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Dear All

OPBAS Suspicious Activity Report (SAR) project: Phase 2 themes and next steps

Our [April 2025](#) letter outlined the important roles that the legal and accountancy sector Professional Body Supervisors (PBS) play in driving up SAR quality. We recognised the positive work already being undertaken by PBSs and highlighted opportunities for PBSs to be even more impactful in their work. Since publication, OPBAS has progressed risk-based and phased activity on SARs quality. This letter sets out our findings and actions for the PBSs.

As a reminder, persons working in the regulated sector are required under [Part 7 of the Proceeds of Crime Act 2002 \(POCA\)](#), and the [Terrorism Act 2000](#) to submit a SAR in respect of information that comes to them in the course of their business if they know, or suspect or have reasonable grounds for knowing or suspecting, that a person is engaged in, or attempting, money laundering or terrorist financing. The [Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017 Regulation 46 \(5\)](#) includes the requirement for the PBSs to do this.

SAR project: Phase 2

Following the first phase of our work, we have conducted targeted assessments on the quality of SARs submitted by PBSs across a representative sample of SAR submissions from two legal and two accountancy sector PBSs. PBSs included in our sample were active and willing participants and have already received tailored feedback bilaterally. We want to share key themes to support wider understanding and maximise opportunities to further improve SAR quality.

Our findings

Overall, we were positively encouraged by the quality of SARs that we reviewed. We found:

- **Clear and accessible SARs.** The SARs reviewed provided relevant and sufficient information to support an understanding of the reason for the suspicion. More effective practice included the use of chronologies to clearly set out events, including relevant specific dates around suspicion identification and the suspicion itself, and explaining technical terms simply and concisely.

- **Proportionate inclusion of relevant information.** Appropriate information was contained across relevant data fields. More effective practice observed included provision of additional context if not all information could be provided. For example, in one SAR we reviewed, the full contact number was not known but the reporter indicated the potential country of origin. Accurate, specific and clear information can support the effectiveness of law enforcement investigations and enhance the SAR's utility.
- **Appropriate use of relevant glossary codes.** Using relevant glossary codes allows UKFIU and wider law enforcement to conduct analysis to identify Money Laundering trends, identify high risk cases for development and take immediate action where necessary.

Opportunities to improve effectiveness

While PBSs demonstrated plenty of positive practice, we also identified some opportunities to further enhance the approach to SAR submissions and underlying quality. These include:

- **Referencing open-source information.** We encourage PBSs, when referencing open-source data, and when appropriate and proportionate to do so, to include the information source, title, author, date (and date the document was last accessible) and a short summary of what the information relates to. This can support the assessment of open-source material especially, for example, if a direct link may no longer be operational or the domain name has changed.
- **Clarity on intended action.** We encourage PBSs to include information on next steps where appropriate. For example, if a PBS may be undertaking a further assessment or is taking formal action. This helps support a more holistic understanding of ongoing and future actions and opportunities for coordination.
- **Joining the dots - linking to other SARs.** We encourage PBSs, in addition to providing the SAR code for a linked SAR, to also add one or two concise lines of summary to explain the connection and reference any relevant information from previous submissions to support the overall accessibility of the SAR.

We encourage PBSs to consider these opportunities within their own activities and procedures.

Stakeholder engagement to drive tangible action

In line with our second key OPBAS objective¹, in April 2025 we convened a wider group of stakeholders, including the legal and accountancy sector PBS Affinity Group Chairs, HMRC, the Gambling Commission and UKFIU, for a SARs quality roundtable. Attendees shared learnings and know-how as well as discussing action to enhance the SAR approach within the non-financial sector. This included driving more consistency in the approach to SAR reviews and SAR record retention. For example, we supported new wording on the SAR portal around SAR record keeping, addressing a previous concern

¹ To facilitate collaboration and information and intelligence sharing between PBSs, statutory supervisors and law enforcement agencies.

that inconsistent information retention by reporting entities could impede the effective review of SARs.

Next steps

In terms of next steps, OPBAS is actively working with partners in UKFIU to support a series of training sessions on SAR quality. Our first event will be held in London, but we are also exploring sessions across other locations. We look forward to welcoming you at these events which we hope will be useful opportunities for you to ask questions, share experiences, hear from OPBAS on supervisory expectations and receive SAR training from UKFIU to include real life contextual case studies from law enforcement.

OPBAS will also continue to support SAR focused actions including under the UK [Professional Enablers Strategy](#). This includes supporting driving up the quality of information disclosed in SARs by the private sector on suspected professional enablers.

Action for PBSs

In the meantime, we encourage all PBSs to view the new AML bitesize videos that UKFIU have recently released to support SAR submissions. The six SARs Best Practice Videos cover the following topics:

1. What is a SAR and why do I need to submit one?
2. Know your Glossary Codes
3. Reason for Suspicion
4. Best practice for completing the criminal / terrorist property section
5. Best practice for completing the prohibited act section
6. What happens after you submit a DAML or DATF?

The videos are available on YouTube, and the playlist can be accessed [here](#).

We request that PBSs review the contents of this letter and reassess their current approach to SAR submissions to identify opportunities to increase effectiveness. PBSs can expect OPBAS to seek evidence of steps taken as part of our ongoing proactive engagement.

All PBSs should continue to look for ways to enhance their approach to SARs to improve SAR quality which in turn can improve system co-ordination, threat understanding and risk management. This is a common goal which we all have an interest in achieving. PBSs can expect OPBAS to continue to focus on the approach to SARs through our ongoing proactive engagement and assessment activity.

Yours sincerely

OPBAS