

AI and process mining for digital compliance, AML detection and management of KYC processes

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Thomas Hildebrandt, Professor

Department of Computer Science

KØBENHAVNS UNIVERSITET



Thomas T. Hildebrandt

- 2018- Professor, Department of Computer Science
 - Member of Danish Standards group for AI (and Cyber-security)
 - Head of new Data Stewardship study programme
 - Advisory board for D-seal (D-mærket) 
 - 2018-2023: Founder and head of software, data, people & society research section
- 2012- Independent consultant and speaker on Digitalisation & AI
- 1999-2018 Researcher at IT University of Copenhagen, Denmark
- 1996-1999 PhD in Computer Science, Århus University



Recent and ongoing research

<p>Effective, co-created & compliant adaptive case management for Knowledge workers EcoKnow.org</p> <p> Innovationsfonden 2017-2022 Grand Solutions Projekt</p>	<p>Public Administration and Computational Transparency in Algorithms (PACTA)</p> <p> INDEPENDENT RESEARCH FUND DENMARK 2019-2024</p>	<p>Programming Technology Foundations for Accountability, Privacy-by-design & Robustness in Context-aware Systems (PAPRiCaS)</p> <p> INDEPENDENT RESEARCH FUND DENMARK 2020-2025</p>	<p>DATA4ALL & Nordic Refugee Determination: Advancing Data Science in Migration Law (NoRDASIL)</p> <p> NordForsk 2021-2024</p>
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What is the problem?

Annual costs of compliance management in the Danish Financial Sector in 2019:

DKK 3.400.000.000

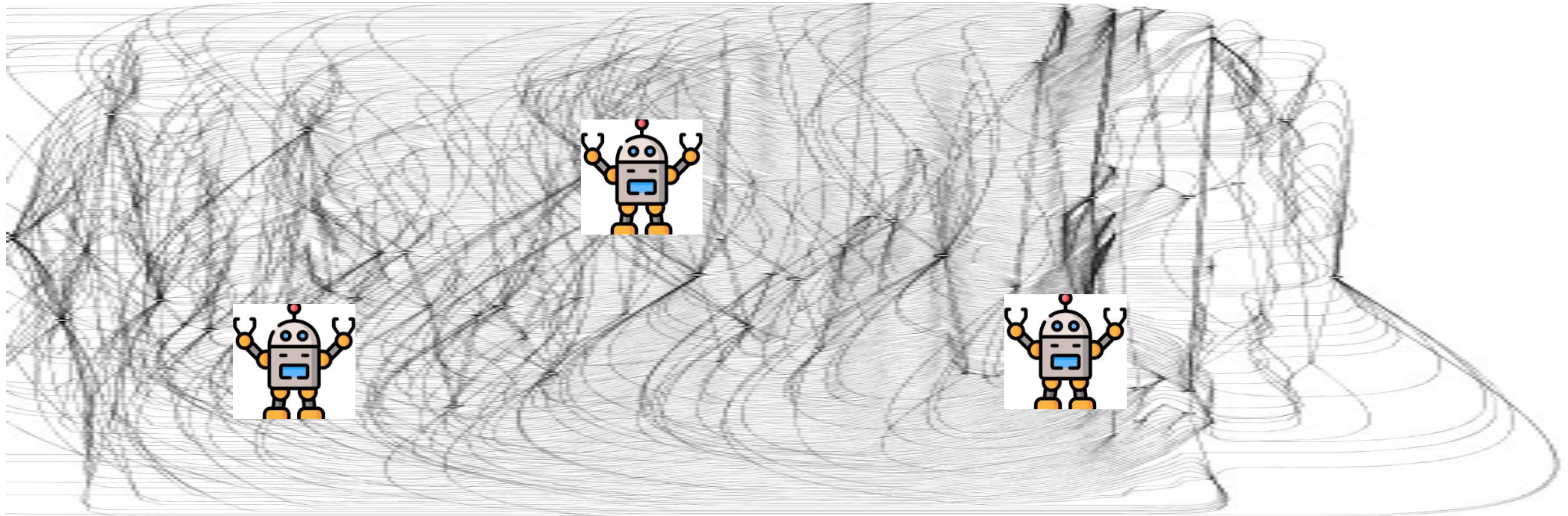
The documentation, regulations and guidelines



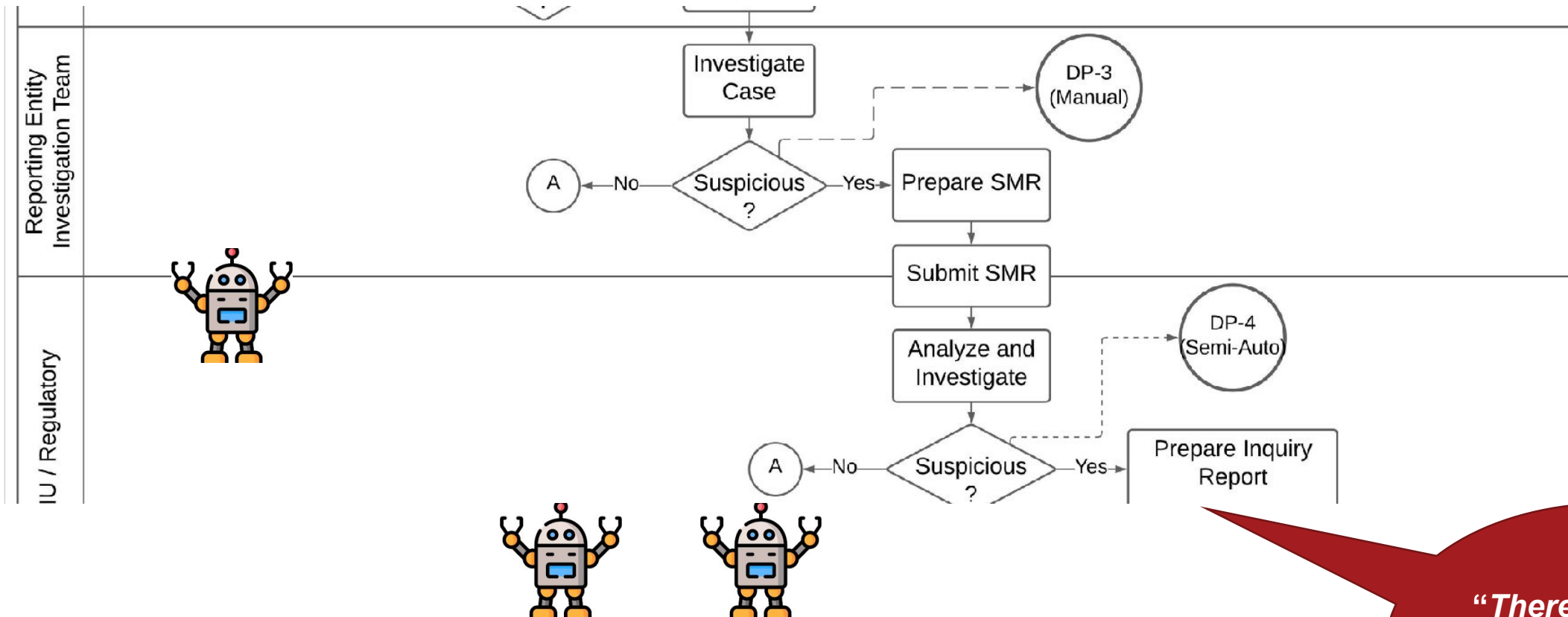
The processes in our
bank

How do we manage the processes? How do we ensure compliance? How do we detect unwanted behaviour?

Automation of individual sub tasks only helps a bit



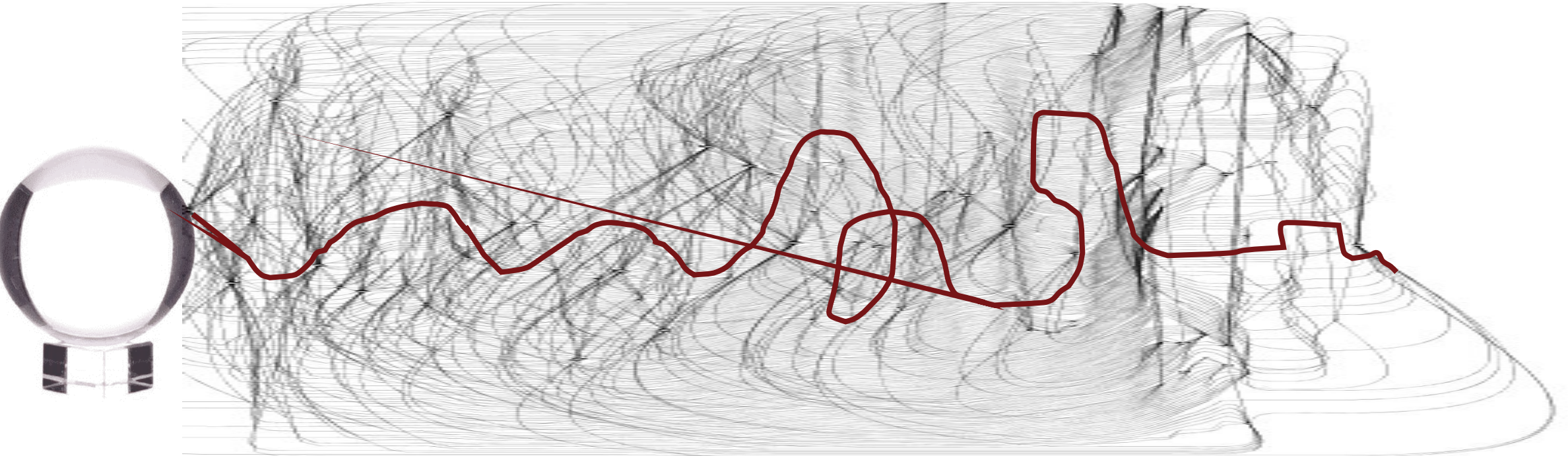
Simplifying the process to a pretty flow diagram makes it worse



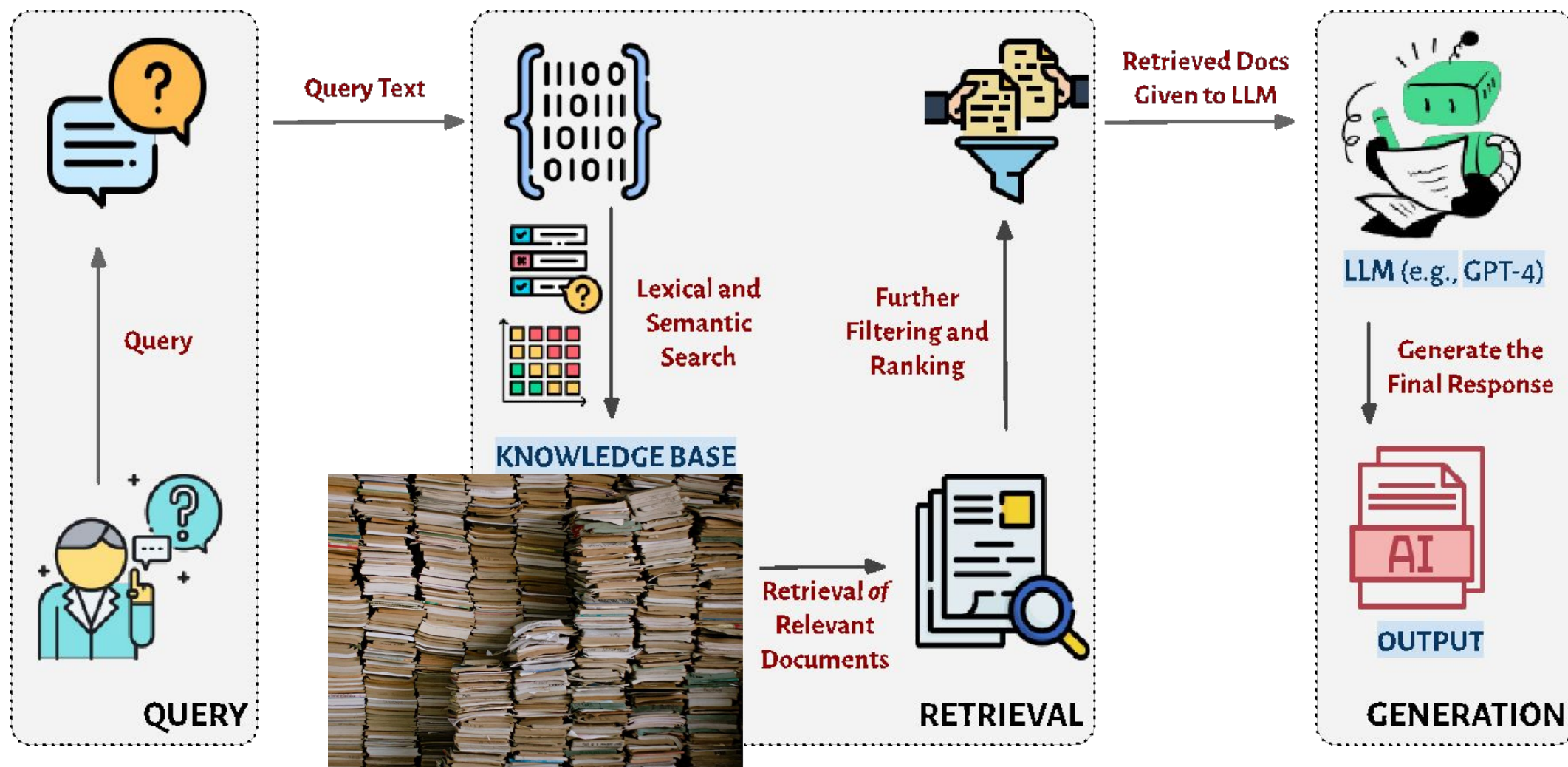
"There no such thing as a single happy path"

Lars Reinkemeier

Attempting to predict the future path with AI is a dream



Using Retrieval Augmented Generation to read our guidelines



is not trustworthy, sustainable nor maintainable

Figure from:
Hallucination-Free? Assessing the Reliability of
Leading AI Legal Research Tools

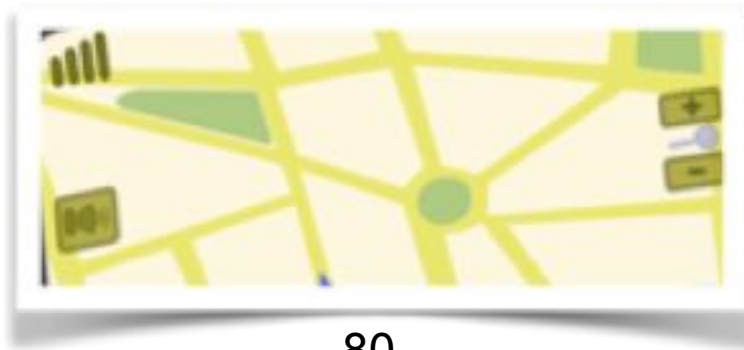
What can we do instead?

Simple, high predictability and volume



5
%

Complex and unpredictable



80
%

Unknown territory



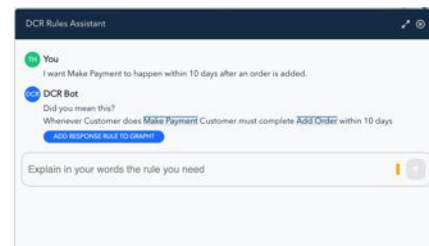
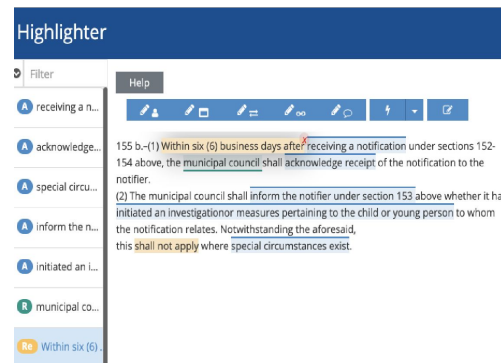
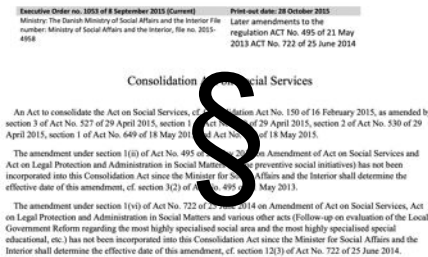
15
%



Can we get a
workflow GPS with autopilot and
a maintainable and explainable map
?

DCR Solutions: Declarative Process Modelling and Mining as Maintainable & Explainable AI in Business processes

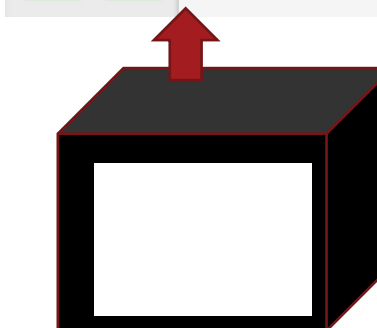
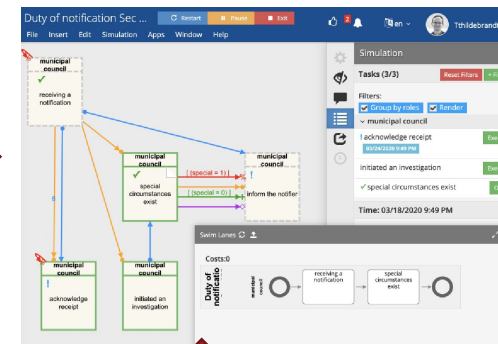
tool supported, mappings to executable & explainable models



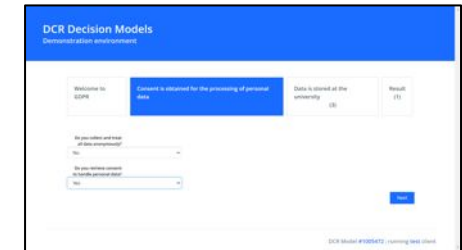
ChatGPT prompt



automation via service requests



DisCoveR Process



Dynamic Guidelines and self-service application forms



Case management support

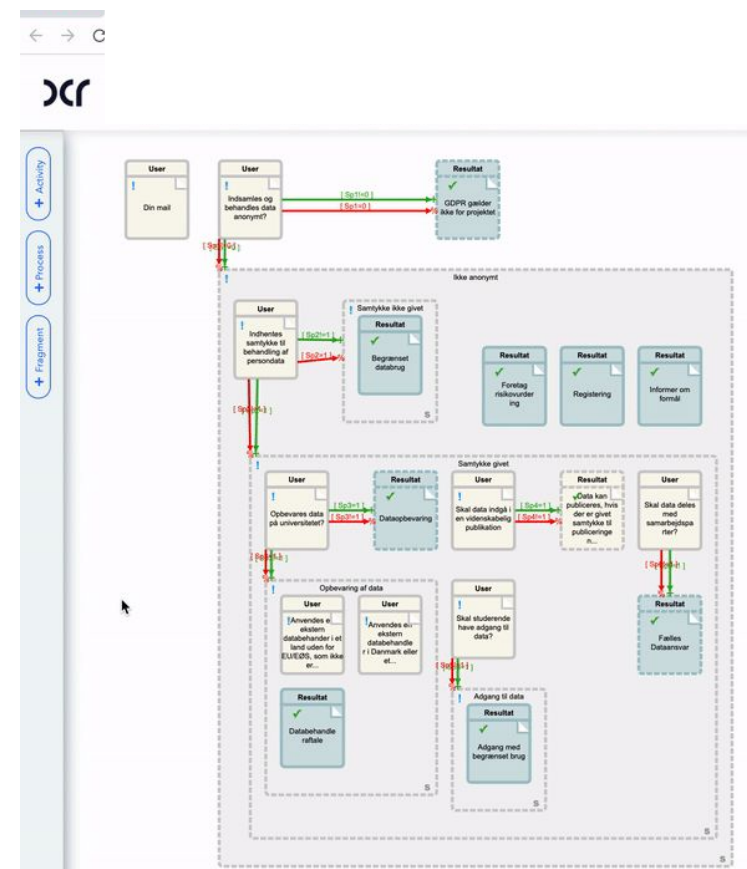


Successful spin-off from EcoKnow.org research project in 2018

More than 35 end-customers are using DCR today!



Example: Corona guidelines



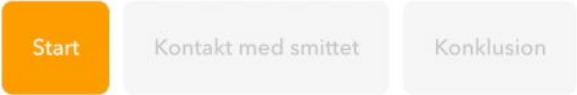
11 page guidance,
with 14 updates



Digital business process

DCR SOP

Corona - Nærkontakt SOP



Next

Få svar på om du er nærkontakt og hvad du skal gøre

Ved at besvare spørgsmålene kan du finde ud af om du er nær kontakt, om du skal gå i selvisolation og hvornår du skal tage PCR test.

Bor du sammen med den smittede?

Har du haft direkte fysisk kontakt med den smittede?

Har du har været tættere end en 1 meter på den smittede i mere end 15 minutter?

OBS: Hvis du er omfattet af særlige omstændigheder bør du læse disse retningslinjer:

- [Særlige retningslinjer for børn.](#)
- [Særlige retningslinjer for personale der arbejder i sundhedssektoren og med ældre.](#)

Know your customer

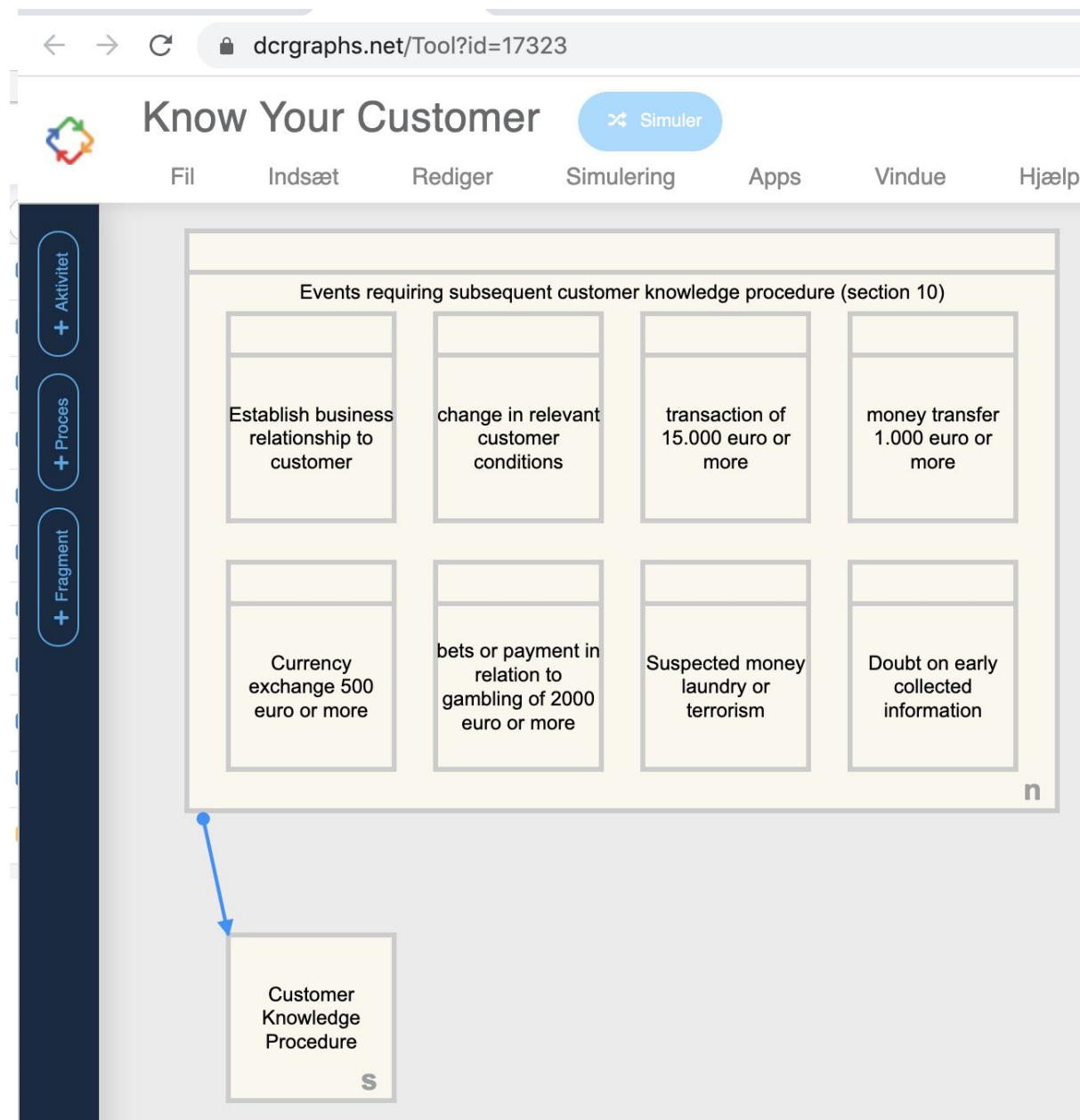
Kapitel 3

Kundekendskabsprocedurer

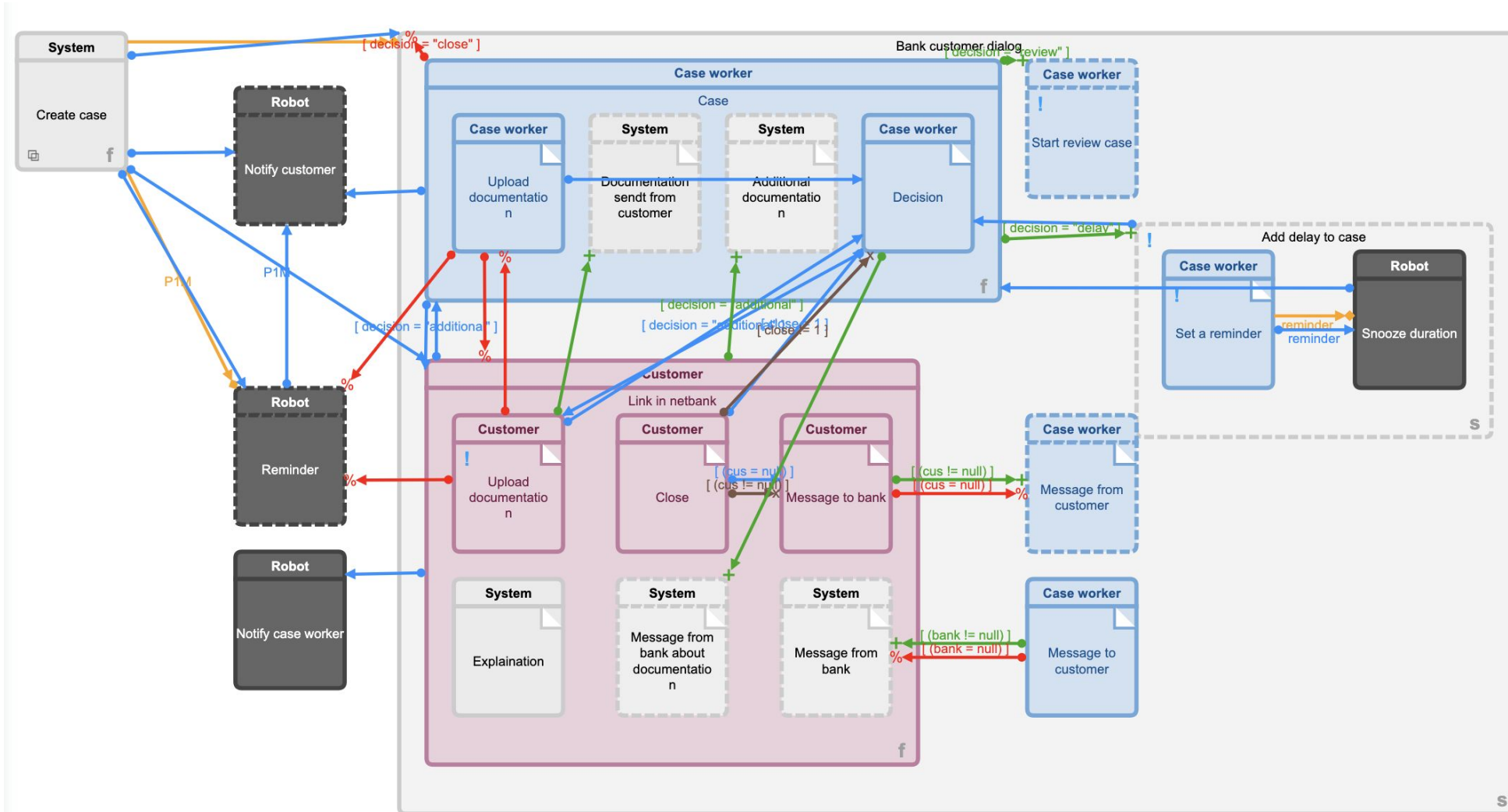
Almindelige krav

§ 10. Virksomheder og personer omfattet af denne lov skal gennemføre kundekendskabsprocedurer, jf. §§ 11-21, når

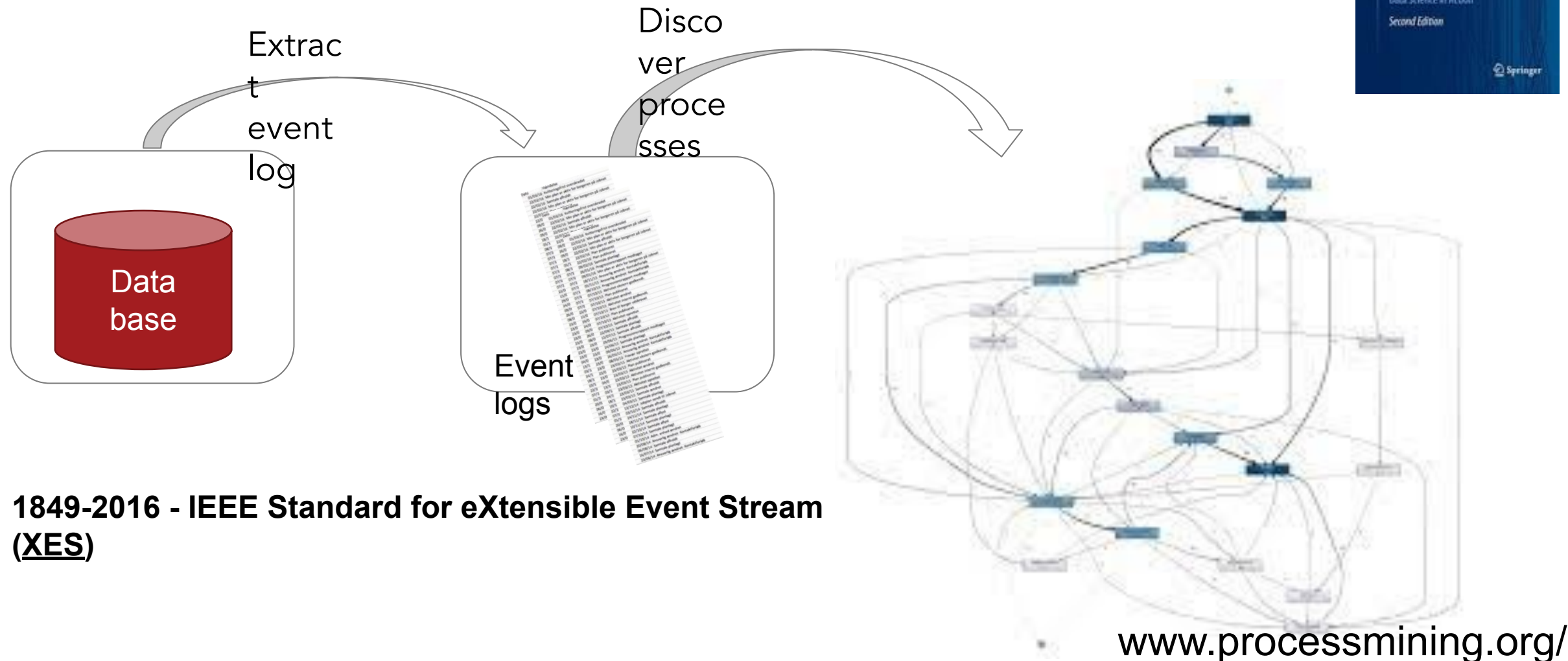
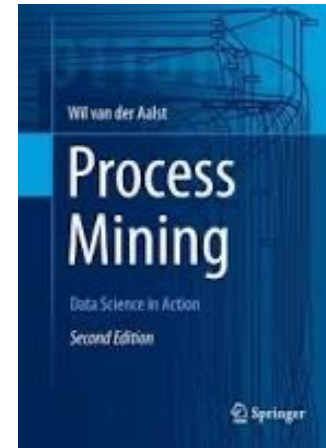
- 1) de etablerer en forretningsforbindelse, en kundes relevante omstændigheder ændrer sig, og i øvrigt på passende tidspunkter, herunder når virksomheden eller personen i løbet af det relevante kalenderår er juridisk forpligtet til at kontakte kunden med henblik på at undersøge enhver relevant oplysning vedrørende den eller de reelle ejere,
- 2) de udfører en enkeltstående transaktion på
 - a) mindst 15.000 euro, hvad enten transaktionen sker på én gang eller som flere transaktioner, der er eller ser ud til at være indbyrdes forbundet,
 - b) mere end 1.000 euro i form af en pengeoverførsel, hvad enten transaktionen sker på én gang eller som flere transaktioner, der er eller ser ud til at være indbyrdes forbundet, eller
 - c) 500 euro eller derover ved valutaveksling, hvad enten transaktionen sker på én gang eller som flere transaktioner, der er eller ser ud til at være indbyrdes forbundet,
- 3) de i forbindelse med udbud af spil modtager indsatser, udbetaler gevinster eller begge dele på mindst 2.000 euro, hvad enten transaktionen sker på én gang eller som flere transaktioner, der er eller ser ud til at være indbyrdes forbundet,
- 4) der er mistanke om hvidvask eller finansiering af terrorisme, uanset at betingelserne i nr. 2 og 3 ikke er opfyldt, eller
- 5) der er tvivl om, hvorvidt tidligere indhentede oplysninger om kundens identitet er korrekte eller tilstrækkelige.



Anti Money Laundering



Process Mining

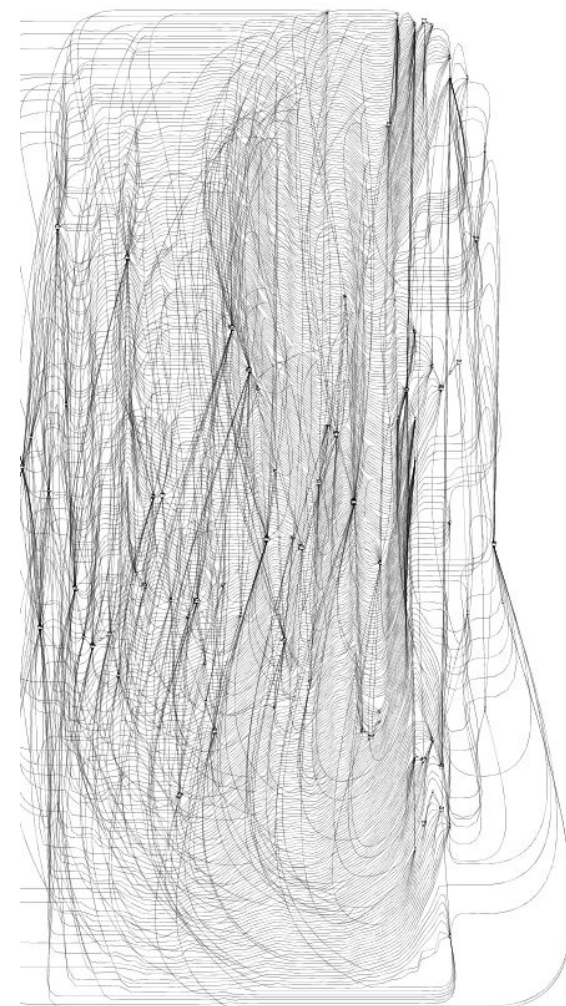


Either a lack of
vision: do whatever
you want

too many explicit
choices make the model
unreadable.

The graph is a complex, dense network of nodes and edges. It features a central vertical column of nodes, with many other nodes branching off to the left and right. The nodes are small, rectangular boxes containing text, and the edges are thin, curved lines. The overall structure is highly convoluted and difficult to follow, with many nodes and edges overlapping or closely packed together. The graph is rendered in a light blue and grey color scheme.

Or a “spaghetti model”:
too many explicit
choices make the model
unreadable.

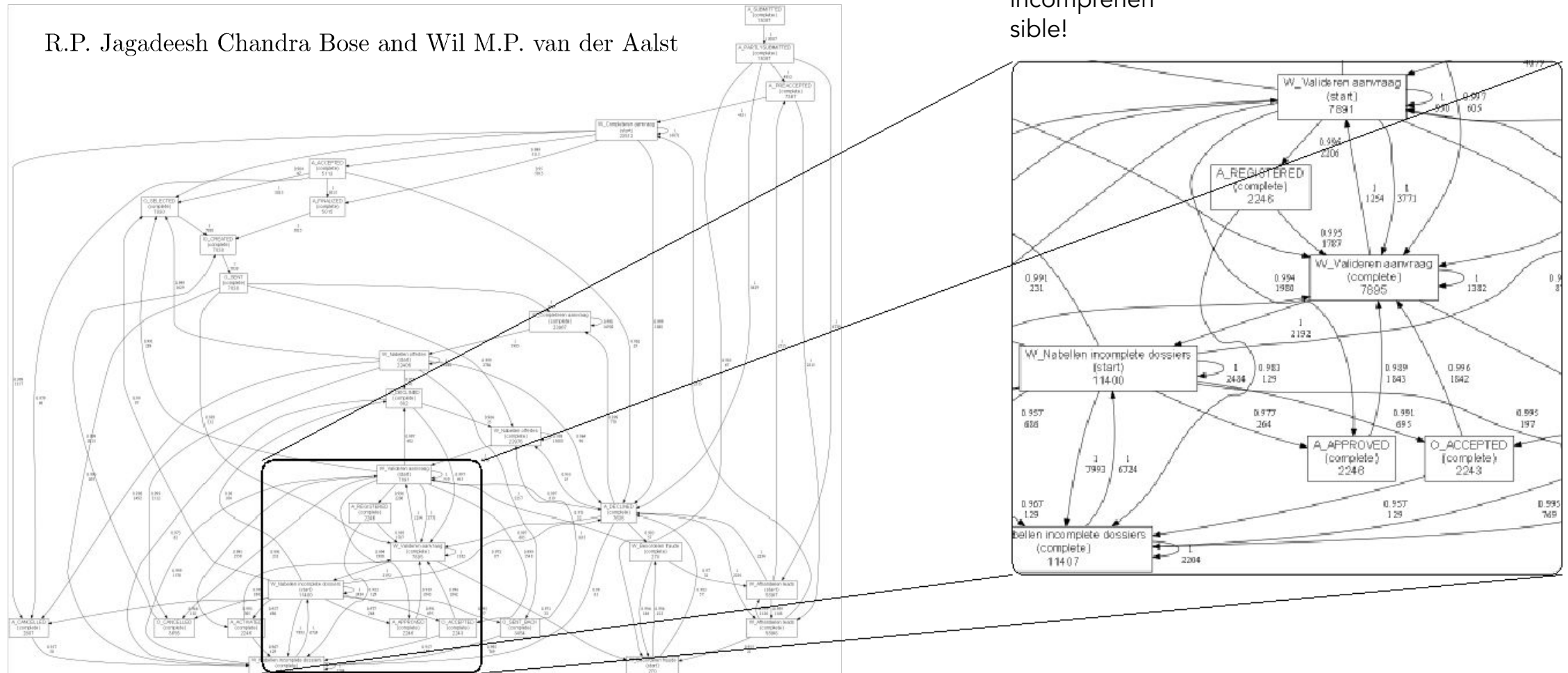


Example: Mined spaghetti process from loan application log

Process Mining Applied to the BPI Challenge 2012: Divide and Conquer While Discerning Resources

R.P. Jagadeesh Chandra Bose and Wil M.P. van der Aalst

Traditional
flow chart is
incomprehen-
sible!



Award-winning Process mining algorithm for discovery of DCR graphs from event logs



Process Mining Conference 2021 + 2023

3rd International Conference on Process Mining, October 31-November 4, 2021

Process Discovery
Contest Best
Overall Algorithm

awarded to:

Axel Christfort, Søren Debois
and Tijs Slaats

for their process discovery algorithm:

DisCoveRN

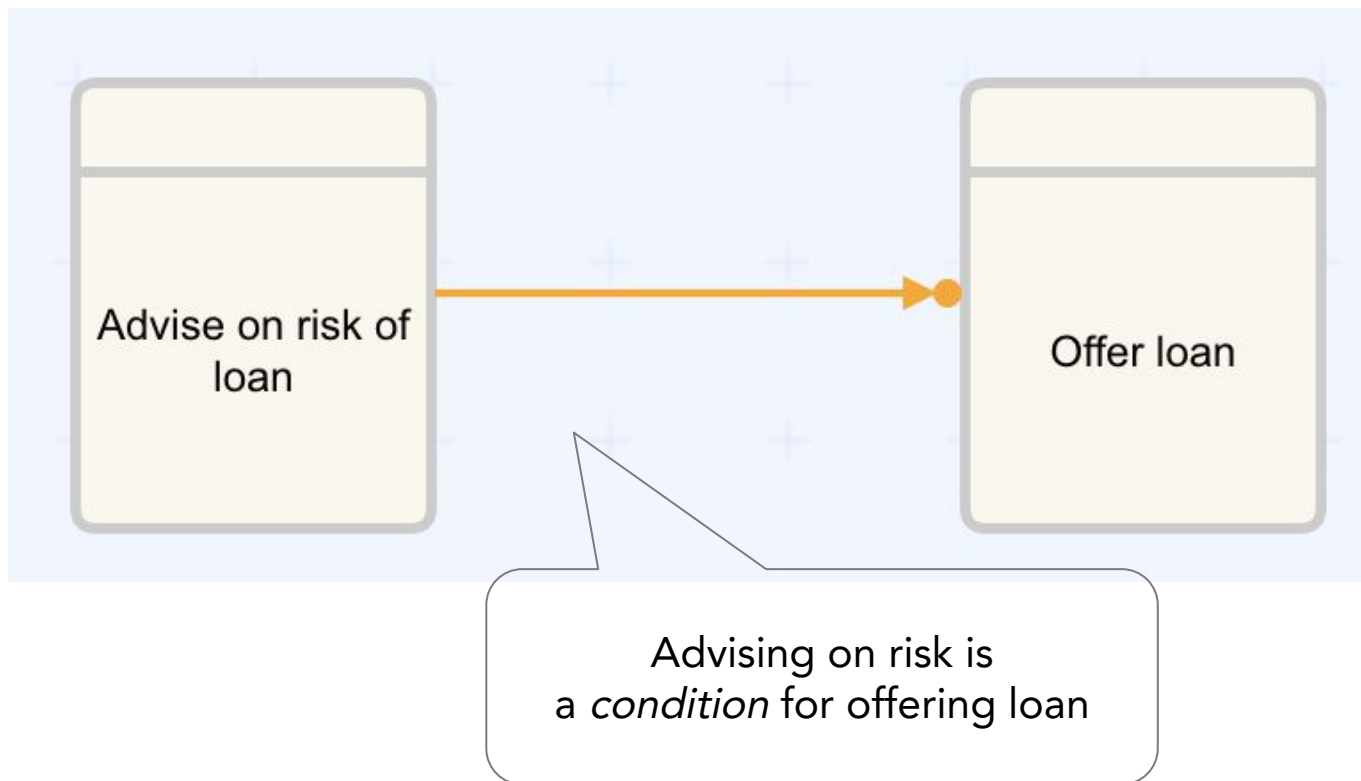
“Honorable mention” to
DCR Solutions from Gartner in 2023



Our approach

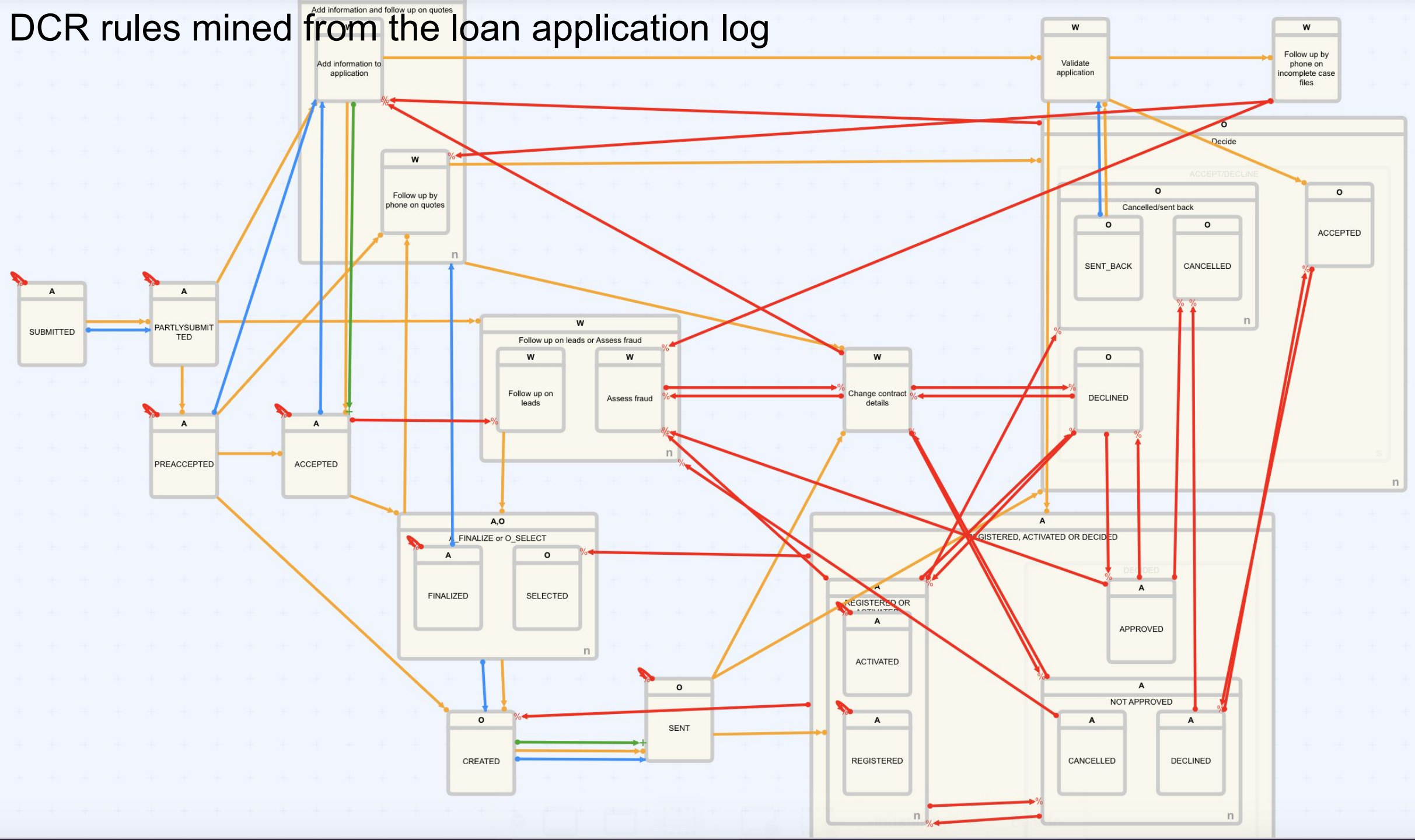
Mines business rules, which:

- Can be reasoned about in isolation
- Explain the rules of the process

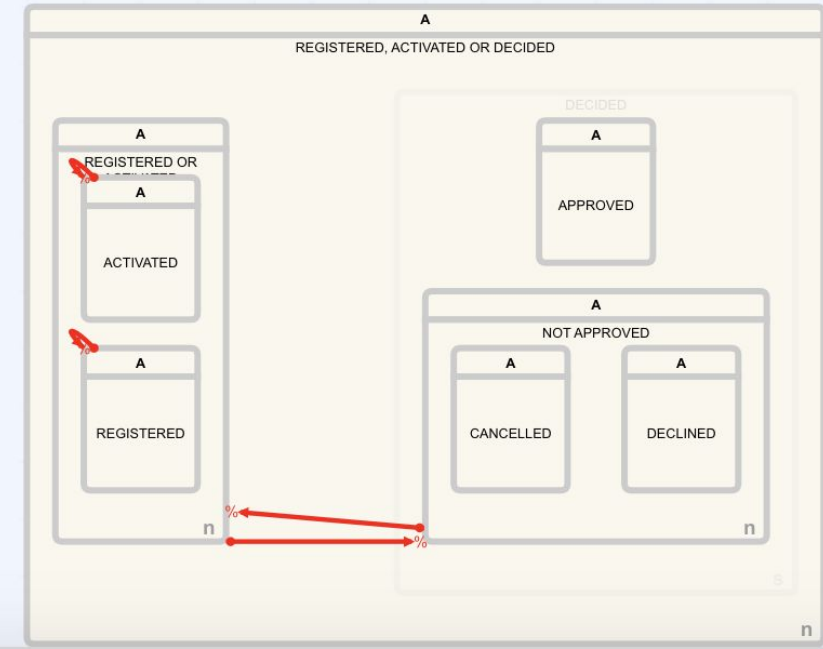
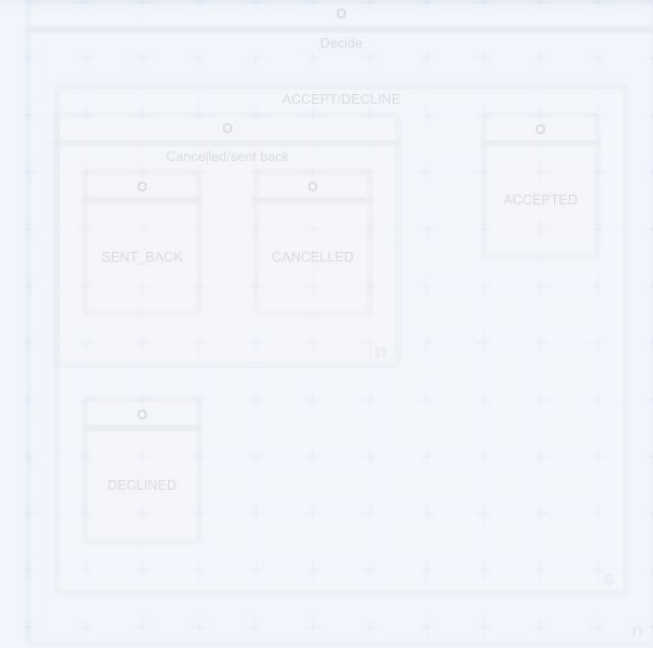
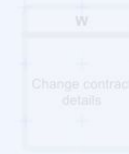
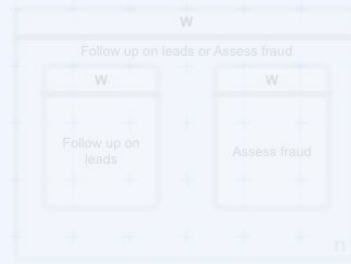
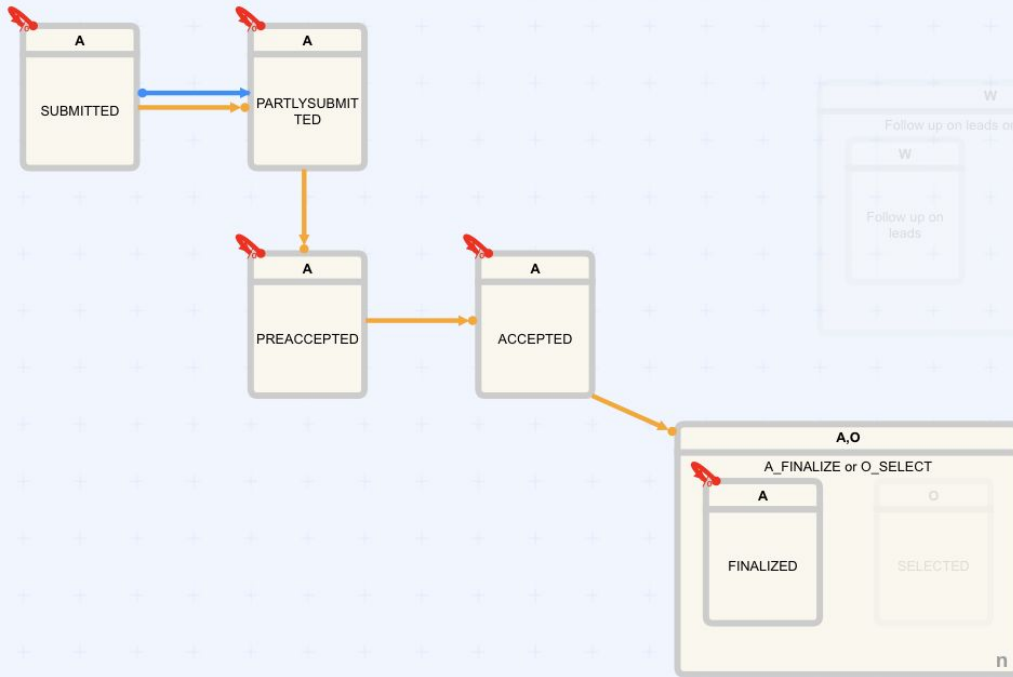


If this rule is found by the process mining algorithm the log is compliant

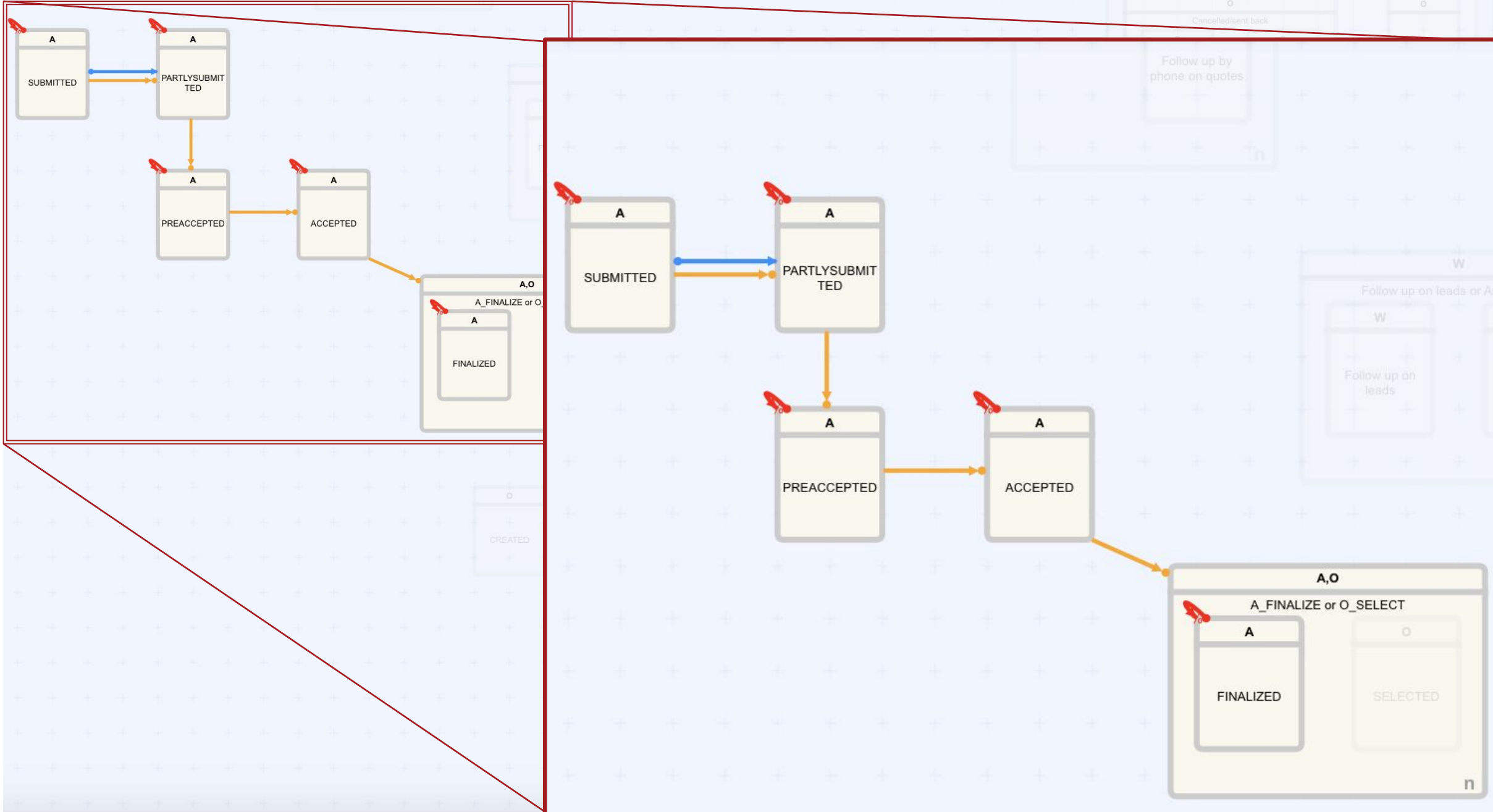
DCR rules mined from the loan application log



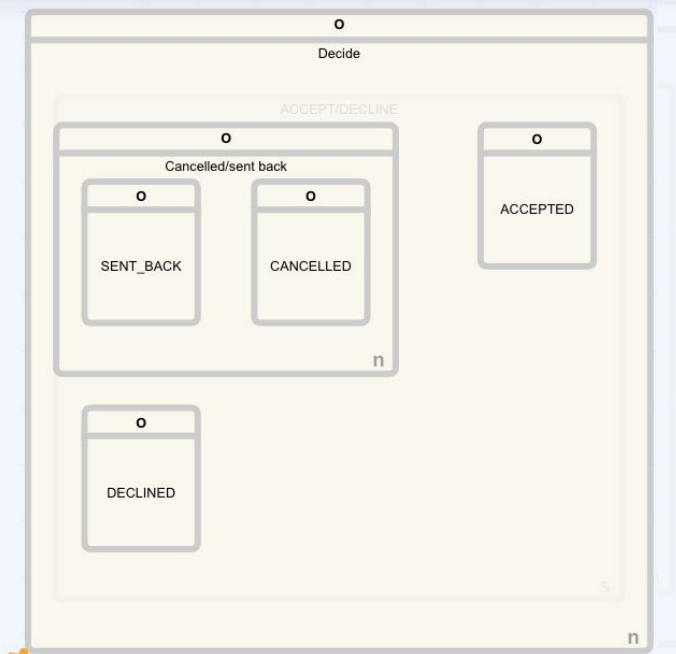
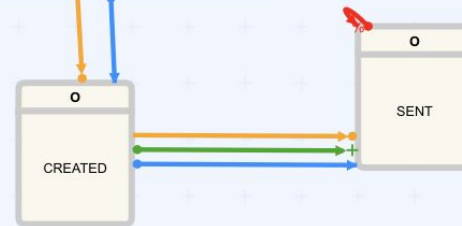
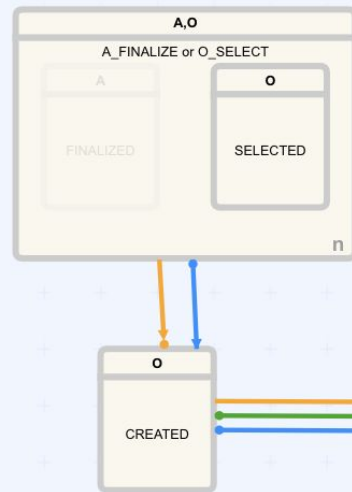
Application sub process



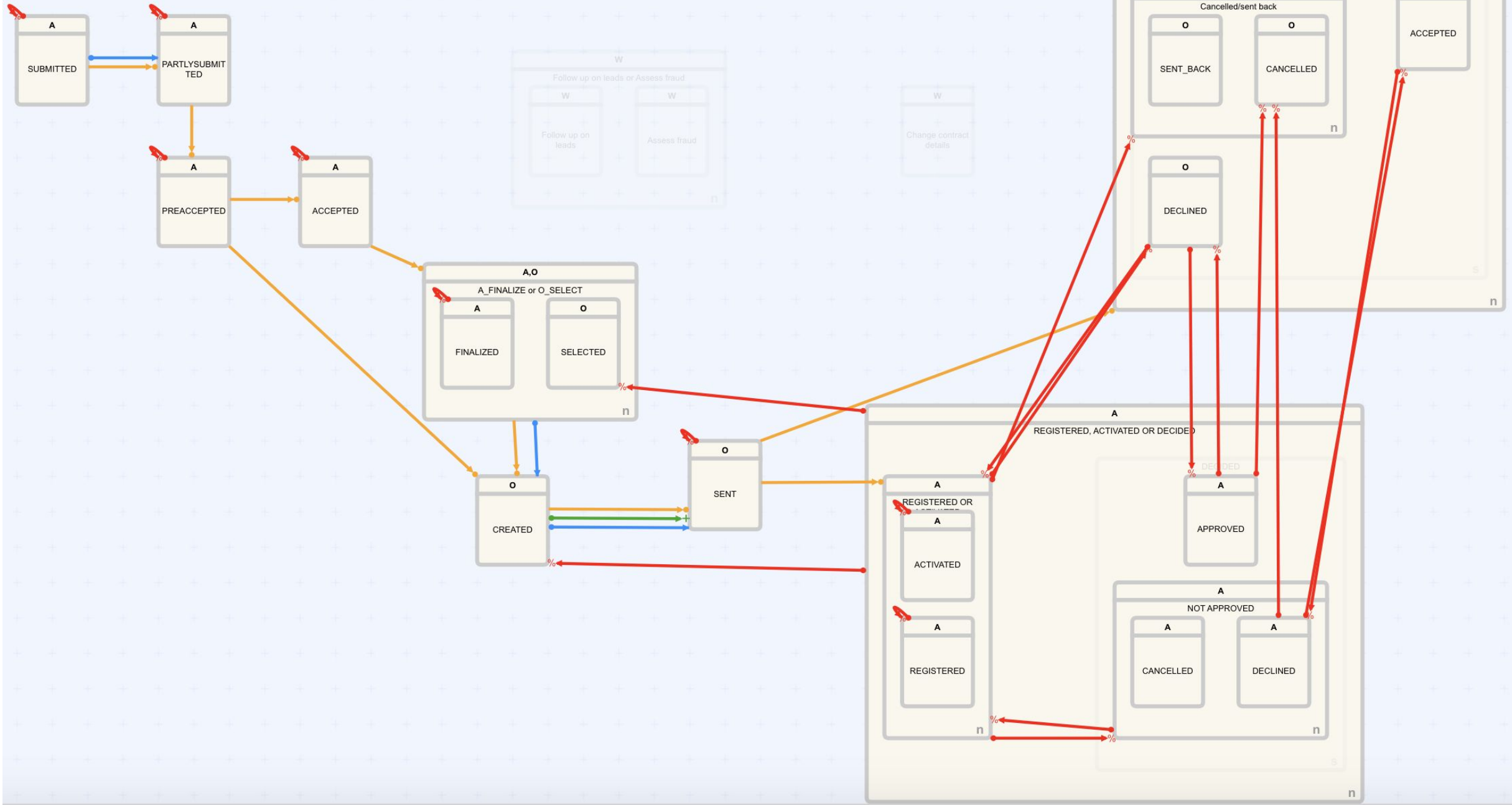
Zooming in – very simple sequential sub process



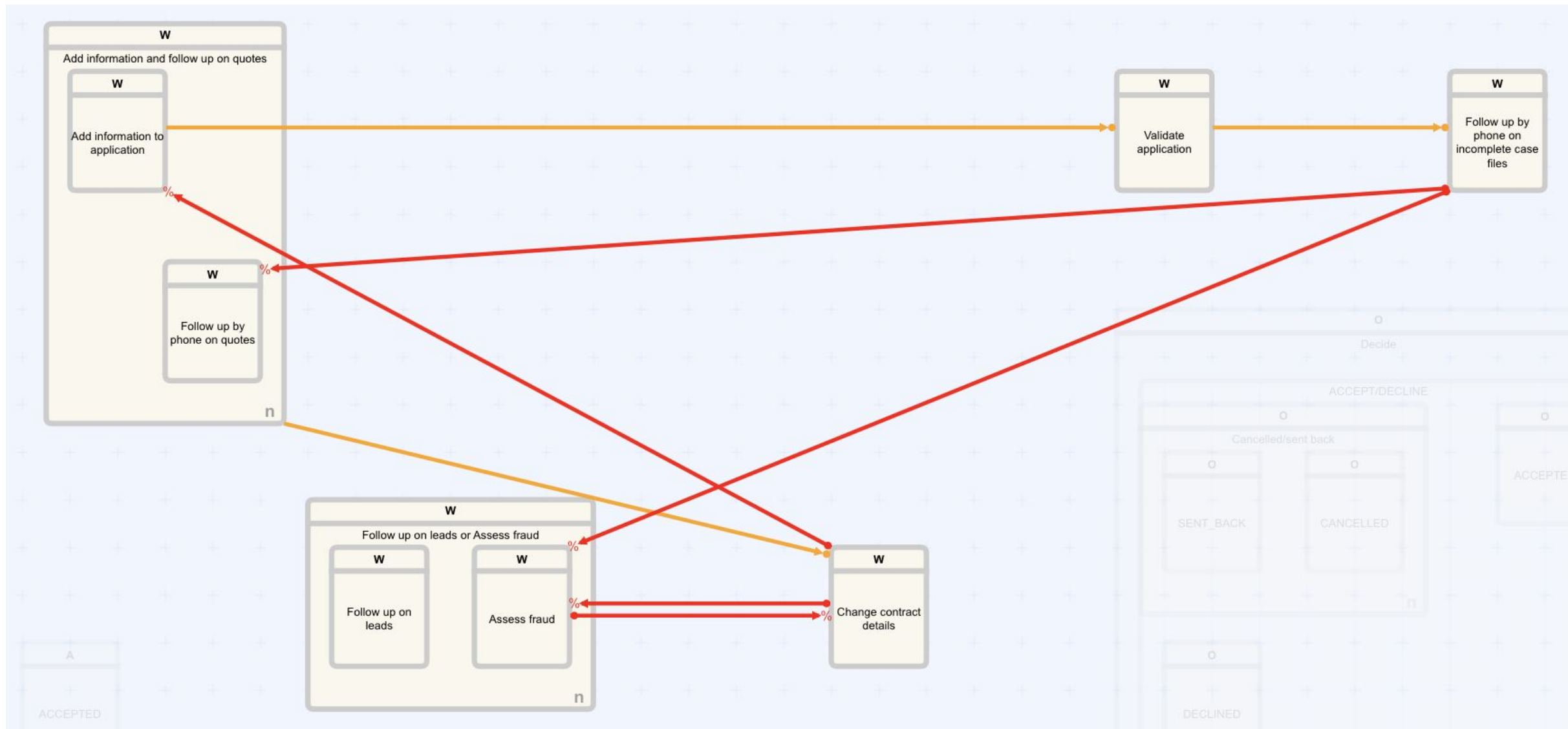
Mined rules for loan offers sub process



Rules for application and loan offer sub processes

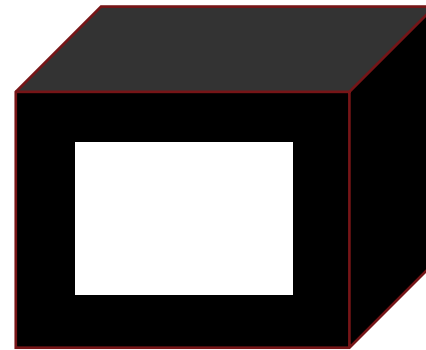


Rules for case handling workflow sub processe

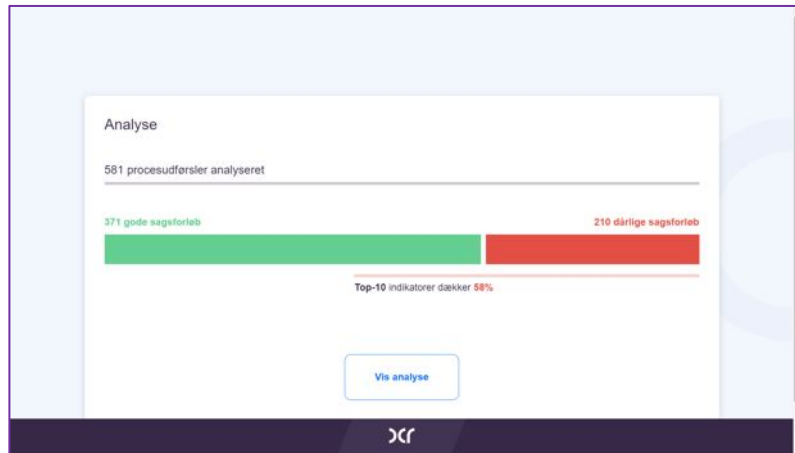
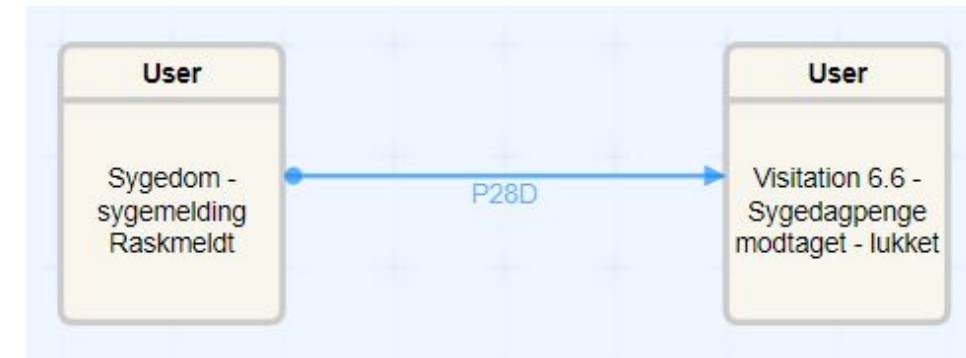
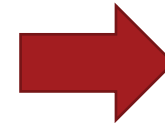


Rule based Process Mining for continuous process improvements

This is how our process running and how can I improve it?



Process miner



Insights / Information Technology / Article

Gartner Top 10 Strategic Technology Trends for 2023

