



# **UK Financial Intelligence Unit**

## **Suspicious Activity Reports**

### **Annual Report 2019**

## Statement by Ian Mynot, Head of the UKFIU

It is my pleasure to present the Suspicious Activity Reports (SARs) Annual Report for 2019.

The UK Financial Intelligence Unit (UKFIU) continued to perform strongly in 2018-19, receiving and processing another record number of SARs (478,437), with a 52.72% increase in requests for a Defence Against Money Laundering (DAML) (34,543).

The UKFIU has again worked hard to provide law enforcement agencies (LEAs) with focused asset recovery opportunities as a result of DAML requests. Over the year £131,667,477 was denied to criminals as a result of DAML requests (refused and granted) where law enforcement obtained restraint or used new civil powers under the Criminal Finances Act 2017 (CFA) to freeze an account. This is up considerably from the previous year, when £51.9m was denied.

Also of note is that the UKFIU has expanded, growing from an establishment headcount of 80 (during the Financial Action Task Force review) to 118 at the start of the 2019-20 financial year. It is great to welcome so many new staff, with so much diverse experience. It is also important to thank existing staff, not only for training and mentoring these new officers, but also because it is down to them that the UKFIU has been able to process the increasing volumes and deliver much improved results.

The Home Office is leading the SARs Reform Programme as part of the wider Economic Crime Plan, published in July 2019. The UKFIU contributed significantly to the development of the Home Office-led SARs Reform Programme. The Programme's vision is to support the delivery of the Economic Crime Plan by implementing improvements to better protect the integrity of the regulated sector and better support the disruption of money laundering, terrorist financing and predicate offences, while ensuring that the regime operates effectively and efficiently across all participants, both public and private.

The Government's Economic Crime Plan sets out a number of commitments that impact on the UKFIU and SARs regime, in addition to SARs reform. This includes better information sharing with supervisors and, importantly, ensures the confidentiality of the SARs regime, in particular protecting SARs material from being disclosed in civil proceedings.

The UKFIU also contributed significantly to discussions revolving around the Law Commission's review of the anti-money laundering (AML) regime under the Proceeds of Crime Act 2002 (POCA) and the Terrorism Act 2000. A report was published in June 2019, which made a number of positive recommendations, including retaining the DAML regime.

The UKFIU does not control the increases in SAR volume and with these volumes come increased risks that require effective mitigation. The IT is in need of replacement and over the course of the year a six phase plan for doing so was initiated. The SARs Reform Programme, including SARs IT Transformation, will be crucial in achieving a workflow that is manageable on a sustainable basis.

The pattern of reporting is changing. While the number of reports from lawyers and accountants remains low, we are now seeing increased reporting from challenger banks and Fintech companies. Over 2019/20 we are working to develop our understanding of these sectors and undertake targeted outreach.

Also this year we will further develop our international outreach. The UKFIU is engaged in a number of important projects undertaken under the auspices of the Egmont Group. This includes co-leading, with the FIUs of Australia and the Philippines (AUSTRAC and the Anti-Money Laundering Council), a project to improve understanding of the financial flows associated with online child sexual abuse and exploitation.

With the UK's exit from the European Union (EU) due to take, the UKFIU is also planning for Brexit outcomes to ensure that it can continue to deliver its services.

As the UK is a global financial centre, it is important that it has an FIU that corresponds with this status. 2019/20 presents an opportunity for us to develop and cement our position in this respect.

## Key statistics

- **478,437 SARs received between April 2018 and March 2019 (3.13% increase on 2017-18 [463,938])<sup>1</sup>**
- **34,543 DAML requests (52.72% increase on the previous year's 22,619)**

Key statistics	April 2018 to March 2019
Total SARs	478,437
DAML SARs	34,151
Defence Against Terrorism Financing (DATF) SARs	392
DAML SARs refused	1,332
DATF SARs refused	40
Breaches of confidentiality	3

### DAML requests

- £131,667,477 denied to criminals as a result of DAML requests (refused and granted) – up 153.66% on the previous year's £51,907,067.

The introduction of Account Freezing Orders (AFOs) and the extension to the moratorium period enacted by the CFA is believed to be the reason for the significant increase in funds restrained during this reporting period.

Interventions arising from refused DAML requests	
Restraint sums (includes restraints and AFOs)	£122,838,459
Cash seizure sums	£829,752
Funds recovered by HMRC	£7,947,889
<b>Total</b>	<b>£131,616,100</b>

Interventions arising from granted DAML requests <sup>2</sup>	
Restraint sums (includes restraints and AFOs)	£45,692
Cash seizure sums	£5,685
<b>Total</b>	<b>£51,377</b>

<sup>1</sup> 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 money laundering or terrorist financing.

<sup>2</sup> There is no requirement for LEAs to inform the UKFIU of restraint, cash seizure or arrest figures as a result of granted DAML requests (only refusal) and these figures should be viewed as conservative amounts.

Of the 1,332 DAML requests which were refused initially, 17 (0.01% of overall refusals) were subsequently granted in the initial moratorium period.<sup>3</sup>

- 459 cases refused without a previous or existing law enforcement investigation resulted in £32,313,517 restrained and £7,501 cash seized.
- The UKFIU made a decision on 69.81% of DAML requests without referral to law enforcement for a recommendation.<sup>4</sup> Examples of when such an approach is taken include when the risk of assets being dissipated is not immediate, when there is unlikely to be law enforcement interest, or when the assets are likely to be impossible to recover. This has assisted law enforcement in focussing its efforts on the highest priority cases.
- 5.12 days – the average turnaround time for responses to reporters for all requests (up from 4.32 the previous year). This is due to the volume increase in DAML requests during the reporting period.
- 234 threshold variation requests.<sup>5</sup>
- 2,695 cases closed because the reporter withdrew the DAML request within the notice period, because they had requested a DAML in error, had failed to include a key piece of piece of information but were uncontactable or had failed to submit the additional information in writing to the UKFIU within the notice period.<sup>6</sup>
- 70 moratorium extensions from 25 different LEAs were processed.<sup>7</sup> A total of £34,659,354 was restrained and £245,552 subject to indemnity procedures in these cases. In 12 of these cases there was no previous or existing law enforcement investigation and the value restrained was £25,779,271 (one case was for £25m). In three cases there were existing international investigations and asset denial was undertaken on behalf of the foreign jurisdiction. This demonstrates the unique value of the SARs regime – in that SARs submitted are directly leading to new law enforcement investigation.

<sup>3</sup> If a request for a DAML is refused within the 'notice period' (seven working days), law enforcement has a further 31 calendar days (the 'moratorium period') – from the day of refusal – to further the investigation into the reported matter and take further action e.g. restrain or seize funds. The 31 days includes weekends and public holidays. The reporter runs the risk of committing a money laundering offence if they proceed during the moratorium period whilst the request is still refused.

<sup>4</sup> While the NCA makes the decision to grant or refuse a DAML request, they will seek LEA advice in certain circumstances.

<sup>5</sup> Deposit taking institutions with concerns that an account may contain the proceeds of crime/used for laundering money may still have to process regular 'lifestyle' payments to/from that account. Legislation permits discretion in relation to such payments, up to a threshold of £250 per transaction. If frequent transactions are over this threshold, the reporter can apply to the NCA for a threshold variation under POCA and seek permission to impose a higher threshold for regular transactions. This figure is down from 283 in the previous year.

<sup>6</sup> 2,015 cases in 2017/18.

<sup>7</sup> The CFA allows for a court application to extend the 31 day moratorium period, during which funds can be frozen following a DAML refusal.

## International

	Number of financial intelligence requests received	Number of financial intelligence requests made by UKFIU
Egmont network <sup>8</sup>	1,132	1,147
FIU.Net network (EU) <sup>9</sup>	234	114
ARO network <sup>10</sup>	244	227
CARIN network <sup>11</sup>	29	30
<b>Total</b>	<b>1,639</b>	<b>1,518</b>

Intelligence reports spontaneously received from overseas	1,295
Intelligence spontaneously disseminated (excluding Europol)	399
Intelligence spontaneously disseminated to Europol	365

### UKFIU international 'other' work<sup>12</sup>

In support of UK partners	30
In support of EU partners	90
In support of non-EU partners	76
In support of other <sup>13</sup>	62
<b>Total</b>	<b>258</b>

- One Memorandum of Understanding was signed with international counterparts.

<sup>8</sup> Egmont is the coordinating body for the international group of FIUs.

<sup>9</sup> FIU.Net is the secure network for the exchange of data between FIUs in the EU.

<sup>10</sup> Asset Recovery Network (ARO).

<sup>11</sup> Camden Asset Recovery Inter-Agency Network (CARIN).

<sup>12</sup> 'Other work' refers to the number of requests the UKFIU received/sent which fall outside the usual inbound/outbound type requests. These usually refer to general questions on systems, regulations, legislation, etc. and are not counted as usual inbound requests.

<sup>13</sup> 'In support of other' refers to work done supporting Europol/Interpol, CARIN Secretariat, Egmont Secretariat.

## Intelligence development

The UKFIU screens/analyses SARs daily to identify fast-tracking to LEAs; this is to ensure that the intelligence's maximum value is exploited. Over the year the UKFIU:

- 'read and triaged' 27,586 potential vulnerable person SARs (up 5.84%).<sup>14</sup>
- disseminated 3,735 vulnerable person SARs (up 3.32%).
- read and triaged 25,800 potential politically exposed person (PEP) SARs (down 3.25%).
- disseminated 2,388 PEP SARs (up 68.29%).
- read and triaged 29,848 integrity SARs (down 4.51%).<sup>15</sup>
- disseminated 788 integrity SARs (down 35.78%).

## Terrorist finance

- 1,909 SARs pro-actively identified and disseminated to the National Terrorist Financial Investigation Unit (NTFIU) and Counter Terrorism Unit (CTU) network.<sup>16</sup>
- This process involved the targeted review of 20,132 SARs, identified from all SARs received.

<sup>14</sup> 'Read and triaged' refers to the total number of SARs returned by the UKFIU keyword searching that requires reading and triaging by a UKFIU officer.

<sup>15</sup> Integrity SARs relate to knowledge or suspicion of money laundering and/or terrorist financing that concerns an employee of an LEA or the civil service.

<sup>16</sup> 2,688 in 2017/18.

## Overall SAR reporting statistics

### Summary of SARs reporting by sector

The UKFIU makes no comment as to the relative volume of reports from different sectors. It is for the sectors and their supervisors to assess if the volume of SARs submitted is proportionate to the risks their sectors face.

April 2018 to March 2019	Volumes	% of total	% comparison to 2017-18
Credit institution – banks	383,733	80.21%	3.29%
Credit institution – building societies	21,714	4.54%	10.56%
Credit institution – others	10,203	2.13%	-25.41%
Financial institution – MSBs	18,940	3.96%	-10.65%
Financial institution – others	24,911	5.21%	16.16%
Accountants and tax advisers	5,055	1.06%	-1.65%
Independent legal professionals	2,774	0.58%	4.29%
Trust or company service providers	23	0.00%	-56.60%
Estate agents	635	0.13%	-10.56%
High value dealers	481	0.10%	93.17%
Gaming (including casinos)/leisure (including some not under Money Laundering Regulations [MLRs])	4,163	0.87%	93.27%
Not under MLRs	5,805	1.21%	5.78%
<b>Total</b>	<b>478,437</b>	<b>100%</b>	<b>3.13%</b>

### SARs submitted by money service businesses (MSBs)

April 2018 to March 2019	Volumes	% of total	% comparison to 2017-18
Money transmission	11,591	61.20%	-6.27%
Bureau de change	6,662	35.17%	-16.79%
Cheque casher	687	3.63%	-16.83%
<b>Total</b>	<b>18,940</b>	<b>100%</b>	<b>-10.65%</b>

### SARs submitted by regulated and non-regulated gambling

April 2018 to March 2019	Volumes	% of total	% comparison to 2017-18
Gaming/leisure	4,163	71.86%	93.27%
Bookmaker	1,087	18.76%	24.66%
Spread betting	543	9.37%	-26.82%
<b>Total</b>	<b>5,793</b>	<b>100%</b>	<b>53.74%</b>



# Main report

## Analysis and engagement

### Engagement

During 2018-19 the UKFIU presented at the quarterly Legal Affinity Groups and at AML events for the Solicitors Regulation Authority and the Law Societies of England and Wales, Scotland and Northern Ireland.

At the beginning of 2019 the UKFIU delivered presentations to AML and fraud teams in the insurance sector on how to submit good quality SARs. This was the first time these type of events had taken place within that sector and feedback has been positive. Working with the National Economic Crime Centre, the UKFIU hopes to create a new Insurance Sector Forum to share good AML practices.

In order to reach small firms and one person type businesses the UKFIU contributed to SAR guidance webinars targeting the gambling, estate agent and accountancy sectors, as well as accountancy service providers, high value dealers, MSBs and trust or company service providers. The UKFIU collaborated with HM Government departments, sector trade bodies and SAR supervisors to produce these events. The webinars outlined newsworthy sanitised cases and typologies seen in SARs that match Financial Action Task Force (FATF), National Risk Assessment and other international FIU red flags. A series of videos signposting existing UKFIU SAR guidance and answering key questions were also released on the Gambling Commission's website throughout the year.

In April 2018 the UKFIU introduced the first of a series of monthly Knowledge Building Sessions to develop its officers, with presentations from the private sector, law enforcement, senior management and various NCA teams.

In November 2018 the UKFIU launched its own official Twitter page – @NCA\_UKFIU; this has been used to promote UKFIU partnership working as well as online links to specific SARs-related guidance.

### Analysis

A number of UKFIU findings and case studies were referenced in the Egmont Group report *Emerging Financial Technologies, Money Laundering and Terrorist Financing: A Typology of Virtual Currencies*. The UKFIU shared an analytical review of virtual currencies in SAR data with the organisation's Information Exchange Working Group.

Data matching by the UKFIU between SARs and cash declarations made at the UK border identified notable intelligence opportunities which were developed into law enforcement referrals.

The UKFIU also provided input into the FATF Heads of FIU Forum for projects looking at virtual assets, counter proliferation finance and strategic analysis.

### Guidance and communication

A key aspect of UKFIU liaison work is promoting SAR guidance. The UKFIU developed a document signposting where key UKFIU guidance can be found online with links to useful SAR educational websites. The document is shared at AML events.

The DAML Frequently Asked Questions document draws together good practice and interpretations from experienced Money Laundering Reporting Officers and Nominated Officers across the SARs regime. Collaborative answers are provided to the most frequently asked questions concerning the DAML process. This was published in May 2018 and forwarded to all SAR regulators/

supervisors/trade bodies to cascade to their sectors. They have indicated that they will use it as a key reference point on their AML help desks. HMRC also cascaded the FAQ document to approximately 15,000 firms falling under the MLRs.

The UKFIU disseminated a SARs Reporter Booklet in December 2018 which received positive feedback from the private sector and law enforcement.

In February 2019 the UKFIU launched the first issue of its 'SARs In Action' magazine, available via the NCA website. Aimed at all participants of the SARs regime, each publication will focus on a specific issue relevant to the exploitation of financial intelligence to assist in preventing/detecting crime. The inaugural publication focused on vulnerable person SARs, examining how the UKFIU identifies and fast-tracks such SARs to law enforcement to take action. The magazine, which was disseminated to tens of thousands of reporters, has received worldwide positive feedback.

### **'Flag It Up'**

The UKFIU continued to be a major contributor to HMG's Flag It Up campaign. Flag It Up aims to increase AML compliance amongst at-risk professionals in the accountancy, legal and property sectors through promoting best practice in customer due diligence and reporting suspicious activity. The UKFIU contributed to a number of media articles and a video, and also presented webinars for both the accounting and property sectors to help professionals better understand their AML obligations.

### **Disclosure**

The UKFIU deals with queries and conducts risk assessments on SAR disclosure issues in criminal and civil proceedings for law enforcement, the Crown Prosecution Service (e.g. where it is perceived that the SAR could undermine the prosecution or support the defence) and the reporting sector (e.g. reporters seeking a DAML having to defend their position in the civil courts where a customer is pursuing a claim against them).

The legislation which underpins such disclosure is the Criminal Procedure and Investigations Act 1996 and the Civil Procedure Rules 1998. It is the expectation of the UKFIU that SARs will remain confidential for the reasons highlighted in Home Office Circular 022/2015. There is also the expectation that the reporting sector will use the underlying documentation in their possession to evidence their suspicion rather than relying on the SARs to defend claims against them, only using SARs as a last resort given the potential for disclosure to prejudice an existing or future law enforcement investigation (whether or not one is identifiable at that stage), 'tip-off' the subjects or place third parties at risk of serious harm.

In 2018-19 the UKFIU received and assessed 122 queries relating to the disclosure of SARs.<sup>17</sup>

<sup>17</sup> This number has not previously been captured.

## Information technology

### SARs IT systems

The UKFIU successfully finished an IT sustainment project to implement upgrades on selected components of the core SARs IT systems. The purpose of this was to reduce risk of failure and outage to the existing SARs systems until a new IT solution is implemented. This work completes all viable sustainment activity on the current SARs IT suite.

In parallel, the UKFIU continued to work closely with the Home Office SARs Reform Programme to set up the SARs IT Transformation Project. The NCA has begun to develop a modern suite of IT services that will enable: SAR reporting (bulk and portal); law enforcement workflow and analysis; and UKFIU database and tools to manage the progress of SARs. By reusing existing UK Government IT services, modern open source tools and standard tools to integrate with other systems automatically, we will deliver a new technical architecture that will support enhancements to the SARs regime and allow us to retire the existing IT suite. The first set of new law enforcement and reporter services is due to go live in 2020.

The UKFIU continued to provide support to LEAs wishing to increase their knowledge around the use of Arena and its wider use in law enforcement environments.<sup>18</sup> This involved numerous demonstrations (including to the private sector and international visitors) as well as the UKFIU training LEA officers. Excellent feedback showed that end users recognised that information in SARs has both financial crime investigation value and 'all crimes' potential value.

<sup>18</sup> A search and analysis tool for end users of SARs.

<sup>19</sup> In relation to the £115,000 figure, as these were not new cases identified by DAMLs during the reporting period, they have not been included in the above figures.

### HMRC increasing the use of SARs

SARs continued to be used in HMRC civil and criminal investigations, identifying potential cases or enhancing/providing additional information for ongoing ones. As a result of DAML SARs:

- £7,947,889 was recovered by HMRC.
- £6,088,723 in tax freezing orders, restraints and winding up petitions was obtained.
- orders under the new CFA were obtained to the value of £3,649,752.

A data matching tool enabling the cross referencing of HMRC and third party data with SARs data continued to generate HMRC cases for criminal and civil investigation.

- Yield from civil enquires amounted to £40,266,350.
- Further exploitation of this capability enhanced civil investigations profiled for HMRC's risk-led taskforces, generating intelligence to support a yield of £30,797,779.
- A further £9,408,865 was generated from enhancing HMRC cases already under civil investigation by providing intelligence in SARs.
- A total of £115,000 in restraint was secured on cases already being worked on within HMRC's Fraud Investigation Service teams and the DAML was fed into their enquiries.<sup>19</sup>

## Case studies

The following case studies demonstrate the value of SARs intelligence in tackling a wide range of crimes over the course of 2018/19.

At the beginning of 2019 an NCA project saw the coordinated submission of a large quantity of DAML SARs to the UKFIU from a high street bank, which sought to focus upon a specific suspected money laundering typology previously identified by them. As a result of this activity approximately £3.3m of suspected funds were successfully frozen using AFOs.

Intelligence development conducted by the UKFIU led to the freezing of approximately £120,000 from a number of bank accounts. An excellent example of close working between the NCA, law enforcement and the private sector, the work focused on an organised crime group operating in the UK and internationally that had used counterfeit and stolen passports to set up accounts and shell companies, in order to commit large scale frauds and launder the proceeds of crimes.

A reporter sought a DAML to release almost £600,000 to the subject. Following liaison with local police the UKFIU refused the request as the subject had been identified as a convicted criminal operating under an alias with previous convictions for fraud offences. The subject had been given a serious crime prevention order and was subject to a confiscation order. Refusing the DAML enabled the LEA to secure a restraint for the full amount along with other assets in the form of vehicles and property. Enquiries are ongoing into other identified offences.

The UKFIU received a request from a foreign partner enquiring about a UK subject linked to money laundering activities in the region. UKFIU checks identified that the subject was wanted in the UK for violent offences and was still at large. The UKFIU provided the foreign agency with an intelligence package and informed UK law enforcement of a potential residence abroad. This is a good example of the value of SAR derived material and how the international FIU network can support and add value to different crime types, including those that are non-financial based.

A financial investigator made enquiries into a company following a DAML request. The enquiry led to the investigation of previous and current directors of the company. It became apparent that the subjects were setting up limited companies, of which the linked bank accounts were in receipt of far greater credits than their declared anticipated turnover. This prompted further SARs. Numerous companies, both in the UK and overseas, were identified as being owned or controlled by the subjects. The UK company accounts would receive vast sums of monies, the majority of which were then transferred to overseas companies before being transferred back to the UK. As a result of the initial SAR, cash in excess of £300,000 has been recovered and assets in the region of £1m have been restrained. Enquiries are ongoing but it is believed at this stage of the investigation that in excess of £10m has been laundered.

A reporter submitted a DAML for almost £250,000 on a PEP who was being investigated overseas for corruption. The subject's UK account was receiving global transfers from his own accounts in foreign jurisdictions and the reporter was concerned that the funds in the UK account may represent the proceeds of crime. The UKFIU refused the request, enabling the NCA's International Corruption Unit to work with the overseas jurisdiction and coordinate the activity to allow for a restraint order to be obtained, which denied assets to an international offender on behalf of foreign partners.

The UKFIU identified a potential vulnerable victim of financial crime who wanted to withdraw over £10,000. The UKFIU fast-tracked it to the local LEA who visited the individual, where officers had concerns around the individual's welfare and vulnerability and feared that the person was being financially exploited. The LEA engaged with a number of agencies and steps were taken to protect the individual from being taken advantage of. This is a great example of the UKFIU using the SARs regime to quickly identify and protect members of the public.

The UKFIU provided support to law enforcement and intelligence services in the aftermath of the August 2018 Westminster terrorist attack. SARs were identified and disseminated within hours of the incident, contributing to the intelligence picture.

Following submission of a SAR, law enforcement commenced an investigation into possible money laundering which uncovered a multi-million pound Ponzi scheme involving a significant number of victims, mainly from overseas. The subject of the SAR was subsequently apprehended and is currently in custody awaiting trial. As a result of the SAR submission, further criminality was prevented. Through the use of its powers to apply for an extension to the SAR moratorium period, law enforcement managed to secure the substantial balances which remained in the subject's accounts. These recovered funds will go some way to assist in repaying the victims of this crime.

A reporter identified suspicions regarding account activity and determined that the accounts were being used to launder the proceeds of crime. The reporter decided to exit the relationship and sought a DAML to release a combined balance of over £1.3m on the accounts. The UKFIU refused the request, enabling an LEA to secure a restraint order for the full amount. Enquiries are ongoing.

## SARs Reform Programme

During the year the UKFIU closely supported the Home Office in establishing and developing the Programme. As well as designing and beginning the IT Transformation Project, the NCA supported the Programme in co-ordinating user requirements.

The UKFIU helped facilitate and document engagement with a representative range of users from across the various reporting sectors, supervisors and regulators and LEAs that make up the UK SARs regime. This included bilateral meetings, 18 sector specific workshops and a range of other meetings, producing 972 'user requirements' for the SARs regime and 79 potential 'near-term improvements'.

The process was assured by a cross-sector user group and the outputs were fed into the Home Office Programme 'Strategic Outline Business Case' and the detailed programme planning for 2019 and beyond.

## Strategy for 2019-20

The SARs Reform Programme is progressing at pace; as it develops this year the UKFIU will become increasingly more involved, in particular leading the IT transformation project, which is the most urgent priority in light of the system's age and the ever increasing volumes.

In alignment with the UKFIU's internal Annual Management Plan the UKFIU will also be working to deliver the following:

- Further enhancing the UKFIU's international position and status, taking part in appropriate and beneficial multi-lateral projects and making a valuable and recognised contribution at international fora.
- Increasing the UKFIU's presence on terrorist finance activity domestically and internationally.
- Continuing to proactively build up the UKFIU's resources, seeking to secure further attachments to increase its analytical and outreach capacity from law enforcement and the private sector.
- Further researching, developing and delivering analytical products, working in conjunction with regional, national and international partners.
- Ensuring that UKFIU officers have the correct skills and capabilities in place and benefit from investment in them.

## Annex A: Total SARs by industry sector (2018 - 2019)

SARs are attributed to the industry or profession the reporter identifies itself as belonging to.

Source type	Apr 18	May 18	Jun 18	Jul 18	Aug 18	Sep 18	Oct 18	Nov 18	Dec 18	Jan 19	Feb 19	Mar 19	2018/19
Accountants	440	411	423	414	369	302	491	445	359	388	480	454	4,976
Anonymous	3	2	7	5	6	5	5	8	2	4	4	8	59
Asset Management	72	66	61	56	62	38	114	80	55	60	64	56	784
Auction house	2	0	5	3	4	2	4	1	1	6	4	6	38
Banks	27,813	30,704	30,672	31,195	30,101	26,182	31,654	32,101	29,693	33,383	39,839	40,396	383,733
Barristers	0	1	0	0	0	0	0	0	0	0	0	3	4
Bookmaker	67	86	78	53	99	84	87	136	62	126	84	125	1,087
Building societies	1,872	1,508	1,553	2,111	1,650	1,664	1,880	2,384	1,475	1,976	1,443	2,198	21,714
Bureau de change	634	559	491	670	518	525	564	630	499	537	481	554	6,662
Capital markets	7	14	8	9	13	13	12	11	6	8	8	24	133
Charity	5	5	1	0	4	5	25	24	16	23	10	12	130
Cheque cashers	43	55	58	71	117	90	84	15	39	36	39	40	687
Clearing house	0	2	2	0	1	0	0	0	1	0	0	0	6
Consumer credit	30	48	56	56	53	100	98	87	44	61	44	44	721
Credit card	596	554	533	607	634	604	540	589	274	309	262	226	5,728
Credit union	50	99	68	89	46	51	64	34	31	71	55	73	731
Education	1	1	0	0	0	2	0	3	4	4	3	6	24
Electronic payment	705	478	509	579	507	654	798	711	847	956	1,171	1,602	9,517
Estate agents	40	48	34	58	57	55	64	70	36	48	55	70	635
Finance company	348	327	314	282	239	218	255	245	155	182	248	207	3,020
Friendly society	0	0	0	0	0	0	0	0	0	0	0	1	1
Gaming	332	401	332	273	349	302	387	340	350	357	376	354	4,153
Government	77	79	80	65	147	52	85	106	68	202	55	30	1,046
High value dealers	4	6	5	4	7	5	4	0	3	1	3	6	48
Independent financial advisers	0	0	0	0	0	0	0	0	0	0	0	0	0
Insurance	129	110	150	136	107	102	90	75	59	60	42	55	1,115

Investment exchange	0	0	0	1	1	1	3	3	7	2	1	5	9	32
IT	1	0	0	1	0	0	0	3	0	0	2	2	1	10
Legal other	9	17	35	14	19	11	24	31	28	19	11	11	20	238
Leisure	1	2	0	1	1	2	1	1	0	1	0	0	0	10
Licensed conveyancers	11	12	4	6	4	9	9	6	4	12	9	9	13	99
Local authorities	2	8	3	6	4	11	4	11	8	9	4	4	3	73
Manufacturer	0	1	1	0	1	2	0	0	0	2	2	2	2	11
Markets and exchanges	198	1	0	2	3	1	0	1	1	0	0	0	0	207
Money transmission	1,018	1,144	935	913	973	839	1,020	879	1,111	982	903	874	11,591	
Mortgage provider	1	0	1	0	0	0	1	0	0	0	0	0	0	3
Motor organisation	17	33	24	33	38	32	40	41	33	21	41	42	395	
Other	143	159	162	154	181	152	225	221	219	191	234	370	2,411	
Other entities regulated by FCA	637	667	963	1,009	849	745	944	1,025	970	1,323	1,837	1,077	12,046	
Pension provider	3	3	3	2	0	0	1	4	2	3	2	0	0	23
Private individual	4	9	11	7	2	5	1	7	6	2	5	13	72	
Regulators	15	29	24	28	22	14	34	15	16	25	23	17	262	
Retail intermediary	51	78	39	72	47	42	61	40	39	34	52	55	610	
Security	5	2	0	0	1	2	1	0	1	0	0	0	1	13
Solicitors	229	210	207	184	144	175	250	228	168	214	203	225	2,437	
Specialist financial services	6	14	9	6	7	10	11	9	7	8	9	10	106	
Spread betting	54	37	88	97	27	18	30	40	15	40	40	57	543	
Stockbrokers	24	20	21	17	16	18	67	20	15	45	32	36	331	
Tax advisers	8	0	12	5	11	4	7	6	3	3	1	19	79	
Trust or company service providers	2	2	2	1	3	2	0	4	0	2	1	4	23	
Unknown	6	8	5	4	3	5	6	5	5	3	1	9	60	
<b>Total</b>	<b>35,715</b>	<b>38,020</b>	<b>37,989</b>	<b>39,299</b>	<b>37,447</b>	<b>33,157</b>	<b>40,045</b>	<b>40,699</b>	<b>36,732</b>	<b>41,740</b>	<b>48,187</b>	<b>49,407</b>	<b>478,437</b>	



**Annex B: DAML SARs by industry sector (2018 - 2019)**

SARs are attributed to the industry or profession the reporter identifies itself as belonging to.

Source type	Apr 18	May 18	Jun 18	Jul 18	Aug 18	Sep 18	Oct 18	Nov 18	Dec 18	Jan 19	Feb 19	Mar 19	2018/19
Accountants	23	33	20	23	14	8	24	23	17	16	20	30	251
Anonymous	0	0	0	0	2	0	0	0	0	0	0	0	2
Asset Management	42	47	43	42	42	21	89	45	34	38	35	34	512
Auction house	1	0	5	3	0	2	4	1	1	4	3	2	26
Banks	1,339	1,339	1,290	1,390	1,426	1,231	1,733	1,951	1,496	1,771	1,710	1,701	18,377
Barristers	0	0	0	0	0	0	0	0	0	0	0	1	1
Bookmaker	12	11	12	17	23	22	18	30	21	29	14	26	235
Building societies	42	32	46	29	47	34	75	59	45	68	62	47	586
Bureau de change	8	9	7	2	5	8	19	16	7	9	7	10	107
Capital markets	0	1	0	2	1	0	1	0	0	2	1	1	9
Charity	1	0	0	0	2	1	8	2	0	1	1	0	16
Cheque cashers	0	0	0	0	2	0	0	0	0	0	0	0	2
Clearing house	0	0	1	0	0	0	0	0	0	0	0	0	1
Consumer credit	8	7	8	11	5	4	11	10	9	6	9	10	98
Credit card	4	11	10	10	13	9	9	6	3	2	4	6	87
Credit union	0	1	2	1	1	0	1	0	0	1	1	0	8
Education	0	0	0	0	0	1	0	3	1	2	0	2	9
Electronic payment	184	200	174	189	182	176	225	270	366	403	614	689	3,672
Estate agents	9	29	14	25	25	23	30	30	22	18	22	33	280
Finance company	14	19	13	18	17	16	28	28	15	27	47	45	287
Friendly society	0	0	0	0	0	0	0	0	0	0	0	1	1
Gaming	41	64	37	44	46	46	64	60	73	64	51	65	655
Government	0	1	1	0	0	1	2	0	1	1	3	0	10
High value dealers	1	1	0	2	0	3	2	0	1	0	0	2	12
Independent financial advisers	0	0	0	0	0	0	0	0	0	0	0	0	0
Insurance	17	10	14	19	17	8	12	12	11	11	6	17	154

Investment exchange	0	0	0	1	0	0	0	0	2	0	0	2	2	7
IT	0	0	0	0	0	0	0	0	0	1	2	1	4	
Legal other	5	10	22	10	12	9	5	19	18	15	5	9	139	
Leisure	0	0	0	1	1	1	1	1	0	0	0	0	5	
Licensed conveyancers	9	11	4	4	3	7	7	5	3	7	9	12	81	
Local authorities	1	6	2	4	2	2	3	8	4	6	4	2	44	
Manufacturer	0	0	0	0	0	1	0	0	0	1	0	0	2	
Markets and exchanges	18	0	0	2	3	0	0	0	0	0	0	0	23	
Money transmission	57	52	75	102	95	52	70	103	67	76	87	72	908	
Mortgage provider	0	0	0	0	0	0	0	0	0	0	0	0	0	
Motor organisation	0	0	0	0	10	4	0	0	0	0	0	0	14	
Other	45	65	48	51	79	65	89	71	65	66	96	183	923	
Other entities regulated by FCA	296	373	363	417	265	210	191	327	410	520	880	403	4,655	
Pension provider	1	0	1	0	0	0	0	1	0	1	0	0	4	
Private individual	0	2	2	0	0	0	0	2	0	1	1	4	12	
Regulators	0	0	0	0	0	0	0	0	0	0	0	0	0	
Retail intermediary	1	2	0	2	1	2	3	0	0	0	0	2	13	
Security	0	0	0	0	1	2	0	0	0	0	0	0	3	
Solicitors	162	155	140	129	109	125	171	164	110	159	143	145	1,712	
Specialist financial services	1	0	0	0	0	0	0	1	0	1	3	0	6	
Spread betting	34	24	75	81	15	10	21	25	5	31	27	48	396	
Stockbrokers	9	10	11	6	5	10	53	11	5	30	12	13	175	
Tax advisers	0	0	0	1	0	0	0	0	0	0	0	1	2	
Trust or company service providers	0	1	0	0	1	0	0	0	0	0	1	2	5	
Unknown	2	0	1	0	1	2	1	0	1	2	0	2	12	
<b>Total</b>	<b>2,387</b>	<b>2,526</b>	<b>2,441</b>	<b>2,638</b>	<b>2,473</b>	<b>2,116</b>	<b>2,970</b>	<b>3,286</b>	<b>2,811</b>	<b>3,390</b>	<b>3,882</b>	<b>3,623</b>	<b>34,543</b>	

## Annex C: Terrorist finance SARs by industry sector (2018 - 2019)

SARs solely disseminated to the NTFIU and CTUs by source type.

Source type	Number of SARs disseminated to NTFIU/CTUs from 1 April 2018 to 31 March 2019	As a percentage of all terrorist finance SARs in this period
Accountant/accountancy service provider	4	0.21%
Asset management	2	0.10%
Bank	1,232	64.57%
Barrister	1	0.05%
Bookmaker	6	0.31%
Building society	80	4.19%
Bureau de change	27	1.42%
Charity	3	0.16%
Consumer credit	4	0.21%
Credit card	7	0.37%
Electronic payment	56	2.94%
Estate agent	7	0.37%
Finance company	8	0.42%
Gaming/leisure	9	0.47%
Government	1	0.05%
Insurance	12	0.63%
Legal other	1	0.05%
Money transmission	373	19.55%
Other	19	1.00%
Other entities regulated by the FCA	30	1.57%
Pension provider	1	0.05%
Private individual	2	0.10%
Regulator	1	0.05%
Solicitor	18	0.94%
Specialist financial services	1	0.05%
Spread betting	1	0.05%
Stockbroker	1	0.05%
Tax adviser	1	0.05%
<b>Total</b>	<b>1,908</b>	<b>100%</b>