

Completing and Submitting Suspicious Activity Reports (SARS) Using SAR online.

Slide 3 - The Proceeds of Crime department sits within the Intervention directorate of SOCA.

The Proceeds of Crime (PoC) department seeks to reduce harm to the UK by taking the profit out of crime. It operates across four areas:

Business Strategy - Providing strategic direction and innovation.

Operations - Which aims to disrupt and recover the proceeds of crime; and develop others' capability to do so. The department champions proceeds of crime-related activity to ensure that all SOCA's operational activity contains elements of financial investigation, asset denial and recovery.

UKFIU -The United Kingdom Financial Intelligence Unit (UKFIU) has national responsibility for the gathering, analysis and dissemination of financial intelligence submitted through the Suspicious Activity Report regime. The FIU also includes the National Central Office for the Suppression of Counterfeit Currency (NCO) which is responsible for all matters relating to the counterfeiting of currency and protected coins.

Civil Recovery & Tax - The Civil Recovery and Tax Branch (CRT) comprises financial investigators and lawyers who work together to recover the proceeds of crime using civil legislation. If property is identified i.e. houses, money or any other valuable object, that has been financed by criminal activity it may be recovered, therefore the CRT mostly deal with cases that have failed during the criminal process for whatever reason.

All branches work closely with partners from law enforcement and regulators to private and public sectors both in the UK and internationally.

Slide 4 - The UK Financial Intelligence Unit (UK FIU) sits within POC and has national responsibility for gathering, analysis and dissemination of the financial intelligence submitted through the Suspicious Activity Report (SAR) regime. Within the UKFIU there are a number of specialist teams, for example TFT, PEPS and Consent one of whom may deal with report depending on its content.

Slide 6 -The SAR online system is accessible via our website

Slide 7 - Once on the home page, you will need to click on "Submit a Suspicious Activity Report" in the bottom right hand corner under Related Links.

Slide 8 - Once on the home page for SAR online, you will need to click on Register at the top of the page to start the process.

Slide 9 - In order to register you will need to supply a fully functioning email address and enter the disguised code detailed on screen. The disguised code is a security measure designed to distinguish between a human and a computer and repel attacks on the system.

Slide 10 – This screen requires you to enter the details of the reporting institution you represent and your regulator.

Once you have completed the required details you should then click on Register at the bottom of the page to continue.

Slide 11 - You should receive a message of success on screen, within this message is detailed your first activation code. This code only appears on screen and will be irretrievable if you leave this screen without making a note or printing it first.

Slide 12 - This screen also highlights that your second activation code will have been sent to the email address you have just registered with.

Activation codes are supplied to you in two different ways for security reasons. Similarly the codes you receive only have a seven day lifespan from the day they are generated. Therefore you should endeavour to register and activate your account before seven days have elapsed.

Slide 13 - Once in possession of both codes you can activate your account. Activation Code 1 which was displayed on screen should be entered into the first box and Activation Code 2 received by email should be entered into the second box, once this is done you should click on Activate. Please note: You should be aware that activation codes are case sensitive and must be entered exactly as seen.

Slide 16 - Asterisks denote mandatory fields, all mandatory fields must be completed to achieve a successful submission.

Slide 17 SAR Header - Consent Required box This by default is unticked on the application, if you require Consent from SOCA you need to ensure this box is ticked, so that it is dealt with by the appropriate team and within the required timescale as laid down in legislation.

Consent should be sought if:

You have a suspicion that you may be dealing with the proceeds of crime (in whole or in part) and the instructions from your client/ customer require you to commit one of the three money laundering offences i.e. concealing/converting, arranging/facilitating, using or possessing criminal property.

SAR Access Level – This can be set to either “shared “or “private”

Private - means it can only be viewed or edited by you and will not appear to other colleagues who may also have been nominated to use the facility within your organisation.

Shared – This means it can be viewed or edited by other members of your organisation who have been nominated to use the site.

Slide 18 Main Subject - The main subject of your report can be either an individual or a company when clicking on step 2 you will be asked if this is a person or a legal entity.

The mandatory fields on this page are the Surname and Gender fields.

Slide 19 - However in the case of an individual with a popular surname, a full name and DOB (where known) is invaluable in helping to positively verify the identity of the subject.

Also of note is that on Steps 2, 3 and 4 there are options at the bottom of the page to add further details if required.

Slide 20 Address Details - Current address details including postcodes for the main subject and any associated subject(s) are often a starting point for any Law Enforcement enquires. Addresses provided without a postcode (which are not denoted as an international address, by the presence of three asterisks) will lead to the report not being automatically allocated to a force area and thus may restrict or delay any action taken.

By default the current address box is ticked, if for any reason the address information you have for the main subject is not current you should ensure this box is unticked. To take account of the fact that once received into our database, SARs are automatically allocated to a force area based on the current address details supplied for the main subject.

Slide 21 Other Information – Other identifying information like National Insurance numbers, VAT registration numbers, Company directorships, phone numbers email/ website addresses can all prove incredibly useful.

However we don't expect you to go above and beyond what is immediately available to you.

Slide 22 Associated subject(s) – This can be a company (Legal Entity) or a person(s) where applicable.

Where the associated subject is a company other useful information to detail if known includes registered, trading or correspondence addresses and/or the names of key individuals and their association. In particular those in a position to control or conduct transactions, such as company directors, shareholders, trustees and authorised signatories.

Slide 23 Transactions - This page will only accept current or retrospective transactions it will not accept future dated ones. The three mandatory fields on this page are only mandatory if you have entered other transaction details on this page. (as detailed on the slide)

Slide 25 Reasons for suspicion - This should be concise, structured and avoid the use of jargon. It should detail the type of activity that is believed to be taking or have taken place and why this particular activity is suspicious. Some background information in relation to the subject and the length of the relationship would be helpful to put the suspicious activity in context.

If the transaction or activity is particularly complex, it is always worth giving a précis, this makes it much more useable by the Financial Investigator (FI) at the other end without further enquiry.

Nothing focuses the mind more than £ signs – so details of the level of funds involved are also important.

If you are requesting Consent from SOCA, you should ensure you clearly state in this field that you are seeking Consent and what you are seeking Consent for?

If the report refers to a potential Politically Exposed Person (PEP) you should strive to provide as much information as possible relating to your suspicion, explaining how you have ascertained that this individual may be PEP. As well as details of the enhanced due diligence (further research) that has been undertaken to assess the risks involved.

The SAR glossary of terms (available on our website) was devised as a result of feedback from reporters and end users which identified a shared desire to have common terms for categorising suspicious activity. When submitting a SAR the relevant search prefix(s) taken from the glossary should be included in the reason for suspicion field. If more than one prefix applies, please include all relevant prefixes at the beginning of your report.

Once you have completed all the details and are satisfied that you have provided as much information as possible, you should click the submit SAR button. You will then see a further page asking you to save or print a copy of your SAR. Once you have done this you should then proceed to the bottom of this page and click on the second "submit" button.

Confirmation of SOCA's receipt of your report will be provided to you with a Unique Reference Number (URN) to the email address of the submitting user.

Slide 26 - If you have very limited information, but still feel you should submit a SAR, you can submit a Limited Intelligence Value (LIV) report, by completing Step1, 2 and 5 of the online form. Ensuring that you have completed all mandatory fields on these pages will still allow a successful submission