

CROSS-SYSTEM PROFESSIONAL ENABLERS STRATEGY

2024 - 2026



The UK published its second Economic Crime Plan in 2023 setting out a series of strategic objectives to transform the public and private sector’s response to economic crime.

The cross-system strategy to tackle professional enablers is a core commitment within this plan and has been developed by the National Economic Crime Centre (NECC) and the Office for Professional Body AML Supervision (OPBAS) in close partnership with HM Government, supervisory bodies, law enforcement, the Crown Prosecution Service and private sector.

The aim of this strategy is to galvanise a whole system response to deliver a step-change in reducing the threat posed by professional enablers.



WHAT IS A PROFESSIONAL ENABLER?

The financial and professional services are gatekeepers to the UK economy and play a critical role in the prevention and detection of economic crime. The public expects them to uphold the highest levels of trust and integrity, and prevent criminal activity entering the system.

We recognise the majority of firms invest heavily in ensuring their services are not used for criminal purposes, however, professional enablers have the ability to tarnish the reputation of our financial and professional services sectors and undermine the UK as a global centre for legitimate finance and investment.

A professional enabler is defined as *"an individual or organisation that is providing professional services that enables criminality. Their behaviour is deliberate, reckless, improper, dishonest and/or negligent through a failure to meet their professional and regulatory obligations"*.

Professional enablers can impact the following sectors:



Banks



**Money Service
Businesses**



**Legal
Sector**



Accountancy



**Estate
Agents**



TCSPs



**Art Market
Participants**

WHY ARE WE ESTABLISHING A STRATEGY?

The professional enabler threat is complex, and is driving serious and organised crime at a regional, national and international level.

A professional enabler can play a critical role in the efforts of corrupt elites and Organised Crime Groups to conceal the origin and destination of the proceeds of crime, and they often play a direct role in the criminal activity that impacts our communities.

The UK needs to implement a multi-faceted response that prevents, disrupts and prosecutes professional enablers whilst implementing initiatives to build resilience in the financial and professional services sectors.

This strategy establishes a new framework which will focus and reinvigorate the response to professional enablers, and sets out the specific actions the system will take.



BY BRINGING THE WHOLE SYSTEM TOGETHER TO WORK IN PARTNERSHIP WE CAN...



Maximise the knowledge, skills and capabilities available across the system



Protect the financial and professional services from criminal exploitation



Make the UK a hostile place for professional enablers

STRATEGY

VISION

Our vision is to deliver a world-leading response to professional enablers which sets the bar for international standards and maximises the combined knowledge and capabilities of the whole system. We will build a culture where law enforcement, supervisors, prosecutors and the private sector work together to enhance collective understanding, make better use of powers and intervention tools, and develop joint disruption strategies.

OBJECTIVES

The strategy focuses on developing the whole system approach in order to:

- 1.** Create an enhanced sectoral level understanding of the threat;
- 2.** Ensure quality information is shared between law enforcement and supervisors;
- 3.** Strengthen and co-ordinate the capabilities of the whole system;
- 4.** Prevent enabling activity through supervision;
- 5.** Achieve long-lasting disruptive impact against the threat;
- 6.** Be a world-leader on the response to professional enablers.

The strategy sets out our priority actions to drive a fundamental change in approach to tackling professional enablers.

Pillar 1: Threat understanding.

We will develop a detailed, sectoral-level understanding and fill intelligence gaps through enhanced exploitation of data.

Pillar 2: Information and intelligence sharing.

We will ensure effective legal gateways and processes are in place and encourage proactive and reciprocal sharing of information between law enforcement and supervisors.

Pillar 3: System coordination.

We will provide law enforcement and supervisors with the tools and expertise they need, and change the culture to one of collaboration both within the UK and internationally. Early engagement with prosecutors to develop case strategies is essential.

Pillar 4: Protecting financial and professional services.

We will empower individuals and businesses with an understanding of economic crime risks, and deliver effective supervision that prevents professional enablers from operating.

Pillar 5: Delivering impactful disruptions.

We will develop joint operating models using the full range of civil and criminal powers and supervisory interventions to disrupt enabling activity. We will ensure cases reach positive outcomes.

Pillar 6: Driving an international response.

We will drive the international response, prioritising engagement with key jurisdictions and sharing lessons learnt to continually enhance best practice.



WE HAVE A SHARED COMMITMENT TO ENHANCE OUR RESPONSE TO PROFESSIONAL ENABLERS

- National Economic Crime Centre
- Office for Professional Body AML Supervision (OPBAS)
- United Kingdom Financial Intelligence Unit
- National Crime Agency
- National Police Chiefs Council
- Regional Organised Crime Units
- Serious Fraud Office
- Home Office
- HM Treasury
- Foreign, Commonwealth and Development Office
- Department for Business and Trade
- HM Revenue and Customs
- Financial Conduct Authority
- Accountancy Sector Professional Body Supervisors
- Legal Sector Professional Body Supervisors
- Crown Prosecution Service
- UK Companies House