

Guidance on reporting routes relating to vulnerable persons



UKFIU

UK Financial Intelligence Unit

This is a United Kingdom Financial Intelligence Unit (UKFIU) product. It is aimed at all reporters of Suspicious Activity Reports (SARs) and is produced in line with the National Crime Agency's (NCA) commitment to share perspectives on the SARs regime.

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NCA

National Crime Agency

Purpose

The purpose of this document is to **provide the correct reporting pathways when concerns are raised in respect of vulnerable persons**. SARs are occasionally used as a means of reporting a crime, which often involves vulnerable persons. The SARs regime is not a route to report a crime and this document will signpost the reporter as to the most appropriate reporting routes.

Definition of a Vulnerable Person

A **vulnerable adult** is any person aged 18 years or over who is or may be in need of community services by reason of **mental, physical or learning disability, age or illness** AND is or may be unable to take care of themselves or unable to protect themselves against significant harm or exploitation.

Risks to vulnerable adults include (but are not limited to) **sexual and other physical abuse, financial abuse (including fraud) and they may be the victims of modern slavery**. The latter is defined in the Modern Slavery Act 2015, and means that it is a crime to force people into slavery, servitude and forced or compulsory labour.

A child is regarded as someone under 18 years of age. A child is always considered to be vulnerable, irrespective of the adult vulnerability criteria. A child may show mental, physical or learning disabilities or show illness, but this should be considered as an additional reporting factor reinforcing the child's inability to protect themselves against significant harm or exploitation.

Similar to vulnerable adults, if there is an immediate risk to the child, consideration should be given to calling **999** (Banking Protocol).

Crime reporting



The SARs regime is **not** a route to report crime or matters relating to immediate risk to others.

The SARs regime is for reporting knowledge or suspicions of money laundering, or belief or suspicions relating to terrorist financing.



As such, **in addition** to a SAR, you may have to report the matter via other routes to ensure the right information gets to the right organisation.

Where you do report a crime alongside a SAR it is good practice to **include the crime reference and the organisation details in the SAR.**

The NCA is not a crime reporting agency.

If the funds involved are not yet the proceeds of crime then it is not money laundering, but attempted fraud.

Does the money laundering/terrorist financing relate to a **vulnerable person at risk of *immediate* harm?**

- Call the police on **999**.
- **To report a fraud, contact Action Fraud.** (<https://www.actionfraud.police.uk/> or call 0300 123 2040).
- To report other crime ring 101.
- Include **SAR glossary code XXV2XX** in any SAR relating to money laundering/terrorist financing concerning vulnerable people.

Does the money laundering/terrorist financing relate to a **child at immediate risk of harm, including sexual exploitation and abuse?**

- Call the police on **999**.
- Include **SAR glossary code XXV3XX** in any SAR relating to money laundering/terrorist financing concerning child exploitation.
- If you wish to report the **abuse of a child please follow the guidance at <https://www.gov.uk/report-child-abuse>**
- If you want to report suspicious behaviour online with or towards a child, use the **Child Exploitation and Online Protection (CEOP) Centre online report form** (<https://ceop.police.uk/report-abuse/>).
- If you want to report illegal content online report to the Internet Watch Foundation (<https://www.iwf.org.uk/report/>).

Do you suspect **modern slavery/human trafficking?**

- If there is an immediate risk of harm call the police on **999**.
- If not immediate consider using the Modern Slavery website (<https://www.modernslavery.gov.uk>) or **reporting via 101 or 0800 0121 700**.
- Include SAR glossary code XXV2XX in any SAR relating to money laundering/terrorist financing. Also use SAR glossary code XXOICXX when related to organised immigration crime.

Does the scenario involve the abuse, or potential abuse, of **power of attorney?**

- The Office of the Public Guardian is the organisation responsible for managing and monitoring powers of attorney and can be contacted on **0300 456 0300**.

Other routes for reporting child exploitation

- If the matter is not immediate, the abuse of a child should be reported via www.gov.uk/report-child-abuse