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HM Revenue
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Office of Financial
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HM Treasury



Amber ALERT

Financial Sanctions Evasion, Money Laundering & Cultural Property Trafficking Through the Art Storage Sector

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This Amber Alert is issued by the United Kingdom's National Crime Agency (NCA), a member of the National Economic Crime Centre (NECC), HM Treasury's Office of Financial Sanctions Implementation (OFSI) and HM Revenue & Customs (HMRC), working in conjunction with UK law enforcement and financial sector partners as part of the Joint Money Laundering Intelligence Taskforce (JMLIT). The JMLIT was established to ensure a more collaborative approach between law enforcement and the banking and wider private sector.

This Alert is devised with the aim of promoting awareness and bringing about preventative action. We recommend you use this Alert to complement existing knowledge and support ongoing improvements to your business processes and procedures.

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Overview

This Amber Alert is issued by the JMLIT with representation from UK law enforcement, private industry, financial crime regulators and OFSI.

The purpose of the Alert is to highlight the sanctions evasion and money laundering risks presented to UK industries linked to the art storage sector, and to serve as a reminder on due diligence checks and reporting obligations.

What We Would Like You to Do

The National Crime Agency (NCA) is a national law enforcement agency which leads the UK's fight to cut serious and organised crime. The NCA Alerts process is the way in which we provide information to non-law enforcement bodies including the private sector to combat and disrupt serious crime. To help us to improve this service, we would welcome any feedback you have on both the Alert itself and the information provided to you. Please email all feedback to alerts@nca.gov.uk and include the reference **0735-NECC** in the subject line.

If you identify activity which may be indicative of the typologies detailed in this report, and your business falls under the regulated sector, you may wish to make a Suspicious Activity Report (SAR). If you decide to make a report in this way you should adopt the usual mechanism for doing so, and it will help our analysis if you would include **XXJMLXX** within the text and the reference **0735-NECC** for this Alert within the relevant field on the NCA SAR Portal.

The NCA would also welcome any information identified as a result of this Alert which does not constitute a SAR. Please email all such information to jmlit@nca.gov.uk. Any information received in this way will be treated in confidence and will be handled in line with the data protection principles.

OFSI is the UK's competent authority for the implementation of financial sanctions. If you identify information that is indicative of either a frozen asset or a breach of financial sanctions, such as dealing with frozen assets or funds involving a designated person (DP), then report this to OFSI at OFSI@hmtreasury.gov.uk.

Executive Summary

This Alert focuses on UK artwork storage facilities, the UK specialist service providers that are linked to the art storage sector and the clients that utilise these art storage facilities.

Within this Alert the term 'artwork storage facilities' refers to any facility or space that is used to hold, store or move artworks, antiques, antiquities and collectibles whether short-term or for prolonged periods of time. This includes purpose-built warehouses, auction houses, art dealerships, galleries, museums and freeports.

The term 'specialist services' in this instance refers to any company that provides any service to the art storage sector in order to support or enhance their ability to conduct business. This includes shipping and transport companies, insurance companies and agents, brokers, lawyers, accountants and banking providers.

High-net-worth individuals (HNWIs) are known to keep art works in specialist storage facilities, some of which are tax free. As the price of art has increased, contemporary collecting has grown, with owners more interested in seeing their artwork investment portfolios appreciate in value. This trend is not exclusively linked to HNWI buyers, but it is prompting concerns about the use of these storage facilities for illegal activities by criminals seeking a capital asset that can be safely stored, that appreciates in value over time, and that can be liquidated if and when required. It is estimated that millions of pieces of art are currently held in specialist storage and have not left those facilities in decades.¹ The situation is illuminated by the fact that only about 5% of museums' collections are on display at any one time, mainly due to a lack of display space.²

Clients of UK artwork storage facilities and/or their linked specialist service providers may be UK residents or located overseas, including in jurisdictions of high risk such as Russia. Many elites and other HNWIs possess considerable artwork assets which are held either within properties or in storage facilities. Non-HNWI clients may also utilise storage facilities to circumvent financial and other restrictions. Furthermore, any client may be represented by a third party such as a law firm, a brokerage firm, or a Trust and Company Service Provider (TCSP), further obfuscating the true source of funds and provenance of artworks.

This Alert highlights that criminals are finding ways to utilise the art market to conduct illicit activity. Art market participants (AMPs)³ – including those working in the art storage sector or in a linked specialist service provider capacity – should have the ability to identify within their business any change in client status and suspicious activity relating to financial

¹ <https://www.nytimes.com/2016/05/29/arts/design/one-of-the-worlds-greatest-art-collections-hides-behind-this-fence.html>

² <https://www.widewalls.ch/magazine/art-storage-museum-collections>

³ An art market participant is defined as a firm or sole practitioner who: (i) by way of business trades in, or acts as an intermediary in the sale or purchase of, works of art and the value of the transaction, or a series of linked transactions, amounts to €10,000 or more; or (ii) is the operator of a freeport that by way of business stores works of art and the value of the works of art stored amounts to €10,000 or more – British Art Market Federation, 'Guidance on Anti Money Laundering For UK Art Market Participants', amended 6 February 2023, pg 8 - <https://tbamf.org.uk/wp-content/uploads/2023/02/BAMF-AML-Guidelines-February-6th-2023.pdf>

sanctions evasion, money laundering, cultural property trafficking, or other criminality. Thorough due diligence checks conducted at regular intervals will assist in ascertaining any change to a client's circumstances that may affect their risk rating. Any concerns identified as a result of the ongoing checks can then be reported by the AMP through the appropriate channels, thereby ensuring the AMP is fulfilling their reporting obligations and thus avoiding any potential criminal offences such as sanctions breaches, court restrictions breaches or storing prohibited property, which may also lead to the voiding of insurance cover.

A customer may raise no concerns upon initial on-boarding, but may subsequently become subject to financial sanctions, involved in money laundering activity, or become associated to other criminal activity such as tax evasion, fraud, terrorist financing, bribery or corruption. Failure to undertake regular and appropriate due diligence is considered to be a red flag for complicity and may indicate an attempt to circumvent regulations. Breaches of financial sanctions, such as dealing with frozen assets or funds involving a DP, are criminal offences and applicable to the DP as well as to any associates or enablers. Registered businesses who fail to comply with the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (MLRs) may be subject to civil penalties and/or criminal prosecutions.

Criminals are exploiting the assumption made by many AMPs in the art storage sector that someone else has taken responsibility for conducting due diligence and for maintaining accurate and up-to-date customer profiles. Inadequate and/or irregular KYC research opens the door for criminals and their professional enablers to circumvent legislation and regulations, putting both the company and the UK at risk. Criminals are known to test organisations' due diligence processes by conducting legitimate business activity, and then placing illicit items and/or requesting sudden service changes, thereby concealing and moving assets that may be subject to restrictions.

Art Storage Facilities and Specialist Services

Art storage facilities include shipping or transport company warehouses, auction houses, art dealerships, galleries, museums and freeports. Many purpose-built art storage facilities offer a range of services in addition to storage, including insurance, security, climate control, inventory management, customs bonding, private viewing rooms and office or boardroom facilities.

Storage facilities are often used to store high value artworks and other cultural objects, due to the special conditions required to prevent damage, or for security reasons. Such facilities provide a discreet and secure storage service to art collectors, but also represent money laundering and terrorist financing vulnerabilities.⁴

Some other entities offer storage services in addition to their main business purpose, which may include logistics, packing, transport, removals, installations, gallery displays, restorations, valuations, auction representations and sales, and online/physical retail sales.

⁴ FATF (2023), Money Laundering and Terrorist Financing in the Art and Antiquities Market, FATF, Paris, France, p17 – <https://www.fatf-gafi.org/publications/methodsandtrends/money-laundering-terrorist-financing-art-antiquities-market.html>

Freeports are a type of special economic zone (SEZ) where different laws allow goods to be landed, stored, handled, manufactured or reconfigured and re-exported without attracting customs duty.⁵ UK freeports are still in their infancy, with three active in Plymouth/South Devon, Solent and Teesside as of December 2022 and a further seven scheduled to become operational in the near future.⁶ UK freeports were brought into the scope of the MLRs in January 2020 through the Fifth Anti Money-Laundering Directive requirement for art storage.

Specialist services that directly facilitate the art storage sector to enhance their ability to conduct business include shipping and transport companies, insurance companies and agents, brokers, customs bonding agents, lawyers, accountants and financial service providers.

Such services may be manipulated by criminals in order to facilitate illicit activity. Criminals may recruit professional enablers working in these fields to assist them in obfuscating and conducting criminal activity through wilful blindness and/or active participation. Illicit activity may be hidden amongst legitimate activity, making it harder to detect.

Key Indicators and Useful Questions

- **Change in client circumstances**
 - Are the international sanctions listings and other due diligence systems being checked on a daily basis against clients' details and their assets under the control of your organisation?

- **Attempts to transfer artwork or cultural property ownership to a family member, close contact, business associate or other intermediary**
 - What is the reason provided for the requested transfer of ownership?
 - Has the individual wishing to transfer ownership to a third party recently become subject to financial or other sanctions, or believe they are about to become subject to such sanctions or other legal restrictions?
 - Does the third party who is due to take ownership of the artwork or cultural property have any open-source links to an individual who has been recently sanctioned or is otherwise subject to scrutiny by authorities?
 - Where a change of ownership is being considered, and a DP may be involved, have you received the relevant permissions from OFSI to effect the transfer?

- **Attempt to sell artwork or cultural property quickly, or move it to another jurisdiction**
 - What is the reason provided for the requested sale of the artwork or cultural property, and/or its immediate re-location to another jurisdiction?

⁵ <https://www.theguardian.com/world/2020/feb/10/eu-clamps-down-free-ports-zones-crime-terror-links>

⁶ There are hundreds of freeports in the world, with Geneva Freeport reportedly hosting the world's largest art collection at an estimated value of \$100 billion and an estimated 1.2 million items of art in storage - <https://www.thecollector.com/geneva-free-port-the-worlds-most-sective-art-warehouse/>

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- Could the movement of artwork or cultural property to another jurisdiction be an attempt to obscure the financial trail, potentially making detection of criminal activity and seizure of illicitly held assets more difficult?
- Has the provenance of the artwork or cultural property been verified by a trusted source?
- Has there been an attempt to sell the artwork or cultural property at an artificially low or inflated price?
- Has the individual wishing to sell or re-locate the artwork or cultural property recently become subject to financial or other sanctions, or believe they are about to become subject to such sanctions or legal restrictions?
- **Regular payments from an unclear source**
 - Who has indirect control over the individual or entity completing the transaction?
 - Is the lack of clarity on the source of the payment an intentional method of concealing the Ultimate Beneficial Owner (UBO) of the artwork or cultural property, and if so, what is the reason for the obfuscation?
 - Are the transactions being made through the use of an offshore account?
 - Has there been a change in payment arrangements for the artwork or cultural property storage?
- **Use of front or shell companies, or complex corporate or trust structures where the UBO is unclear**
 - Does the client's company have a website containing very little information and/or featuring an unprofessional appearance?
 - Does the company have a suspicious business model, such as finances differing from those expected or seen?
 - Are shell companies or other intermediaries being used in order to transact anonymously and obscure an individual as the UBO of the artwork or cultural property?
 - What commercial justification for the complex structure has the client provided? Is it a legitimate reason?
- **Requests to store objects that are stolen or subject to restrictions**
 - Are lost and stolen art registers and other due diligence systems being checked on a daily basis against objects under the control of your organisation?
- **Use of financial services to acquire, sell or ship artworks or cultural property in and out of specialist storage facilities**
 - Is the client completing transactions via an intermediary acting as a middle layer between the buyer and seller, so that the end ultimate buyer and seller remain unknown to each other?
 - Does the client's business have unusual activity, such as unusual turnover?
 - Does the client's business feature exclusive relationships, where they appear to be trading with one or two other businesses that do not trade with any other businesses?

For detailed information on the red flags for money laundering in the art market, please refer to the Amber Alert **0631-NECC Art Market Participants, AML Regulations and Financial Crime Vulnerabilities** published in May 2021:

<https://www.nationalcrimeagency.gov.uk/who-we-are/publications/516-necc-art-market-participants-aml-regulations-and-financial-crime-vulnerabilities/file>

For detailed information on the red flags for frozen asset transfers, please refer to the Red Alert **0697-NECC Financial Sanctions Evasion Typologies: Russian Elites and Enablers** published in July 2022:

<https://www.nationalcrimeagency.gov.uk/who-we-are/publications/605-necc-financial-sanctions-evasion-russian-elites-and-enablers/file>

Case Studies

Case Study 1 - Concealment of high value assets in bonded art storage facilities

Summary: An investigation into a sanctioned Hezbollah financier identified approximately a million pounds sterling in fine artwork belonging to this individual in art storage facilities in the UK. The storage facility owners, including a fine art shipping company, had ceased dealing with the subject and the artwork had been left in situ for over a year, but the companies involved had not notified the authorities of what they were holding, or for whom. When the artwork was identified, efforts were made to secure it as listed assets under the Proceeds of Crime Act 2002 (POCA). The artwork was seized with the consent of the involved companies and a detention order granted.

Observation: The case highlights the risks of art storage facilities as a mechanism for long-term storage and concealment of high value assets by sanctioned persons.

Case Study 2 – Unquestioned long-term storage for illicitly removed and faked cultural properties

Summary: An AMP involved in organised crime had actively cultivated over many decades a close personal relationship with a shipping company. This resulted in the shipping company providing long-term storage facilities in the UK for cultural properties that had been illicitly removed or faked. The shipping company also provided office accommodation to the AMP within the shipping company's storage site. The shipping company made applications on behalf of the AMP in respect of export licences.

Observation: Close personal friendships can develop between shipping companies and AMPs, which could result in behaviours ranging from a company rarely questioning what is being stored on their sites and failing to undertake regular due diligence enquiries, through to AMPs actively evading regulatory requirements.

Relevant Offences

Sanctions Evasion Offences

It is commonplace for goods such as artworks to move between jurisdictions, making such movements less noticeable when being undertaken for the purposes of sanctions evasion.⁷

For example, a DP seeking to move assets following a UK designation would constitute breach offences under the UK financial sanctions regulations, as well as potential circumvention offences by the DP and any associates or enablers. The Sanctions & Anti-Money Laundering Act (SAMLA) 2018 has extra-territorial application, meaning it applies to all persons within the territory and territorial sea of the UK and to all UK persons, wherever they are in the world.

OFSI has overall responsibility for ensuring the UK's financial sanctions regimes are properly understood, implemented and enforced. To ensure they are compliant with UK sanctions, businesses and individuals should assess their own risks and put due diligence measures in place to manage them. OFSI can provide guidance as to what measures may be helpful, but the onus is on the organisation and/or individual to ensure that they have put in place sufficient measures to ensure they do not breach financial sanctions. For more information on financial sanctions implementation and asset freezing, please refer to OFSI's April 2023 publication 'High Value Dealer Guidance: Guidance on financial sanctions implementation for high value dealers, luxury goods markets and art market participants':

- https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1151932/OFSI_HVD_Guidance_FINAL_180423.pdf

OFSI's Consolidated List of financial sanctions targets includes regularly updated information relating to asset freeze and investment ban targets across all financial sanctions regimes implemented in the UK.

- <https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets>

It is also possible to view a breakdown of financial sanctions regimes relating to a specific country or terrorist group, along with the specific regulations and DPs for each regime imposed in the UK.

- <https://www.gov.uk/government/collections/financial-sanctions-regime-specific-consolidated-lists-and-releases>

⁷ 'High Value Dealer Guidance: Guidance on financial sanctions implementation for high value dealers, luxury goods markets and art market participants' – HM Treasury Office of Financial Sanctions Implementation, April 2023, page 4 - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1151932/OFSI_HVD_Guidance_FINAL_180423.pdf

Many HNWI's have deep roots in the art industry as high value collectors and patrons, and possess considerable quantities of artwork assets. Under the Russia (Sanctions) (EU Exit) Regulations 2019, there are five financial restrictions (regulations 11-15), the breach of which would result in an offence being committed ("a sanctions breach"). These restrictions can be summarised as dealing with the frozen assets of a DP or making funds or economic resources available for that DP, either directly or indirectly. In addition, conduct or activities the effect of which is to circumvent any of the above restrictions would also constitute an offence.

Under the same legislation, Regulation 18C outlines the prohibition of the provision of new trust services to a person connected with Russia, as well as the continued provision of existing trust services to DPs when not for the purposes of maintaining frozen assets.

Regulation 19 provides a circumvention offence of intentionally participating in activities knowing the object or effect is to circumvent the breach regulations or to facilitate their contravention. This circumvention offence may apply where enablers are seeking to obstruct other parties from carrying out necessary due diligence to meet their own sanctions obligations. This could include misrepresenting entities that are owned/controlled by the DP.

For a detailed overview of the various methods used in particular by Russian elites and oligarchs to evade financial sanctions imposed in relation to the Russian invasion of Ukraine, please refer to the NCA's Red Alert 0697-NECC, referenced above.

Money Laundering Offences

Intelligence indicates that some HNWI's invest in artwork, antiques, antiquities and collectibles in order to transfer illicit finance from drugs sales, fraud, corruption and other criminal activity, and this sector poses a high money laundering risk to the UK.

In addition to the legal obligations to prevent and report suspected money laundering under POCA, the Fifth Money Laundering Directive (5MLD) brought UK AMPs into the scope of the MLRs on 10 January 2020. AMPs who deal in sales or purchases of works of art with a value of €10,000 (or other currency equivalent) or more (for a single transaction or series of linked transactions) must now fulfil a range of transparency and due diligence obligations. This also includes storage of art within a UK freeport.⁸

As sanctions breaches or circumvention of the regulations constitute criminal offences, this means the onward transfer of funds or assets could become proceeds of crime and recoverable property under POCA. This would also apply to funds transferred for an arrangement intended for use in unlawful conduct, such as a future breach or circumvention of sanctions.

⁸ British Art Market Federation, 'Guidance on Anti Money Laundering For UK Art Market Participants', amended 6 February 2023, pg 5 – <https://tbamf.org.uk/wp-content/uploads/2023/02/BAMF-AML-Guidelines-February-6th-2023.pdf>

Cultural Property Trafficking Offences

The UNESCO 1970 Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property provides a framework for its 143 state parties on the measures to be taken to prohibit and prevent the illicit trafficking of cultural property.⁹

The Dealing in Cultural Object (Offences) Act 2003 is the UK ratification of the UNESCO 1970 Convention. The Act makes it an offence to acquire, dispose of, import or export 'tainted' cultural objects, or agree or arrange to do so. It is immaterial whether the act is agreed or arranged to take place in the UK or elsewhere.

The Cultural Property (Armed Conflicts) Act 2017 is the UK ratification of the 1954 Hague Convention for the Protection of Cultural Property in the Event of Armed Conflict and its two Protocols.¹⁰ The Act makes it an offence to deal in cultural property knowing or having reason to suspect that it has been unlawfully exported.

Reporting Obligations and Mechanisms

OFSI has issued extensive non-statutory guidance in order to support firms and members of the public in remaining compliant with financial sanctions.¹¹ If you are a relevant firm or relevant institution (as defined under section 71 of the Russia (Sanctions) (EU Exit) Regulations 2019) and other sanctions regimes (refer to the relevant regime regulations) you are legally obliged to report to OFSI if you know or suspect that a breach of financial sanctions has occurred, that a person is a DP, or if you hold frozen assets, and that knowledge or suspicion came to you while conducting your business.

Reporting to OFSI can be delivered through the Compliance Reporting Form, which is available online:

- https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/776805/compliance_reporting_form.docx

The regular updates to OFSI's Consolidated List mean that it needs to be checked regularly for additions of individuals or entities that may be part of your client base. To stay up to date with the latest information on financial sanctions, including amendments to the consolidated list of asset freeze targets, you can subscribe to OFSI's free email alert service:

- <https://public.govdelivery.com/accounts/UKHMTREAS/subscriber/new>

⁹ <https://www.unesco.org/en/fight-illicit-trafficking/about>

¹⁰ <https://www.ucl.ac.uk/archaeology/research/ethics/policy-regarding-illicit-trade-antiquities>

¹¹ www.gov.uk/government/publications/financial-sanctions-faqs

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For guidance on assets other than artwork, including luxury goods items such as wine, cars and jewellery valued at €10,000 or more, please refer to OFSI's April 2023 publication 'High Value Dealer Guidance', referenced above.

Further guidance on **professional body supervision** across relevant sectors can be found in NCA's Red Alert 0697-NECC, referenced above.

The **UK Financial Intelligence Unit (UKFIU)** is housed in the NCA and has national responsibility for receiving, analysing and disseminating financial intelligence submitted through the Suspicious Activity Reports (SARs) Regime. The UKFIU has introduced the sanctions-specific glossary code **XXSNEXX** for reporters where they suspect the activity is consistent with money laundering and is linked to entities sanctioned by the UK, US, EU and other overseas jurisdictions.¹²

A SAR can be submitted via the secure web-based NCA SAR Portal:

- <https://www.nationalcrimeagency.gov.uk>

Any SARs and other reports submitted as a result of this Amber Alert should also include the Alert-specific reference **0735-NECC**. The NCA SAR Portal contains a field where this information can be included.

¹² <https://nationalcrimeagency.gov.uk/who-we-are/publications/585-ukfiu-sar-glossary-codes-note-march-2022>

Data Protection Act

The NCA reminds you of your legal obligations in respect of the management of this information, including under the Data Protection Act 2018.

Article 5(1) requires that personal data shall be:

1. Processed lawfully, fairly and in a transparent manner;
2. Collected for a specified, explicit and legitimate purpose and not further processed in a manner that's incompatible with these purposes;
3. Adequate, relevant and limited to what's necessary in relation to the purpose for which they are processed;
4. Accurate and where necessary kept up to date;
5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purpose for which the personal data are processed;
6. Processed in a manner that ensures appropriate security of the personal data.

Suspicious Activity Reporting (SARs)

If you know or suspect that there has been money laundering or terrorist financing activity (including as a result of information provided to you by the NCA) and your business falls within the regulated sector, then you are reminded of the obligations to make reports to the NCA under Part 7 Proceeds of Crime Act 2002 and the Terrorism Act 2000. If you decide to make a report in this way you should adopt the usual mechanism for doing so, and it will help our analysis if you would include the reference **0735-NECC** within the specified field on the NCA SAR Portal. This reference is specific to the Alerts process; where appropriate, we would ask that this is used *in addition* to the ongoing use of the glossary codes. Guidance on making suspicious activity reports is available at www.nationalcrimeagency.gov.uk.

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Alert Markings

NCA Alerts are marked either Red or Amber. This is designed to indicate the urgency of the warning. Red may indicate a more immediate or specific threat, whilst those marked Amber will provide more general information that may complement existing knowledge.

NCA Alerts Team

Recognising that the private sector is often the victim of serious organised crime and is engaged in its own efforts to prevent, deter and frustrate criminal activity, the NCA seeks to forge new relationships with business and commerce that will be to our mutual benefit – and to the criminals' cost. By issuing Alerts that warn of criminal dangers and threats, the NCA seeks to arm the private sector with information and advice it can use to protect itself and the public. For further information about this NCA Alert, please contact the NCA Alerts team by email alerts@nca.gov.uk. For more information about the National Crime Agency go to www.nationalcrimeagency.gov.uk.

Protecting the Public – Providing information back to the NCA

Section 7(1) of the Crime and Courts Act 2013 allows you to disclose information to the NCA, provided the disclosure is made for the purposes of discharging the NCA's functions of combating serious, organised and other kinds of crime. The disclosure of such information to the NCA will not breach any obligation of confidence you may owe to a third party or any other restrictions (however imposed) on the disclosure of this information. The disclosure of personal information about a living individual by you to the NCA must still comply with the provisions of the Data Protection Act 2018 (DPA). However, you may be satisfied that the disclosure by you of such personal information to the NCA in order to assist the NCA in carrying out its functions may be permitted by Schedule 2, Part 1 of the DPA 2018. This allows a data controller to be exempt (by means of a restriction or adaption) from provisions of the GDPR, if the personal data is processed for the following purposes:

- a) the prevention or detection of crime,*
- b) the apprehension or prosecution of offenders, or*
- c) the assessment or collection of a tax or duty or an imposition of a similar nature,*

to the extent that the application of those provisions of the GDPR would be likely to prejudice any of the matters mentioned in paragraphs (a) to (c).
(DPA 2018, Schedule 2, Part 1).

Any Section 7(1) information should be submitted to alerts@nca.gov.uk.

The NCA's Information Charter is published on our external website at www.nationalcrimeagency.gov.uk.

Handling advice – Legal information

This information is supplied by the UK's NCA under Section 7(4) of the Crime and Courts Act 2013. It is exempt from disclosure under the Freedom of Information Act 2000. It may be subject to exemptions under other UK

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legislation. Except where permitted by any accompanying handling instructions, this information must not be further disclosed without the NCA's prior consent, pursuant to schedule 7, Part 3, of the Crime and Courts Act 2013.

This report may contain 'Sensitive Material' as defined in the Attorney General's guidelines for the disclosure of 'Unused Material' to the defence. Any sensitive material contained in this report may be subject to the concept of Public Interest Immunity. No part of this report should be disclosed to the defence without prior consultation with the originator.

Requests for further disclosure which are not permitted by any handling instructions or handling code must be referred to the NCA originator from whom you received this information, save that requests for disclosure to third parties under the provisions of the Data Protection Act 2018 or the Freedom of Information Act 2000 and equivalent legislation must be referred to the NCA's Statutory Disclosure Team by e-mail on statutorydisclosureteam@nca.gov.uk.