



Real-Time Sanctions Screening for High-Volume Payments

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Abstract

Sanctions screening is critical for preventing terrorism financing, money laundering, and organized crime. Effectively enforcing compliance in a high-throughput environment, such as screening billions of financial transactions per year for a large bank, poses a unique challenge. Achieving a balance between matrix-like false-positive rates, detection times, and data freshness is central to the problem, which requires careful consideration of detection algorithms and their underlying data sources, together with the system's overall architecture.

A heuristic review identifies the main design considerations and explores each category in turn—screening architecture, detection algorithms, data quality and provenance, and overall scalability and performance. The results synthesize best current practice and highlight areas for further research.

Keywords: Sanctions Screening Systems, Financial Crime Prevention, Anti-Money Laundering (AML), Counter-Terrorist Financing, High-Throughput Transaction Monitoring, Compliance Detection Algorithms, False-Positive Rate Optimization, Real-Time Screening Architectures, Data Freshness Management, Financial Data Quality and Provenance, Scalable Compliance Platforms, Large-Scale Transaction Analytics, Risk-Based Screening Frameworks, Heuristic Compliance Design, Performance-Aware Detection Systems, Regulatory Technology (RegTech), Enterprise Compliance Architectures, Automated Watchlist Screening, Financial Systems Scalability, Trustworthy Compliance Operations.

1. Introduction

Formal compliance with government sanctions requires businesses and their partners to robustly track and monitor sanctioned individuals and entities. Successful transactions may be unwound or blocked after the fact, and regulatory authorities increasingly impose onerous fines for offenses. The importance of sanctions screening has led to a growing demand for financial transaction monitoring solutions that support high base rates and low false positive rates. Scalable, high-throughput sanctions screening systems for very large financial transaction volumes do exist, but the available designs are poorly documented, attention focused primarily on other aspects. To support future development of such systems, this section synthesizes knowledge accumulated from published papers, system implementations, discussions with industry practitioners, and recent literature on commercial and proprietary solutions. It identifies important architectural and algorithmic design considerations when building scalable

sanctions screening systems for financial transaction monitoring solutions operating at the highest throughput levels. The first part outlines possible system architectures, discussing batch versus streaming processing paradigms, policies for managing and normalizing data structures, indexing techniques, and search strategies. The second part addresses algorithms and techniques employed for sanctions matching, including rule-based systems for checking transaction details against sanction lists and machine-learning-assisted page classification systems for identifying suspicious connections.

1.1. Overview of the Study

Sanctions screening constitutes a critical component of the AML/KYC compliance processes in the finance and banking industries. Characterized by extremely high throughputs that often exceed one thousand transactions per second, sanctions screening is challenging to implement in a robust way without affecting system performance. This



paper provides a synthesis of the architecture of systems that perform sanctions screening for transactions having high rates of arrival. Fundamental scalability considerations inherent to the design of such systems are set out and explained. Several strategies for effectively responsive sanctions detection are elaborated, supported by research drawn from the fields of false positive reduction, provenance management, data quality, data governance, and machine-learning-assisted classification. These strategies apply during the latter stages of transaction processing where strict latency requirements are imposed by the external system operators.

The study contributes to a comprehensive overview of the domain of sanctions screening streaming systems that operate in high-throughput, low-latency, production environments. The potential to leverage recent developments in stream-based safe-ML classification extends above and beyond the basic use case, enabling the combination of data expansion techniques, like data-sampling, with safe-ML to trade false positive detection accuracy for classification efficiency. Such combinations could support operation in the financially normal-resource-poor topical domains.



Fig 1: Architecting High-Throughput Sanctions Screening: Scalability, Stream-Based Safe-ML, and Efficiency-Accuracy Trade-offs in Low-Latency Environments

2. Background and motivation

The growing adversarial threats posed by drug-trafficking networks, terrorist organizations, and other crime syndicates have led to an increase in the number of sanctions-eligible persons and entities in various jurisdictions worldwide. Paying particular attention to international regulations, sanctions monitoring and compliance screening have become essentials for financial

institutions and organizations engaged in cross-border transactions. In contrast to common monitoring efforts that are geared toward alert generation, focused only on high-risk customers or transactions, sanctions screening is a high-throughput, extremely low-latency application that is designed to clear as many transactions as possible with multiple lists at a very low false-positive rate.

The growing volume of transactions processed by major financial institutions and organizations has long rendered traditional rules-based screening solutions untenable. Current research and development efforts directed at sanctions screening in operate a least-cost, least-risk, and least-time manner, applying commercial risk and compliance solutions, rule-based engines, and external services without concern for overall scalability, costs, processing performance, or success. Moving sanctions screening in high-throughput environments toward enhanced transparency, accountability, and governance is an enabler for true innovation.

2.1. Rationale and Significance of the Study

Sanctions play a crucial role in geopolitical relations and are among the primary regulatory obligations faced by the financial sector and, more broadly, by many organizations across multiple industries. Governments use these measures as instruments to exert diplomatic and economic pressure by blocking the target's assets and restricting their access to the international financial system. The intention is to deter terrorist activities, the proliferation of weapons of mass destruction, and human rights violations. Sanctions risk management in financial institutions is carried out by dedicated compliance teams, whose main objective is to verify whether incoming and outgoing financial transactions are in accordance with the lists of sanctioned countries, organizations, and individuals. When a match is detected, the financial institution has to freeze the transaction and notify the competent authority in the country.

When operating in a low-throughput environment, the compliance teams can manually review every match and determine whether it is a false positive or not. However, in international banks and financial institutions, the volumes of transactions can reach several millions per month, thus



- This operational reality: near-capacity systems experience queue buildup and latency spikes.

1.3 Little's Law (linking backlog, throughput, latency)

A second key relationship often used in streaming system sizing is **Little's Law**:

Step 1: Define

- L = average number of transactions "in the system" (in-flight + queued)
- λ = average arrival/throughput rate (tx/s)
- W = average time in system (s)

Step 2: Relationship

$$L = \lambda W$$

Step 3: Use

If you have an SLA latency bound $W \leq W_{SLA}$, then backlog must satisfy:

$$L \leq \lambda W_{SLA}$$

1.4 Elasticity (scaling for bursty volumes)

Let load vary over time: $\lambda(t)$. If you can provision $c(t)$ workers, each with per-worker capacity μ_0 , then:

$$\mu(t) = c(t)\mu_0$$

To keep stable and avoid latency blow-ups:

$$\lambda(t) < \mu(t) = c(t)\mu_0 \Rightarrow c(t) > \frac{\lambda(t)}{\mu_0}$$

3. Architectures for high-throughput screening

Architectures for high-throughput screening: streaming versus batch processing; data models and normalization; indexing and search strategies

When dealing with fast-paced transaction streams, sanctions screening must be designed accordingly.

Processing transactions with no visible delay is generally expected by customers, preventing the effective integration of checking tasks into banking operations. Consequently, solutions must offer appropriate throughput rates with short response times. Several performance and scalability-related aspects should be particularly addressed.

Sanctions detection is normally formulated as a pattern-matching problem against a set of rules or signatures. A typical security application is therefore based on elements widely available in the information retrieval community and on techniques tailored to specific requirements. The screening challenge shares important characteristics with several strategic IR areas, such as processing very large document collections, high-throughput/low-latency applications, and data synthesis from diverse, semi-structured sources. Although sanctions-screening databases can grow to billions of entries and may contain picture or audio data, their overall scale remains much smaller than the Web. Streaming processing can also be applied to specialized domains such as news providing energy-efficient and cost-effective alternatives by enabling smaller and less-scalable distribution networks.

3.1. Streaming versus batch processing

Depending on expected throughput and the evaluation of latency, different screening processing paradigms offer alternative advantages. A natural approach involves screening transactions as they are generated, allowing for immediate settlement and minimizing latency and cost. Modern transaction systems regularly generate multiple thousands of transactions on a daily basis or, for particularly busy institutions, perhaps even several thousands in a single day. Processing these transactions in a single batch, often referred to as the "batched stream" model, is both time- and space-efficient, as the batch is normally kept in volatile memory during screening. In business scenarios where the interaction with the customer is done— or at least semi-automatically done— via pages on the internet, a different model can often be applied: transactions can be logged in a database table and screened periodically (for example every 1 or 2 minutes). As they are filtered, they can be either approved, either automatically or through a semi-automated process, or



Fig 3: Architecting Compliance: Real-Time Sanction Screening Integration and Automated Investigative Protocols in Correspondent Banking

One way to check the sanctions is through an internal sanctions screening list that is regularly updated using one of the internal screening solutions. The internal list is a separate and additional list that contains the names of banks that should not be present in the payment flows. It must be fed with the most recent names and, as such, must be refreshed regularly. The embarkation of names on the list follows a set of internal procedures of the financial institution which have been defined in accordance with all relevant norms.

5.2. Provenance tracking and auditability

For both regulatory and operational reasons, screening data must be regularly reviewed and updated to maintain a minimal false-noise ratio, an increasingly critical feature as sanctions regimes become more dynamic. Data freshness is further recognized as a key requirement by some machine-assisted ruleset management frameworks, which rely on regularly refreshed sources to spot changes in entity characteristics or the addition of new records. Changes are also difficult to detect. The types of changes that commonly introduce risk to financial institutions are jumps in risk score, a probable change of financial element, or family relations or cooperations with other entities that are watched. Continuous provenance and change indexing, however, can facilitate auditing of data freshness and completeness; indeed, successful integration schemata include active monitoring indexed in a provenance layer, allowing traffic lights for freshness indicators, trend detection of variables and cross-reference for probable change notification.

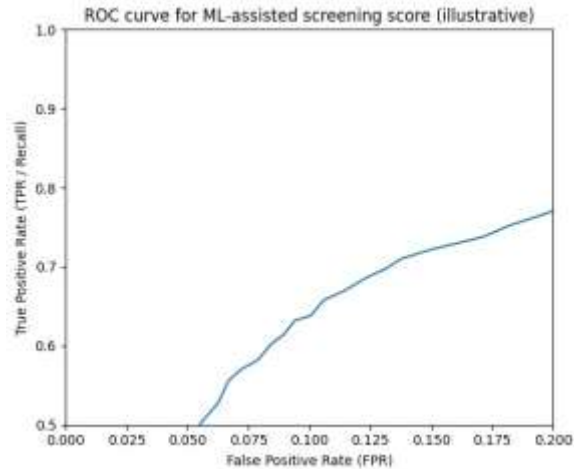
Metric	Formula	Value (illustrative)
Accuracy	$(TP+TN)/(TP+FP+TN+FN)$	0.988
Precision (PPV)	$TP/(TP+FP)$	0.8

Metric	Formula	Value (illustrative)
Recall (TPR)	$TP/(TP+FN)$	0.4444444444444444
False Positive Rate (FPR)	$FP/(FP+TN)$	0.002036659877800407
False Negative Rate (FNR)	$FN/(FN+TP)$	0.5555555555555555

6. System scalability and performance considerations

Scalable, high-throughput systems for the screening of sanctions-related activity need to cope with many conflicting performance objectives: supporting high transaction volumes (throughput), response times of seconds rather than minutes (latency), scaling up and down depending on workload (elasticity), tolerating system or component failures (fault tolerance), and covering system or service interruptions (resilience). Performance optimization requires consideration of all aspects of the system architecture, algorithm design, and the available technology stack.

Integrating performance concerns directly into the design of a sanctions screening system requires examining the key components of the overall system together with the broader context in which screening takes place. High-throughput sanctions screening systems are part of a larger end-to-end business process that starts when a transaction is created and ends with its final disposition by the relevant control functions. Performance can be improved not just by optimizing the sanctions screening step alone but also by eliminating or offloading non-essential functionality outside the screening engine or service.



Equation 3) Indexing/search “equations”: why dictionary lookups stop scaling

3.1 Dictionary membership cost

Let N = number of candidate entries to check (e.g., names/aliases).

If membership test is linear in N (as described), then:

$$T_{\text{lookup}}(N) = O(N)$$

At throughput λ , compute per second scales as:

$$\text{work/sec} \propto \lambda \cdot O(N)$$

So doubling list size doubles compute at fixed throughput.

3.2 Sub-linear index structures (nearest neighbor / trees)

With a space-partitioning tree or ANN index, average query cost can be:

$$\approx O(\log N) \quad (T_{\text{search}}(N) \text{ idealized; depends on dimension/structure})$$

Then:

$$\text{work/sec} \propto \lambda \cdot O(\log N)$$

6.1. Throughput, latency, and elasticity

Throughput represents the volume of transactions that a sanctions screening system can process in a defined time unit (e.g., transactions per second). For high-throughput financial services such as payments or trade finance, throughput constitutes a major consideration. Provided that processing conforms to established Service Level Agreements for sanctions screening, delays may be acceptable provided that they do not introduce artificial constraints for transaction processing. In batch-oriented screening approaches, throughput is determined by the slowest component of the screening function chain, such as integration of data from upstream systems (e.g., SWIFT), search of the sanctions database or of an associated ML model, and delivery of alerts to downstream components. Latency denotes the delay between request and delivery of results. In a sanctions screening system, low latency is desirable because it allows for nimble and proactive response to detection of potential sanctions violations—for instance, allocation of additional resources to investigate a potential match—and minimizes the financial exposure time associated with alerts during risky time intervals (e.g., for ongoing armed conflict). Latency may be further reduced by progressively assigning an alert risk level, enabling preallocation of detection resources to high-risk alerts.

In contrast to throughput and latency, elasticity indicates the system capability to respond to fluctuating volume and velocity of transactional data by scaling to automatically match the required level of performance. The business case for ML-assisted risk classification partly depends on elasticity, because Financial Transmit and Services institutions rarely conduct sustained screening of messages at the velocity represented by SWIFT in abnormal scenarios (e.g., outbreak of armed conflict, economic sanctions taking effect). Here, performance requirements may be met at appropriate cost through an ML model infrastructure that scales to match sudden peaks.

6.2. Fault tolerance and resilience

A system's ability to operate without errors in the face of failures is termed fault tolerance. Scenarios where users



alerts, and ensuring ease of integration with existing workflows.

Support for bottom-up efforts is equally valuable, especially when aiming to meet specific organization needs in an efficient, cost-friendly manner. System throughput and latency naturally stand out as primary design considerations, underlying all strategic decisions within the broader development plan. In addition to optimizing resource utilization, such considerations pave the way toward low-latency, near-real-time solutions for destinations handling tens of thousands of transactions per hour. Expandability, versatility, and fault tolerance also support increasingly high throughput requirements across application levels, without compromising the demand for precision—indeed, by increasing it in selected operational contexts.

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