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Message from the head of the UKFIU

Vince O'Brien, Deputy Director

Welcome to issue 12 of the UKFIU's magazine *SARs in Action*. In this issue we take a look at the recently published National Strategic Assessment and how collaboration with the UKFIU and the analysis of SARs data plays an integral role in identifying some of the key changes in the serious organised crime threat.

We also hear from HM Revenue & Customs on why the SARs regime is integral to mitigating tax and illicit finance risks associated with gold. This requires a collaborative response from the public and private sectors and SARs information is an essential component in helping to develop our understanding of the risks associated with gold and organised crime.

Building on a recent UKFIU podcast on vulnerable person SARs, we examine how UKFIU procedures are in place to identify SARs containing information on various types of fraud that target potentially vulnerable members of society. Relevant SARs are identified and fast-tracked to police forces who will, in many cases, arrange visits by local officers to offer advice in order to prevent fraud or further losses.

Talking of podcasts, don't forget to subscribe to streaming sites such as Spotify to be kept up-to-date on when we release these. The latest was issued in July and focuses on virtual assets - what they are, how they work, complexities faced by law enforcement and the role SARs and reporters can play. You can also follow us on LinkedIn and Twitter (NCA_UKFIU) for updates on all our guidance products and engagement work.

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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'd love to hear what you think of the publication, what topics you'd like us to consider and we're always open for possible articles/collaborations. Previous issues of this magazine are available on the NCA website. Please send any feedback to **ukfiufeedback@nca.gov.uk**

Updates can also be found on Twitter at NCA_UKFIU and via our LinkedIn page.

Opinions expressed in articles provided by partners are not necessarily the view of the UKFIU/NCA. The UKFIU exercises the right to edit submitted articles.

UKFIU updates

Reporter engagement survey

The UKFIU is evolving the way it communicates and engages with members of the regulated sectors as part of the broader SARs Reform Programme.

To understand how we are doing, and to help us identify areas where we can do more, we're asking all organisations who submit SARs to the UKFIU to provide some feedback via a short survey – this includes both submissions via the SAR Online portal or via the bulk reporting process.

We would like to hear from as many reporters as possible – the more we find out about our interactions, the more we can do to better support you in future, and the more we can disrupt financial crime here in the UK and abroad.

To access the survey, please click on this [link](#). The survey will close at 18:00 on 22/10/2021.

You can also use the below QR code to access the survey using a mobile device.

Open the camera, focus on the code, then tap the screen when the www.homeofficesurveys message appears.



SAR Researcher role

The Financial Intelligence Administrator (FIA) role was established by the UKFIU in 2014 to extend direct access to SARs beyond the financial investigator and financial intelligence officer communities. It was intended to give wider policing and government departments access to SARs for intelligence and analysis and thereby increase the exploitation of the information that SARs contain. In October 2021 the FIA role is being replaced by a new SAR Researcher role.

A key objective of the UKFIU and part of the wider SARs Reform Programme is to increase the exploitation of SAR data. SARs have traditionally been seen in law enforcement as an intelligence stream to support financial investigations only. However, feedback provided to the UKFIU by SAR end users have shown that the data contained in SARs has been used to enhance intelligence pictures and support a myriad of investigations.

By simplifying access to SARs whilst maintaining confidentiality requirements, the SAR Researcher role supports the UKFIU commitment to exploit the use SARs as widely as possible throughout the law enforcement community in support of the Government's SARs reform objectives. As with the FIA role, the SAR Researcher role is purely to access SARs for intelligence purposes only. SAR Researchers will not have POCA powers, nor will they be listed on the Financial Information Gateway.

This change in role name will be accompanied by a more streamlined and simplified registration process whilst still ensuring that officers have sufficient knowledge to be able to access, sanitise and share SAR data appropriately.

National Strategic Assessment

Ilana and Charlotte
National Assessments Centre

Surnames withheld at authors' request

The National Assessments Centre (NAC) is an integral part of the National Intelligence Hub of the NCA. Its role is to produce assessed intelligence reporting covering all areas of serious and organised crime (SOC) impacting the UK or UK interests overseas. In May 2021 the NAC published the public version of the National Strategic Assessment of Serious and Organised Crime 2021 (NSA).

SOC is a rapidly changing and complex national security threat that endangers the integrity, legitimacy and sovereignty of the UK and its institutions, at home and overseas. Criminals worldwide exploit the vulnerable, dominate communities and seek to undermine the UK's economy and infrastructure. Communities across the UK are impacted by SOC. As a result, the NSA seeks to inform not only key decision-makers, but also the public and non-law enforcement partners who can make a difference on the front line.

Over the last year the SOC threat to the UK has continued to increase in both scale and complexity. The numbers of criminals impacting on the UK are greater than previously estimated, and our understanding of the scale of the SOC threat continues to improve. SOC offenders have shown their flexibility and adaptability, especially in their response to COVID-19. Technological enablers are firmly embedded within SOC groups' methodologies, enabling them to upscale their operations and to adapt to law enforcement and regulated sector activity.

This has driven some of the growth in the threat. Analysis of data recently gained from the EncroChat platform (one of the largest providers of encrypted communications, used by criminals to plan and coordinate their activity) offered new insight into SOC and how offenders operate, but also made clear the scale of the challenge we face around technology.

SOC is a global threat, and the UK is a key target of criminals operating internationally and domestically, as well as a key transit point for commodity smuggling. Collaboration with the UKFIU and analysis of SARs data play an integral role in identifying some of the key changes in the SOC threat, as highlighted by the examples below/next page from this year's Fraud and Money Laundering chapters.

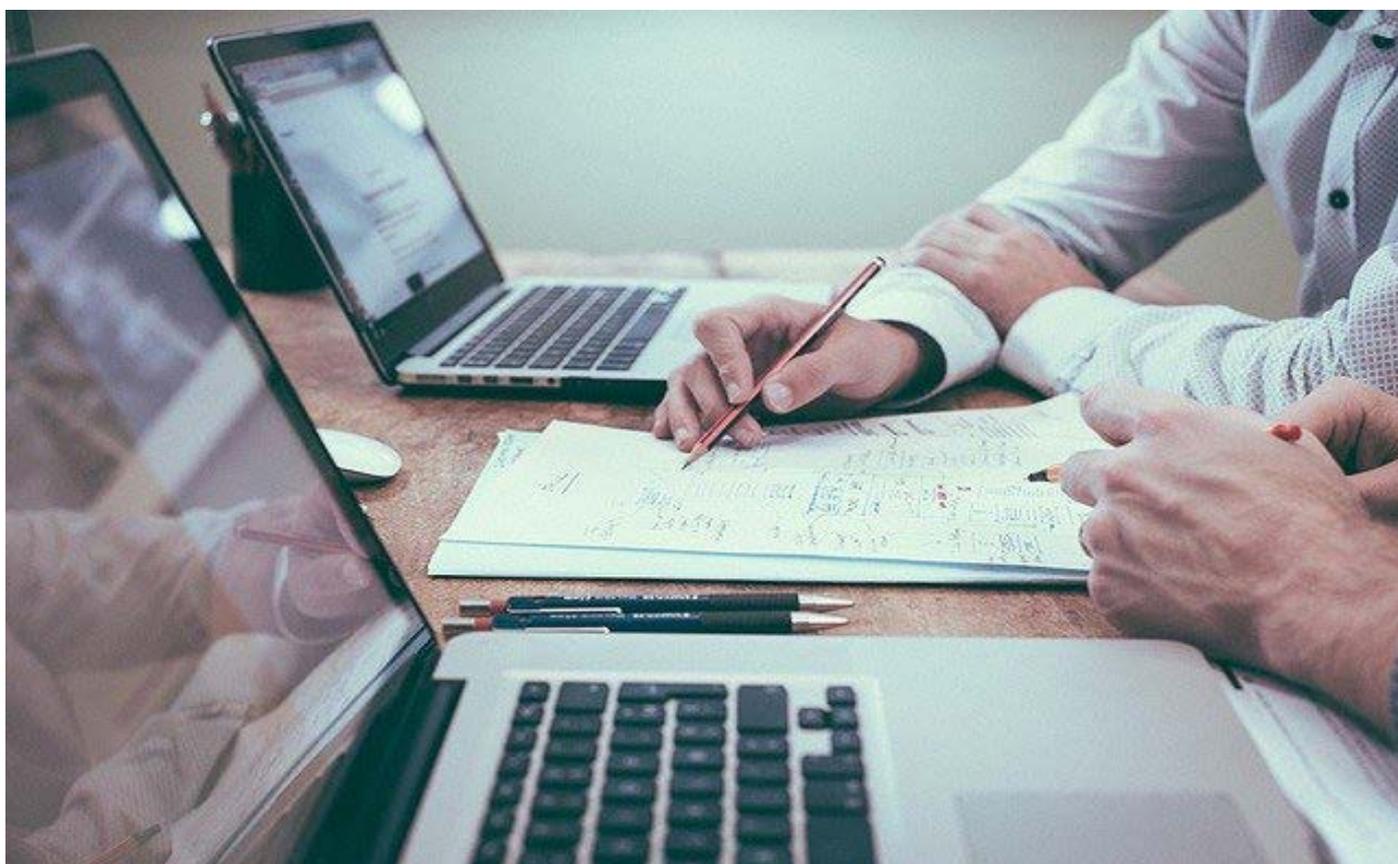
Fraud remains England and Wales' most common crime type and accounted for over a third of estimated crime in the year ending September 2020. COVID-19 has been a key driver of fraud, with the risk to the UK public sector demonstrated by the speed, scale and diversity of frauds linked to the pandemic. UKFIU analysis of COVID-related SARs resulted in an Amber alert which contained red flag indicators for industry and was used to produce an Intelligence Brief in September 2020 and inform this year's NSA.

Money mule activity increased, particularly among younger age groups, with an increase in vulnerable person SARs. Criminals exploited public fear and financial vulnerability arising from the pandemic and resulting economic downturn. More people working from home led to an increase in social media use, a popular platform for mule herders to target and recruit victims.

Mule herders also demonstrated an increasing awareness of bank detection tools. Further work is underway by the NAC, using SARs data and other intelligence sources, to develop our understanding of the money mule threat, including the vulnerabilities mule herders exploit and the recruitment of under-18 money mules.

Focussing on key changes in the threat, the NSA informs partners and the public of the most important SOC issues of the day, and influences the strategies put in place to tackle and mitigate these threats. This impacts across the whole spectrum of the UK's response, be it increasing the awareness of the 'bobby on the beat' of the exploitation that occurs within County Lines drugs offending to influencing decision makers in Whitehall on the national response to the criminal exploitation of social media.

We'd encourage you to read the full NSA (available from the NCA website) and welcome any feedback. Planning for the 2022 NSA is already underway so if you think you are able to provide useful data or intelligence regarding any of the SOC threats please do get in touch at NAC@nca.gov.uk



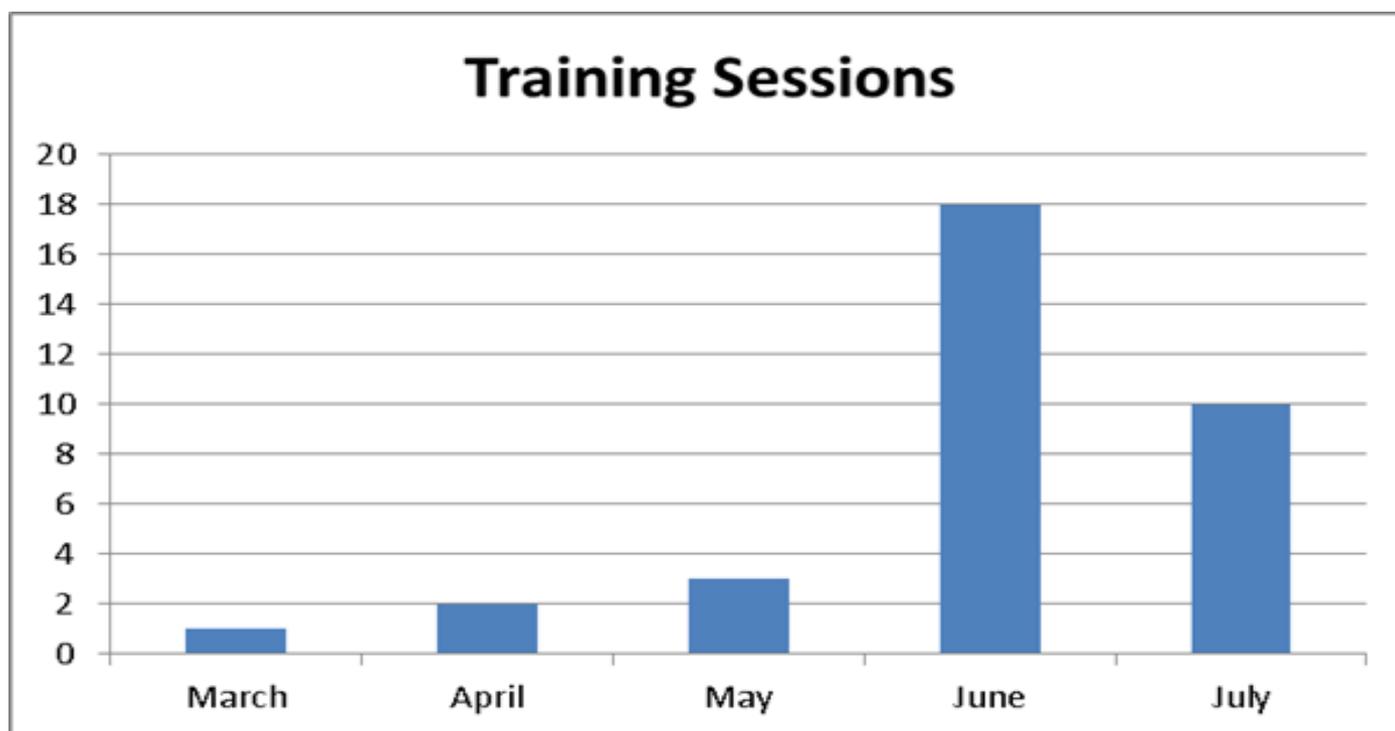
Engagement with law enforcement

The UKFIU's SARs Exploitation Team's (SET) mission is to drive up the exploitation of SAR information across police forces, government departments and wider law enforcement (collectively known as end users). A key component to the exploitation of SARs is the use of a search, retrieve and analytical tool called Arena.

During restrictions imposed by the COVID-19 pandemic, because of the sensitivity of the information in SARs, training was unable to be delivered across internet platforms such as Zoom or Microsoft Teams; it has to be delivered face-to-face.

As restrictions around COVID have gradually relaxed over the past months, SET officers have finally been able to get back out to their key stakeholders to undertake an intensive calendar of training sessions.

The following chart is a summary of training sessions delivered by SET between March to July 2021:



"It has been really frustrating not being able to provide the fullest support that we know some users need to exploit the information in SARs to its fullest extent," said SET manager Mike Hinds.

"Whilst we've continued to support our law enforcement partners remotely, the benefits of actually meeting people in the flesh have been lost. However, now that we are reconnecting with our law enforcement partners, we have already seen some tangible benefits from the training we have provided.

"Following one of our training sessions, one officer identified a bank account for a suspect with almost £100,000 in it that had previously not been identified. Those

funds were subsequently added to a court order. More recently, information in a SAR proved invaluable in assisting a rape enquiry. This shows again the importance of the information that SAR reporters provide and how they can assist in all sorts of law enforcement enquiries.”

SET is confident that more face-to-face interaction with UK law enforcement can only be a positive.

“There is no doubt in my mind that face-to-face interaction stimulates greater confidence in the support of the UKFIU and engenders closer partnership working,” added SET officer Steve Longshaw.

“It also raises the profile of the department and the Agency as a whole. Physically attending an end user organisation automatically stimulates a greater sense of commonality of purpose. We have had several follow up calls with a number of police and regional forces that we have visited and have provided bespoke assistance where requested. That call may not have been made without the visit we made.”

The following chart is a summary of Arena training delivered by SET (March – July 2021):



In addition to the operational successes that SET activity has contributed to, anecdotal evidence and comments suggests that the visits have been extremely beneficial. Moreover the visits have also given the SET a chance to promote UKFIU social media channels and communication products via the NCA website. A new training cycle is planned to begin again in the Autumn.

Virtual assets

An in-depth version of these interviews features in episode eight of the UKFIU podcast, available on Spotify and other streaming sites. Don't forget to subscribe to be made aware of new podcasts.

The fifth anti-money laundering directive regulations (5AMLD) came into effect in January 2020, the aim being to tackle the risks linked to cryptocurrencies and bring exchange platforms and custodian wallet providers within its scope. These two categories became 'reporting entities' under the new legislation, meaning that they are now required to conduct strong customer due diligence (or CDD) much like traditional financial institutions and to report suspicious transactions to the competent financial intelligence unit.

In this article we look at virtual assets – what they are, how they work, some of the complexities faced by law enforcement and the role that SARs and reporters can play.

Craig Gleeson, National Economic Crime Centre (NECC)

Cryptocurrency has grown massively as an industry and continues to do so at pace. What 5AMLD has done is to tighten the industry – in terms of the UK, it's meant that the crypto asset providers fall under the regulatory remit of the Financial Conduct Authority (FCA).

Inevitably the tightening up of the industry is a massive boost for law enforcement. It helps to legitimise the sector, which is beneficial for everybody, but it also helps to improve public private partnerships, enabling us to build bridges with the industry, and to start working together to combat crime and to try and tackle the issues that were going on pre-regulation.

Money laundering is probably now the most significant criminal use of cryptocurrencies. It's becoming part and parcel of professional money launderers and how they try and obfuscate funds on behalf of a wide range of criminal groups. This is in large part because of the fact that, for a while, it wasn't regulated as it is now and it has the anonymising elements to it. Essentially the idea is to convert it into something that can be easily transported and cryptocurrency can essentially be carried on a USB stick or a phone, easily transferred across borders without using banking systems.

Phil Ariss, cryptocurrency lead for the National Police Chiefs' Council's (NPCC) cybercrime programme

The NPCC brings together police forces in the UK to help co-ordinate operations, reform and improve and provide value for money. The cybercrime programme was initially just to deliver local capability projects, establishing sub-crime units across England and Wales, but this remit has widened to basically build a world-leading policing cyber capability with the best training tools and technology available to us.

Going back just a couple of years there was very little capability on the policing frontline level in relation to cryptocurrency; we've now developed a process whereby there are now cryptocurrency tactical advisors in every single force and Regional Organised Crime Unit, and they've all been trained in cryptocurrency investigations and spotting the initial signs of cryptocurrency usage.

We've also delivered guidance to investigators and training and a whole host of other sort of tools and capabilities that has allowed local, regional and national officers the ability to actually identify what cryptocurrency usage is and a level of capability to investigate it.

Most forces or regions are seeing significant volumes of cryptocurrency investigations; we're seeing people being brought to justice in this space. And also, which is what I'm very passionate about, we're taking that away from criminals as far as the benefits from these crimes – the Proceeds of Crime Act is being applied in relation to cryptocurrency usage.

SAR reporting in this field is absolutely vital, especially considering that this is still not mainstream policing yet. I think it's also important to stress that while the European Union and the UK has regulation in place, there are many areas in the world that don't sadly, and those weaker jurisdictions and those softer borders will always remain a threat. So it's really important that we try to capture that as much as possible in SARs and that early strategy in investigations.



Vulnerable person SARs and fraud

An in-depth version of these interviews features in episode 7 of the UKFIU podcast, available on Spotify and other streaming sites. Don't forget to subscribe to be made aware of new podcasts.

While fulfilling anti-money laundering and counter terrorist financing obligations reporters sometimes identify those who are being exploited or who are potential victims of fraud. The UKFIU has procedures to identify SARs containing information on various types of fraud that target potentially vulnerable members of society. Relevant SARs are identified and fast-tracked to police forces who will, in many cases, arrange visits by local officers – whilst maintaining the confidentiality aspect of SARs – to offer advice in order to prevent fraud or further losses.

There are plenty of useful UKFIU guidance documents available on the NCA website –such as the *Guidance on Reporting Routes Relating to Vulnerable Persons* and the *SAR Glossary Codes and Reporting Routes* for instance. It is worth reiterating, however, that the SARs regime is not a route to report a crime and the guidance on the NCA website will signpost reporters as to the most appropriate reporting routes.

Denise Napper, manager of the UKFIU's SARs Enquiries and Action Team

The most important thing about fast-tracking is that we will exploit it within a time critical window – we can send that SAR out within 24 hours of having received it. The effect of frauds and scams on vulnerable individuals is still very evident in the increasing number of SARs that we receive. This crime has a considerable and significant impact on individuals' health, in addition to, in many cases, sadly significant financial loss.

Vulnerable people can and are often the main target for scammers, although they can become a victim of a fraud regardless of age, gender or their financial situation. For elderly and disabled individuals a fraud can have a devastating effect on their emotions and can lead to them actually being targeted again by a range of further fraud attempts, often being added to what we've been advised is referred to as a 'suckers list', where fraudsters pass on the details of people that they've been able to successfully exploit to other crime groups to try and extract more financial gain from the individuals.

The SARs that we analyse each day contain intelligence on a variety of different frauds and situations where people are being financially exploited. The exploitation could be at the hands of a family member, those close to them in positions of trust, a carer, powers of attorney, a friend that has been put in place to protect them etc.

We see SARs relating to romance fraud, along with pressure and coercion to send money overseas. And we find that this particular fraud is really popular when targeting elderly people, people that are lonely, they've lived quite isolated lives and believe genuinely that the company and the attention they're receiving is legitimate.

Kate Mills, financial investigator with Thames Valley Police

Very often these fast-tracked SARs are the first indication that something is not quite right. Bank staff may notice an increase in cash being paid into an account or cash withdrawn from an account or just an increase in foreign payments coming in and going out, or just third parties that are paying money in and it just doesn't fit right with what's expected from the profile of that customer.

As soon as we receive these fast-tracked SARs we search our system and we see if they are known to us. Very often they're not and also they're not necessarily known to any other agencies. So they could have been suffering for a long time as a victim of this offence with nobody knowing and sometimes there's a lot of embarrassment that goes with this and they are really coerced into becoming a victim.

It's vital that we receive these because the banks themselves can see the change in activity. They can see a spike in a certain month where all the same activities started. So it's great. If we receive these then we can instigate a visit to them and offer that vital advice and support that's needed.

We review and action all of the fast-tracked SARs we receive and we sanitise all the information that we give to our frontline officers who attend the addresses. Any information and intelligence that reporters provide is totally protected and only the necessary information is sanitised and given to those officers.



Tax and illicit finance risks with gold

Elizabeth Rees
Economic Crime Strategy Unit
Fraud Investigation Service
HMRC

Law enforcement's continued impact in disrupting illicit financial flows by targeting cash means criminals are increasingly looking to turn their ill-gotten gains into sought-after commodities like gold.

They may target precious metal through burglaries or ask for it as payment within courier frauds.¹ Alternatively, illicit cash is laundered and then converted into gold as part of the first stage of the money laundering process. We repeatedly see gold featuring in money laundering methodologies including trade-based money laundering – the process whereby criminals move the proceeds of crime through trade transactions in an attempt to legitimise their origins.

The Financial Action Task Force has explained why gold remains an attractive proposition to money launderers, even with the onset of modern forms of wealth like cryptoassets.² Unlike crypto, gold remains a stable form of global currency, does not require technology and appears in many forms including gold bars and jewellery.

The ability to transform gold into different objects means it can be transported, smuggled and traded across the globe and its origins made difficult to trace. Gold can be exchanged for cash anywhere in the world. A 24 carat, 1 kilogram gold bar is worth more than £44,000 and is much smaller than the equivalent cash value. This makes it an attractive proposition for money launderers.

The demand for gold continues to grow due to its many uses such as jewellery, medicines, engineering, the development of new technologies and as a financial investment.

This global demand unfortunately feeds a global demand for illicitly mined and traded gold. That fuels a host of illegal activity, including smuggling, human trafficking, tax evasion and corruption, as well as the funding of war, crime and terrorism. Reports suggest organised crime gangs in South America have moved away from the drugs trade because illicit gold mining is more lucrative and less risky.³

The UK is one of the largest gold trading centres and we must remain vigilant so that gold traded as a result of illegal activity does not compromise our supply chains and legitimate trade.

While the connections between cash and criminal activity are well established and understood, the connection between commodities like gold and criminal activity may be less understood. Illicit transactions involving the precious metal therefore may not be as easily recognised.

The multiple forms and uses of gold present unique challenges for carrying out due diligence and reporting suspicious activity in such transactions. The generic term 'gold' could be referencing bars, jewellery, scrap or unrefined gold and it is important such distinctions are made, wherever possible, when suspicious activity is reported.

Adherence with the Organisation for Economic Co-operation and Development's due diligence guidance for precious metal supply chains is integral in tackling organised criminals who trade in gold. Equally important is the need to report suspicious activity when it comes to buying and selling gold. This is particularly crucial in preventing the use of gold in money laundering.

Identifying and managing tax and illicit finance risks associated with gold requires a multifaceted and collaborative response from both the public and private sectors. Use of information provided by the SARs regime is an essential component in helping to develop our understanding of the picture of risk associated with gold and organised crime.

The more informed our picture of risk is, the more effective our response to gold risks can be. Without this type of information, it would be more difficult to establish an effective and co-ordinated strategic and tactical public and private sector response to this threat.

Of course, the tax and illicit finance risks associated with gold are also applicable to other precious metals. That means the work we do through SARs to develop our understanding of the risks associated with gold and how we mitigate it will also pay dividends when it comes to other work.

FOOTNOTES

1. <https://www.northyorkshire.police.uk/news/police-issue-urgent-warning-after-hundreds-of-thousands-of-pounds-lost-to-gold-scam/>
2. <https://www.fatf-gafi.org/media/fatf/documents/reports/ml-tf-risks-vulnerabilities-associated-with-gold.pdf>
3. <https://qz.com/867104/illegal-gold-mining-has-supplanted-cocaine-trafficking-as-latin-americas-criminal-endeavor-of-choice/>



Insolvency practitioner new guidance

Katherine Smith
UKFIU Senior Manager

Cross-sector engagement and collaboration is key to successfully tackling economic crime. Through ongoing interaction with regulators and reporters, the UKFIU and stakeholders are able to jointly identify barriers to effective financial intelligence exchange and pursue the necessary process and legislative changes to remove those barriers.

As a result of the Institute of Chartered Accountants of England and Wales (ICAEW) Thematic Review of SARs, specific challenges faced by insolvency practitioners (IPs) in reconciling their obligations under insolvency law and those under the Proceeds of Crime Act (POCA) relating to DAML and Defence Against Terrorist Financing (DAFT) requests were identified.

New guidance has been published by the ICAEW, with the support of the Home Office and the NCA to address these challenges:

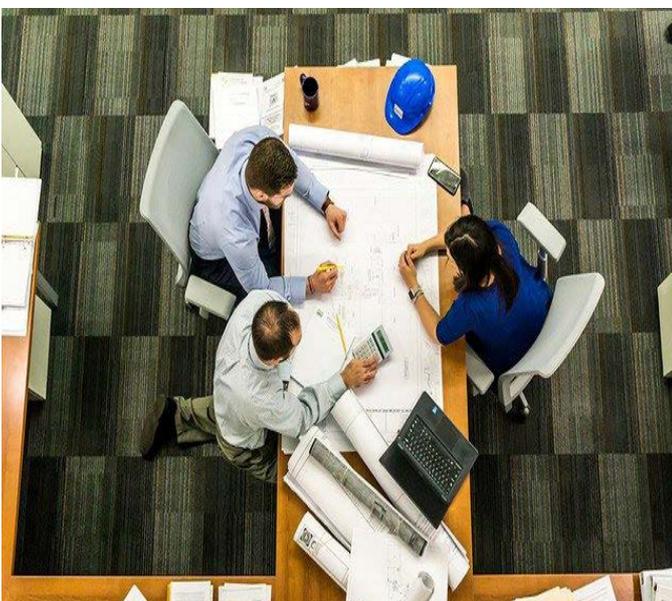
DAML on appointment

In circumstances where an IP may be appointed, there is a risk that individuals or companies may have engaged in criminality to preserve or generate cash, or are subsequently found to have done so. If the IP is aware or suspects that the entity may be in possession of the proceeds of crime or terrorist property, a DAML or DATF request should, where possible, be made prior to accepting the appointment - but only where the criminal property is already within the company.

Accepting the appointment is a business decision and does not constitute a DAML. On appointment, the IP takes control of assets for the benefit of the creditors; if some of the assets comprise criminal property, the IP could commit an offence under POCA. A second DAML may be required to realise newly discovered criminal property.

The timescale to obtain a DAML is seven working days following submission. This timescale will generally conflict with the urgency required to appoint an IP to protect the interests of legitimate creditors.

Under the new guidance, in the case of truly urgent appointments, IPs can escalate urgent DAML submissions for consideration. The NCA aims to provide a response within 24 hours, if appropriate.



DAML required for urgent payments upon appointment

On appointment, in order to continue to trade, it may be necessary for IPs to make payments to staff and legitimate suppliers within a short time period. Suppliers, who are already owed money, may only accept 'payment on delivery' terms. This can cause issues where criminal property is suspected or identified before accepting an appointment.

There may be circumstances where there is sufficient time pre-appointment to identify such payments and a DAML application made. However, there has been experience of DAML refusal when the IP cannot state definitively that the appointment will take place or provide exact details of the amounts to be paid. In other cases, the appointment takes place rapidly without time for prior application.

If the payments are not made, this creates tension with the obligations governing IPs. Additionally, the opportunity to save the business may be lost, with resulting loss of employment and detrimental effect on legitimate creditors. The new guidance proposes that, where payments need to be made urgently after appointment, IPs should escalate urgent DAML submissions for consideration. The NCA would aim to provide a response within 48 hours.

The need for multiple DAML applications

In some cases, an application to deal with assets in accordance with the duties and law applicable to an IP has resulted in a DAML granted for a 12 month period. In other cases, this has been refused due to the complexities of the specific case, with a description of the potential prohibited acts along with amounts required. An IP may be able to identify creditors at an early stage, but this can take longer.

Where each of the various entities to whom a payment is to be made are ascertained, this will result in multiple DAML requests. There may also be additional requests for each asset disposal.

The new guidance allows for a DAML request to cover all assets, expenses and liabilities of an entity, enabling the IP to make any payments or distributions during the insolvency, subject to a 12 month period. The request needs to specify that this DAML request is only in respect of parties or creditors who do not appear to be connected to the wrongdoing which gave rise to the proceeds of crime.

Where an insolvency appointment is expected to last more than 12 months, the reporter will need to consider requesting additional DAMLs, as NCA policy is to only grant a DAML for a maximum 12 months as a proportionate response to the long term management of criminal property.

The Guidance, published by the ICAEW with the support of the NCA, seeks to provide an enhanced service, where required to IPs, in time critical circumstances, to enable them to act within the provisions of Insolvency Law and POCA. The published Guidance is available by clicking [here](#).

A different kind of cuckooing...



Angela Foyle
Chair of the Institute of Chartered
Accountants in England and Wales
Economic Sub-Committee

Director
Global Economic Crime Risk
Management
BDO

Law enforcement describe the practice by which drug dealers take over someone's home (often a vulnerable person) as a base for their activities as 'cuckooing'. However, it appears that accountancy firms suffer from their own distinct breed of cuckoos. These are companies who use the accountancy firm's address as a registered office address without the knowledge or consent of the firm.

A recent meeting of firms identified that this is a common problem. Of the 15 firms represented at the meeting (of all sizes) all had discovered cases of companies registered at the firm's address who had no connection with the building or the firm; discussions with supervisors indicates that the issue may be even more widespread.

There could be some innocent errors in the cases identified, but the most likely explanation for using the accountancy firm's address is that it provides credibility which may be used to facilitate fraud. In many cases, the company will combine using the address with a Post Office redirection arrangement so the accountancy firm will not receive any mail which might trigger an investigation.

Identifying the misuse of the address is one element. A further challenge is getting the record changed. Although the reforms proposed in the Companies House Consultation would have facilitated this, currently the process is long and laborious.

A form must be completed, then evidence provided to Companies House that the accountancy firm has a legitimate interest in the address (including lease documents and in some cases utility bills) and it can take several months to have the record changed. Once removed, there is nothing to stop the company from re-registering at the same address or at the address of another accounting firm and the process will have to begin again.

There are no exact numbers of how many companies misrepresent their registered addresses. However, law enforcement and others should be aware it will not always be the case that the registered address is being used legitimately.

Financial crime communications

Stuart Hadley
Communications Account Manager
National Crime Agency

Economic crime is increasingly demanding media attention, from proceeds of crime and money laundering, to bribery and corruption and fraud. The NCA press office, which also covers comms for the National Economic Crime Centre, works across the agency to offer transparency around the work to tackle this criminality and to explain the threat landscape, often working closely with partners in the financial sector as well as other arms of law enforcement and the regulators.

While the role of the UKFIU in these cases is largely hidden, many correspondents follow developments in the regime and its processes closely. The need for modernisation of both the regime itself and the infrastructure behind it are a perennial area of interest, as is the relative reporting levels of different members of the regulated sector.

For the UKFIU, the press office acts as the gatekeeper between the media and the unit itself. This will typically involve responding to media queries from the very general to the highly specialist, arranging interviews with senior leaders to encourage and improve reporting within particular sectors, and working on campaigns to raise awareness among law enforcement of the value of SARs data used across the full range of investigations, not just suspected cases of money laundering.

The majority of media engagement involving the UKFIU is with specialist publications or journalists with a particular focus on the regulated sector. However the publication of the annual report, which provides an opportunity for scrutiny of the units performance and of the regime itself, can attract a wider level of interest. The publication date is agreed with Number 10 to ensure it doesn't clash with other Government announcements before it is published and released to the media.

Typically the press office works with relevant media to facilitate interviews and bring out any key findings from the report, and it is frequently referred to in reporting throughout the year.



Missed an issue?

You can download previous copies of the **SARs IN ACTION** magazine from the National Crime Agency's website

www.nca.gov.uk

