This specimen internal suspicious activity report is a basic example that will require tailoring to specific circumstances. It should be read alongside guidance from regulators and adapted as required. We believe it is in the interests of practitioners to have draft documents, on the basis of which, considering the guidance available, their own circumstances, and the relationship and work commitment with clients, they can draft appropriate procedures for their firm.

*Firms should adapt the report for their own requirements and policies and procedures.*

**[Insert name of firm]: Internal suspicious activity report**

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| **Guidance:**   * Please complete all fields in Part 1 to Part 4 of the form and submit to the firm’s money-laundering reporting officer (MLRO), [insert name] (email@anaccountacypractice.com) * The subject of the email should be in the following format: INTERNAL SAR; member/name. * If the case requires urgent attention or you require advice, please speak to [insert name] (MLRO) as soon as possible. * Please complete with all known details; where details are not known, please state. * If you are reporting a case that relates to a transaction (for example, a transfer of funds or property) that is yet to happen and you suspect that the funds/property being transferred represent the proceeds of crime, speak with [insert name] MLRO immediately. In these situations we may be required to raise a consent/Defence Against Money Laundering (DAML) suspicious activity report (SAR) with the National Crime Agency (NCA). |

**Part 1: involved parties**

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| --- | --- | --- |
| **Individual** | **Name** | *Insert name of individual* |
| **Date of birth** | *Insert date of birth* |
| **Address** | *Insert address* |
| **Contact details** | *Insert any contact telephone number or email address* |
| **Additional details** | *Insert any further details that may be known about the individual* |
| **Involvement** | *This should indicate the involvement as you understand it of this party in the activity you are reporting, eg client of the firm* |

|  |  |  |
| --- | --- | --- |
| **Other party** | **Name** | *Insert name* |
| **Address** | *Insert address* |
| **Contact details** | *Insert any contact telephone number or email address* |
| **Additional details** | *Insert any further details that may be known (for example, any company numbers or websites)* |
| **Involvement** | *This should indicate the involvement as you understand it of this party in the activity you are reporting, eg victim* |

*You should create as many tables as required for your case and complete as much information as known for each party.*

**Part 2: reason for suspicion**

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| **Guidance on completing this section**  Provide a summary to explain your suspicion and then provide a chronological sequence of events. Try to keep the content clear, concise and simple. For example, explain how you became aware of the situation, describe the events, activities and/or transactions that led you to be suspicious, and how and why you became suspicious because of these.  To help when completing this section, the following has taken from The National Crime Agency (NCA) guidance:  *“As a guide when submitting a Suspicious Activity Report (SAR), wherever you can, try to answer the following six basic questions to make the information provided as useful as possible:*  *• Who?*  *• What?*  *• Where?*  *• When?*  *• Why?*  *• How?*  *Remember to include:*  *• the date of activity*  *• the type of product or service*  *• how the activity will, or has, taken place when documenting the reason for suspicion.*  *If you are suspicious because the activity deviates from the normal activity for that individual/firm, briefly explain how the activity that gave rise to your suspicion differs from the normal.”*  ***TIP/REMINDER*** *Have you clearly described the suspicion? This report will be read by a third party and potentially forms a basis of a report to Law Enforcement/Authorities. Have you clearly explained your concern so a third party can understand?* |

**Part 3: supporting documentation**

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| *Attach any supporting documentation that is relevant for the case. For example, this may include copies of correspondence, customer files or information that you have obtained on the matter.*  *For each file attached, ensure that an explanation is provided of what it is, as this will help the third party when reviewing the case.* |

**Part 4: submitter’s details**

|  |  |
| --- | --- |
| **Name** |  |
| **Contact number** |  |
| **Date of report** |  |