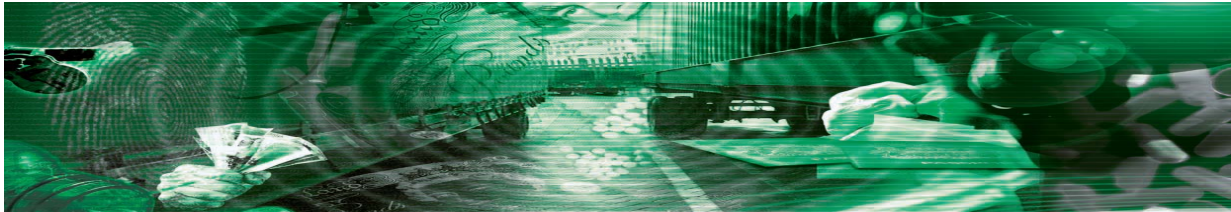




Completing a Suspicious Activity Report (SAR)



This leaflet seeks to provide advice and relay best practice when making a SAR. A SAR is a piece of information that alerts law enforcement that certain client/customer activity is in some way suspicious and might indicate money laundering or terrorist financing. By submitting a SAR to the Serious Organised Crime Agency (SOCA) you will be providing law enforcement with valuable information of potential criminality and complying with certain obligations you have under the Proceeds of Crime Act 2002 (POCA).

Tips for Reporters

Making a quality report that is structured in a logical format and includes all the relevant information will significantly enhance law enforcement's ability to extract greater value from the SARs that you submit:

- Please ensure you include and accurately input as much 'Know Your Customer' (KYC), now also referred to as Customer Due Diligence (CDD) detail as possible. Include the subject's full name, date of birth, passport number, National Insurance number, telephone numbers (home, business and mobile), company name/registration number, e-mail addresses, associated addresses and postcodes, if you have this information. Please specify between current and previous addresses. Do not include the investigating officers' names.
- Provide an initial summary that clearly defines the grounds for suspicion and, where possible, any links to criminality. Apply a logical structure, detailing chronologically, the dates of individual transactions. Keep reports clear and concise and avoid the use of technical jargon.
- Where you are suspicious because the activity deviates from the normal activity for that customer, business or sector, you may need to explain what the normal activity is and how this differs.
- Include the value of the transactions involved, the origins/destination of the funds and, if applicable, the associated crime number at the top of the report. Also, where applicable the reference numbers of any previous related SARs.

Consent Requests

The Consent Team manages the resolution of SARs seeking consent to perform what may be a 'prohibited act' under the Proceeds of Crime Act 2002.

- Please ensure you tick the appropriate 'Consent Box' and provide clarity as to the specific activity where consent is required.
- If you are making a Threshold request please specify a threshold amount and the account it relates to with reasons for the variation.

continued overleaf...



SARs generated from Pre-Order Enquiries and Production Orders

Although POCA does not allow for the 'transfer of suspicion' to another person, knowledge of law enforcement interest in a customer will naturally act as a catalyst for an institution to review their records and Customer Due Diligence (CDD) in respect of that client. This is good business practice since it may help identify system weaknesses or additional training requirements. Closer scrutiny of CDD may also facilitate the identification of suspicion that was not previously detected. Where SARs do not add anything in addition to that already contained within the Production Order material, you are encouraged to include 'For Intelligence Purposes Only' in the top line of the 'Reason for Suspicion' field of the SAR.

Reporting Crime and SARs

When you have knowledge or suspicion of an acquisitive crime, you will be faced with a parallel decision making process. Firstly, you will have to decide whether or not to report the crime to your local police force. Secondly, regardless of whether or not a crime report has been made, you will have to consider your legal obligations under POCA 2002. If you have knowledge or suspicion that a money laundering offence is taking place, then you must submit a SAR to SOCA. Where the matter has been reported as a crime you are encouraged to include the Crime Reference Number in the top line of the 'Reason for Suspicion' field of the SAR.

SARs Glossary of Terms

The SARs Glossary of Terms provides immediately identifiable headings that are used for categorising certain types of suspicious activity when submitting reports. This significantly enhances the capabilities of end-users (e.g. Law Enforcement Agencies) to utilise submissions from reporters and will also reduce the effort expended by reporters in completing SARs. Guidance and a full description of the terms and definitions within the SARs Glossary of Terms are available on the SOCA website.

Alerts and Keywords

The Alerts process is a recognised and established way by which SOCA communicates with the UK's private sector. These are written communications that warn of a specific risk, threat or problem. All Alerts contain a keyword. If you submit a SAR on the strength of an Alert please include the keyword within the free text field. This will greatly assist law enforcement.

Enquiries and Support

You can submit a SAR easily and securely via SAR Online. Guidance on how to register and submit a SAR is available on the SOCA website at www.soca.gov.uk. There is also a dedicated support team available during office hours to deal with any SAR Online enquiries you may have. Please telephone 020 7238 8282 and select option '3'.



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