

Submitting suspicious activity reports, UKFIU advice

News

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The UK Financial Intelligence Unit (UKFIU) is responsible for receiving and analysing suspicious activity reports (SARs) and disseminating intelligence to law enforcement agencies both within the UK and overseas. We sit at the heart of the SARs regime, working with reporters and law enforcement to combat serious and organised crime.

SARs are submitted by reporters where there is the knowledge or suspicion that an organisation or individual is engaged in money laundering or terrorist financing. While anyone can submit a SAR, persons working in the regulated sector are required under Part 7 of the Proceeds of Crime Act 2002 (POCA) and the Terrorism Act 2000 (TACT) to submit a SAR in respect of information that comes to them in the course of their business if they know, suspect, or have reasonable grounds for knowing or suspecting, that a person is engaged in, or attempting to engage in, money laundering or terrorist financing.

The SARs database holds approximately 3.8 million SARs at present. Over recent years, UKFIU has been receiving consistently higher volumes of submissions, with more than 900,000 SARs received in the past year alone. The regime is a wealth of intelligence that, without the support of the UK's regulated sector, would not be available to law enforcement partners.

That said, there is little value in holding millions of SARs if they're written in a way that:

1. makes it difficult for the UKFIU to validate and manage the regime.
2. law enforcement cannot exploit for use in their investigations.

SARs are not just used in financial investigations; they can be used in **any** law enforcement investigation and are searchable by accredited officers for several years. The UKFIU is an Egmont member – this is an international organisation which facilitates and prompts the exchange of information amongst FIUs (www.egmontgroup.org [<http://www.egmontgroup.org>]). Due to this, disclosures made into the UK's SARs database have the potential to assist investigations in many parts of the world, following case management at the UKFIU. The scope and potential of SARs reports truly is massive.

The Reporter Engagement Function within the UKFIU was set up with the task of ensuring that all these SARs are written in a way that makes them useful to the UKFIU and wider law enforcement. There is a guidance document on [the NCA website \[https://www.nationalcrimeagency.gov.uk/who-we-are/publications/633-submitting-a-suspicious-activity-report-sar-within-the-regulated-sector-1/file\]](https://www.nationalcrimeagency.gov.uk/who-we-are/publications/633-submitting-a-suspicious-activity-report-sar-within-the-regulated-sector-1/file) that helps reporters create well written SARs that are fit for purpose.

However, as an Engagement Officer, I'm often asked what are my top tips for submitting useful SARs into the regime?

I've come up with three tips and explanations as to why they are important:

1. **Glossary Codes:** These are codes that we circulate to reporters and are available on our website. Each one indicates that your SAR submission relates to a specific threat area, but you might not realise why they are so useful to the UKFIU. They are crucial for enabling us to conduct analysis, feed intelligence pictures up to our Senior Management Teams and fast-track high risk or time sensitive cases for development.
2. **Structure:** The UKFIU and wider law enforcement can read hundreds, even thousands of SARs, per week. By enabling us to validate SARs quickly, ensuring all required elements of POCA or TACT have been met, it means we will be less likely to refer back to the reporter for further information. All parties can manage resources more effectively.
3. **Useful Information:** Finally, put yourself in the shoes of an investigator and consider what would be useful, given the context of your SAR. For example, account numbers are unique identifiers and searchable by law enforcement. If funds are moving overseas, it's best practice to include the jurisdictions. If you are filing a SAR because the police got in touch with you, let us know which police force or unit it was (please do not include any officers' names) so we can ensure that it is sent to the correct place. Consider including other information like IP addresses for your subject, or advising in the SAR if you hold scanned documents like copies of passports. By doing that, the investigators know exactly where to look for the intelligence they require to further their investigation.