

**Accountancy Sector  
Suspicious Activity Report (SAR) - Template**

NO.	SECTION	DETAIL	ADDITIONAL REMARKS	SAMPLE TEXT
1.1	<b>Introduction</b> - the introduction allows the reporter to explain in simple terms how and where the suspicion has arisen.  This can be a very short summary to help law enforcement understand the context of the report, and what other information may be available.	Outline the suspicion and the circumstances in which it arose. State whether the report relates to suspected money laundering or terrorist financing activities.		The following [money laundering/terrorist financing] suspicion has arisen in the course of providing professional services [describe the generic service] to [name of client/recipient of the service] who is a [describe their activities and general location].
1.2		Describe the nature of the professional services being provided	State <b>PROFESSIONAL SERVICES</b> at the beginning of the text to identify the context. Provide a brief explanation of the services being provided where they are relevant to the suspicion. Where possible, use codes for accountancy -specific services (see Appendix)	The professional services being provided are statutory audit of [financial statements / personal tax compliance / administration of a pension scheme / financial due diligence / transactional advisory services]
1.3		Name the client / recipient of the service (if relevant to the suspicion being reported)  Identify Main Subject / Associated Subjects	s337(1) POCA protects reporters from any potential breaches of confidentiality. However, consider whether this information is <b>directly connected</b> to the suspicion being reported.  Where there are multiple parties, restrict the number of Associated Subjects to those directly connected with the suspected ML/TF activity - give details of other parties and their involvement (victim, suspect, unknown) in section 2.  For individuals, include (where known): full name(s), date(s) of birth, nationality, identification number(s), full address(es) including postcode(s), telephone numbers. For entities, include (where known) full legal name, any trading name(s), country of incorporation, registered addresses, trading/business addresses, details of beneficial ownership (if relevant to the suspicion).  Indicate where addresses are current, previous, last known, business, residential etc.  State where information is not known e.g. address UNKNOWN.	
1.4		Describe their activities / location	This can include job title, Companies House reference, email or IP address, or a summary from a directory/website.	
1.5		Describe the situation in which the knowledge/suspicion arose		E.g. meetings with the management / audit committee / finance director, reviewing documents relating to
1.6	Where a previous report has been submitted, reference should be made here to assist law enforcement.	Give the date [month/year] and [URN]	If you include the URN for the previous SAR, ensure you use the UK FIU URN for that previous SAR and not your own reference number.	The suspicion was initially reported in [date and URN]. Further detail has now been obtained as a result of [describe additional update].
1.7		Describe the reason for providing an additional update		Information received from the client / further review of information in the course of the engagement / discussions with third parties
2.1	<b>Suspicion or Knowledge</b> - in this section, explain the context, introduce the Associated Subject(s) if relevant, and describe the criminality which has been discovered. Explain what the proceeds of crime consist of, and quantify them if possible.	Describe what has been heard or observed	Explain how the criminal activity has taken or will take place.	In the course of providing professional services [describe the nature of the professional services] the reporter [describe what has been heard or observed].
2.2		Describe the nature of criminal property and quantum (if known)	Provide a chronological sequence of events where possible. Avoid jargon, acronyms and abbreviations. Give details of any documentation or sources that may be relevant.  State if the value or quantum is UNKNOWN. An estimate is still useful, provided the fact that it is an estimate is clearly stated.  Give as much information as possible regarding the suspected criminal / terrorist property, e.g. location, address.	The suspected proceeds of crime are [describe the type and quantum - e.g. property worth £x, cash totalling £x, other movable stolen property, unpaid tax].

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2.3		Describe the reason for the suspicion	Who is involved? How are they involved? Where is the criminal / terrorist property? When and how did your knowledge/suspicion arise? Why do you know or suspect the property is criminal / terrorist property?	
2.4		If known, insert the relevant glossary code at the beginning of this section.	This will help the NCA to more quickly assign and cross-reference the information. Where no glossary codes are available, state NO CODE APPLIES.	
2.5		Other parties - identify any other party/parties involved.	Includes addresses and dates of birth if known - state if not known.	
2.6		Include any other information that is relevant to the knowledge/suspicion and can be shared.	Do not include attachments.	
3.1	<b>Reason for disclosure</b> - this is the place to make the connection between the knowledge/suspicion and the ML/TF activity, by identifying the criminal activity, linking it to the criminal proceeds and describing the ML/TF offence.	Who is known/suspected to have engaged in criminal activity?	Refer to the Main Subject, Associated Subject, etc.	
3.2		Describe the criminal activity	Describe the conduct as you understand it - what do you think is happening? What is the conduct that has raised concerns? If you know the specific legislation (eg Bribery Act, Theft Act, Fraud Act) you may refer to this and describe the criminal conduct using the language in the legislation (eg fraud by misrepresentation).	The Main Subject is suspected of [describe the criminal activity], such activity being considered an offence under [name of legislation, if known].  As a result of this criminal activity, it is suspected that the [Main Subject] may have [ML/TF offence] [SAR Code XXXXXX] the proceeds of crime and as a result may have committed money laundering / terrorist financing offences under POCA 2002 / TA 2000.
3.3		What is the money laundering / terrorist financing offence?	Money laundering: concealing/acquiring/use/possession/becoming concerned in an arrangement  Terrorist financing: fundraising/use or possession/arranging/concealing etc	
3.4		Use relevant SAR code for ML/TF activity	XXD5XX Concealing / XXD6XX Transferring	
4.1	<b>Other Information</b> - If known, state whether the suspicions have already been reported to the relevant authorities, or whether further reports may follow. Similarly, if you are aware of other relevant proceedings, including civil proceedings to recover the criminal / terrorist property, or the individual has been dismissed, these should be reported.	Name of law enforcement body. Include relevant reference number if known.	Metropolitan Police HMRC SFO FCA Interpol	It is believed that the matter has already been reported to [name of relevant law enforcement or government body] on [include date and year if known].  It was reported that the [relevant individual] has [action taken].  It is understood that there are proceedings underway involving [parties] to [purpose of proceedings].
4.2		Relevant individuals	Main Subject / Associated Subject etc  Name any known parties to any relevant proceedings	
4.3		What has happened?	Dismissed by their employer / contract terminated / ongoing SFO investigation	
5.1	<b>Defence against money laundering (XXS99XX)</b> - You are seeking a defence to carry out a prohibited act (e.g. to continue with a matter that you know or suspect involves ML).	<b>Prohibited act</b> - consider whether a defence is required. What is the prohibited act (i.e. the specific ML offence) you are seeking a defence for? Specify the section in POCA (sections 327-329) - this depends on whether the act involves dealing with the criminal proceeds in some way (s327), arranging or facilitating the use, control, acquisition or retention of such proceeds (s328) or involves the acquisition, use or possession of the proceeds (s329).	A defence cannot be granted simply to continue acting for a client.	This SAR seeks a defence to a money laundering / terrorist financing offence in relation to [describe transaction] under section 327*/328*/329* POCA 2002. Set out the amount or value of the suspected criminal proceeds or the best estimate of this amount or value (indicate whether the amount is an estimate). * delete as appropriate
5.2		Relevant individuals - identify the individual(s) you know or suspect to be involved in ML	Give details of the vendor/purchaser in a sale/purchase, give the amount of any consideration / transaction value.	

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5.3		<b>Rationale</b> - what is the basis for the knowledge/suspicion? What are the events/activities that led you to become suspicious?	The report may be relied upon to make the decision to complete a transaction, or the liquidator will make payments to creditors or take possession of criminal property.	
5.4		Describe the <b>criminal property</b> - to enable the NCA to consider and assess the application	Include a description of the criminal property, its whereabouts (eg bank details), and its amount or value	
5.5		Describe the <b>next steps</b> to be taken in the matter / transaction	Provide a timetable of steps you need to take	
6.1	<b>Contact details</b>	Name of MLRO	The NCA maintains a list. This can be the Deputy MLRO if necessary.	If you require any further information, please contact our MLRO [name of MLRO] on [contact details].
6.2		Contact details	Include work or mobile numbers, and email addresses.	

**Definition:** Money laundering is used to describe any activity which involves dealing in, using, possessing, retaining, converting or disguising or otherwise benefitting from proceeds of crime. It also includes any involvement in arrangements which facilitate such dealings, use, retention, possession or other benefit. Proceeds of crime include any monies or assets which derive directly or indirectly from any criminal conduct, for example, tax evasion, theft, fraud or corruption.