



# NCA

National Crime Agency

## **Suspicious Activity Report (SAR) Glossary Codes and Reporting Routes**

### **1 September 2016**

United Kingdom Financial Intelligence Unit (UKFIU)

#### **PLEASE NOTE:**

This booklet replaces **all** previous glossary codes publications.

## Overview

The purpose of this booklet is to provide guidance on the use of Suspicious Activity Report (SAR) glossary codes and reporting routes.

## Key points

1. **The use of glossary codes is considered good practice** and will allow the UK Financial Intelligence Unit (UKFIU) and wider law enforcement to conduct analysis to identify money laundering trends, high risk cases for development and take immediate action where necessary.
2. The SARs regime is **not a route to report crime or matters relating to immediate risks to others**. The SARs regime is for reporting knowledge or suspicions of money laundering, or belief or suspicions relating to terrorist financing. As such, in addition to a SAR, you may have to report the matter via other routes to ensure the right information gets to the right organisation. Where you do report a crime alongside a SAR it will be good practice to include the crime reference and the organisation details in the SAR.
3. When submitting a SAR, the relevant glossary code should be **included in the 'Reason for Suspicion' text space** (see SAR examples pages 13-17).
4. It is acceptable to have a SAR with **several codes**; if in doubt as to whether a particular code applies, always work on the basis that it is better to include one than not.

## Contents of booklet

- **Walkthrough checklist** (step by step guide, pages 3-4)
- **Detail on codes** (definitions and context, pages 5-11)
- **Examples** (location for codes and good practice tips, pages 13-17)
- **Alphabetical list** (menu of key themes signposting where they are in this guidance, page 12)
- **Aide memoire** (annex overview of all the codes, page 18 – *reporters may find it useful to have this summary available when inputting SARs*)

## Walk-through checklist

### Step 1: Do the circumstances require immediate attention?

- Do you require a **defence under POCA<sup>1</sup>** ('consent')? Use code XXS99XX and if submitting via SAR Online tick the 'consent' box. For **requests for a defence under TACT<sup>2</sup>** submit under 'Terrorism' and tick the consent box. See example 1, page 13.
- Does the money laundering/terrorist financing relate to a **vulnerable person at risk of immediate harm**? Call the police on 999. To report a fraud, do so via Action Fraud [see page 8] or report other crime by ringing 101. Include code XXV2XX in any SAR relating to money laundering/terrorist financing concerning vulnerable people (see page 9 and example 3, page 15).
- Does the money laundering/terrorist financing relate to a **child at immediate risk of harm, including sexual exploitation and abuse**? Call the police on 999. If a non-emergency crime has occurred ring 101. Include code XXV3XX in any SAR relating to money laundering/terrorist financing concerning child exploitation. Additionally consider other reporting routes (see page 9 and example 2, page 14).

Do you suspect **modern slavery/human trafficking**? If there is an immediate risk of harm call the police on 999. If not immediate consider using the Modern Slavery website or reporting via 101. Include code XXV2XX in any SAR relating to money laundering/terrorist financing and also code XXOICXX when related to organised immigration crime.

### Step 2: Are there factors which indicate high-end money laundering? (See definition page 5)

- Does it involve **others in the financial sector or related professionals** who are providing a service which is potentially wittingly or unwittingly enabling money laundering? Use code XXPRFXX. See page 5 and example 5, page 17.
- Are there indicators of **trade-based money laundering**?<sup>3</sup> Use code XXTBMLXX (see pages 6-7).
- Is the laundering connected with the **purchase of real estate property (e.g. dwelling house, factory building or office premises)**? Use code XXPROPXX (see page 7 and example 4, page 16).
- Do your suspicions/knowledge relate to **politically exposed person/s (PEPs)**? For international PEPs use code XXD7XX; for UK domestic PEPs use code XXD8XX (see page 10).
- Does it relate to **proceeds of bribery and corruption**? Use code XXD9XX (see page 10).

<sup>1</sup> Proceeds of Crime Act 2002.

<sup>2</sup> Terrorism Act 2000.

<sup>3</sup> Trade based money laundering has been defined by the Financial Action Task Force (FATF) as "the process of disguising the proceeds of crime and moving value through the use of trade transactions in an attempt to legitimise their illicit origins".

### Step 3: Does the laundering relate to specific predicate economic crime offences? (See page 8)

- Does the laundering relate to **tax evasion overseas** (code XXTEOSXX) or does it relate to **UK-based tax evasion** (code XXTEUKXX)?
- Does the laundering relate to tax evasion by a **corporation/business or an individual**? Use codes XXF3XX and XXF4XX respectively.
- Does the laundering relate to **benefit fraud** or **excise evasion**? Use codes XXF1XX and XXF2XX respectively.
- Does the laundering relate to **VAT fraud**? This could include carousel/missing trader intra-community (MTIC) fraud. Use code XXF5XX.
- Does the laundering relate to **fraud against the private sector**? Report to Action Fraud. Use code XXF6XX in any SAR relating to laundering/terrorist financing.

### Step 4: Do the circumstances relate to other predicate offences?

- Relate to the **supply of firearms**? If there is an immediate risk of harm ring the police on 999. Report non-emergency offences via 101. Use code XXFIREXX in any SAR relating to money laundering/terrorist financing.
- Links to **organised immigration crime**? Report non-emergency offences via 101 or via the Home Office (<https://www.gov.uk/report-immigration-crime>). Use code XXOICXX in any SAR relating to money laundering/terrorist financing.
- Links to the **supply of illegal drugs**? Report non-emergency offences via 101. Use code XXDRUXX in any SAR relating to money laundering/terrorist financing.

### Step 5: Does it relate to a specialist initiative?

- Is it a **counter-proliferation report**? This relates to counter proliferation financing (counter-proliferation refers to diplomatic and military effort to combat the rapid increase of weapons). Use code XXPCPXX.

## **Detail on glossary codes**

### **High-end money laundering**

The National Risk Assessment of Money Laundering and Terrorist Financing 2015 defines high-end money laundering as:

*laundering which is conducted as a service, either wittingly or unwittingly, by the financial sector or related professional services. High-end money laundering is specialist, usually involves transactions of substantial value, and involves abuse of the financial sector and professional enablers... This type of laundering is particularly relevant to major frauds and serious corruption, where the proceeds are often held in bank accounts, real estate or other investments, rather than cash, and are moved through the banking sector as part of the laundering process.*

The key red flag indicators of this criminality could include a sophisticated smokescreen created by (i) complex company structures, shell companies and offshore companies, and/or (ii) complex cash flows or transactions moving through jurisdictions with high money laundering risks or tax haven notoriety and/or (iii) the complex involvement of unknown third parties. This sophisticated smokescreen to disguise laundering criminality is often facilitated wittingly or unwittingly by persons providing professional services.

**XXPRFXX** – Professional enablers: persons providing professional services or specialist knowledge that wittingly or unwittingly facilitates money laundering.

The laundering of criminal proceeds is sometimes reliant on access to the professional skills of, among others, lawyers, accountants, investment bankers and company formation agents. Professional enablers can also be highly organised criminals who develop products and services specifically to facilitate criminal enterprises. The use of professional enablers increases the complexity of money laundering activities, for example with the setting up of shell companies, trusts and other instruments providing anonymity.

The UK National Risk Assessment of Money Laundering and Terrorist Financing 2015 describes professional enablers as those persons having the skills and/or knowledge to (wittingly or unwittingly) assist criminals in laundering the proceeds of crime. The Assessment<sup>4</sup> concluded that the professions posing the greatest risk are within the financial and legal sectors, for example accountants and solicitors.

Professionals can effectively act as private banks to individual clients. Client accounts offer criminals relative anonymity, the ability to obscure the origins and beneficiaries of criminal proceeds, and the perceived protection of legal privilege. The hallmarks of high-end money laundering facilitated by professional service providers are very visible in the real estate property market and trade environment.

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<sup>4</sup> NCA, National Strategic Assessment of Serious & Organised Crime 2015.

## **XXTBMLXX – Trade-based money laundering (TBML)**

The Financial Action Task Force (FATF) defines TBML as “the process of disguising the proceeds of crime and moving value through the use of trade transactions in an attempt to legitimise their illicit origins.”<sup>5</sup> At its core, it relates to the use of the international trade system to obscure the origin of illicitly obtained funds.

The UK Joint Money Laundering Intelligence Taskforce (JMLIT) Trade Based Expert Group suggests that criminals will commonly utilise the following two defined techniques to achieve this aim: (1) The abuse of Trade Finance Products and (2) the abuse of Commercial Client Open Account payments.

### **Trade Finance Based Money Laundering – The Abuse of Trade Finance Products**

Trade finance can, in its broadest interpretation, be described as being the finance and/or facilitation of the trade related payment by financial institutions relating to the movement of goods and services between two points, both domestically and cross border. The standard products used are Documentary Letters of Credit (LCs) and Documentary Bills for Collection (BCs). These standard products have trade related documents (invoices, transport document etc.) that are sent through financial institutions and are examined by the financial institutions for consistency with the terms of the trade transaction. Both these products are governed internationally by sets of rules and practice issued under the auspices of the International Chamber of Commerce. Approximately 10% of global trade is done in this way using trade finance products.

It is the discrepancies found in the verification checks of the trade related documents that often reveal strong indicators of criminal abuse of the trade activities.

### **Trade Based Money Laundering – The Abuse of Commercial Client Open Account Payments**

More commonly, world trade is conducted on ‘Open Account’ terms, whereby a ‘clean’ payment is made by the buyer of the goods or services direct to the seller, i.e. without presentation of the supporting trade documentation to the financial institution through which the payment is affected.

Open Account trade involves the movement of goods or services between two companies, either domestically or internationally, based on mutual trust. In Open Account transactions, unlike transactions where trade finance products are used, the bank is only aware of, and in receipt of, the instruction to effect payment and will not be aware of the underlying reason for the payment.

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<sup>5</sup> Financial Action Task Force (FATF), Trade Based Money Laundering, June 2006.

In a typical Open Account transaction, the seller and buyer contract for the delivery of stated goods from the seller to a place designated by the buyer. Banks involved in handling a payment related to an Open Account trade transaction generally do so in one (or both) of two capacities:

- a) the seller or buyer is their commercial customer
- b) the seller or buyer is the commercial customer of the bank's correspondent banking customer.

Banks handling trade-related payments will be able to perform the basic screening and monitoring related to payments transactions, but they will not, given the absence of availability of underlying transactional information, generally be in a position to otherwise discern suspicious activity.

Open payment methods can facilitate:

- using criminal cash/stockpile to fund a trade payment on behalf of a **third party (goods do not become criminal property)**
- paying for goods to move value directly across borders (goods become criminal value)
- paying for and moving goods through multiple companies/jurisdictions to:
  - disguise origin of funds
  - disguise criminal profits
  - provide reason for wealth/profit at destination
- manipulating the value of goods to move value across borders

### **XXPROPXX** – Purchase of real estate property

Purchasing real estate property as a method of money laundering provides the criminal with the opportunity to clean large amounts of illicit funds in a single transaction. It is likely that a significant proportion of criminals purchase property through estate agents to launder the proceeds of crime. Other professionals, in particular solicitors and conveyancers, are likely to be wittingly or unwittingly involved.

Real estate property could include dwelling houses, apartments or flats, commercial buildings such as office or factory premises. It can also include investments in property developments that build dwelling or commercial premises.

## **Predicate offences - economic crime**

Fraud and tax offences are the largest known source of criminal proceeds from offending in the UK and involve a variety of crime types, victims, and perpetrators.

If you are reporting suspicions/knowledge of money laundering or terrorist financing concerning the below predicate offence please use the appropriate code from the table below in the SAR.

XXTEOSXX	Tax evasion overseas
XXTEUKXX	Tax evasion UK-based
XXF1XX	Proceeds from benefit fraud
XXF2XX	Excise evasion (duty on alcohol, tobacco, fuel etc.)
XXF3XX	Corporate tax evasion (tax evasion by businesses, corporations)
XXF4XX	Personal tax evasion (tax evasion by individuals e.g. income tax)
XXF5XX	VAT fraud e.g. carousel – Missing Trader Intra-Community (MTIC) fraud
XXF9XX	Frauds against private sector
XXD9XX	Bribery and corruption

### **Fraud reporting alongside this:**

When you encounter a fraud (or attempted fraud) you will have to consider whether you want to report a crime ***alongside*** any responsibilities you have to report suspicions/knowledge of money laundering and terrorist financing to the National Crime Agency via a SAR.

### **You cannot report a crime to the NCA.**

There are a number of routes to report fraud-related offences if you wish to do so alongside reporting suspicions/knowledge of money laundering/terrorist financing to the NCA. The main route is via the national fraud and cyber-crime reporting centre, Action Fraud, which is run by City of London Police and works alongside the National Fraud Intelligence Bureau.

### **Action Fraud**

- Report online via [http://www.actionfraud.police.uk/report\\_fraud](http://www.actionfraud.police.uk/report_fraud) or call 0300 123 2040 (Mon – Fri, 0900 – 1800)
- If you are calling from abroad please call +44 (0)169 8264 700 or +44 (0)289 0169 853

However, if you wish to report business or personal tax fraud you should do so to HM Revenue & Customs via <https://www.gov.uk/topic/dealing-with-hmrc/tax-compliance> . Additionally, to report a benefit fraud, do so to the Department for Work & Pensions via <https://secure.dwp.gov.uk/benefitfraud/>

To report a fraud related to immigration crime (or any other immigration crime) do so to the Home Office via <https://www.gov.uk/report-immigration-crime>

## **Vulnerable persons**

### **XXV2XX – Risk to vulnerable adults**

#### **If you think a vulnerable adult is at immediate risk call 999.**

A vulnerable adult is any person aged 18 years or over who is or may be in need of community services by reason of mental, physical, or learning disability, age or illness AND is or may be unable to take care of themselves or unable to protect themselves against significant harm or exploitation.<sup>6</sup> Risks to vulnerable adults include (but is not limited to) sexual and other physical abuse, financial abuse (including fraud), and they may be the victims of modern slavery.

If you are reporting suspicions/knowledge of money laundering or terrorist financing concerning a vulnerable person include the XXV2XX glossary code in any SAR (see example 3, page 15).

#### **Alongside this:**

If you also wish to report a fraud contact Action Fraud. For another non-emergency crime contact your local police force via 101. If you wish to report a vulnerable adult (or child) who is a victim of modern slavery ring 101 or the Modern Slavery helpline telephone number 0800 0121 700 or seek advice via the [modern slavery website](#) .

### **XXV3XX – Risk to children – particularly including sexual exploitation and abuse**

#### **If you think a child is at immediate risk call 999.**

A child is regarded as someone under 18 years of age. A child is always considered to be vulnerable, irrespective of the adult vulnerability criteria. A child may show mental, physical or learning disabilities or show illness, but this should be considered as an additional reporting factor reinforcing the child's inability to protect themselves against significant harm or exploitation.

If you are reporting suspicions/knowledge of money laundering or terrorist financing relating to risk to children, include the code XXV3XX in any SAR (see example 2, page 14).

#### **Alongside this:**

If you wish to report the abuse of a child please follow the guidance at <https://www.gov.uk/report-child-abuse>

If you want to report suspicious behaviour online with or towards a child, use the Child Exploitation & Online Protection (CEOP) Centre online report form (<https://ceop.police.uk/report-abuse/>)

CEOP Centre enquiries: 0370 496 7622 (24/7 telephone)

If you want to report illegal content online report to the Internet Watch Foundation (<http://www.iwf.org.uk/>)

<sup>6</sup> Association of Chief Police Officers (ACPO), Safeguarding and Investigating the Abuse of Vulnerable Adults.

## **XXD9XX - Corruption and bribery**

The UK Anti-Corruption Plan 2014 acknowledged that there is no universally accepted definition of 'corruption'. It suggests as a guide a number of other organisations' definitions, including Transparency International, who define corruption and bribery as "the abuse of entrusted power for private gain". The World Bank defines a corrupt practice as "the offering, giving, receiving or soliciting, directly or indirectly, of anything of value to influence improperly the actions of another party."

In view of the public profile of persons in a prominent public function it is likely that they would wish to avail themselves of a sophisticated smokescreen to conceal their corrupt illicit corrupt gains. Corruption and bribery therefore has significant links to high-end money laundering.

## **Politically exposed persons (PEPs)**

The UK National Risk Assessment of Money Laundering and Terrorist Financing 2015 defined PEPs as:

*International PEP*: a term describing someone who has been entrusted with a prominent public function in a state other than the UK in the preceding year, or a relative or known associate of that person. A PEP generally presents a higher risk for potential involvement in bribery and corruption by virtue of their position and the influence that they may hold.

In February 2012, FATF defined PEPs as:

*International (Foreign) PEPs*: individuals who are or have been entrusted with prominent public functions by a foreign country, for example heads of state or heads of government, senior politicians, senior government, judicial or military officials, senior executives of state owned corporations, important political party officials.

*Domestic PEPs*: individuals who are or have been entrusted domestically with prominent public functions, for example heads of state or of government, senior politicians, senior government, judicial or military officials, senior executives of state owned corporations, important political party officials.

**International PEP** – glossary code to be used **XXD7XX**

**Domestic PEPs** – glossary code to be used **XXD8XX**

## **Priority crime types**

The National Strategic Assessment (NSA) of Serious and Organised Crime 2015 identifies the following priority crime types: firearms, organised immigration crime (OIC) and drugs.

**If you think there is an immediate urgent risk to public safety call 999.**

### **XXFIREXX – Firearms**

The NSA<sup>7</sup> illustrates that handguns and shotguns remain the two types of firearms favoured by criminals. However, submachine guns (SMG) are also used by criminals. Criminal abuse of firearms could include ammunition, deactivated weapons or replicas.

If you are reporting suspicions/knowledge of money laundering or terrorist financing relating to firearm criminality include the code XXFIREXX in any SAR.

### **XXOICXX – Organised Immigration Crime**

The NSA identifies the risk of serious and organised criminals enabling migrants to enter the UK clandestinely. The unlawful activities of such criminal networks to avoid UK border controls are considered to be organised immigration crime (OIC).

If you are reporting suspicions/knowledge of money laundering or terrorist financing relating to Organised Immigration Crime include the code XXOICXX in any SAR.

### **XXDRUXX – Illegal supply of drugs**

The NSA illustrates that the social and economic costs of illegal drug supply remain significant - an estimated £10.7 billion annually. The number of cannabis farms and new psychoactive substances (NPS) detected in the UK has grown. The high-priority threats are cocaine and heroin.

If you are reporting suspicions/knowledge of money laundering or terrorist financing relating to drugs include the code XXDRUXX in any SAR.

### **Alongside using these codes in SARs**

If you also wish to report a non-emergency crime relating to firearms, OIC or drugs contact your local police force via 101

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<sup>7</sup> National Strategic Assessment (NSA) of Serious and Organised Crime 2015.

## Alphabetical reference list of contents

- A** Adult vulnerable person – pages 3, 9 (see example 3, page 15)
- B** Benefit fraud – page 8  
Bribery – page 10
- C** Carousel fraud (see MTIC) – page 8  
Child exploitation – pages 3, 9 (see example 2, page 14)  
Consent – pages 3 (see example 1, page 13)  
Corruption – page 10 (see PEPs page 10)  
Counter proliferation – page 18
- D** Drugs (illegal supply of drugs) – pages 4, 11
- E** Excise evasion – page 8
- F** Firearms – page 11
- H** High-end money laundering (HEML) – page 5  
Human trafficking – pages 3, 9 (see OIC page 11; see modern slavery page 9)
- I** Immigration crime (see OIC) – page 11
- M** Modern slavery – page 9  
MTIC (Missing Trader Intra Community) fraud, (carousel fraud) – page 8
- O** Organised immigration crime (OIC) – page 11 (cross refer with modern slavery, human trafficking)  
Overseas tax evasion – page 8
- P** Politically exposed persons (PEPs) – page 10  
Professional enabler – pages 3, 5 (see example 5, page 17)  
Projects – page 18  
Property market – pages 3, 7 (see example 4, page 16)
- R** Real estate (cross refer [property market page 7] (
- T** Tax evasion (UK based, overseas, by businesses/corporations and personal by individuals) – pages 4, 8  
Trade based money laundering – pages 6-7
- U** UK tax evasion – page 8
- V** Vulnerable persons pages 3, 9 (see example 3, page 15) (child exploitation pages) (cross refer with modern slavery, human trafficking)  
VAT fraud (MTIC) (carousel fraud) – page 8

## Glossary code example 1 – requesting a defence from the NCA SAR Online view

REASON/SUBMIT

### What is your Reason for Suspicion/Knowledge?

Insert ***glossary code(s)*** here at the start of reason for suspicion.



#### **Example 1: code and content – requesting a defence from the NCA (consent SAR)**

“XXS99XX This SAR seeks a defence to a money laundering offence in relation to our suspicion of money laundering. The circumstances are...”

#### **Good practice tips – always:**

- identify as clearly as possible the suspected benefit from criminal conduct (the ‘criminal property’) including, where possible, the amount of benefit
- identify the reason(s) for suspecting that property is criminal property
- identify the proposed prohibited act/s you seek to undertake involving the criminal property
- identify the other party/parties involved in dealing with the criminal property, including their dates of birth (DOB) and addresses where appropriate (such information should be held routinely by reporters in the regulated sector to comply with the requirements of the Money Laundering Regulations)

For further guidance relating to requests for a defence to a money laundering offence please refer to the document ‘Requesting a defence from the NCA’, published on the NCA website [www.nationalcrimeagency.gov.uk](http://www.nationalcrimeagency.gov.uk)

## Glossary code example 2 – risk to children SAR Online view

REASON/SUBMIT

### What is your Reason for Suspicion/Knowledge?

Insert ***glossary code(s)*** here at the start of reason for suspicion.



#### ***Example 2: code and content – risk to children (person under 18 years of age)***

“XXV3XX This SAR concerns a child we believe is being exploited. The circumstances are that the person is 15 years old .....”

#### **Good practice tips – always :**

- describe fully the reasons for suspicion in relation to the money laundering. As a basic guide, wherever you can, try to answer the following six basic questions to make the SAR as useful as possible: Who? What? Where? When? Why? How?
- describe fully all personal information concerning the child – full name, DOB, address and post code, nationality.
- describe if law enforcement are already aware of the circumstances, in particular the exploitation of the child. Confirm if contact has been made with CEOP (CEOP ref number) (officer contacted).
- describe fully if any additional vulnerabilities exist e.g. if the child is unable to properly protect him/herself against exploitation due to what appears to mental, physical or learning disability, or illness related condition.

## Glossary code example 3 – risk to vulnerable adult SAR Online view

**REASON/SUBMIT**

### **What is your Reason for Suspicion/Knowledge?**

Insert ***glossary code(s)*** here at the start of reason for suspicion.



#### ***Example 3: code and content – risk to vulnerable adult (person over 18 years of age)***

“XXV2XX This SAR concerns a person we believe is a vulnerable adult. The circumstances are that .....”

#### **Good practice tips – always :**

- describe fully the reasons for suspicion in relation to the money laundering. As a basic guide, wherever you can, try to answer the following six basic questions to make the SAR as useful as possible: Who? What? Where? When? Why? How?
- describe fully all personal information concerning the adult – full name, DOB, address and post code, nationality.
- describe if law enforcement or social services are already aware of the circumstances (include any ref number) (persons contacted).
- describe fully the vulnerabilities you believe suggest the person cannot protect him/herself against exploitation e.g. do your concerns relate to what appears to be mental, physical or learning disability, or an illness related condition?

## Glossary code example 4 - property market SAR Online view

REASON/SUBMIT

### What is your Reason for Suspicion/Knowledge?

Insert ***glossary code(s)*** here at the start of reason for suspicion.



#### **Example 4: code and content – property market**

“XXPROPXX This SAR involves the purchase/sale of a property. The property address is .....”

#### **Good practice tips – always:**

- describe fully the reasons for suspicion in relation to the money laundering. As a basic guide, wherever you can, try to answer the following six basic questions to make the SAR as useful as possible: Who? What? Where? When? Why? How?
- also include:
  - describe the full address of the property and post code
  - describe the value of the property
  - the date of activity, how the activity will take place or has taken place AND
  - the full identity, where known, of the other party/parties involved in dealing with the property, including, in particular, if they are providing professional services e.g. solicitor, estate agent, accountant or company formation agent etc. Where a professional enabler is visible also use the code XXPRFXX (see good practice tips in example 5, page 17).

## Glossary code example 5 - professional enabler SAR Online view

REASON/SUBMIT

### What is your Reason for Suspicion/Knowledge?

Insert ***glossary code(s)*** here at the start of reason for suspicion.



#### ***Example 5: code and content – professional enabler***

“XXPRFXX The circumstances of this SAR involves the use of a Professional Enabler. The circumstances are .....

#### **Good practice tips – always:**

- describe fully the reasons for suspicion in relation to the money laundering. As a basic guide, wherever you can, try to answer the following six basic questions to make the SAR as useful as possible: Who? What? Where? When? Why? How?
- describe the services being provided e.g. “the professional services being provided are...” (e.g. accountancy insolvency, audit, company formation, property conveyance, legal services etc.)
- remember to include:
  - the date of activity
  - how the activity will take place or has taken place
  - full identity, where known, of the other party/parties involved in, including in particular, the type of professional services being provided e.g. solicitor, estate agent, accountant or company formation agent etc.
- describe if suspicion relating to the services being provided appear to be wittingly or unwittingly facilitating the money laundering described. Describe the indicators suggesting complicit criminal behaviour or negligent behaviour of the professional(s) involved.

## Glossary code overview (September 2016) – Aide Memoire

<b>Request for a defence under POCA/TACT</b>	
XXS99XX	Request for a defence under POCA
Tick 'Consent' and submit under TACT	Request for a defence under TACT
<b>High-end money laundering</b>	
XXPRFXX	Relates to person(s) providing professional services or specialist knowledge that wittingly or unwittingly facilitates money laundering
XXTBMLXX	Trade-based money laundering
XXPROPXX	Relates to purchases of real estate property
<b>Predicate offences - economic crimes</b>	
XXTEOSXX	Tax evasion overseas
XXTEUKXX	Tax evasion UK-based
XXF1XX	Proceeds from benefit fraud
XXF2XX	Excise evasion (duty on alcohol, tobacco, fuel etc.)
XXF3XX	Corporate tax evasion (tax evasion by businesses, corporations)
XXF4XX	Personal tax evasion (tax evasion by individuals e.g. income tax)
XXF5XX	VAT fraud e.g. carousel – Missing Trader Intra-Community (MTIC) fraud
XXF9XX	Frauds against private sector
XXD9XX	Bribery and corruption
<b>Politically Exposed Persons (PEPs)</b>	
XXD7XX	International PEPs
XXD8XX	Domestic PEPs
<b>Money laundering/terrorist financing relating to vulnerable persons</b>	
XXV2XX	Risk to vulnerable adults
XXV3XX	Risk to children – including sexual exploitation and abuse
<b>Other predicate offences</b>	
XXFIREXX	Firearms
XXOICXX	Organised immigration crime
XXDRUXX	Illegal supply of drugs
<b>Projects/other</b>	
XXPCPXX	Counter-proliferation