



SARs IN ACTION

The life of a SAR

**Every step from
submission to
law enforcement
outcome**

**The UKFIU's
business critical
teams**

Case studies

Regime news

Issue 2

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A United Kingdom Financial Intelligence Unit (UKFIU) publication aimed at all stakeholders in the Suspicious Activity Reports (SARs) regime

Message from the head of the UKFIU

Ian Mynot

It is my very great pleasure to introduce the second issue of the UKFIU magazine, SARs In Action. The inaugural edition, published in March, has been well received, with positive feedback received around the world.

The magazine is aimed at all participants of the SARs regime, and each publication focuses on a specific issue relevant to the exploitation of financial intelligence to assist in preventing/detecting crime.

This issue we lift the lid on the 'life of a SAR', examining the whole process of what happens when a reporter has a suspicion of money laundering, the subsequent submission of that SAR to the UKFIU, the checks that our teams then conduct, and the onward availability of that financial intelligence to law enforcement partners and their response, including case studies illustrating the value of SARs information.

We also focus on the extensive engagement work that the UKFIU has been conducting, including the use of conference presentations, webinars and educational videos with numerous stakeholders.

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Who is this magazine aimed at?

- All law enforcement; this includes senior investigating officers, front-line police officers and police staff
- Reporters
- Regulators
- Supervisors
- Trade bodies
- Government partners
- International partners

We hope that you find this magazine useful.

We'd love to hear what you think of the publication, what topics you'd like us to consider in the future and we're always open for possible articles/collaborations.

Please send any feedback to **ukfiufeedback@nca.gov.uk**

Issue 1 of this magazine is available on the NCA website
www.nationalcrimeagency.gov.uk

Don't forget to follow us on Twitter at @NCA_UKFIU or visit us at www.nationalcrimeagency.gov.uk

NEWS ROUNDUP

AUSTRAC officer in the UKFIU

AUSTRAC (Australia's FIU and anti-money laundering/counter-terrorist financing regulator) has posted a liaison officer in London for 18 months. The officer is embedded in the UKFIU one day a week to work on joint strategic and tactical analysis projects between the two FIUs.

Areas of engagement will also hope to include key priorities for both agencies including human trafficking, serious financial crime, serious organised crime, child exploitation, tax avoidance/evasion including offshore service providers and working with public-private partnerships.

DAML note on bank holidays

If you are submitting a Defence Against Money Laundering (DAML) request from Northern Ireland, Scotland or Wales and a bank holiday falls within your region (but not within England), during the seven working day notice period, please include this information at the end of your Reasons for Suspicion.

This will enable the UKFIU to ensure that it adjusts the notice period to meet your circumstances.

SARs IT Transformation Project

Mainly funded by the SARs Reform Programme, the NCA is undertaking the transformation of the existing SARs IT over the next two years. To ensure continuity of existing services, this will be delivered in stages. The preparatory work is almost complete. The first major build activity will transform the way the NCA delivers SARs workflow and analysis services to law enforcement partners.

We will replace both the existing Arena (a search and analysis tool for law enforcement users) and Moneyweb (an online portal through which law enforcement users access the SARs database for DAMLs) applications. We will deploy a new single interface providing access for end users to a wider range of analytic and visualisation services, detailed management information, as well as efficient workflow management services for SARs, particularly in relation to DAML SARs.

Some of the benefits enabled by these new services will be:

- Increased usability through a single user portal to allow "single sign on" across multiple law enforcement systems and compatibility with current and future law enforcement IT platforms.
- Improved timeliness – SARs will be made available more quickly to law enforcement agencies (LEAs)
- A scalable and flexible service that can be easily updated in future.

This first stage is key to help enable: quicker decision-making on DAMLs; greater feedback on SARs from law enforcement; and to increase law enforcement use of SARs in operations.

UKFIU ENGAGEMENT

Insurance sector relationships

The UKFIU has been forging strong relationships with Aviva UK and Directline UK, promoting the wider benefits of submitting good quality SARs. Workshops were held with both organisations and Directline visited the UKFIU to give a presentation on its work. The UKFIU is looking to set up a new SAR working group for the insurance sector. This approach should have a positive impact on enhancing the quality of future SARs from a sector rich with intelligence that will help combat serious organised crime.

UKFIU speaks at IMLPO event

In May the UKFIU presented at an Institute of Money Laundering Prevention Officers conference attended mainly by the private sector. The theme of the event related to the threats and opportunities emerging from the digital/cyber environment. The UKFIU gave an overview of the National Economic Crime Command and the NCA's whole system approach to combatting serious organised crime.

Joint UKFIU/HMRC presentation well received by ACRA

Positive comments followed a joint UKFIU/HM Revenue & Customs (HMRC) presentation at the Association of Company Registration Agents' (ACRA) annual forum. The key message on how to make good quality SARs and the subsequent benefits really landed with the sector. ACRA Chair, Gareth Jones, said: "thank you for your excellent contribution... Your presentation was particularly interesting, relevant and well received. We look forward to working with you further in the months and years ahead".

Positive response to legal sector presentations

Excellent feedback was received relating to UKFIU presentations to the Law Society of Northern Ireland. One hundred percent of delegates advised that they would recommend the UKFIU seminar, hosted by UKFIU managers Martin Cox and Tony Fitzpatrick, to colleagues. Comments included: "both speakers [were] excellent and pitched the topic at a level which is entirely comprehensible and informative".



UKFIU officers Martin Cox and Tony Fitzpatrick

UKFIU ENGAGEMENT

Webinar highlights money laundering red flags for estate agents

In March the UKFIU held a webinar with Rightmove aimed at educating estate agents on money laundering, red flags and the importance of submitting good quality SARs. A poll survey of the 276 estate agents taking part revealed that viewers had little experience and little confidence in submitting SARs so the event hit the right audience to signpost existing guidance and good practice. Positive feedback received included:

- "Really loved the relaxed feel of this webinar and how the guests spoke in layman terms so that it made a dry subject more interesting for all staff. Would like to use this as part of our new staff training on the subject"
- "thank you for a most comprehensive and beneficial update on anti-money laundering (AML)"
- "I found it very useful ... and timely, given the reports this week of various agencies receiving substantial fines for not complying with AML rules".

The webinar is available at <https://hub.rightmove.co.uk/anti-money-laundering-with-the-national-crime-agency/>



UKFIU officers Mike Hindes, Tony Fitzpatrick with Rightmove's Lisa Gray

Close working with Barclays

The UKFIU has met with Barclays to discuss DAML good practice and highlight UKFIU guidance documents available on the NCA website. The UKFIU also outlined the benefits of SARs to all crime investigations.

Martin Wilson, Barclays Anti-Money Laundering (AML) Operations UK head, said that "all the teams found the sessions really useful ... hopefully we can meet with the UKFIU again soon".

Gambling Commission videos

As mentioned in the last magazine the Gambling Commission created a series of videos in partnership with the UKFIU to help raise the quality of SARs provided by gambling operators.

As of the end of June 2019 the videos had been viewed a total of 1,794 times – a 235% increase on when first launched in September 2018. The videos are available from the Gambling Commission website.

Inside the SARs regime



Submitting a suspicious activity report and what happens next

What is a SAR?

A SAR is a piece of information which alerts law enforcement that certain client or customer activity is in some way suspicious and might indicate ML or terrorist financing.

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, or suspect or have reasonable grounds for knowing or suspecting, that a person is engaged in, or attempting, money laundering or terrorist financing.

However, even if you are not in the regulated sector, you may have an obligation to submit a SAR. You may commit an offence if you have 'knowledge' or 'suspicion' of money laundering activity or criminal property, do something to assist another in dealing with it, and fail to make a SAR.

If you're unsure if your firm is in the regulated sector consult your regulator, professional body or trade association, or seek independent legal advice. Submitting a SAR protects you, your organisation and UK financial institutions from the risk of laundering the proceeds of crime.

The role of the UKFIU

The UKFIU has national responsibility for receiving, analysing and disseminating financial intelligence submitted through the SARs regime. It receives over 470,000 SARs a year. SARs are shared through a secure UK IT network, enabling visibility and an analysis capability to review just over two million SARs across over 70 different UK LEAs.

Making a SAR

The easiest way to submit a SAR is with the secure SAR Online system. SAR Online is free, negates the need for paper-based reporting, provides an instant acknowledgement and reference number (which manual reporting does not) and reports can be made 24/7.

Online reports will also be processed more quickly, particularly if a DAML is sought. SAR Online can be accessed from the NCA website homepage - www.nationalcrimeagency.gov.uk

Legal basis for reporting SARs

The UK's AML and counter terrorist financing network consists of primary and secondary legislation and industry guidance, designed to support Her Majesty's Treasury, in accordance with Financial Action Task Force (FATF) international standards and European Union Directives.

Primary legislation consists of POCA and TACT. Secondary legislation is the Money Laundering Regulations which support the primary legislative objectives.

Those reporting to the UKFIU need to be aware of the 'tipping off' provisions (Section 333A-E of POCA) which makes it an offence, having submitted a SAR, to reveal information which is likely to prejudice any resulting law enforcement investigation.

It is a criminal offence in the UK to finance or facilitate the financing of terrorism and there are legal obligations to submit SARs as set out in Part III of TACT. There are offences for failing to make a disclosure under sections 19(2) and 21 of TACT.

The life of a SAR

One of the largest sources of financial intelligence available to UK law enforcement is the SARs database (called Elmer), containing over two million SARs, which is maintained by the UKFIU. Elmer primarily contains data received from the financial sector that potentially relates to suspicious financial activity. The database also contains information received from foreign partners and UK LEAs relating to requests for financial information from abroad.

The UKFIU screens all SARs before they are made available on moneyweb or Arena, using key words to identify SARs relating to sensitive issues - e.g. 'integrity SARs' (pertaining to knowledge or suspicion of money laundering and/or terrorist financing that concerns an employee of an LEA or the civil service]), terrorist financing, corruption and Politically Exposed Persons (PEPs).

These SARs are withheld by the UKFIU and forwarded exclusively to specialist teams/organisations e.g. the National Terrorist Finance Investigation Unit (NTFIU), police forces' professional standards units etc.

Keywords are also used to identify SARs relating to vulnerable persons, human trafficking, modern slavery and child sexual exploitation (see last magazine issue). When a positive hit is identified on a keyword or SAR glossary code, a UKFIU officer views it and fast-tracks it to the relevant LEA, the quick-time turnaround providing a greater opportunity to exploit time critical windows.

All SARs and requests from foreign FIUs are immediately available on Elmer but to UKFIU officers only. All non-sensitive SARs are available seven calendar days from receipt on both moneyweb and Arena portals.

Similarly, all non-sensitive SARs are available after seven days to NCA accredited officers via Discover, a web-based portal that enables NCA officers to exploit the NCA's information more fully and with greater effect; both as intelligence support to general criminal investigations and to deprive criminals of illegally acquired assets.

Making SARs available via moneyweb, Arena and Discover enables LEAs to conduct their own searching.

DAML SARs, sensitive and priority SARs are emailed directly to the relevant end users; DAML SARs are then made available via moneyweb prior to Day 7 of the notice period for specific end users.

With regards to DAML SARs, the UKFIU identifies which LEA is best placed to advise on the request and whether it pertains to an ongoing investigation. Similarly, the UKFIU forwards all Defence Against Terrorism Financing requests to the NTFIU and the relevant counter terrorist units.

SARs are only made available to accredited officers: these are accredited financial investigators, financial intelligence officers, financial intelligence administrators or those who have completed SAR confidentiality training.

The value of SARs



SARs alert law enforcement to activity which is in some way suspicious and may indicate money laundering or terrorist financing. They are a critical intelligence resource and provide information from the private sector that would otherwise not be visible to law enforcement.

The value of SARs is wide-reaching. SARs intelligence has been instrumental in locating sex offenders, tracing murder suspects, identifying subjects suspected of being involved in watching indecent footage of children online and showing the movements of young women being trafficked into the UK to work in the sex industry.

Some SARs provide immediate opportunities to stop crime and arrest offenders, others help uncover potential criminality that needs to be investigated, while others provide intelligence useful in the future. Information contained in SARs can help identify criminal assets which can be recovered by use of restraint orders, confiscation orders and cash seizures.

Information provided through SARs such as contact details (e.g. names, addresses, telephone numbers etc.), alias identities, companies, investment activity, IP addresses, bank accounts and other assets can lead to the instigation of new investigations or enhance ongoing operations.

A single SAR may be used several times by several different users for different purposes e.g. the information within the same SAR may inform a) HMRC about taxation b) local police about fraud or theft and c) a government department about a regulatory issue or a weakness in a financial product.

SARs can help identify changes in the nature or prevalence of types of organised crime e.g. mortgage and boiler room frauds. This enables detection and prevention activity including the issuing of Alerts to businesses at risk.

SARs provide intelligence about criminal methods, contribute to the UK's understanding of crime and inform strategies to reduce the impact of crime.

Even if no criminal investigation is conducted, a SAR may still have information that contributes to painting a picture on current trends or patterns. This helps reporters and law enforcement to plan and prevent against new crime trends.



Inside the UKFIU

**Exploring the functions of the
FIU's business critical teams**

The DAML Team

The DAML Team's core role is to prevent money laundering. Its frontline officers triage, risk manage, assess and facilitate all the SARs that come to the UKFIU where a request for a money laundering defence is sought. It is the team's responsibility to grant or refuse such a defence.

Typically the team makes a decision to refuse when a criminal investigation is under way or is initiated with a view to securing restraint of the assets through the courts. Officers' decisions can therefore help return stolen money to victims and deny criminals the benefit from their crimes.

The DAML Team receives around 1,000 new cases a week. Decisions are made on each of them within seven working days of receipt to comply with the law. Effective decision-making in a time critical environment is daily activity for the team. The following situations which the team has managed show the huge implications and risks considered:

- Making judgments in support of surveillance teams following the subject into financial institutions whilst on the telephone to the UKFIU seeking advice.
- Strategic decisions to share information to partners relating to information indicating a foreign country that might be on the brink of economic collapse.
- Complex political and ethical decisions relating to proposed ransom payments to terrorist group kidnappers who use this crime to fund their activities.

- Some decisions that could hold up multi-million pound UK trade deals.

Each case goes through a rigorous risk assessment; as well as the legal implications, the team has to consider the welfare and potential impact on the reporter and the SAR subject.

If the funds being temporarily frozen are needed to pay employees oblivious to their boss's illegal dealings, then it can be difficult to divulge the circumstances to innocent members of the public who need to feed their families. The team is aware that some customers have self-harmed in front of banking clerks who have told them they cannot have their money. This can add additional pressure in a very stressful situation and requires careful but quick thinking.

Every DAML submitted is sent straight to the team, who cannot infer, imply or assume meaning from what is disclosed; this results in complex requests for further information sent to reporters to clarify the activity they are seeking to undertake.

Once the team has assessed the SAR, it is sent to law enforcement to take positive action to deny the proceeds of criminality to offenders.

If the suspect has international dealings the case is passed to the UKFIU International Team for possible liaison with other international FIUs. Similarly, if the team suspects that the money or the suspect has links to terrorist organisations, the matter is passed to the UKFIU Terrorist Finance Team.

The International Team

The primary role of the UKFIU International Team is to interrogate the SARs regime to identify and exploit those reports linked to a foreign territory or for foreign criminal assets held in the UK. This enables the potential for asset recovery both within the UK and abroad. The team also looks at identifying and exploiting those reports that potentially relate to foreign criminal property located in the UK.

One of the ways that the team does this is to regularly data mine the system for those reports that are deemed to be of an international nature by the reporter. The reporting sector has been issued with a list of codes that relate to differing areas of activity, international activity being one of them.

Once identified, the report is assessed as to destination and any pertinent risk associated with the jurisdiction and the type of activity covered. If considered suitable then a report is prepared for dissemination for intelligence purposes.



The Terrorist Finance Team

The core function of the Terrorist Finance Team (TFT) is to receive, analyse and disseminate terrorist financing relevant SARs from the private sector submitted to the UKFIU by using automated searches for keywords and phrases. Those search patterns, which are updated regularly, are derived from current counter terrorist intelligence. The reporting sectors, principally the major retail banks, apply their own intelligence parameters to identify potential risk. These are drawn from briefings from the TFT and NTFIU and open source research. This mechanism enables the UKFIU to identify SARs relating to terrorist financing where the reporter may not recognise the significance of their suspicion.

The SARs Enquiry and Action Team

The UKFIU SARs Enquiry and Action conducts daily targeted SAR analysis via keyword searching to identify and action SARs relating to priority threat areas and ongoing operational activity. These priorities are set in response to local, regional, national and international concerns and enable us to exploit financial intelligence within 24 hours of receipt.

The team prioritises SARs relating to:

- the exploitation of vulnerable individuals for financial gain (including suspicions relating to child sexual exploitation, modern day slavery and human trafficking)
- PEPs, domestically and abroad, including any activity that concerns bribery and corruption
- matters concerning the integrity of government or law enforcement employees in the UK.

All SARs extracted and reviewed are actioned on the same day and if required disseminated immediately to provide recipients with maximum time and increased opportunity to take effective action before they are seen on the UKFIU's external SARs portals.

Options include:

- retained for action within the UKFIU (e.g. sensitive SARs) and removed from end user portals. The SAR, or SAR-derived intelligence, is then disseminated as required to the appropriate LEA
- passed to an NCA intelligence team to instigate intelligence development or assist an ongoing case
- passed to an NCA or LEA investigation to assist in an ongoing enquiry
- fast-tracked for immediate action to an LEA.

A fast-track is necessary where imminent risk, danger or crime in action is identified at a local level and safeguarding protocols are required to protect the individuals concerned.

Where, after review, no action is required the SAR is made available, as are all non-sensitive SARs, for wider law enforcement end users to review on the UKFIU external portals money.web, Arena and Discover. These are allocated to the end users via geographical area and postcode.



Analysis and Communications Team

The UKFIU Analysis and Communication Team develops possible new and emerging threats identified by other UKFIU teams, identifies new SARs in respect of NCA aims and objectives, and analyses SARs relating to reporting sectors, identifying areas for improvement or issues of quality, to produce specific assessments and typologies. The team is also responsible for managing all external and internal communications pertaining to the UKFIU.

Systems Team

This team has responsibility for the UKFIU SARs IT facilities. With a priority to ensure business continuity for the SARs reporting sector and end users, its remit also includes working with the NCA's IT supplier to identify future SARs IT enhancements and replacement solutions. A key function of the team is to support and maintain the electronic SARs reporting portals. SARs are primarily reported via secure bulk encrypted email and the SAR Online website. There are two support desks housed within the Systems Team which assist users of these facilities.

Operational Risk Management Team

This team manages compliance with Home Office Circular 022/2015 – the confidentiality and sensitivity of Suspicious Activity Reports and the identity of those who make them – investigating breaches of SAR confidentiality and taking appropriate action. Additionally the team deals with queries from, and conducts risk assessments on, SAR disclosure for law enforcement, the Crown Prosecution Service and the reporting sector.

Engagement and Liaison Team

The UKFIU Engagement and Liaison Team develops new partnerships with key stakeholders and stronger relationships with existing partners. With reporters the team seeks ways of improving the quality of SARs; with law enforcement the aim is to exploit the information within SARs. Their liaison is therefore about helping build the best intelligence picture possible to enable better Pursue, Prevent and Prepare opportunities.



The law enforcement response

How SAR end users exploit financial intelligence

Police Scotland

Our Financial Intelligence Development Unit (FIDU) is responsible for the assessment and development of SARs for the whole of Scotland. Each working day, financial investigators (FIs) assess all pertinent SARs which have become available on the SARs Elmer database during the previous working day.

Each SAR is assessed to identify potential criminality indicating that a SAR is suitable for investigation. SARs deemed suitable for development will be enhanced with the intelligence development process.

SARs deemed suitable for development and investigation will be researched by the FIDU and, where appropriate, intelligence packages will be created and allocated to the most suitable resource to carry out any further development work and progression of any investigation.

As a result of the assessment process, a varying number of further actions can occur. The information reported may be added to our intelligence database or referred to partner agencies such as the Department for Work and Pensions (DWP), HMRC, UK Border Agency, Human Trafficking etc.

The FIDU also receives DAML and fast-tracked vulnerable person SARs direct from the UKFIU. The FIDU will forward any DAML issues to the appropriate police division on the same day that it is received. This will then be investigated by the relevant division and returned to the FIDU outlining any recommendations. The FIDU updates the NCA with this information.

If, after enquiry, it is suspected that the subject of a fast-tracked vulnerable person is an adult at risk of financial harm, then the FIDU will prepare an intelligence package and submit this to the Divisional Intelligence Manager for the area in which the victim resides. Local officers will carry out an investigation, with the main aim being to protect the public from becoming victims of financial crime.

Case study

A SAR concerned an account being operated out of character. It had received large deposits from third party transfers and thereafter funds had been withdrawn in cash or transferred abroad. It was assessed that the account holder was being utilised as a mule. A package was completed and thereafter passed to the local divisional FI.

Enquiries established that the account holder was a vulnerable person who had been befriended online by someone asking the account holder to receive money and carry out transactions. The account holder had initially transferred funds abroad believing they were for a good cause. Then the account holder had handed over large sums of cash to associates of the online subject, assessed to be members of an organised crime group (OCG). The outcome of this SAR was that over £10,000 in cash was seized, thereby depriving the OCG of funds. The account holder's bank account was closed preventing further misuse and they were referred to the relevant agencies for support and protection.

West Yorkshire Police

The West Yorkshire Police SARs team consists of advanced accredited FIs and a researcher. SARs are downloaded every Monday and include the SARs for the week, as it takes at least seven days for a SAR to appear on Moneyweb.

Every SAR allocated to West Yorkshire Police is accessed, read and checked against local databases. SARs linked to people who are of interest to West Yorkshire Police are usually converted into intelligence for future use. Those that are linked in any way to ongoing investigations are highlighted to the investigating officer via FIs.

Any SARs we feel may relate to a vulnerable victim are referred for safeguarding intervention which may be a visit or telephone call. Those we feel would be of interest to a partner agency are referred on via email. We have developed a good working relationship and partnership working with agencies such as the DWP, HMRC, Gambling Commission, Post Office, Insolvency Agency and Trading

Case study

SARs were received on an individual raising concerns about a significant amount of transfers in and out of a gambling account and suspicion of receiving fraudulent credits. This was a romance scam investigation and the subject subsequently received a prison sentence ; they were found to have benefited from their criminality by almost £1m. The SARs played a significant part, identifying bank accounts which formed part of the criminal investigation and confiscation.

Standards amongst others.

SARs that we feel require further checks are put through a scoring matrix process which allows us to make a decision on whether to put them forward for an investigation; several, however, are identified by the FIs who have vast experience of financial crime and know when things just don't look right. By processing the majority of the SARs they are able to identify new trends and keep track of techniques and emerging threats and often identify names and addresses that have been previously reported, often on unrelated disclosures. We are hopeful that with the introduction of new SARs reporting technology in the future we will be able to provide specific feedback to reporters on individual disclosures to ensure the SARs process is as effective as possible and assists the reporters.

In addition to the everyday SARs we receive, we also deal with DAMLs and fast-tracked SARs. We review each DAML and carry out basic checks to decide if the DAML merits intervention and then allocate it to an accredited FI for investigation. All fast-tracked SARs are logged and reviewed and unless we have other information to negate the need for intervention, a safeguarding referral is made and the subject is usually visited by specialist officers.

During the 2018/19 financial year, we have obtained 30 account freezing orders to the value of £1,492,663 and ten frozen funds forfeiture orders, totalling £376,521 all of which have originated from SARs.

Stakeholder views



Neil Rennie

Acting head of AML investigations at RBS

Working in Royal Bank of Scotland's AML Investigations Department is always busy. Thousands of investigations are undertaken monthly across automated transaction monitoring alerts and manual suspicion reports. If red flags trigger unease/suspicion then colleagues are required to complete an online form reporting their concerns. These are manually assessed and, after prioritisation, are assigned to an accredited investigator.

Tools available to an investigator include: carefully reviewing the information in the submitter's form; reviewing the account activity; consideration of the customer profile and Customer Due Diligence information; enquiries to various internal departments/branches; or even contacting the customer to gather further information ensuring not to tip the customer off.

Once all enquiries have been pursued, investigators should have enough information to make an informed decision to report the activity or not. After reporting a customer, the investigator also decides whether to continue the banking relationship with the customer.

With such high volumes of investigations to be carried out each month, a robust training and accreditation programme and cutting edge technology solutions are key to a successful operation. It usually takes months to become accredited and the quality of investigations are continually assessed even after accreditation.

Despite the volume of cases, and the challenges that come with working in a fast evolving industry with ever changing money laundering and terrorist financing typologies, the payoff is rewarding. Every day the work we do helps to protect vulnerable customers, identify victims of embezzlement or fraud and helps put an end to ongoing crimes that leave innocent customers' lives in tatters.

We work closely with police and community protection teams to share information for either the benefit of victims or for the apprehension of criminals. We all believe what we do makes a difference.

Stakeholder views



Nicholas Hogg

Nominated Officer at Nationwide

At Nationwide, we take fighting financial crime seriously. It's not just our financial crime team that helps to protect our members and society; our entire business has a role to play. The most obvious place you'd perhaps think of is within our branches, with frontline staff having face-to-face interactions, building relationships with members. They see the more traditional banking interactions but are also able to identify if something is unusual for a particular member or change in activity in their area. Other areas include our mortgage teams who review the source of funds for deposits and repayments, our ATM teams looking for changing patterns in ATM usage and our Payment Operations teams who identify unusual payment requests. Where staff identify suspicious activity, they report this to the Nominated Officer.

As well as people-generated suspicions, we deploy technology that alerts us to activity for review. Using our transaction monitoring suite of rules, alerts are generated for a variety of reasons including changes in member behaviour, exceeding pre-determined thresholds or a sequence of events, or hitting certain red flags for known typologies e.g. alerts designed specifically to detect possible links to County Lines. Our 'rules' are reviewed and adjusted regularly to ensure they are effective in identifying suspicious activity, cover our risks and adapt to emerging criminal threats. Our interactions through the Joint Money Laundering Intelligence Taskforce help ensure that we understand and deploy appropriate detection to new threats, while continually reviewing the changing landscape with how our members behave which can indicate emerging risks.

Once an alert is generated, my operational team reviews each one. We triage depending on the threat level or urgency e.g. a possible terrorism link, vulnerable person or pre-notified transaction that may require a DAML will be expedited. In assessing each case, it's important to understand our member, their personal circumstances, sources of income and typical behaviour. We ensure that internal and public domain information is reviewed, which helps to understand plausibility or assist in formulating suspicion. Our analysts investigate and complete additional due diligence as necessary to make a decision on whether they are suspicious, or not to report. They are trained to identify certain crime types and therefore need to have a broad understanding of how banking products and facilities can be exploited. SARs and DAML SARs are then submitted to the NCA where a suspicion is formulated.

Money laundering is a dirty business



Money laundering isn't always obvious, but the consequences are severe. If you miss the signs, you could be fined or prosecuted. Don't dirty your reputation. Submit a SAR if you are suspicious.

Dirty money. Know the signs, report the crime.

flagitup.campaign.gov.uk