



NCA

National Crime Agency

SARs Reporter Booklet

February 2017

This is a UK Financial Intelligence Unit (UKFIU) product for reporters of Suspicious Activity Reports, produced in line with the National Crime Agency's commitment to share perspectives on the SARs regime.

Overview

This document is produced by the United Kingdom Financial Intelligence Unit (UKFIU) which has national responsibility for receiving, analysing and disseminating financial intelligence submitted through the Suspicious Activity Reports (SARs) regime. The UKFIU sits within the National Crime Agency (NCA) and receives over 380,000 SARs a year.

This booklet contains a sanitised summary of feedback from law enforcement agencies (LEAs) on their use of SARs and includes pertinent information and updates from the UKFIU.

The contents of this booklet are aimed at:

- sharing perspectives on the use of SARs with participants of the regime
- sharing and encouraging best practice among reporters
- providing a feedback mechanism to the UKFIU about the operation of the regime.

More information about the UKFIU, the SARs regime and further guidance notes can be found at the NCA website www.nationalcrimeagency.gov.uk. The UKFIU section can be found by navigating from the front page: About us/What we do/Economic Crime Command/UK Financial Intelligence Unit.

We would appreciate your feedback on the effectiveness and format of this document. Please email any comments to ukfiufeedback@nca.x.gsi.gov.uk

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UKFIU assistance

For information or assistance with submitting SARs or SAR Online enquiries, please visit www.nationalcrimeagency.gov.uk or contact the UKFIU on 020 7238 8282:

Press '2' – General SAR enquiries

Press '3' – SAR Online helpdesk

When contacting the UKFIU please have available your SAR reference number if applicable. If you wish to make a SAR by post you should address your SAR to UKFIU, PO Box 8000, London, SE11 5EN or by fax on 0207 283 8286. **NB:** post and fax are slower than SAR Online and therefore it will take longer for your SAR to be processed. You will not receive an acknowledgement if you use post or fax.

General UKFIU matters may be emailed to ukfiusars@nca.x.gsi.gov.uk

All defence against money laundering (DAML) request queries are only dealt with via email. Should you have any queries email DAML@nca.x.gsi.gov.uk

Foreword

It is with very great pleasure that I present you with the latest SARs Reporter Booklet

As ever, it has been a busy period for the UKFIU since the last booklet. The UKFIU has continued to experience a yearly increase in the number of SARs received as well as an increase in the number of cases where a Defence Against Money Laundering (DAML) has been requested. In order to successfully manage the receipt and processing of these and future SARs, we have needed to realign the UKFIU's existing resources and structure. As of the beginning of 2017 the UKFIU has embarked on a restructure, details of which can be found on page 13.

We have issued a number of products identifying typologies seen in various sectors to outline the visibility of certain sectors, wittingly or unwittingly, enabling money laundering as seen in the SARs data set. The aim of these typologies is to raise awareness and offer useful red flag indicators for potential use by reporters. The reports were created for SAR regulators/supervisors and engagement groups. The reports have looked at the accountancy, legal, charity and property sectors, as well as professional enablers and high-end money laundering. The UKFIU has also provided assistance to the Home Office in its current 'Flag it up' campaign, which aims to help solicitors and accountants identify potential money laundering signs.

We have already received positive examples of how the new DAML process – which was introduced in July 2016 – has been influencing reporter behaviour. A post implementation review of the new DAML process is currently underway. This will be a six month review of the changes and will include sector specific feedback on case numbers and statistics including: cases closed for standards where reporters were asked for more information; cases where reporters needed more than one letter asking for more information; cases which were closed when the UKFIU didn't get a response; cases where the UKFIU sent a Letter J reminding the reporter of their responsibilities under the Money Laundering Regulations and where the NCA could not make a decision because of a lack of 'know your customer'/customer due diligence. We hope to be able to share this data with regulators and members of the SARs Regime Committee shortly.¹

In October 2016 the Home Secretary introduced the Criminal Finances Bill to Parliament. The NCA (including the UKFIU) has worked closely with the Home Office on this. The plan is for the Bill to get Royal Assent soon after Easter and for the provisions to come into force this Autumn. The main provisions that relate to the UKFIU/SARs regime are extending the moratorium period (up to a maximum of six months in certain circumstances), the power of the UKFIU to request additional information from reporting entities in order to perform analysis and information sharing within the private sector. The NCA has made it clear publicly that provisions

¹ Details of the new DAML process can be found in the UKFIU document 'Requesting a defence from the NCA under POCA and TACT' available from the UKFIU's pages on the NCA website (see page 16 of this booklet for details).

in the Bill will notably improve the powers available for law enforcement to tackle criminal finances and we welcome the Government's commitment to ensuring that law enforcement have the right tools at their disposal.

The following few months will be a busy time for the UKFIU as HM Treasury leads the UK's preparation for the upcoming mutual evaluation conducted by the Financial Action Task Force (FATF), supported by the Home Office. Significant changes to assessment methodology have been introduced since the UK's last assessment in 2007. Compliance, as before, will be judged against technical requirements (40 in total although they have changed since 2007). A further separate assessment will be made of the UK's 'effectiveness' in 11 standalone anti-money laundering (AML)/counter financing of terrorism (CFT) areas called Immediate Outcomes. This change of focus from outputs to outcomes requires the UK to present a more qualitative report to assessors consisting of case studies, narrative and impact assessments linked to relevant data. The UKFIU will be fully engaged in the preparation and evaluation process.

I hope this provides useful reading and feedback to the reporting community.

Alan Hislop,
Head of the UKFIU

Case studies

A review of case studies provided by LEAs and other end users² of SARs demonstrates how they continue to be instrumental in instigating and supporting investigations to tackle a wide range of the highest priority threats identified by the National Strategic Assessment of Serious and Organised Crime (NSA).³

Money laundering

A number of SARs raised concerns about an individual receiving large credits into his account, with the funds exclusively withdrawn in cash. The subject was already known to a variety of agencies; however, the SARs enhanced the concerns of the agencies, identified previously unknown accounts and highlighted the scale of the funds involved, which was previously unknown. The subject was charged with handling stolen goods and money laundering.

A subject was receiving regular unexplained large cash credits on their account. The financial investigator (FI) was able to link the subject to criminality using Arena⁴ which identified links to nail bars – a modus operandi for forced labour and money laundering. Enquiries are on-going.

SAR intelligence was received regarding a subject transferring monies overseas. Although the subject was linked to the head of an organised crime group (OCG), no criminal activity could be established. A check of Arena showed that someone connected to the subject had transferred larger amounts overseas over a longer period. A civil investigation meant that over £80,000 was successfully restrained.

A case started as a money laundering enquiry due to the initial SARs showing that large sums of cash were passing through the subject's account with debits in cash by transfer to family members' accounts overseas. Developing the intelligence the LEA identified that the subject was involved in human trafficking and prostitution. Evidence was gathered in relation to movements of the subject and his associates. Cash seizures were made and one person received a prison sentence.

Drugs

Large deposits were seen going into a suspect's accounts and intelligence checks highlighted drug dealing activity. A number of people were arrested, whilst a SAR assisted in the restraint of assets before they could be dissipated.

² A current or potential user of SARs such as an LEA or relevant government body.

³ Public version issued June 2015; available on the NCA website.

⁴ A search and analysis tool for end users of SARs.

A reporting institution submitted a disclosure due to concerns over high volumes of cash credits and debits identified in an account. The development of a SAR identified links to known criminality which resulted in a warrant being executed at the subject's home address and the discovery of cannabis cultivation. The subject was charged and received a community sentence. Confiscation proceedings are on-going.

A number of SARs related to multi-cash deposits in multiple locations; the SARs were linked to several other individuals and assisted in identifying funds flow and commodities of prisoners' friends and families who were sending and receiving monies on their behalf. This was linked to the sale of drugs in prison. Those involved received prison sentences.

Fraud

SAR intelligence assisted in identifying the location of a person relevant to a confiscation investigation. Without this information it is likely that the location of the person would not have been identified and that evidence would not have been obtained. The SAR intelligence has led to the arrest of a number of members of a UK-based OCG, the seizure of cash estimated at £100,000 and the restraint of over £3m in assets.

The submission of a SAR requesting a DAML enabled the identification of a bank account which was the location of funds from a £1.1m fraud. A number of people have been arrested and the funds restrained, whilst enquiries are on-going.

SAR intelligence led to the instigation of an investigation which resulted in two individuals receiving prison sentences for their involvement in a fraud totalling £750,000. Compensation from a substantial confiscation order was awarded to the victims.

SARs were received relating to a suspected insurance fraud which entailed accounts from two separate banking institutions. SAR intelligence has highlighted successful fraudulent pay-outs in the region of £500,000. A number of individuals have been arrested and restraints are on-going.

SARs uncovered numerous bank accounts not known to the investigation team in a recent high value benefit fraud involving the hijacking of identities which were then used to make claims for sickness benefits. The fraud cost the public purse over £450,000 involving hundreds of identities. The defendants received lengthy prison sentences. Confiscation proceedings are underway.

Money mule networks⁵ involving accounts held in the names of non-UK individuals were identified from over 50 SARs. The accounts had been used to receive fraudulent tax refunds from Her Majesty's Revenue & Customs (HMRC) and launder them through transfers between the accounts and cash transactions, with approximately £190,000 being laundered in this manner. It is believed that the accounts were set up for this purpose and that the account holders have returned to their home countries. Intelligence concerning their activities has been disseminated to the relevant overseas authorities

As part of an on-going fraud enquiry, a restraint order was requested. This was assisted by requests for a defence against money laundering enabling funds to be held whilst the order was obtained. A restraint order for over £290,000 was granted. The subject subsequently received a prison sentence.

SARs requesting a DAML identified a pattern of usage on accounts that was not in keeping with what the reporters expected. A proactive LEA investigation and a cash seizure resulted in one person receiving a suspended prison sentence for converting/removing and concealing criminal property. The subject had been trading in counterfeit items purchased overseas.

A known offender pleaded guilty to a number of counts of fraud by false representation and received a custodial sentence. The offender was offering non-existent tickets to public events using social media. SAR intelligence alerted the local LEA that the offender was active again and identified various lines of enquiry. SAR intelligence also identified further victims, signalling the potential scale of criminality.

SAR intelligence identified the suspicious flow of funds to and from a customer's account. The subject's account was being used to receive funds from a scam, with these funds then being forwarded onto a third party outside of the UK. The subject subsequently received a prison sentence and was ordered to pay compensation.

A number of SARs requesting a DAML were received with subjects asking to withdraw cash from bank accounts. A common link was identified in that the funds originated from a central account which in turn had originated from a business account. There appeared to be no reason behind the transfers. An LEA investigation established that bogus investors had gained access to the bank account of a victim and a substantial amount of funds had been removed from the account before being distributed to mules. Enquiries are on-going.

⁵ A person who transfers money acquired illegally on behalf of others.

A number of SARs were received relating to an on-going boiler room fraud, in which the boiler room 'call centre' had been set up in the local LEA's area.⁶ Arrests have been made. The SARs have provided crucial financial information on various individuals relating to the investigation and have assisted in building an overall intelligence profile of a sophisticated set up. Enquiries are on-going.

SARs linked to an active large fraud investigation have helped to identify other suspects involved in the fraud. Funds were fraudulently removed from company accounts by an employee who subsequently transferred funds to others. The investigating LEA said that "the quality of reporting on each occasion has been informative, and easy to read and understand". Enquiries are on-going.

The subject of an investigation into fraud and money laundering was arrested for conspiracy to steal. SARs highlighted that the subject was passing significant funds through his accounts which were being transferred to other subjects. Enquiries are on-going.

SARs have assisted in identifying offences of fraud regarding accounts held by individuals who do not exist which appear to have been made possible by offenders taking out loans and transferring them before defaulting on the payments. Checks have also identified a number of real subjects who have frequently changed their names. Restraints are in place and enquiries are on-going.

A reporter requested a DAML to pay back funds to a firm as it was concerned that transactions in its account appeared to be from suspected victims of boiler room activity. Whilst an investigation and restraint were not viable at the time of the disclosure, the reporter indicated that the monies were returned to the identified investors.

A reporter raised suspicion that a customer's account was funded with the proceeds of crime. A DAML request was refused and the subsequent restraint order assisted in withholding assets for confiscation proceedings. The offender was found guilty of fraud by abuse of position and received a suspended prison sentence. The subject received a confiscation order for over £10,000.

A SAR requesting a DAML initiated a criminal investigation as it raised suspicions about large deposits in and withdrawals from an account. An investigation was carried out based on the fact that means tested benefit was being paid into the account in addition to funds received from unknown sources. The subject was subsequently convicted of committing benefit fraud, received a suspended prison sentence and a confiscation order was obtained.

⁶ A boiler room is where fraudsters cold-call investors offering them shares which are usually worthless, overpriced or non-existent.

A high volume of SARs related to specific postcodes. The SARs identified a number of nominals who had opened bank accounts using false documentation and utilised these accounts to launder funds which had been obtained through fraudulent means. A search of their addresses revealed a number of false identity documents. These individuals are part of a larger OCG operating throughout the UK. Deportation proceedings have been initiated against some of the individuals and enquiries are on-going.

The continued input of SARs by various financial institutions (relating to vishing⁷ and mule accounts) has confirmed links/crossovers between a number of operations. The continued flow of financial intelligence received from SARs has confirmed both financial and geographical similarities which have been of crucial significance in the investigations and the impending prosecution of identified accused.

As a direct result of SAR intelligence an investigation was initiated in respect of the subject. The subject had been removing significant amounts from a company they worked for over a number of years. The subject pleaded guilty to theft and fraud and received a prison sentence.

Information that money had been laundered from criminal activity through a UK based company was received, yet no other intelligence was held around the transactions. Money.web⁸ searches, however, identified a number of transactions showing money arriving from outside the UK into a UK-based company and going back out again to overseas. The SAR information played a critical part in furthering the case in intelligence terms.

Vulnerable persons

While fulfilling anti-money laundering and terrorist financing obligations reporters sometimes identify those who are being exploited or who are potential victims of fraud.

Common types of fraud encountered include investment fraud (and variations including pension liberation fraud)⁹, romance fraud¹⁰ and individuals unwittingly engaged in money mule activity.

⁷ The fraudulent practice of making phone calls or leaving voice messages purporting to be from reputable companies in order to induce individuals to reveal personal information such as bank details.

⁸ The online portal through which end users access the SARs database.

⁹ Fraud where members of the public are encouraged to access their pension before retirement, following false representations of anticipated levels of returns when investments are either non-existent or incapable of providing such a return.

¹⁰ Dating or romance scam, when the 'perfect partner', usually online, gains the victim's trust and asks for money.

Relevant SARs are identified and fast-tracked by the UKFIU to police forces who will, in many cases, arrange visits by local officers – whilst maintaining the confidentiality aspect of SARs – to offer advice in order to prevent fraud or further losses.

SAR intelligence identified that the subject had sent a large number of transfers totalling over £100,000 to unrelated people overseas within a short period of time. It was feared that the subject was the victim of a romance scam. The local LEA sent fraud prevention officers to engage with the subject to prevent them from continuing to be a victim of online fraud.

The UKFIU fast-tracked a SAR to a local LEA as it was believed that the subject, a septuagenarian, was a victim of investment fraud. The subject was planning to send money to a company that had been behind a previous scam. The LEA conducted background checks on the suspicious company and visited the subject to provide reassurance and advice. No further SARs have been received in relation to the subject.

SAR intelligence raised concerns about a perceived vulnerable person being coerced into applying for a loan. The UKFIU fast-tracked the SAR to the relevant LEA. One person was subsequently charged with a number of counts of fraud by false representation and received a prison sentence. The LEA stated that investigating the original victim brought to light a second victim, proving “how valuable the SARs regime is”.

A SAR initiated a police investigation. The reporter was suspicious of the legitimacy of a third party transfer credit received into a customer’s account, believing it to have been obtained via deception. The subject was subsequently charged with making false representation and money laundering offences. The LEA stated that “without this disclosure, it is possible that the suspect would still be committing offences against the vulnerable/elderly. This is a very good example of the effectiveness of the SARs process”.

A reporter submitted a SAR on a subject who wanted to send a money transfer to West Africa. The reporter was concerned the subject was possibly the victim of a romance and loan scam. The subject was visited by local police, advice given and Action Fraud notified. Follow up visits have been arranged as the victim was identified as vulnerable.

A reporter raised concerns that one of its customers had fallen victim to a romance scam following excessive activity on his account within a short time frame. Law enforcement visited the subject and provided suitable advice. The subject informed Action Fraud. The subject had sent over £4,000 to one receiver in West Africa.

A reporter submitted a SAR raising concerns about large amounts of money in the form of cheques entering an account which did not tally with the subject's personal circumstances. The investigating LEA established the identity of the person writing the cheques and that the cheques related to rogue trader work. A number of people have been arrested. The funds were restrained and enquiries are on-going. The LEA stated that this was an excellent outcome that prevented the victim losing further funds and the recovery of some that had already gone.

After receiving a SAR, an LEA's local policing team visited the subject who it was felt was the victim of a romance scam. After the visit, intervention was made and a partnership referral made to social services to ensure the subject was safeguarded and that no further money was sent overseas to fraudsters. Although the subject of the SAR was not elderly, they were deemed vulnerable due to loneliness. The LEA said: "this is a great example of our process working: from SAR to local policing team visit to partner agency referral."

A vulnerable elderly woman was identified by a reporter as being a potential victim of fraud due to her sending large amounts of money to several countries. The reporter refunded some of these transactions back to her and had taken steps to prevent her from continuing to send money transfers. The local LEA visited her and it transpired she had been the victim of a romance scam. The family were made aware and took control of her finances; she is no longer being targeted by this OCG.

Other

A SAR alerted law enforcement to the fact that the subject's bank account had been funded exclusively by large cash deposits. The subject had previous convictions and intelligence linked him to acquisitive crime and no legitimate income. He was subsequently charged with possession of criminal property and received a custodial sentence. A confiscation order for more than £20,000 followed.

A major investigation looked at a large number of individuals and companies. A search of money.web resulted in over 40 SARs linked to the individual subjects and their companies. These SARs have identified over 120 financially linked business and personal accounts, of which over 30 relate to a number of the main individuals. A further large number of business accounts have also been identified in relation to the companies under investigation. There are also indications of financial links to individuals linked to other investigations. Enquiries are on-going.

SARs allowed an LEA to corroborate its suspicions that an individual was assisting with labour exploitation by accepting third party payments into their accounts. Without this corroboration, the LEA would not have had grounds to conduct further financial research or to arrange further action with law enforcement partners.

SARs assisted in an investigation into suspected human trafficking, drugs and money laundering offences. SAR intelligence identified a network of individuals transferring proceeds across a number of countries. The operation resulted in one person receiving a prison sentence.

A restraint was sought after a SAR detailed the sale of a property owned by the subject who was serving a prison sentence. The funds left will be paid towards the subject's outstanding confiscation order.

SARs have been instrumental in a human trafficking investigation whereby young women were/are being trafficked into the UK to work in the sex industry. SARs have helped to show the movement of the women, where they were working, property rentals, the sums of money involved and have also helped to identify those organising/facilitating the women's transportation. A number of arrests and charges have been made and enquiries are on-going.

SARs regime and other updates

UKFIU restructure

The UKFIU has continued to experience a yearly increase in the number of SARs received. In order to successfully manage the receipt and processing of these and future SARs, the UKFIU has needed to realign its existing resources and structure. As of the beginning of 2017 the UKFIU has embarked on a restructure.

The new structure aims to provide greater resilience and provide an opportunity to surge resources in response to priority areas should it be needed; therefore, improving timeliness in responding to information requests. There is an emphasis on placing more resources in critical areas e.g. more trained staff dealing with DAML SARs and information exchanges with overseas FIUs. The new structure brings more efficient processing of searches and analysis through an assembly of an expert cadre skilled through daily use of available systems.

Engagement with partners will be managed but will be based on the practical experience of those who have the expert knowledge either from handling and processing the SARs, developing intelligence packages or through expertise developed from technical ICT knowledge of our systems.

As the FATF Mutual Evaluation draws closer, the restructure will enable us to better meet the international and legal requirements on the UKFIU.

A review of feedback provided by LEAs and other end users of SARs has also focused on the timeliness of receipt of SAR referrals, especially for DAML requests and information exchanges with overseas FIUs.

What this means for yourselves as reporters is that you may receive email and correspondence from different staff within the UKFIU. The UKFIU intends a transitional approach to take into account the overall changes and we therefore ask SARs regime stakeholders to bear with us during this period.

Better quality SARs

In September 2016 the UKFIU published a new guidance booklet – ‘Guidance on submitting better quality Suspicious Activity Reports (SARs)’ – available from the NCA website.

This document is a comprehensive guide aimed at providing all reporters with guidance on how to submit quality SARs to the NCA. If all of the good guidance is followed, it will enable the UKFIU and LEAs to gain a fuller picture of:

- who is doing what
- who they are/were doing it with
- when they are/were doing it
- why they are/were doing it
- where they did it
- how they are doing it.

It will also allow for the prioritisation of SARs requesting a DAML or investigations in a timely manner.

Always

- identify as clearly as possible the suspected benefit from criminal conduct (the ‘criminal property’) including, where possible, the amount of benefit
- identify the reason(s) for suspecting that property is criminal property
- identify the proposed prohibited act/s you seek to undertake involving the criminal property
- identify the other party/parties involved in dealing with the criminal property, including their dates of birth and addresses where appropriate (such information should be held routinely by reporters in the regulated sector to comply with the requirements of the Money Laundering Regulations)
- describe fully the reasons for suspicion in relation to money laundering. As a basic guide, wherever you can, try to answer the following six basic questions to make the SAR as useful as possible: Who? What? Where? When? Why? How?

If your SAR relates to the purchase/sale of a property include:

- the full address of the property and postcode
- the value of the property
- the date of activity
- how the activity will take place or has taken place
- the full identity, where known, of the other party/parties involved in dealing with the property, including, in particular, if they are providing professional

services e.g. solicitor, estate agent, accountant or company formation agent etc.

If your SAR relates to a vulnerable person:

- describe fully the vulnerabilities that you believe suggest the person cannot protect him/herself against exploitation e.g. do your concerns relate to what appears to be mental, physical or learning disability, or an illness related condition?
- describe if law enforcement or other agencies are aware of the circumstances (if so, include that organisation's reference numbers, details of the officer contacted etc.)

If your SAR relates to a professional enabler:

- describe the services being provided e.g. "the professional services being provided are..." (e.g. accountancy insolvency, audit, company formation, property conveyance, legal services etc.)
- include:
 - the date of activity
 - how the activity will take place or has taken place
 - full identity, where known, of the other party/parties involved in, including in particular, the type of professional services being provided e.g. solicitor, estate agent, accountant or company formation agent etc.
- describe if suspicion relating to the services being provided appear to be wittingly or unwittingly facilitating the money laundering described
- describe the indicators suggesting complicit criminal behaviour or negligent behaviour of the professional(s) involved.

SAR glossary codes

The latest version of the SARs glossary codes is dated 16 January 2017 and is available from the NCA website. The full title of the booklet is 'Suspicious Activity Report (SAR) Glossary Codes and Reporting Routes'. A summary of the latest codes is below.

The use of glossary codes is considered good practice amongst reporters and allows the UKFIU and wider law enforcement to conduct analysis to identify money laundering trends, high risk cases for development and take immediate action where necessary.

Request for a defence under POCA/TACT	
XXS99XX	Request for a defence under POCA
Tick 'Consent' and submit under TACT	Request for a defence under TACT

High-end money laundering	
XXPRFXX	Relates to person(s) providing professional services or specialist knowledge that wittingly or unwittingly facilitates money laundering
XXTBMLXX	Trade-based money laundering
XXPROPXX	Relates to purchases or sales of real estate property
Predicate offences - economic crimes	
XXTEOSXX	Tax evasion overseas
XXTEUKXX	Tax evasion UK-based
XXF1XX	Proceeds from benefit fraud
XXF2XX	Excise evasion (duty on alcohol, tobacco, fuel etc.)
XXF3XX	Corporate tax evasion (tax evasion by businesses, corporations)
XXF4XX	Personal tax evasion (tax evasion by individuals e.g. income tax)
XXF5XX	VAT fraud e.g. carousel – Missing Trader Intra-Community (MTIC) fraud
XXF9XX	Frauds against private sector
XXD9XX	Bribery and corruption
Politically Exposed Persons (PEPs)	
XXD7XX	International PEPs
XXD8XX	Domestic PEPs
Money laundering/terrorist financing relating to vulnerable persons	
XXV2XX	Risk to vulnerable adults
XXV3XX	Risk to children – including sexual exploitation and abuse
Other predicate offences	
XXFIREXX	Firearms
XXOICXX	Organised immigration crime
XXDRUXX	Illegal supply of drugs
Projects/other	
XXPCPXX	Counter-proliferation

NCA website

There is a large amount of information on the NCA website about the SARs regime, the UKFIU, how to report SARs, the legal basis for reporting and requesting consent. These sections can be found by visiting www.nationalcrimeagency.gov.uk and following the chain '**About us/What we do/Economic Crime Command/UK Financial Intelligence Unit**'. These pages include hyperlinks to various UKFIU guidance notes including the SARs Annual Report, links to related websites and legislation documents and also to SAR Online¹¹ (a link to SAR Online can also be found at the top right corner of every page of the NCA website – click on 'Reporting SARs').

¹¹ The current portal allowing reporters to submit SARs via a web interface.