

Issue 36

SIA

SARs IN ACTION
MAGAZINE



UKFIU

UK Financial Intelligence Unit

SARs INTELLIGENCE IN ACTION

From information to intervention

SARs DIGITAL SERVICE

Law enforcement users
make the switch to SDS

TARGETING ILLICIT FINANCE

Insights from the Western Balkans



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



NCA

National Crime Agency

Message from the Head of the UKFIU



Vince O'Brien Deputy Director

Hello and welcome to Issue 36 of the UKFIU's magazine, SARs in Action.

We are pleased to announce that the UKFIU has now expanded access to the SARs Digital Service (SDS) to all organisations with existing

permission to use SARs, you can find an update on more recent developments in our first article.

We feature two articles from colleagues in the National Economic Crime Centre (NECC) following recently published Amber Alerts. The Alerts are published with the aim of promoting awareness and bringing about preventative action on money laundering and serious financial crimes. These Alerts are shared across law enforcement, government bodies and the private sector. The first Alert looks at the threat posed by electronic money transfers between the Western Balkans and the UK. The second considers how the use of international mortgages may be abused by criminals.

In this issue the SARs Intelligence Development Team share their successes and announce a significant investment in their resources. We also report on a case study involving a subject who was found to be unlawfully residing in the UK.

And finally, we include our response to a valuable question sent in by a reporter in relation to court orders and SARs.

➔ Who is the magazine aimed at?

- All law enforcement; this includes senior investigating officers, frontline police officers and police staff
- Reporters
- Regulators
- Supervisors
- Trade bodies
- Government partners
- International partners

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➔ 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.

SAR Users Switching to SARs Digital Service

Over 1600 law enforcement officials are now using the new SARs Digital Service (SDS).

Following an extensive testing period, where a select group of users were invited to onboard and feedback their views, the UKFIU has now expanded access to SDS to all organisations with existing permission to use SARs. Over two thirds of these partners have joined one of our regular briefing sessions and then applied to get an account.

Most of the remaining users are signed up to onboarding dates during the spring months.



Since the first cohort started logging into the SDS, the development team has been responding to comments and suggestions, and have deployed new functionality on a monthly basis to help the users get even more from the service.

This is typically what new joiners to the SDS are telling us:

“The system is much improved. The layout makes it easier to use and understand.”

Police service user

“When navigating through the vast amounts of data, the system is so much easier to use and the reports better.”

Government department user



Work to equal and surpass the capability of legacy tools will continue throughout 2026 and beyond. However, all existing systems will remain running in parallel for some time and most users will continue to use these alongside the new service.

Colleagues who manage and exploit SARs can expect to see regular updates to the SDS that benefit all users - or focus on specialist teams such as counter terrorism and money laundering.

Any user from a partner organisation who has yet to be advised of on an onboarding date should contact their local SPOC.

Targeting Illicit Finance: Insights from the Western Balkans Illicit Finance Cell

NECC Public Private Partnerships

! Amber Alert

The Illicit Finance Public-Private Threat Group recently commissioned a time-limited investigative cell to examine the threat posed by electronic money transfers between the Western Balkans and the UK.

The initiative focused on deepening understanding of how organised crime groups (OCGs) are facilitating cross-border money flows, with the goal of identifying emerging typologies and tracking the evolution of known financial crime trends.



Bringing together experts from across the public and private sectors, the cell interrogated data, supported four active law enforcement investigations, and shared a range of insightful case studies. Collaboration with counterparts in the Western Balkans was a key feature, enabling the collection of additional intelligence and enhancing the cell's operational reach.

As a result of this work, the cell produced an Amber Alert¹ informed by the range of data sources and diverse perspectives of its partners.

The Amber Alert highlights newly identified typologies employed by OCGs, including overlaps with organised immigration crime, efforts to circumvent UK Border Force controls, and the use of Money Service Businesses in Tirana.

These findings have led to a series of recommendations for further government action and the dissemination of red flag indicators and case studies to support financial institutions in managing customer risk more effectively.



If you encounter activity that may relate to the proceeds of crime, you are encouraged to submit a Suspicious Activity Report (SAR) via the usual reporting mechanism. To assist with analysis, please include the reference **XXJMLXX** in the SAR narrative and **0786-NECC** in the relevant field on the NCA SAR Portal.

¹ This Alert has been shared with members of the NECC Public Private Partnership and is not publicly available.

SARs Intelligence in Action: From Information to Intervention

SARs Intelligence Development Team



The SARs Intelligence Development Team (SIDT) was established in 2020 as part of the Home Office SARs Reform Programme. Since then, the team has established themselves as subject matter experts on SARs identification and dissemination, and identified a myriad of opportunities to drive the use of SARs intelligence into a wide variety of serious and organised criminal (SOC) investigations. The team are based in each one of the Regional Organised Crime Unit (ROCU) network locations and cover England and Wales.

January saw the SIDT host a visit from colleagues from HM Treasury and the Home Office Economic Crime Directorate. The visit aimed to show the importance of SARs intelligence in proactive policing, including presenting practical examples of investigations identified through SARs or significantly impacted by SARs intelligence.




Team members from a variety of ROCUs exhibited a variety of SOC examples from identifying and targeting sex offenders, to detecting cannabis grows, to arresting and dismantling fraud organised crime groups (OCGs).

Our visitors heard how the team has recovered assets in excess of £5.8million, with an additional £14.5 million currently detained under investigation. This is alongside activity identifying and forcing tax bills worth over £500,000 for HMRC and using new legislation in the Proceeds of Crime Act 2002 to restore funds to fraud victims across the UK.



The guests asked questions in relation to SIDT criminal investigations, where the team have caused or been instrumental in almost 150 arrests. To date they have achieved 40 convictions with a significant number of cases still within the criminal prosecution system.



The visit came after the announcement of a significant additional investment into SIDT by the Home Office and HM Treasury. This investment will see the SDS double in size, ensuring that the fantastic work completed to date can continue, reaching further into policing and enabling us to work with law enforcement colleagues. This is a significant achievement by the team, who look forward to the challenge.

Money Laundering through International Mortgages

NECC Public Private Partnerships
International Working Group

! Amber Alert

In March 2026 the NECC, in partnership with Jersey Financial Intelligence Network (JFIN), issued an Amber Alert¹(0798-NECC) to its partner institutions to raise awareness and share key trends relating to the threat of international mortgage products being abused.

The alert was commissioned by the International Working Group, a key part of our Joint Money Laundering Intelligence Taskforce (JMLIT+) model, and was created in collaboration with partners from law enforcement and private sector.

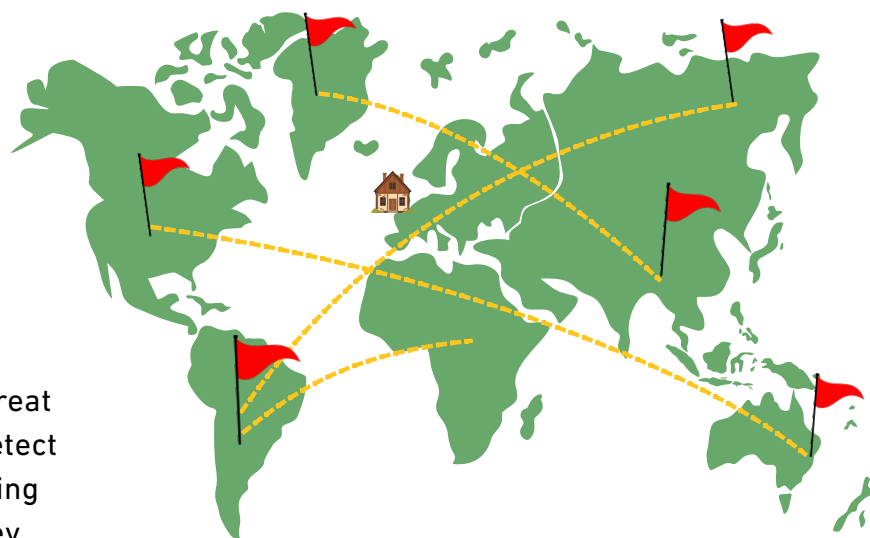


Tackling financial crime together

International mortgages provide numerous benefits to customers seeking to purchase property in a country other than that in which they reside. However, these mortgages may be abused by criminals seeking to add a layer of obfuscation to the ownership, through the geographical disconnects between mortgagor, mortgagee and property owned.

Criminals use international mortgage products to move illicit finance through offshore locations, against UK properties, by obscuring the sources of funds across deposits paid, rental income and mortgage repayments due to the inherent geographical disconnects.

The Alert provides an overview of the threat and aims to help financial institutions detect and prevent instances of criminals abusing legitimate products, through outlining key 'red-flag' typology indicators and enablers.



If you encounter activity that may relate to international mortgage products being abused, you are encouraged to submit a Suspicious Activity Report (SAR) via the usual reporting mechanism. To assist with analysis, please include the reference **XXJMLXX** in the SAR narrative and **0798-NECC** in the relevant field on the NCA SAR Portal.

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SARs Case Study

THE SUSPICION

A subject's account was flagged by the reporter's account monitoring system due to suspicious payment connections. This prompted the reporter to suspect that the subject was working illegally in the UK as a self-employed sex worker. In order to work lawfully in the UK, the subject was required to hold valid right-to-work permission. The subject was contacted by the reporter and asked to provide evidence of their right-to-work. The passport provided showed a six-month leave to enter stamp with employment and recourse to public funds prohibited; however, this permission had already expired.



THE ACTION

Given the lack of valid immigration status and the suspected illegal activity, the reporter made the decision to exit their relationship with the subject. A Defence Against Money Laundering (DAML) SAR was submitted to the UKFIU to seek consent to release the remaining balance of over £10,000 and was sent to a law enforcement agency (LEA) for review. The LEA applied for and was granted an Account Freezing Order (AFO).

THE RESULT

A full POCA investigation ensued, resulting in the forfeiture of over £20,000 held across multiple accounts. Prior to receipt of the DAML SAR, the subject was not known to the LEA, and they were unaware that the subject was unlawfully present in the UK.

Ask the UKFIU: Should a law enforcement request or court order automatically lead us to submit a SAR?

UKFIU Reporter Engagement Team

Dear UKFIU,

Over the past few months at ABC Bank plc, we've seen an increase in court orders, production orders, and enquiries from various law enforcement agencies.

Should a law enforcement request or court order automatically lead us to submit a SAR to the UKFIU?



Receiving a court order, production order, or formal enquiry from law enforcement may act as a catalyst for your organisation to review its relationship with a particular individual or entity.

However, **suspicion must not be inherited**. A law enforcement request on its own should not be the sole basis on which your suspicion is found.



If, following your internal review, you form your own independent suspicion of money laundering, terrorist financing, or criminal property, then you should consider your obligation to submit a SAR. The suspicion of money laundering remains with the reporter. Reporters need to be able to articulate their own suspicion within the SAR, in the context of their relationship with the customer.

If you do deem it appropriate to submit a SAR:

- Please confirm within the SAR there is a known law enforcement interest by checking the relevant box in the SAR Portal
- Please also include the details of the relevant force and any reference numbers in the reason for suspicion field of the SAR Portal

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SARs IN ACTION

You can download previous copies of the SARs IN ACTION magazine from the National Crime Agency's website www.nca.gov.uk



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Episode 28

AVAILABLE HERE



THE UKFIU PODCAST

Educational podcast series discussing areas of interest related to the SARs regime and economic crime.



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



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

