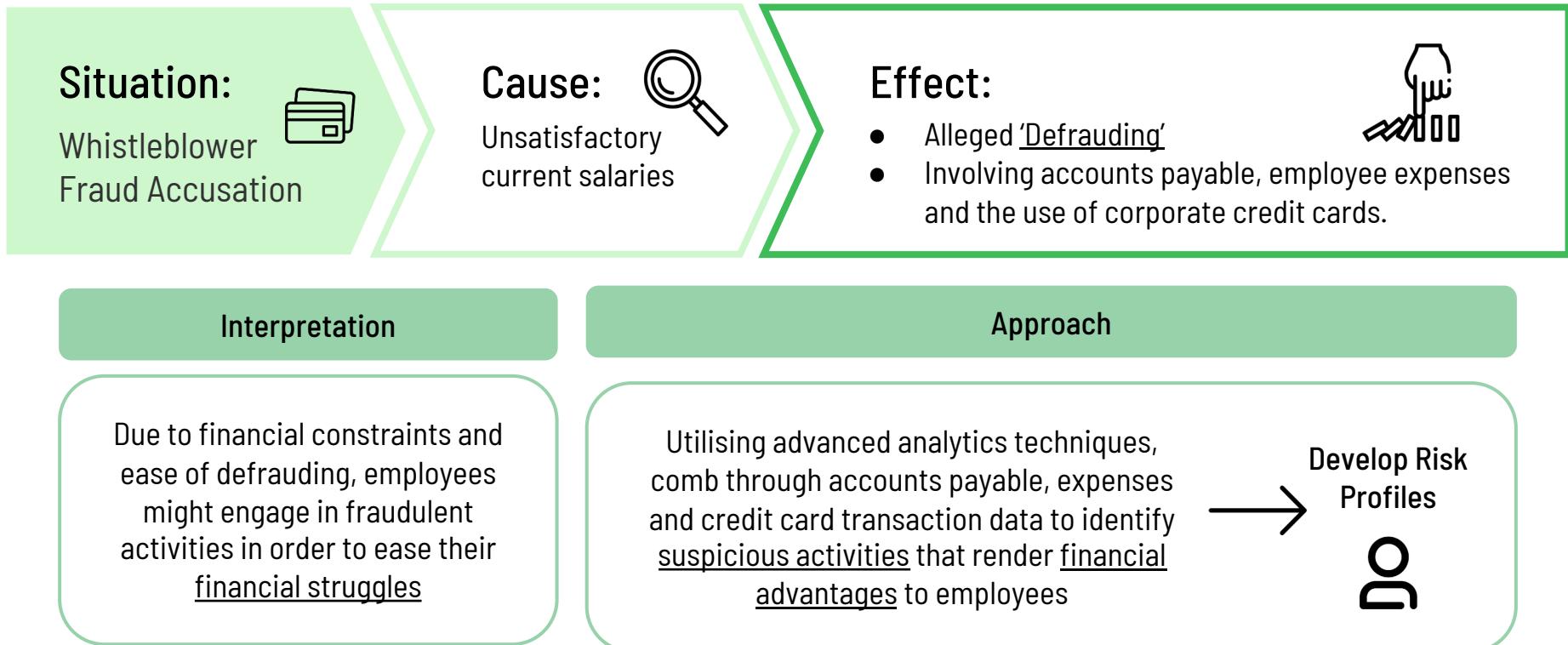
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# Situational Analysis & Our Interpretation



Scope

Data Exploration

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# 02

## Data Exploration

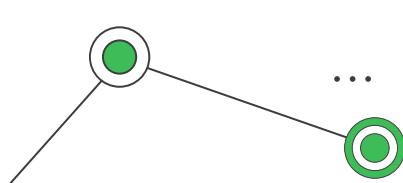
Scope

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# Assumptions & Limitations

## Accounts Payable Data

- Vendor: Without information as to when vendors have been “deactivated” or “discontinued”, we assumed that no transactions to these vendors have ever been approved.
- Invoice: Other than November 2021, where data is missing, the remainder of all invoices have been accurately recorded.
- Payment: No payment is made before an invoice is issued.

## Credit Card Data

- Transaction Data & Leave:
  - Assumed no system error (e.g. duplicated information was manually inputted)
  - Assumed nature of transaction ID (e.g. must be unique & numeric)
  - Assumed that some columns were not mandatory to fill in (e.g. comments)

## Payroll Data

- Employee Information
  - Assumed lack of personal particulars is unintentional negligence (missing/duplicate addresses, numbers)
- Payslips
  - Assumed ordinary earnings for each employee remain largely similar through the 6-month period
  - Assumed pensions to employees are outflows while deductions from employees are inflows of cash

Scope

Data Exploration

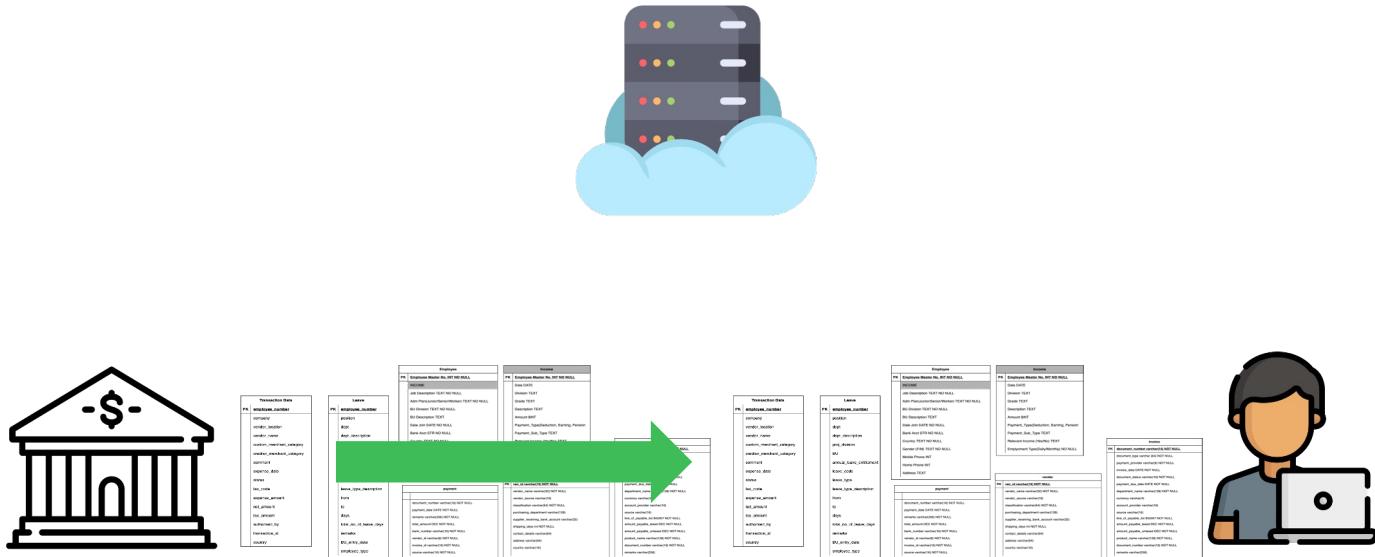
Risk Profiles

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# Workflow

## From the Bank



# Scope

## Data Exploration

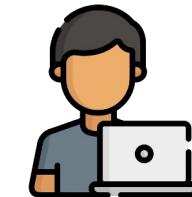
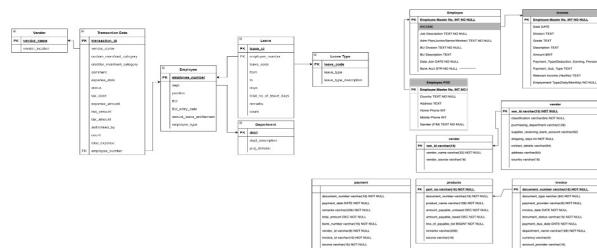
## Risk Profiles

## Recommendations

## Laundering Detection

# Workflow

# Migration



Scope

Data Exploration

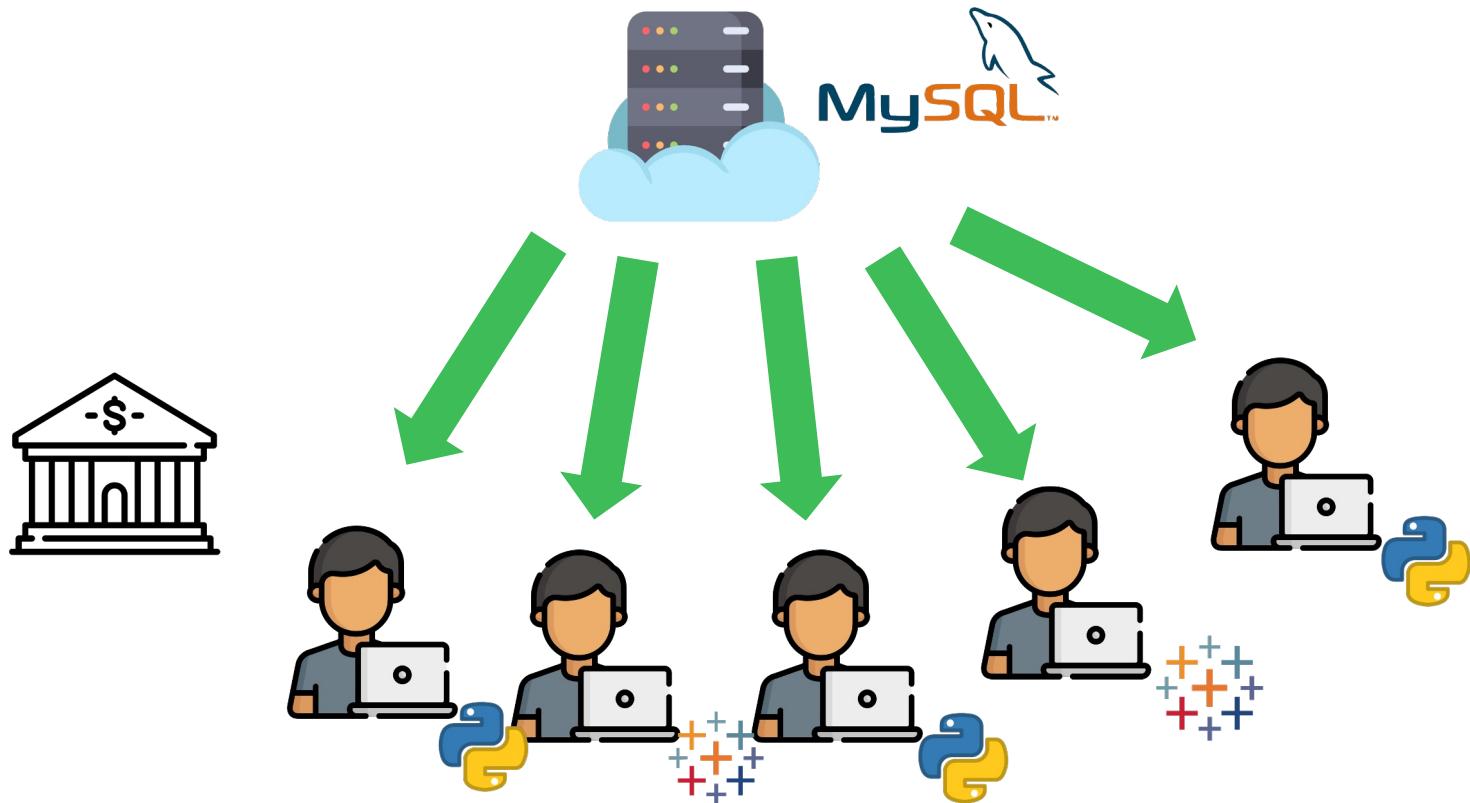
Risk Profiles

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# Workflow

## Analysis Process



Scope

Data Exploration

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Laundering Detection

# 03

## Risk Profiles

Scope

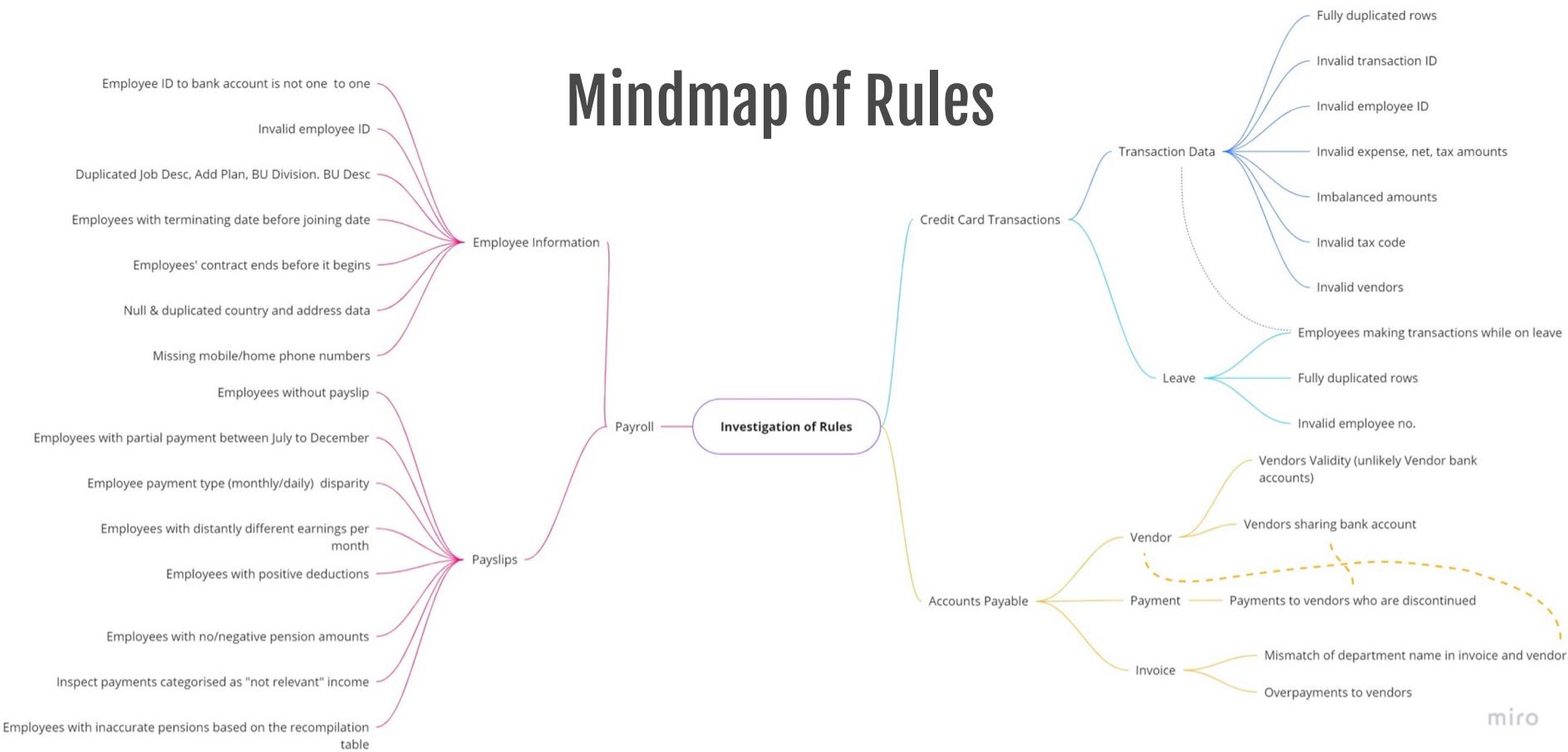
Data Exploration

Risk Profiles

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# Mindmap of Rules



miro

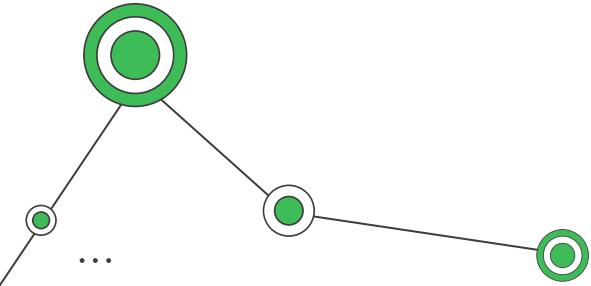
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# Risk Profiles



## Disruptive Actors

Invalid entries



## Ghost Actors

Fake employees/vendors



## Malicious Actors

Insiders with malicious intent

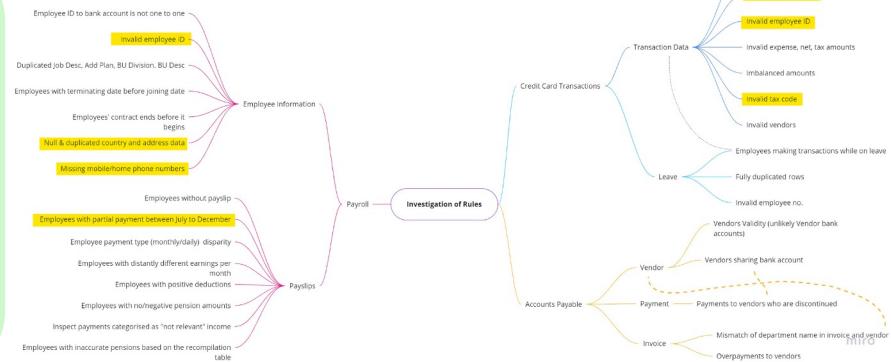


# Disruptive Actors

People who make invalid entries.

## Proposed Rules

1. Invalid transaction IDs (Credit Card)
2. Invalid employee numbers (Credit Card)
3. Invalid tax codes (Credit Card)
4. Invalid/missing employee particulars (Payroll)
5. Deviations in ordinary payments (Payroll)



Total Amount Lost  
**\$ 4,717,165.12**

**17.4%**

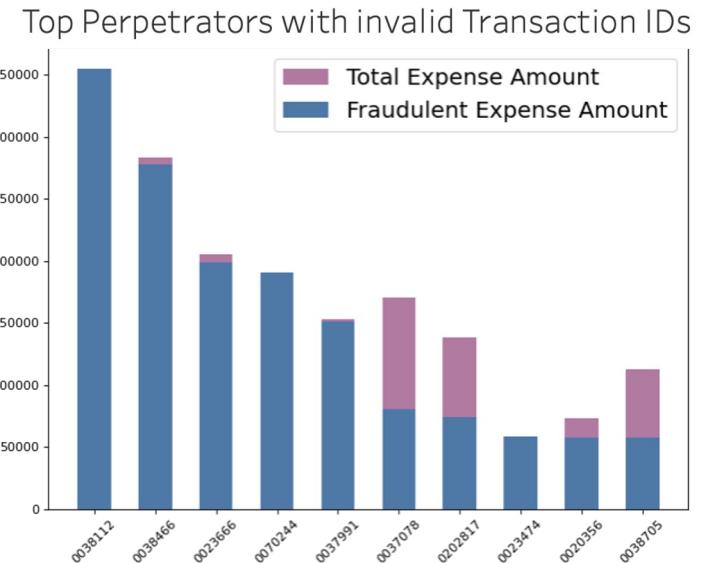
Number of Suspected Actors  
**1277**

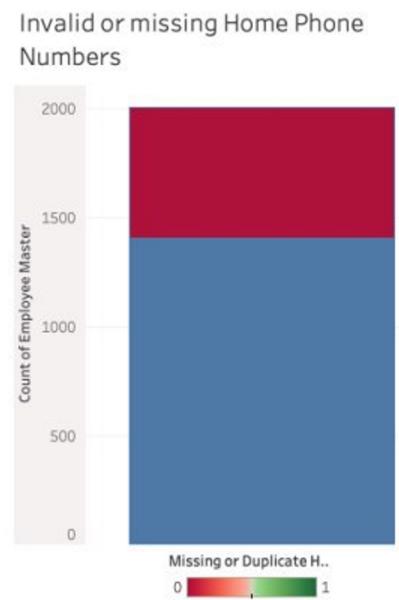
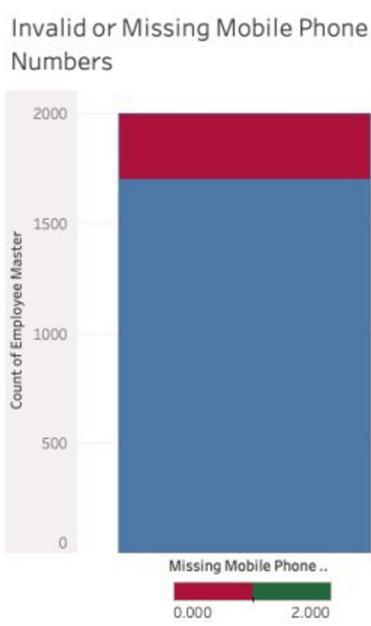
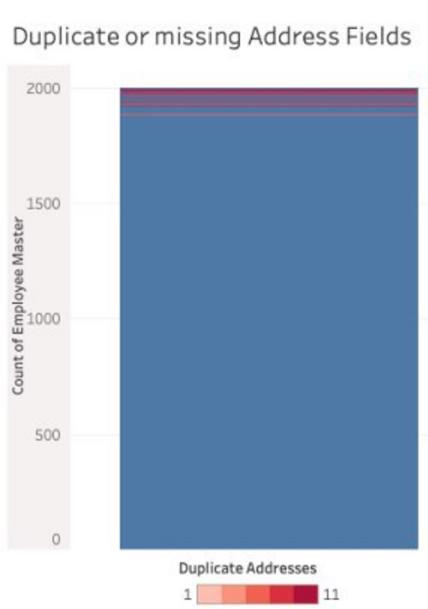
### Most Prominent Rule

Invalid Transaction IDs

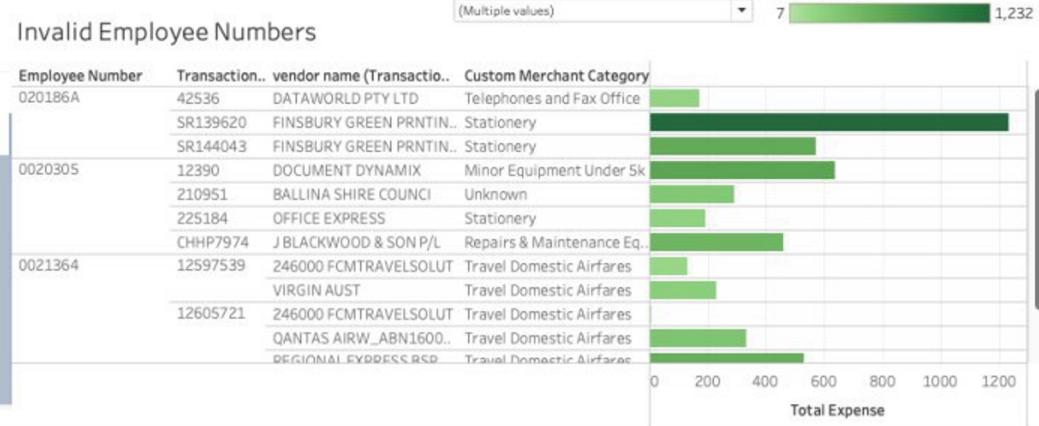
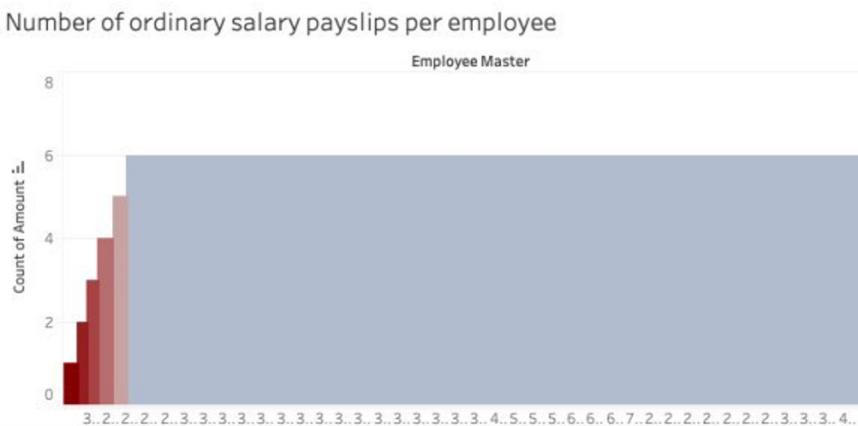
1276 employees committing fraud caught

Implementing rule prevents significant loss





# Snapshot of Tableau Dashboard for Disruptive Actors



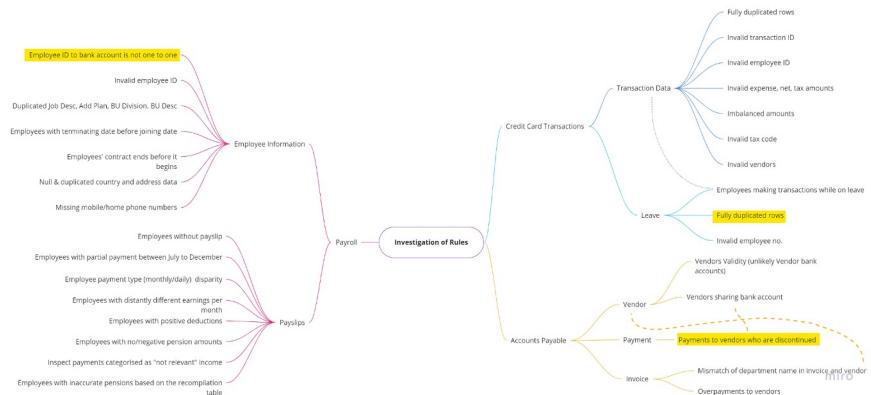


# Ghost Actors

People not part of the organisation

## Proposed Rules

1. Duplicate rows (Credit Card Data)
2. Fake vendors (Accounts Payable Data)
3. Employees with matching bank accounts (Payroll Data)



Total Amount Lost  
**\$ 219,542.84**

Number of Suspected Actors  
**1,325**

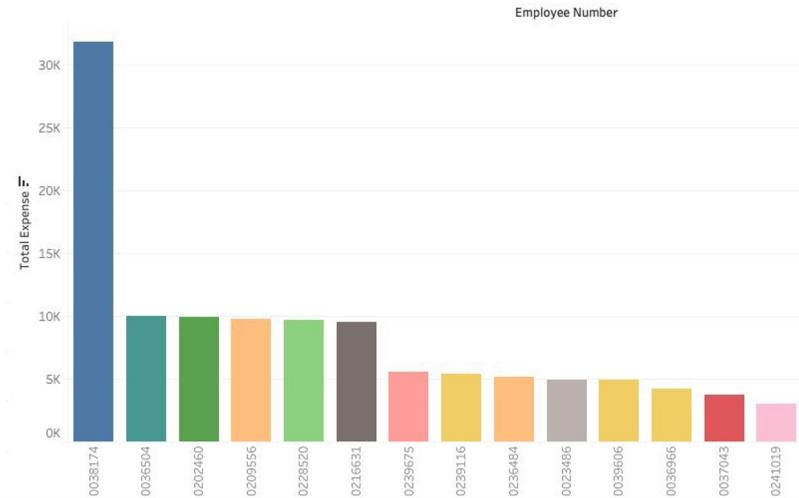
### Most Prominent Rule

#### Duplicate Rows in Credit Card Data

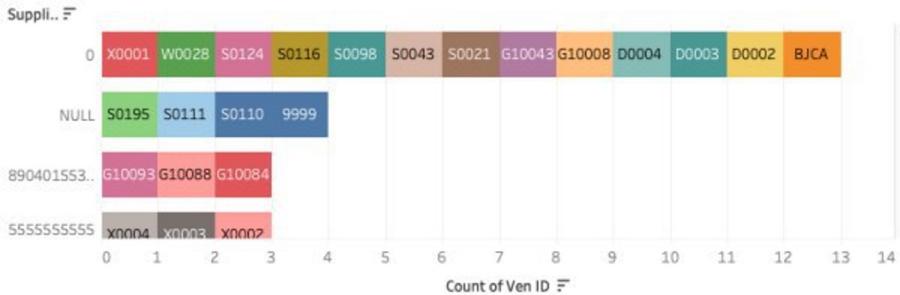
Rows that are 100% alike in all attributes are indicative of invalid/unauthorised transactions.

The same transactions are charged multiple times. This could indicate cash flow to dummy actors

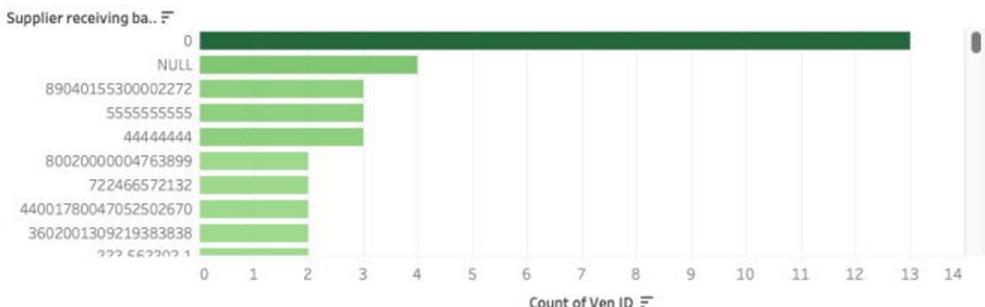
Total expense amount for duplicated rows



#### Unlikely vendor bank accounts



### Number of occurrences of bank accounts



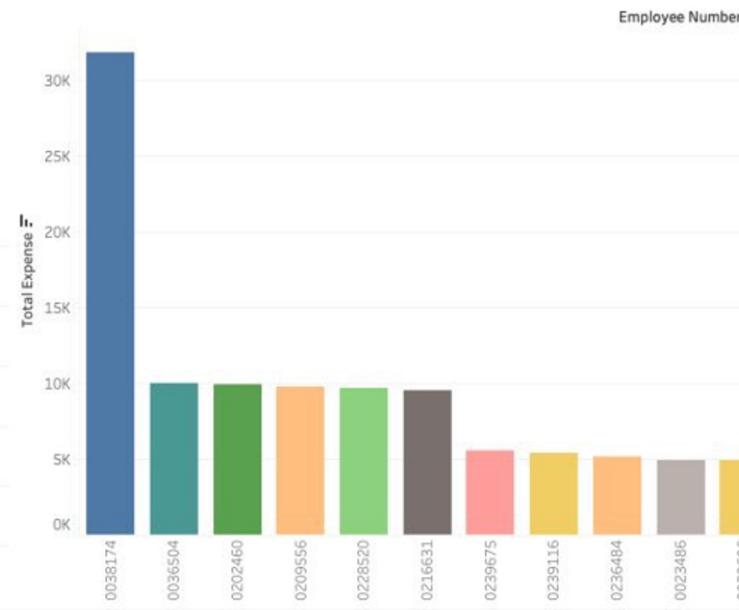
## Employees with matching Bank Accounts

Employee Master (..)	Bank Acct	
Null	282-8803243	Abc
20186	282-8803243	Abc
38776	5555555555	Abc
454690	5555555555	Abc

### Total value of duplicated rows



Total expense amount for duplicated rows

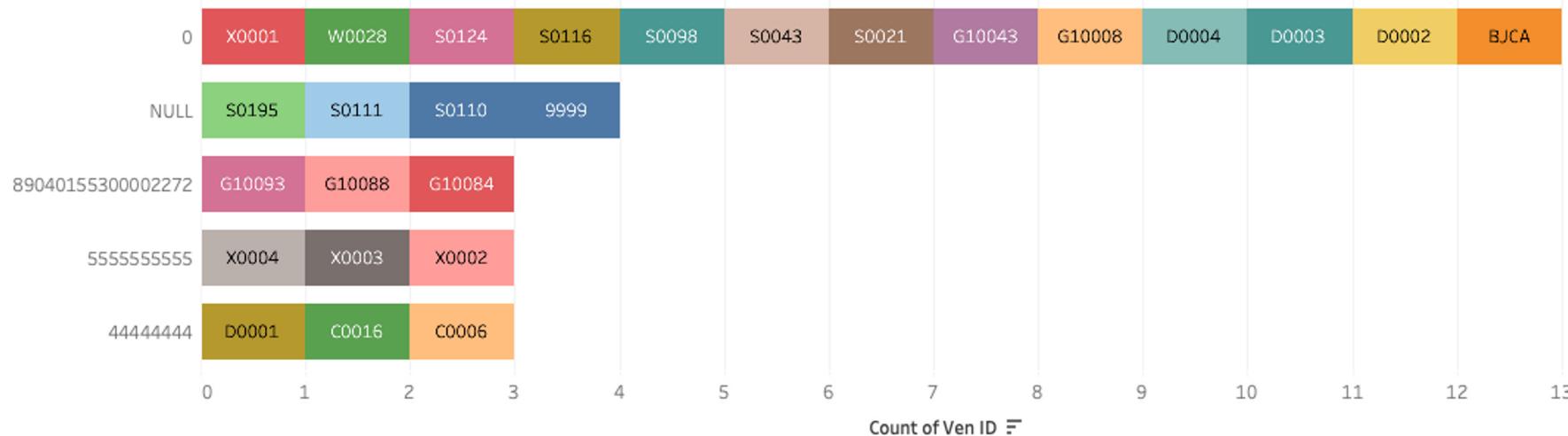


# Snapshot of Tableau Dashboard for Ghost Actors

Some vendors have unlikely bank accounts listed,  
suggesting that money could have been siphoned away as false payments.

### Unlikely vendor bank accounts

Supplier receiving ba..



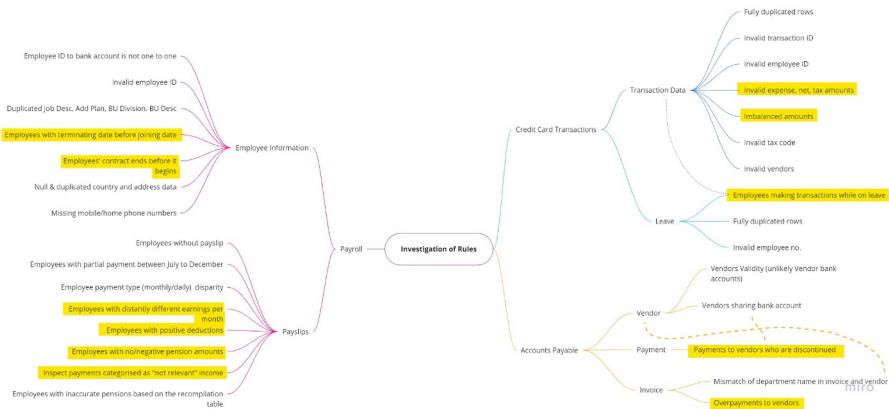
## Proposed Rules

1. Employees making transactions during leave (Credit Card)
2. Negative amounts (Credit Card)
3. Amounts should tally with each other (Credit Card)
4. Payments to discontinued/deactivated vendors (Accounts Payable)
5. Overpayments to vendors (Accounts Payable)
6. Embezzlement by ex-employees (Payroll)
7. Particular performance grade has abnormally high salary (Payroll)
8. Deductions recorded as cash outflows (Payroll)
9. Pensions recorded as cash inflows (Payroll)
10. Large payments recorded as "not relevant" income (Payroll)



# Malicious Actors

Employees abusing authority



Total Amount Lost  
**\$17,558,122.6**

Number of Suspected Actors  
**2,484**

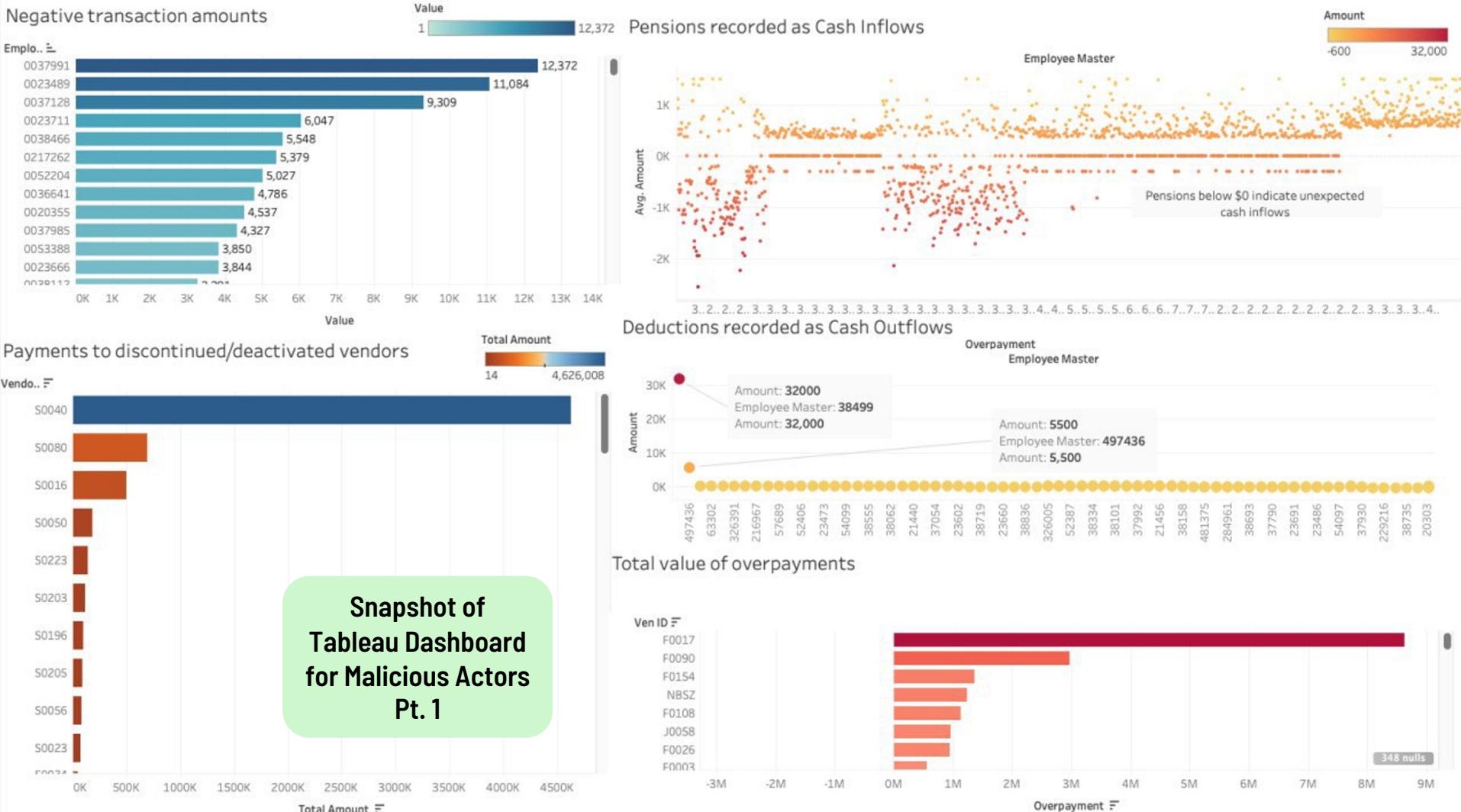
### Text Mining Approach

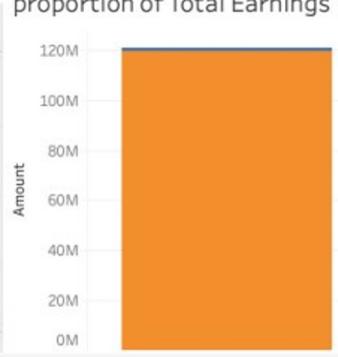
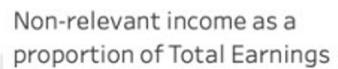
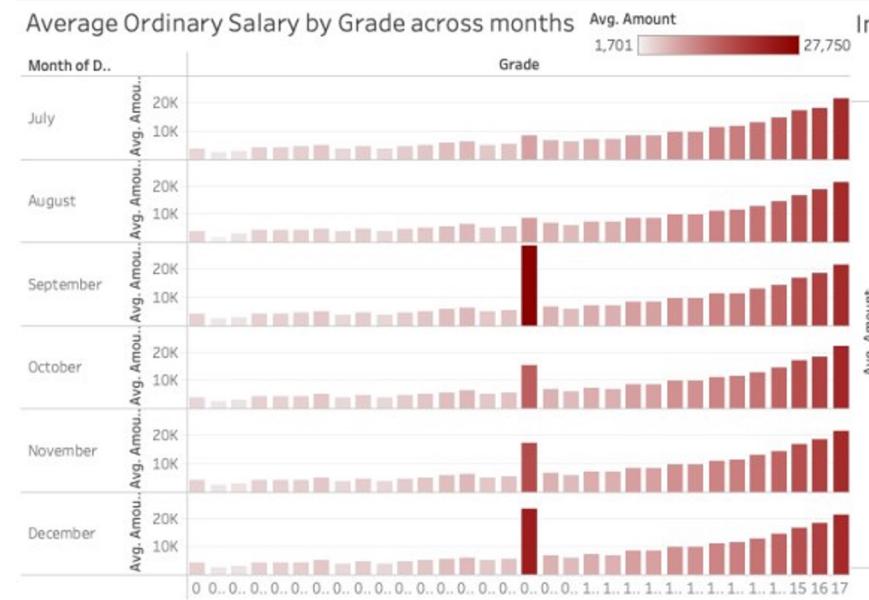
Negative values in transactions are dangerous as they could hide fraudulent amounts transacted

However, upon closer inspection, there is a need to check if transaction is a refund or reimbursement → legitimate transactions

**Text Mining on "comment" column** to eliminate legitimate negative amount transactions

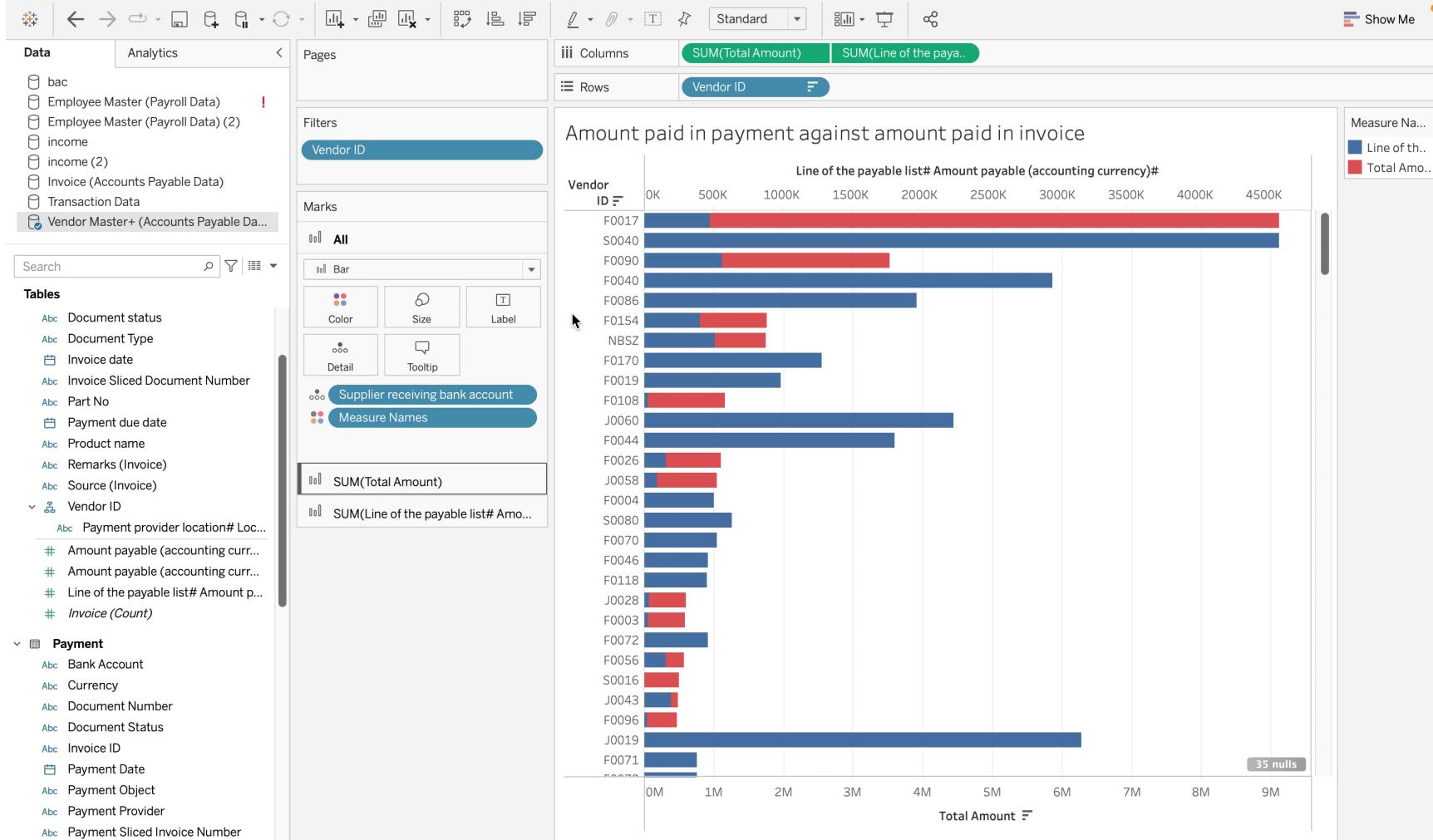
After filtering refunds and returns, remaining transactions that have negative expenses are considered suspicious. This fraud results in the company incurring more expenses than reflected

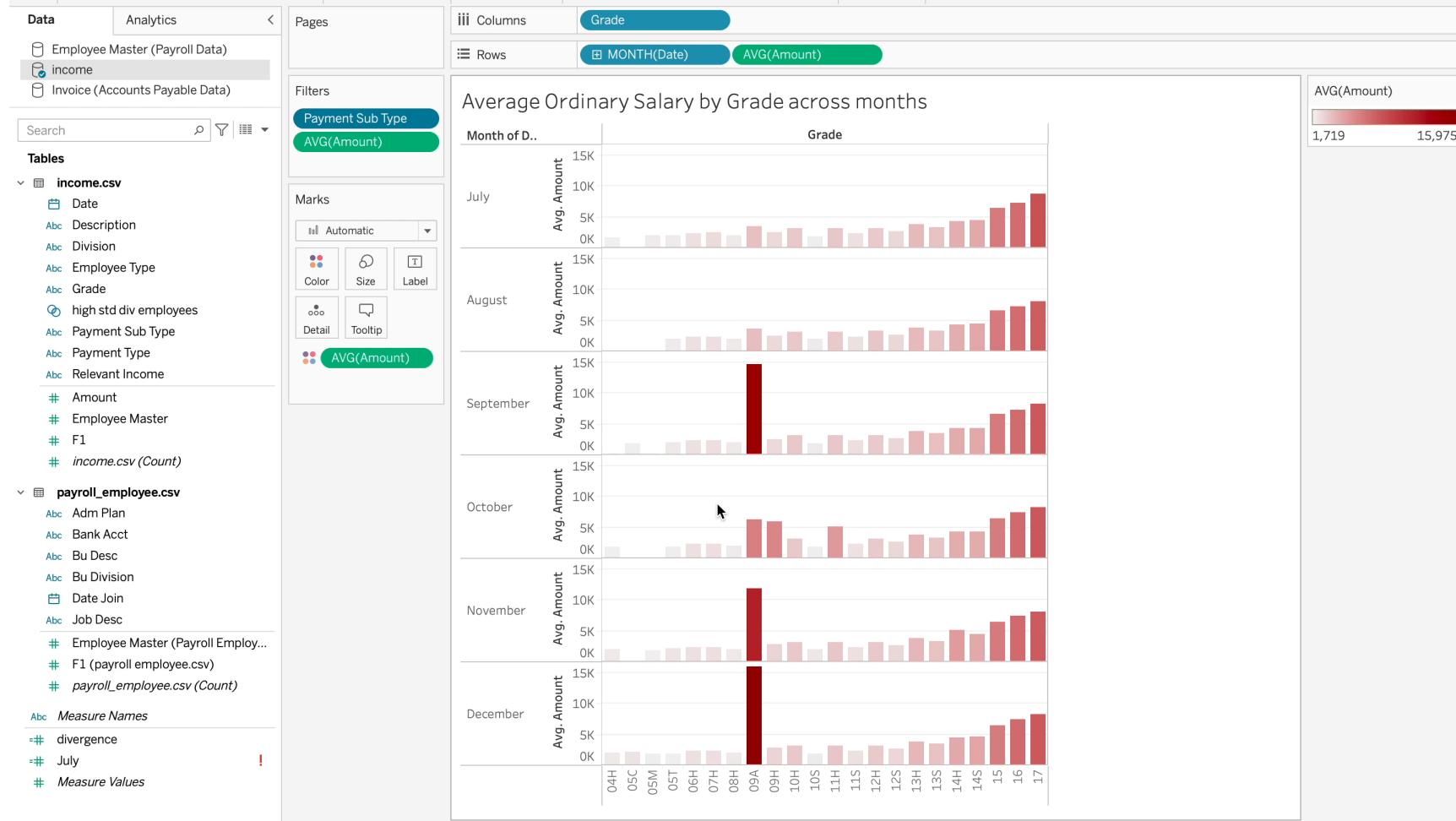




# Snapshot of Tableau Dashboard for Malicious Actors

## Part 2

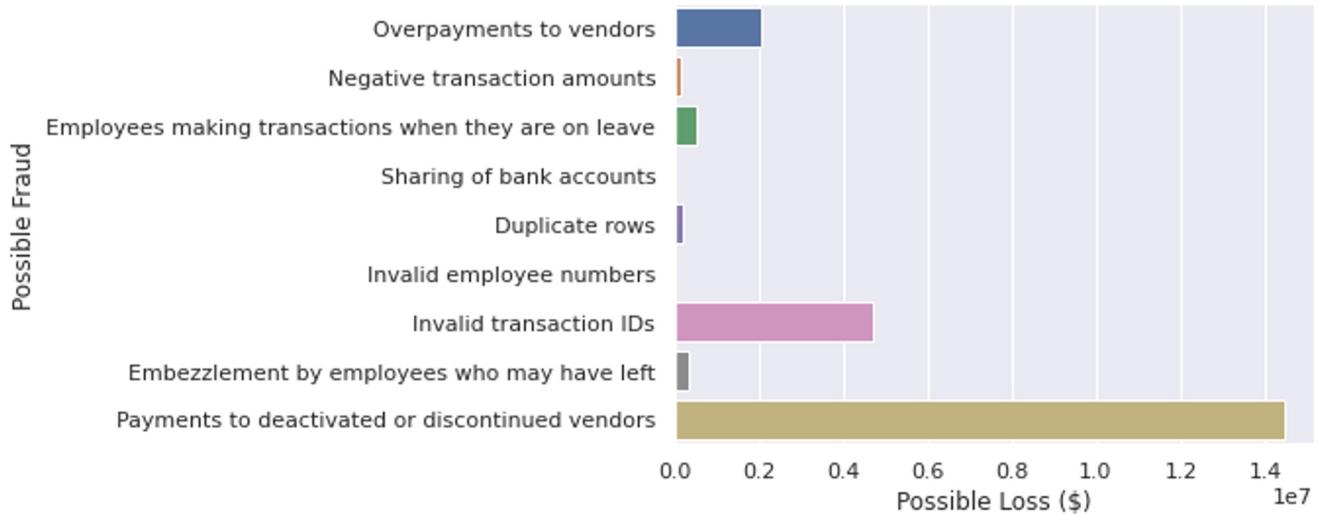




\$22,494,831

Suspected Fraud Valuation

### Comparing monetary impact of rules



The rule which has the highest financial impact identified was the under payments to deactivated or discontinued vendors, with a total potential loss of **\$14,445,195.10**.

# Outcomes



## Which Risk Profile is the Most Prolific?



### Malicious Actors

Highest number of possible rules

Employees are exploiting difficult to notice loopholes

Crediting Lumbago for transactions even after leaving the company

Collaborating with "fraudulent authorisers"

There is a danger of system administrators - such as identified authorisers - for approving large numbers of fraudulent transactions.

**Right Now:** These rules flag out employees and those in positions of power so as to prevent such fraud

**Future:** We need to adopt Machine Learning models such as DBSCAN, such credit card transactions are flagged as fraud by their natural attributes

# 04

## Recommendations

Scope

Data Exploration

Risk Profiles

Recommendations

Laundering Detection



- Disruptive actors exist due to the lack of input control
- **Input control** can be implemented in the following ways:
  - User interface restricts type of input e.g. no alphabets in transaction ID input
  - User interface requires certain inputs to be keyed in for a transaction to be recorded
  - Normalised database implementation will restrict duplicate primary keys e.g. duplicate transaction IDs

- **Strong internal controls**
  - Stringent access controls to authorise and verify employees
  - Multiple user access levels i.e. do not give access to employees that they do not need

Aim: Prevents ghost actors from accessing system
- **Decentralised processes**
  - Actor making transaction should not be able to authorise his/her own transactions

Aim: Prevents ghost actors from being able to make transactions from one point of access
- **White-listing**
  - List of pre-approved vendors should be updated regularly with update history well-documented

Aim: Prevents money from flowing out to fake/outdated vendors



- After sieving out disruptive actors and ghost actors, a more complex approach must be taken to detect malicious actors
- **Rules** developed in this case will be useful in flagging out future similar occurrences
- Increasing sophistication of malicious actors require an **adaptive & constantly evolving approach to fraud detection**
- **Regular data mining & analytics** is required to pick up on new trends and develop new rules
- A **strong whistleblower program** generates good starting points for data exploration and analytics
- **Established & extensive inter-bank communication**

# 05

# Laundering Detection

Scope

Data Exploration

Risk Profiles

Recommendations

Laundering Detection

# Structuring/Smurfing



Scope

Data Exploration

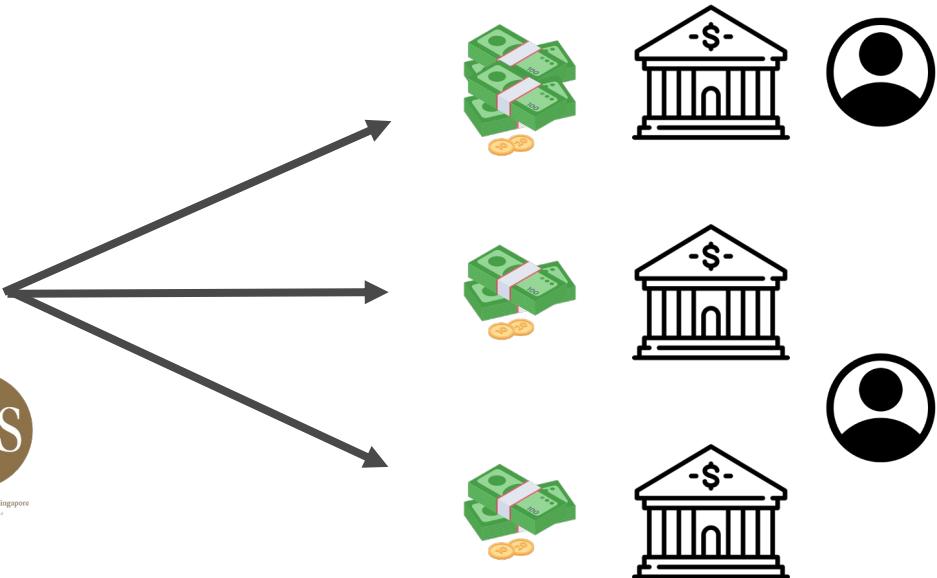
Risk Profiles

Recommendations

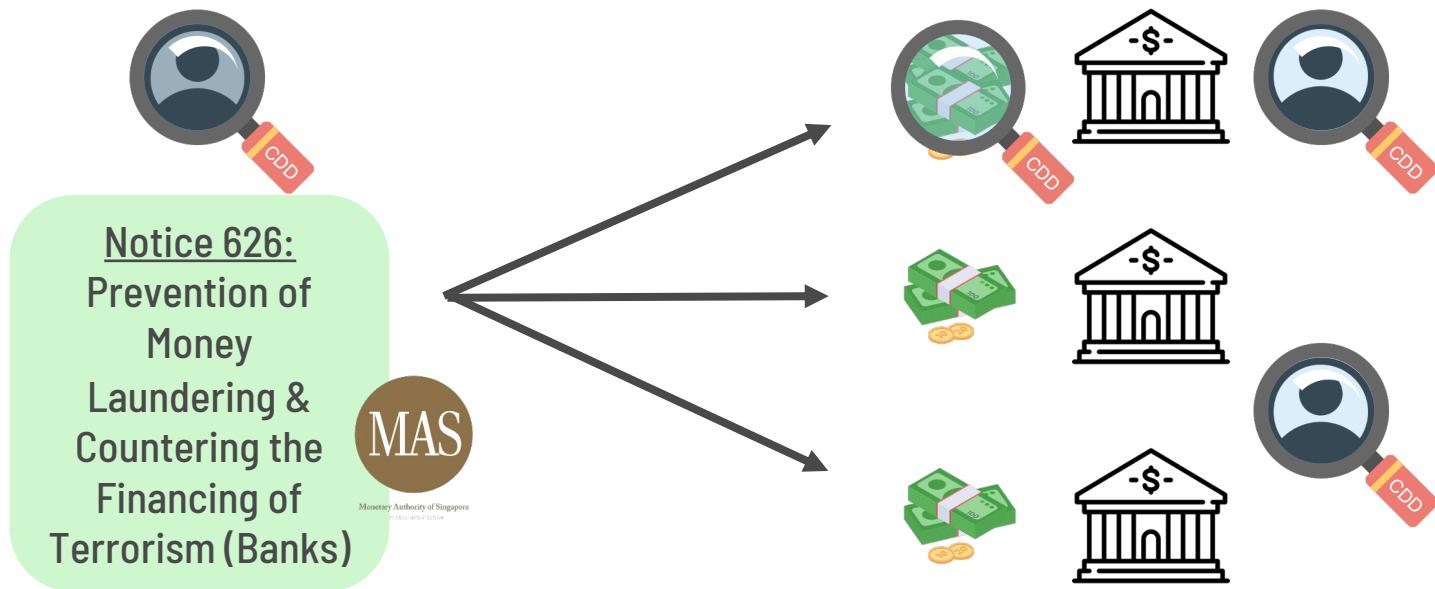
Laundering Detection

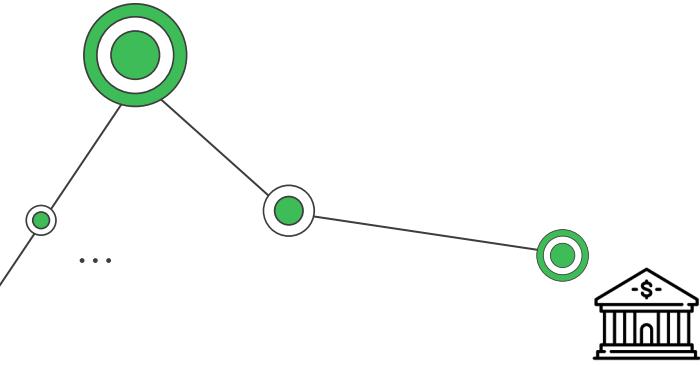
# Structuring/Smurfing

**Notice 626:**  
Prevention of  
Money  
Laundering &  
Countering the  
Financing of  
Terrorism (Banks)

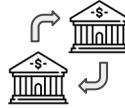
Monetary Authority of Singapore  
MAS.GOV.SG

# Structuring/Smurfing





# Scale of Detection



...

## Intra-bank Smurfs

- Uses bank data
- Data readily available
- Single format & structure

## Inter-bank Smurfs

- Aggregate multiple banks data
- Pending banks' agreement
- Pending architecture to support exchange of data
- Multiple formats & structures
- MAS initiative may alleviate issues

# Detecting Smurfing

- **Customers with multiple accounts**

- Perpetrator may have multiple accounts

Requires: Accounts data + Transaction data

Rule-based

- **Shell customer**

- Perpetrator may have multiple accounts under different aliases
  - E.g. check duplicate emergency contacts, NOK for different accounts

Requires: Accounts data + Customer background check data

- **Linked customers**

- Perpetrator may use relatives'/friends' accounts
  - E.g. check if family has high transaction activity

Requires: Accounts data + Transaction data + Customer background check data

# Detecting Smurfing

- **Grouping transactions**

- Clustering based on transaction date, location, amount
- Identify groups with large activity
- Aims to reverse the smurfing process

Machine Learning

Requires: Accounts data + Transaction data + Customer background check data

- **Generating new rules**

- Accounts flagged out and verified as smurfing cases should be indicated in data
- Enables supervised learning to identify patterns and form new rules
- Reiterative process: flagged patterns can be used to train machine learning algorithms to detect future occurrences

Requires: Accounts data + Transaction data + Customer background check data



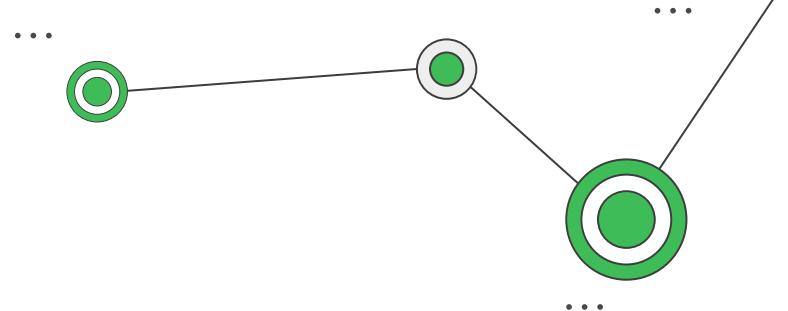
# Conclusion

Combat Internal Fraud

Anti-Money Laundering System

*Grow to be a champion of reliability and a leader in the market*

# Deloitte.



# Thank You

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