

Guidance on submitting better quality Suspicious Activity Reports

Provide **better quality SARs** by following this best practice guidance from the National Crime Agency's UK Financial Intelligence Unit (UKFIU) and Flag It Up

1 Use names, surnames and dates of birth

These key identifiers are used by law enforcement to corroborate the identity of individuals. Where information is not known, using the word UNKNOWN may negate the need for law enforcement to contact the reporter to ascertain whether the information exists. If known, providing details of the main subject's occupation and employer will assist law enforcement with judgements about the origin of funds, and whether the subject is using professional knowledge to facilitate money laundering.

2 Include a postcode

The UKFIU can use postcodes to allocate SARs to the appropriate law enforcement agency. This offers opportunities to take local action and build an intelligence picture. Postcodes and international addresses are also crucial elements in the analysis of trends, such as identifying hotspots of activity.

3 Include relevant transactions

The majority of Defence Against Money Laundering (DAML) SARs include transactions that relate to the request for a defence against a principal money laundering offence. It is important from an investigation point of view to include relevant transactions in the SAR, including the method of the transaction and an indication as to where the request of funds is going to and from.

4 Explicitly describe criminal funds or property

The legal requirement for a DAML request is that the reporter knows, suspects or believes that funds are criminal. The UKFIU DAML Team cannot interpret, assume or infer meaning from a suspicion. Therefore, criminal property in a DAML request should be explicitly described. Concerns or suspicions over account activity without an explanation as to why the reporter believes funds to be criminal will result in the DAML Team having to contact the reporter for clarification.

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5 Clearly specify the 'prohibited act'

When discussing a 'prohibited act' the NCA refers to the proposed activity that the reporter is seeking a defence to undertake. In requesting details of the prohibited act, the NCA does not mean:

- The suspected criminality being undertaken by the subject.
- The particular section under the Proceeds of Crime Act 2002 for which the reporter is seeking a defence.
- A general statement that "the prohibited act for which we seek a defence is money laundering" or similar.

The prohibited act or acts of any DAML request should be explicitly stated with a clear indication of a specified time-frame. The lack of an explicit prohibited act within the context of the SAR will result in the DAML Team having to contact the reporter for clarification. Requests for a DAML must be for a specified activity or specified series of activities and should not be open ended.

6 Do not include unnecessary subject details in the 'reason for suspicion' field

The subject's details need only be included in the subject fields; they do not need to be replicated in the 'reason for suspicion' field.

7 Use SAR glossary codes

This is good practice and allows the UKFIU and wider law enforcement to conduct analysis to identify money laundering trends. Where appropriate, multiple glossary codes should be used.

8 Include the business type

This important element may assist an investigating officer in deciding whether or not an individual or company may have an involvement with money laundering due to the type of business they own.

REMEMBER

- Plainly outline the reason for suspicion
- Include a description of the property that you suspect to be criminal or the proceeds of crime
- Provide a clear, specified, prohibited act that you wish to carry out within a specific time-frame.

For more information and guidance on submitting SARs please visit:

nationalcrimeagency.gov.uk/about-us/what-we-do/economic-crime/ukfiu

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