

SARs IN ACTION

Issue 18 - December 2022

Page 3

How SARs fight serious and organised crime

Page 7

Reporting vulnerability and welfare concerns for individuals

Page 9

Tackling Economic Crime Awards

Page 12

Estate agency SAR working group



A United Kingdom Financial Intelligence Unit publication aimed at all stakeholders in the Suspicious Activity Reports regime



Message from the head of the UKFIU



Vince O'Brien Deputy Director

Hello and welcome to the 18th issue of the UKFIU's magazine *SARs in Action*.

In this issue we look at the usefulness of SARs and how they contribute in the fight against different types of serious and organised crime.

We cover information and guidance for anyone submitting a SAR relating to individuals who are vulnerable or where welfare concerns are identified, and include guidance based on potential indicators of sexual exploitation.

We also look at the Estate Agency SAR working group and how the UKFIU Reporter Engagement Team has been engaging with this sector. This includes a note from the chair of the group on the partnership between the group and the UKFIU.

We feature two events that UKFIU teams attended recently, including the Defence Against Money Laundering (DAML) Team attending the Tackling Economic Crime Awards after being nominated as finalists in the 'Outstanding team' award.

We also start the first in our series of 'Day In The Life' posts, looking at the day-to-day experiences of UKFIU officers across the unit.

➔ Who is the 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

➔ Contents

How SARs help fight crime.....	3
Case studies.....	5
Welfare concerns for individuals...	7
2022 Tackling Economic Crime Awards.....	8
SAR working group.....	11
SOCEX conference 2022.....	13
UKFIU people stories.....	15
Indicators of sexual exploitation...	17
UKFIU podcast.....	20

➔ 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.

HOW DO SARs HELP FIGHT SERIOUS AND ORGANISED CRIME?

Business Change Team

NCA Change Management Office & Strategic Partner

NCA Strategy and Change Directorate

What are SARs?

SARs are reports submitted by organisations in the regulated sector (such as banks, law firms and estate agents) for activities deemed to be suspicious for potential money laundering or terrorist financing. Reports are submitted to the UKFIU and made available to over 70 law enforcement agencies (LEAs) and government departments. They are a **vital source of intelligence** and have helped law enforcement seize illegal drugs, trace murder suspects, and identify the movement of women being trafficked into the UK to work in the sex industry.

Anyone can submit a SAR, whether they do so as a member of the public or representing an organisation. Although SARs are primarily submitted to raise a suspicion that funds may be the proceeds of crime, they can hold wider intelligence beyond the scope of finance. SARs are an all-crime intelligence stream and can be utilised in all areas of law enforcement.

What happens once a SAR is submitted?

All SARs are received by the UKFIU. Every single day, the unit receives **approximately 3,000 SARs**, which are analysed by our internal systems, looking at key words and crime types and then triaged and prioritised accordingly. SARs are made available to LEAs and government departments, and all SARs that require immediate action are quickly forwarded to the correct LEAs for further investigation.



What have SARs helped us achieve during 2021-2022?

SARs are an invaluable data source that have helped to identify victims that require safeguarding, arrest criminals, seize criminal funds and assets, and support multiple investigations all around the country. More specifically, during the 2021-2022 financial year:

Over **£300 million** has been denied to **suspected criminals** as a result of DAML requests.



£300M
denied

Over **16,000 SARs** relating to **potentially vulnerable people** were fast-tracked by the UKFIU to law enforcement, on the basis that there was an immediate risk to a vulnerable individual's wellbeing or safety through exploitation.

Over
16,000
SARs fast-tracked



What other types of crimes have SARs helped disrupt?


It is a common misconception that SARs are only used in cases of financial crime such as money laundering or terrorist financing. There are many cases where **SARs have helped support criminal investigations outside the remit of financial crime.**



One salient example of where SAR intelligence has assisted law enforcement beyond investigating money laundering occurred in 2021. Following training by the UKFIU on the use of Arena to intelligence and specialist crime staff within police forces, one LEA was able to quickly locate and arrest a suspect. A stranger rape had taken place within the force's area; the only identifiers were a phone number and a reference to managing a local business. A SARs check on Arena was implemented by the investigating force which linked and connected to a particular local individual. The subject was not known on any other police intelligence bases. The subject identified by the SAR was promptly arrested.

This illustrates how SARs are often a unique source of intelligence. Across the country and globally, SARs have helped LEAs to prevent and disrupt serious and organised crime.

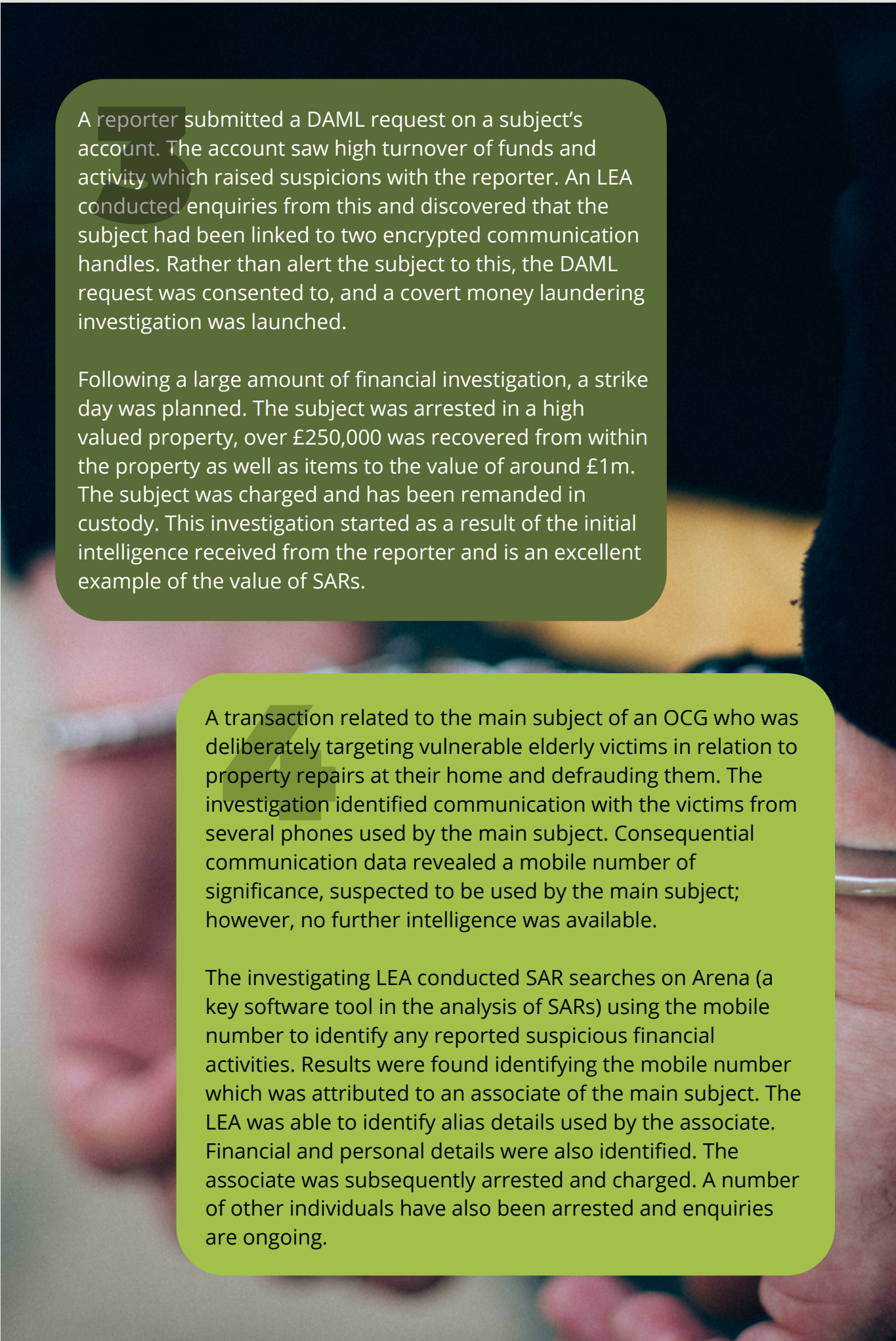
CASE STUDIES



A series of SARs were submitted after multiple fraud reports identified that generational fraudulent funds were entering a subject's account. A DAML was requested and refused giving an LEA the opportunity to investigate further. Investigators identified that false invoices had been sent to international companies to redirect payments into accounts held by the subject and an associate. An Account Freezing Order (AFO) was obtained and over £40,000 of fraudulently obtained funds were successfully recovered. Enquiries are ongoing.

Several SARs were submitted following a series of large cash deposits into an account which did not correspond with behaviour expected of the account holder's occupation and lifestyle. A DAML request was made with consent being subsequently refused and a money laundering investigation began. The cash deposits had been made in quick succession using various money service businesses in different locations on the same day. The submission of SARs enabled investigators to quickly gather evidence relating to the case that otherwise may have been lost.

A short time later, as a result of information submitted via another SAR, an associate was identified whose activity was very similar to that of the original subject and a further DAML request was submitted. Further investigations revealed that cash had been deposited into international bank accounts to bypass restrictions on currency exchange. Intelligence suggested that the subjects may have been used as money mules by international Organised Crime Groups (OCGs). An AFO was granted on both accounts and over £20,000 was subsequently forfeited by the subjects.

A blurred background image showing a person's face and hands, possibly holding a device, with a dark, moody color palette.

A reporter submitted a DAML request on a subject's account. The account saw high turnover of funds and activity which raised suspicions with the reporter. An LEA conducted enquiries from this and discovered that the subject had been linked to two encrypted communication handles. Rather than alert the subject to this, the DAML request was consented to, and a covert money laundering investigation was launched.

Following a large amount of financial investigation, a strike day was planned. The subject was arrested in a high valued property, over £250,000 was recovered from within the property as well as items to the value of around £1m. The subject was charged and has been remanded in custody. This investigation started as a result of the initial intelligence received from the reporter and is an excellent example of the value of SARs.

A transaction related to the main subject of an OCG who was deliberately targeting vulnerable elderly victims in relation to property repairs at their home and defrauding them. The investigation identified communication with the victims from several phones used by the main subject. Consequential communication data revealed a mobile number of significance, suspected to be used by the main subject; however, no further intelligence was available.

The investigating LEA conducted SAR searches on Arena (a key software tool in the analysis of SARs) using the mobile number to identify any reported suspicious financial activities. Results were found identifying the mobile number which was attributed to an associate of the main subject. The LEA was able to identify alias details used by the associate. Financial and personal details were also identified. The associate was subsequently arrested and charged. A number of other individuals have also been arrested and enquiries are ongoing.

VULNERABILITY AND/OR WELFARE CONCERNS FOR INDIVIDUALS

The UKFIU SARs Enquiry and Action (SEA) Team review selected SARs on a daily basis, triaging certain SARs for urgency and prioritisation. In recent months, the number of SARs detailing welfare concerns and serious vulnerability has notably increased.

In order to continue ensuring that the triaged SARs are disseminated to the correct law enforcement audience, and that the contained information is directed appropriately, the team would like to highlight to SAR reporters the following reminders:

- 1 The SARs reporting mechanism should only be used to report knowledge or suspicions of money laundering, or belief or suspicions related to terrorist financing.
- 2 The NCA is not a crime reporting agency

In cases where there is a belief that an individual is at risk of any immediate harm **it is essential that this information is not just contained in a SAR**. There is a chance it could be missed by the triage team despite their best efforts. Additionally, any information shared in a SAR needs to be sanitised by our law enforcement partners prior to onward sharing with non-accredited recipients, taking up valuable resource and time.



At the point of SAR submission, if the matter has been reported via another means - such as dialling 101 or 999 - then it is considered to be good practice to include the crime reference and organisation details in the SAR.

Similarly, if the **Banking Protocol** has been utilised, it is very helpful and time saving if this can be referenced in the SAR. By including this information we are then able to de-conflict with our partners and, as such, are able to save valuable law enforcement resource and time.

ATTENTION

If you are engaged with law enforcement in advance of submitting a SAR you should note this in your report. It is good practice to identify the police team and police force with relevant reference numbers which will help coordinate subsequent activity – but **please avoid naming specific individual law enforcement officers in the SAR**.

2022 TACKLING ECONOMIC CRIME AWARDS

The UKFIU's Defence Against Money Laundering (DAML) Team and the National Economic Crime Centre's Public Private Partnerships (PPP) were finalists in the 2022 Tackling Economic Crime Awards.

The TECAs are designed to recognise excellence and innovation in tackling all areas of economic crime from those working in the private, public and third sectors.

The DAML Team was nominated as a finalist in the 'Outstanding Team' award, whilst the PPP Underground Banking JMLIT+ Cell was nominated as a finalist in the 'Outstanding Partnership' category. Both teams attended a ceremony at the London Marriott, Grosvenor Square, in November when all winners were announced.



Johnathan Hawley, DAML Team officer, and Euan McKeeve, UKFIU Senior Manager

The Underground Banking Cell was an innovative and collaborative piece of partnership activity, designed to reduce the cash money laundering threat in the UK from organised crime groups operating underground banking, informal value transfer system (IVTS) and Daigou money laundering operations in three major cities across the UK.¹

In the financial years 2021-22 and 2022-23 the Cell has supported a number of investigations that have collectively led to 32 arrests, cash/asset seizures worth £1.4m, plus property worth £100,000 and 30+ fake passports being seized. In addition, outputs have been provided to private sector participants which has enabled them to identify vulnerabilities and improve systems and controls.

This was one of the first 'cells' commissioned under the NECC's new public private operating model where activity can be commissioned, across the 4Ps, at speed, to ensure that our collective response to economic crime is agile, collaborative and threat-led by definition, and maximises the collective capabilities of the public and private sectors.

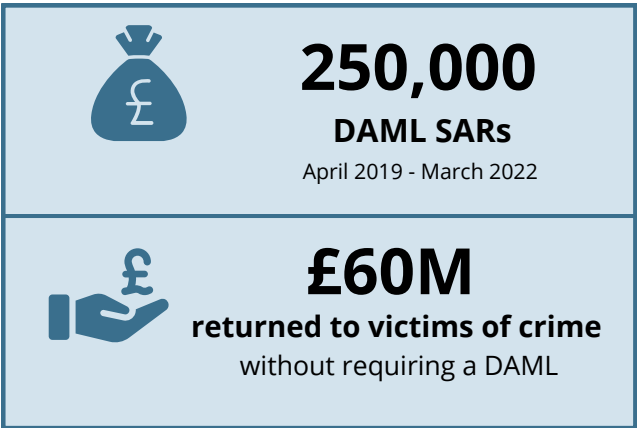


¹ Underground banking systems are financial networks that operate outside of normal banking channels to transfer money internationally.

The UKFIU DAML Team fulfils a **unique statutory function** under the Proceeds of Crime Act (POCA) 2002, making time-critical decisions to grant or refuse consent for DAML requests.

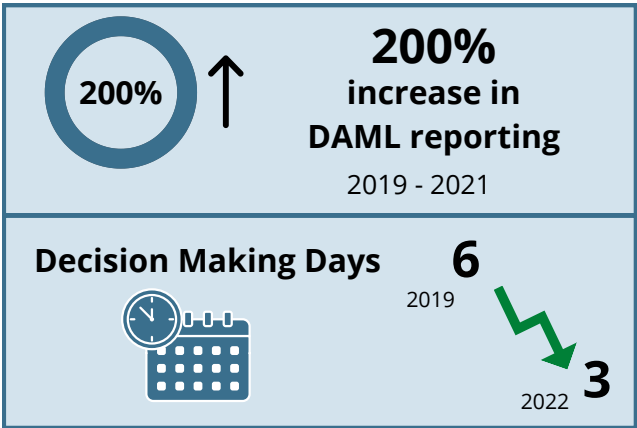
The scale and complexity of DAML reporting requires a concerted, collective approach to delivering the law enforcement response. The UKFIU received over 250,000 DAML SARs between April 2019 and March 2022 with monetary values ranging from £0.01p to billions of pounds.

The introduction of the algorithmic screening capability also permitted the UKFIU to expedite the return of funds to victims of crime. Between 2019 and 2022, over £60m was returned to thousands of victims without requiring a DAML. For victims of crime, **money is returned swiftly**; for reporters, **significant cost efficiencies** are made in reporting SARs instead of DAMLs.




Analysis undertaken by the DAML Team identified a 200% increase between 2019 and 2021 of DAML reporting driven by a lack of definition of ‘suspicion’ for money laundering, coupled with improved money laundering identification by reporters. As a consequence, increased reporting created extraordinary operational delivery pressures for the NCA.

Key developments in UKFIU DAML operational delivery include, but are not limited to: Introducing a risk-based approach to tackle high volume DAML reporting where limited asset denial opportunity existed, supported by the development of an algorithm to screen for such reporting. The benefits of this approach has meant that for the NCA, the process allows finite resources to be redirected to identify high harm cases and intervene earlier. **More timely casework on DAMLs has resulted in improved allocations to law enforcement and increased asset denial outcomes.**



Recognising the nature and scale of increased reporting, the DAML Team pro-actively embarked on a **transformational approach to enhancing operational capability**. The approach has identified multiple opportunities to transform ways of working that are now delivering outstanding, measurable and sustainable benefits to the UKFIU, NCA, reporters and wider law enforcement including reduction in the average decision time for DAML cases, from an average of six days in 2019, to three days by April 2022.

Anti Money Laundering



Head of the UKFIU, Deputy Director Vince O'Brien, said:

“ This is a phenomenal result for the UKFIU and is well deserved by our DAML Team. ”

"Although we were disappointed not to win the award, we are very proud to have represented the NCA at this prestigious event and to network with many of our colleagues from both the public and private sector in a more relaxed setting. The nomination and recognition is a real testament to all the hard work, dedication and consistent delivery of statutory functions by UKFIU officers which often goes under the wider radar.

"The central position of the DAML Team as a conduit between law enforcement and the financial sector gives it a crucial lens on both reporter and law enforcement activity.

"With its DAML triage matrix, a comprehensive assessment and risk management tool, team members at all grades have set the standard for acceptance, allocation, case work and decision-making. This approach means that the DAML Team is pro-actively driving operational activity and performance, underpinned by many years of exposure to risk in reporting trends as they evolve and best operational practice development. It is this shared 'ownership' that drives collective responsibility to make things work and for officers to excel in roles at all levels."

ESTATE AGENCY SAR WORKING GROUP

Koren Sawtell

UKFIU Reporter Engagement Team

The UKFIU Reporter Engagement Team has been working with key reporters in the estates and letting agency sector to respond more effectively to the threat of money laundering and drive up quality of SAR reporting. This has resulted in the formation of a cross-sector SAR working group.

The purpose of the group is twofold: **to provide better engagement opportunities for the regulated sector to interface with law enforcement;** and **to enable reporters within the sector to network and share best practice with each other.**

The Chair and Deputy Chair for the group come from Connells Group (including Countrywide) and Knight Frank respectively.

To date the SAR Working Group has met in May and August , with the next meeting due to be held next year. A number of sector-specific issues and themes were raised by members, with the aim to address or resolve these under the remit of the group. This includes clarification of the DAML process and upskilling group members/money laundering reporting officers (MLRO), which will be a key theme for the next meeting.



In addition, the group hopes to benefit from inviting relevant guest speakers to present to members. This was exemplified by the presentation of the new online SAR portal by the SARs IT Transformation Team at the last meeting, which was an exclusive ‘first look’ at the portal for reporters in the regulated sector.

Members were given the opportunity to ask questions and provide feedback directly to law enforcement, which was very well received and sets a positive precedent for future speakers.

The membership of the group represents the highest-volume SAR reporters, who have a unique insight and perspective on the sector. However, to maximise the impact of the group, methods of engaging smaller and individual estate/letting agent businesses will be explored in future.



Overall, the creation of the SAR Working Group represents a notable step forward in engagement with SARs regime by the estate and lettings agency sector. This is particularly well-timed and notable as the sector has been assessed as increasingly at-risk from money laundering in recent years. The scope for influencing change and promoting collaboration in the sector is vast, and it is encouraging to already see the commitment by members to improving the reporting of SARs.

Guy Cosgrove

**Chair of the Estate Agency SAR Working Group
Money Laundering Reporting Officer for Countrywide**

We all have a common goal to prevent money laundering and terrorist financing. I have lost count over the years of how many times I have experienced the response “you must obtain independent legal advice”. Therefore I feel fortunate to be in a position where we and other agents have been included in the SAR Working Group so that we can hear the UKFIU’s challenges.

We can also share the views of all estate agents, including insights in to the difficulties we experience when submitting SARs. To have these listened to – and possibly reflected in the process to aid the completion, effectiveness and quality of SARs going forward for all estate agents and letting agents.

Furthermore we are able to receive an insight into emerging risks and trends faced by the UKFIU and have access to the subject matter experts. This ensures that the estate agency sector is able to identify those risks when encountered.

SERIOUS AND ORGANISED CRIME EXCHANGE CONFERENCE 2022

In November the UKFIU attended the Serious & Organised Crime Exchange (SOCEX) Economic Crime Conference in Stratford upon Avon.



The conference was a gathering of practitioners as well as managers from across the UK and beyond to examine the challenges faced by those responsible for investigating economic crime. The conference provided opportunities to learn about and exchange best practice relating to the detection, prosecution and strategic management of fraud, money laundering and all aspect of financial crime.

The UKFIU SARs Exploitation Team took part in the conference by promoting:

- the importance of SARs
- Arena top tips
- how SARs can assist law enforcement in their day to day investigations.

This was done through two presentations at the event and by also holding surgeries for delegates.

The event was a great success for the UKFIU as we were able to promote SARs/the Arena portal in front of many UK practitioners, to assist in combating not only financial crime but many other crime typologies.



**Driniz Bala, Senior Officer,
SARs Exploitation Team**

The event was also a success from a networking point of view, allowing UKFIU colleagues to engage with many officers from across the UK, enabling us to build relationships and share best practise around SARs.



Mike Hindes, Manager, SARs Exploitation Team

All photographs used in this article were taken by the Proceeds of Crime Centre.

UKFIU PEOPLE STORIES

Day in the Life
David - UKFIU Operations



How I got here

I graduated a couple of years ago with an undergraduate degree in History and a Masters degree in Politics. When still at university, I attended a talk on cybercrime and one of the panellists worked at the NCA, which got me thinking about a career here.

I applied for a number of public safety roles but landed on the NCA due to my interest in a role in intelligence.

I started in the UKFIU as a business support officer last year and have hit the ground running, soaking up as much information and experience as I can. I recently got my first promotion after just over a year in the agency.



“
**Everything we do is
in the interest of
protecting the public**
”

My role and how I protect the public

My team, which is the International Team, manages analysing SARs for potential information that could be useful to foreign law enforcement partners and we support FIUs across the globe in their UK enquiries.

We constantly access sensitive data, looking for potential links to wrongdoing so we can prevent or minimise occurrences of criminality.

Everything we do is in the interest of protecting the public, whether that's recovering funds someone's been defrauded out of or helping law enforcement with an investigation to protect a vulnerable individual who's potentially involved with human trafficking.

Most criminal activities, particularly serious and organised crimes, require funding behind them, so the range of crime threats we are exposed to at the UKFIU is one of the most varied within the agency.

On a great day

My great days are those when I find my job especially rewarding. I find myself particularly motivated when working on cases that are time-sensitive.

For example, if an LEA comes to us with a suspect already in custody, then there are set time constraints on how long they can hold them without issuing an arrest. So then we are up against the clock to do our job. When things start to move quickly and you are part of that process where there is a need for speed, it can be really exciting.

The days I find my job the most rewarding are those when I see cases that I am directly working on the front page of the newspaper the next day or the 10 o'clock news.

As part of the International Team we can receive requests concerning foreign sanctions or terrorist attacks and we have to judge how to prioritise and analyse the information we have access to. That's what is really cool about it, what you're working on is live and ongoing.

This certainly isn't every day but those instances where we are working on cases that are high-profile and time-sensitive are great days for me.



On a typical day

My typical days revolve around supporting different fights against organised crime. It's not car chases and explosions but every day there are money laundering investigations going on, terrorist incidents being thwarted, organised drug trafficking gangs being uncovered, individuals defrauding the elderly being arrested and I help in these fights.

I now manage my own cases; I've redesigned a business process for the team – identifying where we could improve and implementing changes to help us to operate better and often get time to work on my own personal development.

To find out more about working at the UKFIU please see the [NCA website](#)

POTENTIAL INDICATORS OF SEXUAL EXPLOITATION

The following relates to information provided in an Amber Alert issued by the Joint Money Laundering Intelligence Taskforce (JMLIT) and the National Economic Crime Centre (NECC) in August 2022.

UK law enforcement's understanding of the sexual exploitation threat has increased dramatically in recent years, particularly in relation to the key drivers, enablers and coercion methods underpinning the sexual exploitation business model.

In this article we provide a number of red flag indicators which, in combination, may demonstrate a heightened risk of potential sexual exploitation activity to persons over the age of 18. This refers directly to both offender and victim financial behaviours. **The presence of a single indicator should not be interpreted as being indicative of sexual exploitation; these indicators are not exhaustive and there may be others not highlighted.**

It is also worth clarifying that the provision of sexual services within the UK is legal and **victims of sexual exploitation are highly likely to represent a small minority** of those working in the sex industry.

A distinction should also be made between adult services websites (ASWs) providing advertising for sexual services, and websites that provide generic classified advertising space, including the advertising of sexual services. This may assist with account monitoring, and institutions should recognise the potential significant and wide-ranging impacts that immediate account closure may have on an independent sex worker. As such, **payments solely to ASWs should not be interpreted as a definitive indicator of potential sexual exploitation**, and further investigation is necessary.

Remember – if you suspect someone may be engaged in modern slavery/human trafficking (MSHT) offending or is a potential victim there are a number of ways to report your concerns:



In an emergency (if you believe there is an **immediate threat to life/a crime in action**) phone 999.



For non-emergencies call the police on 101 or the Modern Slavery Helpline on 0800 0121 700. Alternatively you can file a report at www.modernslaveryhelpline.org/report



If you identify activity which may be indicative of the activity outlined, and your business falls under the regulated sector, you may wish to submit a SAR to the UKFIU. Please include the SAR glossary code XXMSHTXX and reference number 0634-NECC. This latter number relates to the JMLIT Alert.

Transactional/general

- ① Regular payments to ASWs or escort agencies that advertise sexual services.
- ② Multiple payments to ASWs from the same account may indicate that the account holder is in control of a number of potential victims.
- ③ A significant proportion of account activity taking place overnight, particularly between 22:00 – 07:00, including payments to ASWs, cash credits, ATM withdrawals or for travel and accommodation.
- ④ Payments received from numerous third parties for rounded values, particularly those including a payment reference from clients suggesting sexual services have been provided.
- ⑤ Receipt of multiple credits, both in cash and faster payments, from multiple locations or IP addresses linked to different locations across the UK. This may suggest that the account holder is being moved across the UK to provide sexual services, or that the account holder manages multiple venues associated to potential sexual exploitation.
- ⑥ Funds transferred to a third party shortly after payments into the account. It may be that the payment references for the credits into the account may provide indication of sexual service provision.
- ⑦ Multiple credits into the account received from numerous locations across the UK and, once consolidated, transferred in bulk to another third party account, either in the UK or overseas.
- ⑧ Regular credits into an account, often with payment references including female names not consistent with customer account details, or sexual services.
- ⑨ ATM withdrawals of suspected client payments, leaving minimal balances.
- ⑩ A lack of expected account payments, such as salary payments or household spending.



Behavioural indicators

These indicators can suggest organisation/control of the account holder's activity by another person/s.

- ① Multiple account holders registered at the same address and/or use of the same telephone number, IP address or device to access multiple accounts for mobile and online banking.
- ② Multiple devices accessing a single mobile or online bank account.
- ③ Coaching through account set-up, whether via video on-boarding or in-branch, or a third party acting as a 'translator', 'guardian', 'and friend' or 'relative'.
- ④ Open source investigation of a prospective account holder identifying multiple links to advertising on ASWs, such as a telephone number associated to multiple adverts and/or profiles.

Travel and accommodation

Patterns of travel and accommodation bookings can demonstrate the movement of potential victims into and across the UK. They can also highlight more organised and large-scale sexual industry, indicating the presence of an organised crime group.

- ① Payments to budget airlines to and from locations typically identified as source countries for potential victims of MSHT, particularly where the traveller's name does not match the name of the account holder, or the account holder has made multiple bookings on behalf of other people.
- ② Frequent payments for UK airport/port car-parking, particularly with no subsequent overseas travel exhibited on the account.
- ③ Regular payments to toll roads and ancillary vehicle travel spending such as petrol costs, payments at service stations etc., both within and outside of the UK.
- ④ High volume and/or frequent transport costs on the same card, particularly where the timings and locations of payments do not correspond with a single person using the card, e.g. transport in London, followed by payment for transport in Birmingham shortly afterwards.
- ⑤ Concurrent card payments to transport providers, such as TfL, app-based taxi companies and rideshares predominantly occurring between the hours of 22:00 – 07:00.
- ⑥ Ad-hoc and last minute payments for accommodation, particularly hotels, B&Bs and short-term property rentals.
- ⑦ Payments for multiple accommodation providers, including hotels, B&Bs, and short- and long-term property rentals.
- ⑧ Payments for accommodation not following expected patterns, e.g. multiple payments on the same dates for accommodation across the UK, or payments for accommodation within close proximity to the registered address of the account holder.
- ⑨ Registered addresses of the account holder inconsistent with the customer profiles.
- ⑩ Numbers of account holders registered to one address inconsistent with the house size. This may suggest multiple sex workers operating within an unlicensed House of Multiple Occupancy.

Ancillary expenditure

The following indicators, when observed at high frequency or volume, can suggest that the provision of sexual services has increased in scale, and that there may be numerous victims under a controller or facilitator. Whilst these indicators can also be seen within legitimate escort agency business models, they can, in combination with other factors, also provide an indication of sexual exploitation.

- ① Payments to cosmetic and beauty service providers (pharmacies, cosmetic suppliers and tanning salons), bulk purchasing of contraception and erotic clothing providers. There have also been anecdotal reports of bulk purchasing of gym memberships.
- ② Multiple mobile phone, SIM and contract payments not in line with the account holder's stated occupation.

THE UKFIU PODCAST

Have you checked out the **UKFIU Podcast** yet?

To date the UKFIU has issued 10 podcasts, with over 12,000 plays on various streaming sites such as Spotify, Audible, and Amazon Music.

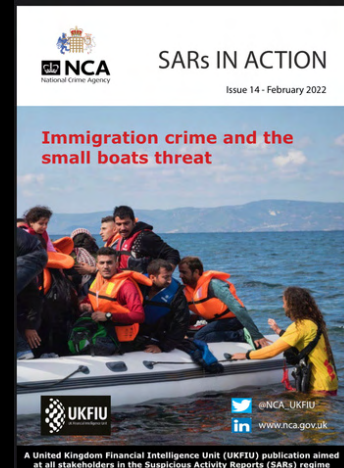
These podcasts are created for the purpose of being educational, to provide important UKFIU updates, to offer guidance on how to create good quality SARs and providing different perspectives on the SARs regime from various partners.

So far, the podcast has covered topics as diverse as:



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



“

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 and collaborations. Please send any feedback to ukfiufeedback@nca.gov.uk

”



Our podcasts can be found on Spotify, Audible, Amazon Music and most streaming sites.



Updates can also be found on Twitter at [NCA_UKFIU](https://twitter.com/NCA_UKFIU) and via our LinkedIn page.

