

# A pocket guide to: Suspicious Activity Reporting (SAR)

To find out how FCR Compliance can help you with your SAR process, please contact [Louis@FCRCompliance.com](mailto:Louis@FCRCompliance.com)



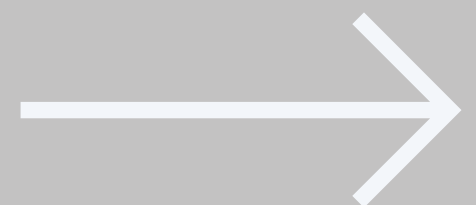
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# What are the SAR requirements?

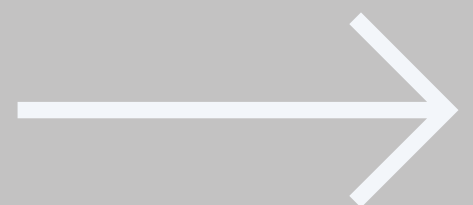
The SAR regime is for reporting knowledge/suspicion of money laundering, or belief/suspicion relating to terrorist financing under the **Proceeds of Crime Act 2002** (POCA) or **Terrorism Act 2000** (TACT).

The information and intelligence provided by SARs is used by the **UK Financial Intelligence Unit** (UKFIU) and **law enforcement agencies** (LEAs) to investigate and protect the public from serious and organized crime.



# Why does quality matter?

Better quality SARs enables quicker review and prioritisation, maximising the potential to stop crime and recover criminal property.



# How to write a good quality SAR (1)

Use a **logical structure**, for example a brief summary to highlight key elements of your suspicion plus a timeline of events.

Include **relevant information** such as customer due diligence records, dates of birth and bank account / transaction details.



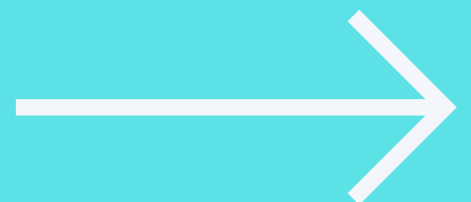
# How to write a good quality SAR (2)

**Be clear and concise** – include all relevant information but keep it as short and simple as you can.

**Make it digestible** - if you can't keep it short, break it up into paragraphs that are easier to read and avoid jargon.



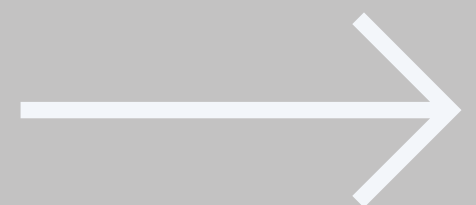
**A well written SAR  
can help stop crime.**



# Submitting a SAR

The National Crime Agency (NCA) **'SAR Online' system** is a secure portal for you to input detail of your suspicions.

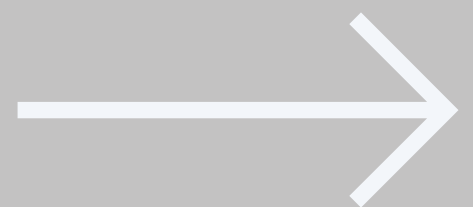
The online SAR form comprises multiple reporting fields – each field will be analyzed by targeted keyword searches.



# Submitting a SAR

You should always:

- Fill in **all** information fields – if you don't know, write 'UNKNOWN'
- Complete all relevant fields **accurately** – especially names, postcodes, account details
- Use the appropriate fields and glossary codes, not just the 'reason for suspicion' field. This enables targeted searches and helps UKFIU systems to link entities and bank accounts submitted by multiple reporters



# What to report

Use the appropriate reporting fields to communicate detail of the reason for your suspicion, including:

- **Who** is involved
- **What** is the benefit from criminal / (terrorist) conduct – plus value
- **Where** is the criminal / terrorist property
- **When** did / will the prohibited activity happen
- **Why** you are suspicious or have knowledge of criminal property
- **How** they are involved - what happened





# What to report

Also include additional information that may assist in identifying the above e.g.

- customer due diligence
- occupation
- date of birth
- legal entity name
- previous SAR reference



# What not to report

SARs are **neither** a **communication channel for advice / guidance**, nor a route to report **general crime**.

If your suspicion of money laundering or terrorist financing relates to:

- a vulnerable person / child at risk of immediate harm, exploitation or abuse
- suspected modern slavery / human trafficking
- immediate risk of harm due to supply of firearms

you should report via correct routes and call the police on 999 if the risk of harm is immediate





**FCR Compliance**

Louis is one of FCR Compliance's founders. He has over 20 years experience in financial crime prevention, investigation and remediation.

Louis started his career in accountancy, where he specialised in forensic investigations and disputes, then moving to the UK FCA where he served as an investigator in both Wholesale and Retail Banking Enforcement, before moving to the Supervision Department where he led regulatory oversight and liaison with industry stakeholders in major UK retail banks.

Since 2018, Louis has worked as a consultant, helping clients with the design and delivery of their KYC file reviews, AML remediation programme assurances, sanctions training and responses to S166 regulatory reviews.