



National Crime Agency

New SAR Glossary Codes for reporters and information - November 2019

United Kingdom Financial Intelligence Unit (UKFIU)

Defence Against Money Laundering (DAML)

Do you require a **defence under POCA** ('consent')?¹ Use Suspicious Activity Report (SAR) Glossary Code XXS99XX and, if submitting via SAR Online, tick the 'consent' box. Also use the code **XXGVTXX** if the suspected money laundering is of a value of £3,000 or less. For **requests for a defence under TACT** submit under 'Terrorism' and tick the consent box.²

Use code **XXGVTXX** in any SAR relating to suspected money laundering where the value is £3,000 or less and you are unaware of any existing law enforcement interest at the time of reporting. The UKFIU is committed to ensuring a risk-based and consistent approach to decision making and operates a triage system for DAMLs in date order. The introduction of this code is to assist with the triage processes and the early identification of key-risk areas and asset recovery opportunities.

Victim refunds

Are you intending on returning money to a victim of crime? The UKFIU view is that a DAML is unnecessary if the reporter's position is that they are returning money to a victim of crime and that they will not be carrying out activity which falls within Sections 327-8 of POCA. The submission of a DAML is therefore entirely the decision of the reporter. If you have a suspicion of money laundering you are obliged to complete a SAR. Use code **XXVICTXX** for any cases where the reporter is submitting a SAR and considers that the purpose of the activity in question is to return money to a victim of crime. In any case where you suspect a criminal offence other than money laundering we advise you to report the activity to your local police force in the normal way.

Bank holidays

If you are submitting a DAML request from Northern Ireland, Scotland or Wales and a bank holiday falls within your region (but not within England), during the seven working day notice period, please include this information at the end of your Reasons for Suspicion. This will enable the UKFIU to ensure that it adjusts the notice period to meet your circumstances.

¹ Proceeds of Crime Act 2002.

² Terrorism Act 2000.



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Modern slavery/human trafficking (MSHT)

The term 'modern slavery' includes the offences of human trafficking, forced labour and debt bondage. Human trafficking involves transporting, recruiting or harbouring people for the purpose of exploitation, using violence, threats or coercion.

Use code **XXMSHTXX**. A victim of MSHT should always be considered to be a vulnerable person so in all MSHT-related SARs it is also normal to additionally include the vulnerable person code (for adults XXV2XX, for child victims [under 18] XXV3XX). There are significant overlaps between MSHT and organised immigration crime (OIC); consequently OIC and MSHT SARs are often connected so it is acceptable to use both codes together.

Virtual assets

The UKFIU is using the term virtual assets as it is the more all-encompassing term including virtual currencies, cryptocurrencies and digital currencies, but also covers that fact that anything can be tokenised as an asset and transferred on a blockchain or other digital peer-to-peer format.

Use code **XXVAXX**. Please note that the use of virtual assets/virtual currencies/cryptocurrencies/digital currencies is not illegal. This code relates to where there is a suspicion that virtual assets are being used to facilitate money laundering. The visibility of virtual assets in isolation should not automatically suggest that a SAR is required.

Illegal lotteries

It is an offence under the Gambling Act 2005 to facilitate or promote a lottery unless the operator holds an operating licence. The profits from an illegal lottery may also be considered criminal property under POCA and therefore the operator may have committed a money laundering offence. It is not an offence to participate in an illegal lottery.

Use code **XXILTX** if you suspect that money laundering is taking place as a result of illegal lotteries.

For further details on all these new codes please see the updated November 2019 SAR Glossary Codes and Reporting Routes document available from the UKFIU at www.nationalcrimeagency.gov.uk