

Issue 33

# SIA

**SARs IN ACTION  
MAGAZINE**



**UKFIU**  
UK Financial Intelligence Unit

# ORGANISED IMMIGRATION CRIME



## INFORMAL VALUE TRANSFER SYSTEMS

How systems such as Hawala can be misused to facilitate Organised Immigration Crime

## ORGANISED IMMIGRATION CRIME IN SARs

Baseline analysis from the UKFIU  
Strategic and Statistical Analysis Team

## OP SHEETFUL

The relentless pursuit of the people smuggling gangs' illicit bankers



A United Kingdom Financial Intelligence Unit publication aimed at all stakeholders in the Suspicious Activity Reports regime



**NCA**  
National Crime Agency



# Message from the head of the UKFIU



## Vince O'Brien Deputy Director

Hello and welcome to Issue 33 of the UKFIU’s magazine, SARs in Action, a special issue focusing on Organised Immigration Crime (OIC).

We open with an exploration into the world of ‘informal value transfer systems’ (IVTS), what they are and how they can be misused to facilitate OIC.

Following on from this, we look at Op SHEETFUL, an NCA investigation into the head of an organised crime group (OCG) which facilitated OIC with payments made and funds laundered, primarily through the use of IVTS.

Read on for a baseline analysis of OIC in SARs from the UKFIU’s Strategic and Statistical Analysis team, followed by SARs case studies as examples.

We take a look at the Joint Fusion Cell (JFC), a collaborative multi-agency initiative which consolidates and amplifies the UK’s efforts in combatting cross channel small boat movements and wider OIC threats.

Following this, we also take a look at a further two NCA investigations. These include Op WIREWORKER, where the subject was ultimately convicted of people smuggling and handed a significant custodial sentence, and Op TAKEFUL, where the subject was convicted of money laundering and facilitating illegal immigration.

We also look at how the Joint Money Laundering Intelligence Taskforce (JMLIT) operates a successful public private partnership model in tackling OIC illicit finance.

Finally, we include an important update in relation to the increased DAML threshold, which came into force on 31<sup>st</sup> July 2025.

## Who is the magazine aimed at?

- All law enforcement; this includes senior investigating officers, frontline police officers and police staff
- Reporters
- Regulators
- Supervisors
- Trade bodies
- Government partners
- International partners

## Contents

The Use of Informal Value Transfer Systems in OIC.....	3
Op SHEETFUL: The relentless pursuit of the people smuggling gangs’ illicit bankers.....	5
OIC in SARs.....	7
SARs Case Study.....	9
NCA’s Joint Fusion Cell .....	10
Op WIREWORKER: Fisherman to convicted people smuggler.....	12
Op TAKEFUL: Illegal business, money laundering, and people smuggling.....	14
Tackling OIC through a Public Private Partnership.....	15
DAML Threshold increase.....	18

Opinions expressed in articles provided by partners are not necessarily the view of the UKFIU/NCA. The UKFIU exercises the right to edit submitted articles.

---

# The Use of Informal Value Transfer Systems in Organised Immigration Crime

Scott, Knowledge & Business Manager - Expert  
Laundering Evidence, National Economic Crime Centre

---

There is no one-size-fits-all model to how illicit finance works within Organised Immigration Crime (OIC). There are a number of methods, however, the most common involves customers (those seeking the services of others to facilitate movement across borders) paying money brokers for the services of the migrant facilitators. The money is held “on account” until the migration services are successfully provided. The funds are then paid to the facilitators using what is suspected as being through the hawala system.



The term “hawala” is predominantly used in South Asia and often as an umbrella term to describe the process or service of informal value transfer system (IVTS). IVTS is an ancient informal banking system that facilitates domestic and international money transfers. A hawaladar is the money service provider who conducts hawala. In its most simple term, IVTS is a way of transferring value from one location to another. Funds do not need to physically cross over borders; it is a movement of value that occurs. That said, when operators of IVTS are balancing or settling accounts, physical cash may be moved.



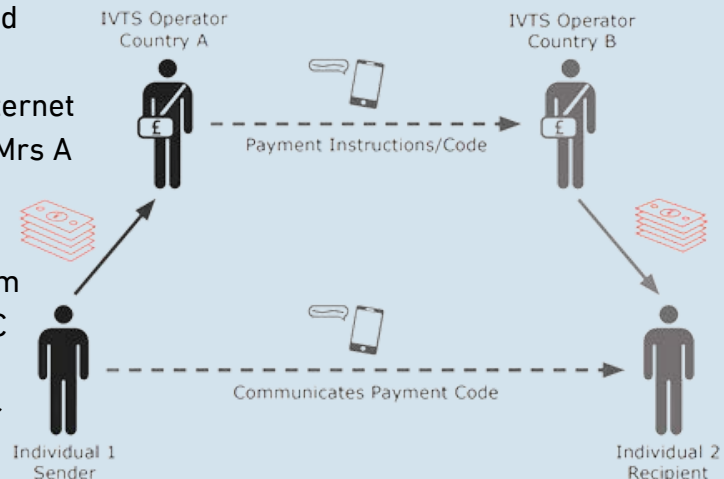
The Financial Action Task Force (FATF) recommendations are recognised by most countries as the global anti-money laundering and counter-terrorist financing standard. FATF define hawala as “money transmitters, particularly with ties to specific geographic regions or ethnic communities, which arrange for the transfer and receipt of funds or equivalent value and settle through trade, cash and net settlement over a long period of time”.

There are various hawala and other similar service providers (HoSSP) systems around the world and they are known by different names or descriptions. They are constantly evolving, especially with the ease of modern electronic communications.

The reputation of the service provider is based on reliability and effective delivery of the service. If performance slips and reputation is lost, then customers will go elsewhere.

## Here is a fictitious, simplistic but realistic example of a hawala transaction

Mr A lives in the UK, however his wife (Mrs A) and children live with relatives in a remote village in South Asia, which has no banking facilities or internet access. Mr A wishes to send a sum of money to Mrs A to give to her parents, who are having health issues. Mr A visits a shop near where he lives that provides money transfer services in the form of hawala. The business is registered with HMRC as a money service business (MSB). The hawaladar tells Mr A that he knows a hawaladar near his wife's family. The UK hawaladar will name his price or commission and Mr A will give him the funds. Some form of reference or name details will be noted. The UK hawaladar will then advise the hawaladar near Mrs A's village. Mrs A will visit the hawaladar and identify herself or give the reference agreed in the UK. The hawaladar will pay the funds to Mrs A out of his pool of cash.



**Remember: No money has travelled across borders. Just the responsibility of value.**

The system operates on the hawaladar in each area having sufficient funds when required. In the case above, the hawaladars in the UK and in South Asia will receive funds from people in those areas wishing to send money elsewhere in the world. Balances between the hawaladars are reconciled later.



In the UK, the activity of HoSSP falls within the definition of an MSB. They must register as such with HMRC or the FCA and comply with money laundering regulations. This includes keeping appropriate customer and transaction records.



Settlement across multiple jurisdictions through value or cash outside of the banking systems presents challenges for law enforcement. This, in addition to being cost effective and efficient, makes IVTS attractive to criminals.

**The Expert Laundering Evidence Cadre is a pool of experts from various law enforcement agencies who provide expertise and opinion to the courts regarding money laundering typologies.**





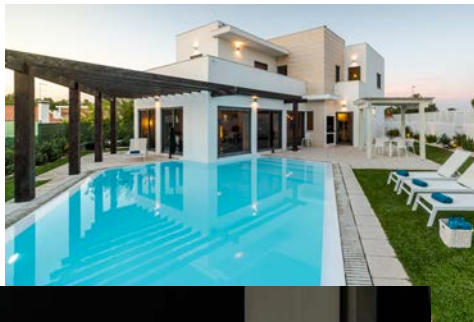
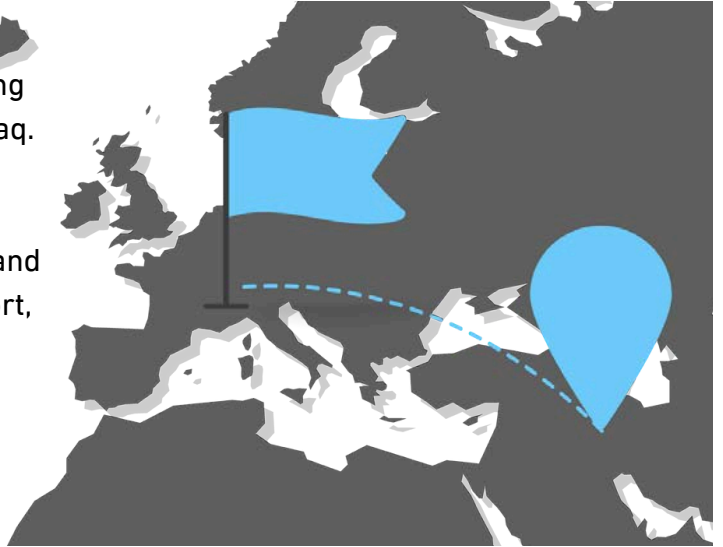
---

# Op SHEETFUL: Breaking new ground – The relentless pursuit of the people smuggling gangs’ illicit bankers

Andrew, Financial Investigator,  
National Crime Agency

---

Op SHEETFUL is an NCA investigation into the head of an organised crime group (OCG) based in the United Kingdom, with a strong financial connection to the Kurdish Region of Iraq. The main subject facilitated the illegal entry of migrants from Kurdistan into Turkey, for onward travel throughout the European Union and United Kingdom using various forms of transport, facilitated by them. The subject directed OCG members overseas to run multiple social media platforms to advertise his Organised Immigration crime (OIC) services. These social media accounts were held in various aliases and the main language used by this OCG was Kurdish Sorani. NCA investigators used translation services to review the online content, which identified a well-established and lucrative migration route.

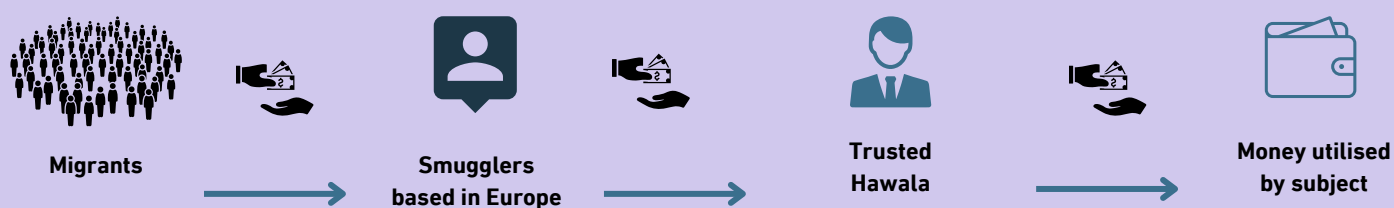


Although the primary service on offer was the transportation from Turkey to Italy and European coastal destinations, they also offered services for movement across Europe and into the UK. Open source research identified a YouTube video where the subject was attending an outside gathering and a song was being sung in his honour as the “Greatest People Smuggler”. The subject is introduced on this video and is referred to throughout as his online alias, that he is a first-class smuggler and the leader of the smugglers by the singer. The lifestyle displayed was one of opulence where the subject flaunted his wealth.

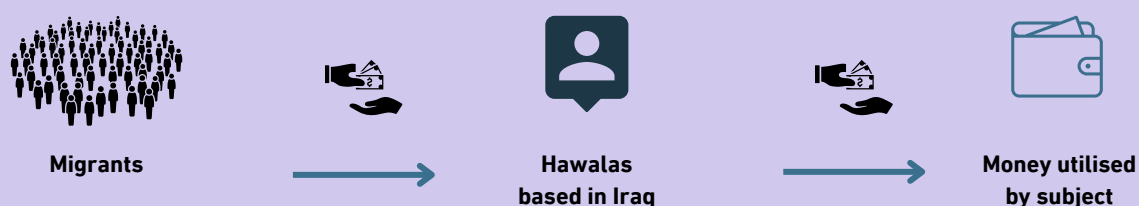


In 2024, the subject was arrested for assisting unlawful immigration into the United Kingdom, contrary to Section 25 of the 1971 Immigration Act. Upon arrest, a mobile phone was seized from the defendant and passed to the NCA digital forensic teams to analyse. **The defendant was then subsequently remanded into custody by the case team and, following a lengthy trial, was subject to 17 years imprisonment.** This is when the confiscation investigation began and the first financial review was conducted. With the help of translation services, it was identified via the seized mobile phone that monies were collected from the migrants for their journey from Turkey to Italy. The smugglers operated two models depending on the service sought.

Money could, on occasion, be collected by the smugglers after their arrival in Italy/Europe and these funds were deposited with a trusted hawala, according to the migrant's preference.



Or, the more prevalent method was for the money to be paid into a select number of hawalas in the Kurdish Region of Iraq where the money was held until the journeys were completed.



Once complete the money was retained by the hawala or released to a location of their choosing. These same hawalas would send money under the direction of the subject for the purchase of other smuggling equipment.



As the funds paid by migrants were lodged via illicit hawala networks based in Kurdistan, there was limited traditional financial intelligence. This caused some barriers to overcome as there were few SAR reports, the majority of the cash never left the Iraqi jurisdiction and was invested into assets such as land, property and high-end vehicles.

The NCA investigation team continue to work collaboratively with partners in the Kurdish Region of Iraq to fully identify assets through land registry. The next stage will be to influence partners to restrain and seize the assets identified and disrupt key members of the OCG who previously operated with impunity.

Watch this space for further developments.



# Organised Immigration Crime in Suspicious Activity Reports

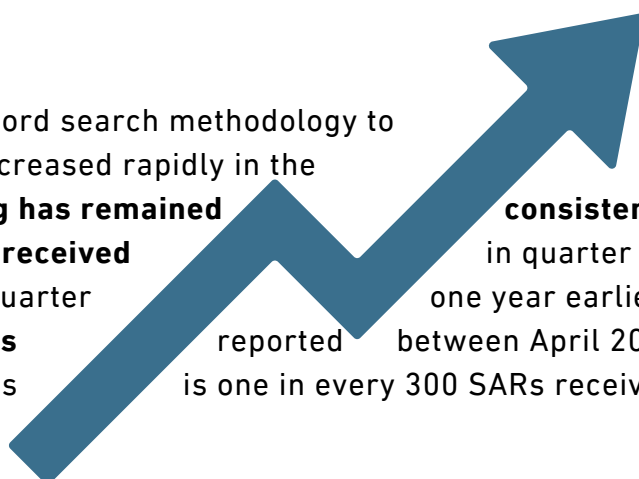
Strategic and Statistical Analysis (SSA) Team  
UK Financial Intelligence Unit

The UK's Financial Intelligence Unit (UKFIU) performed a baseline analysis of Suspicious Activity Reports (SARs) submitted between April 2019 and December 2024 to review the reporting for elements linked to Organised Immigration Crime (OIC).



OIC involves the illegal facilitation of migrants across borders or enablers to taking residency in a country without the required permissions or documentation. OIC intersects with Modern Slavery & Human Trafficking (MSHT), however these are separate offences that do not wholly overlap with one another.

The UKFIU utilised keyword search methodology to identify OIC-related SARs. SARs referencing OIC increased rapidly in the financial year (FY) 2023-2024, and since then **reporting has remained consistently higher, with over 90% more OIC-related SARs received** in quarter four of FY 2023/2024 compared to the same quarter one year earlier. This amounts to **15,000 OIC-related SARs** reported between April 2019 and December 2024. Proportionally, this is one in every 300 SARs received.



identify OIC-related SARs. SARs referencing OIC increased rapidly in the financial year (FY) 2023-2024, and since then **reporting has remained consistently higher, with over 90% more OIC-related SARs received** in quarter four of FY 2023/2024 compared to the same quarter one year earlier. This amounts to **15,000 OIC-related SARs** reported between April 2019 and December 2024. Proportionally, this is one in every 300 SARs received.

The majority of OIC related SARs are reported by the banking sector, who also report the highest number of SARs overall. A higher proportion of SARs were reported by money service businesses (MSB) in respect of OIC, than the relative proportion of MSB SARs across the data set.

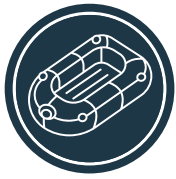


The driver of this increase was businesses operating as Payment Service Providers (PSPs) and Challenger Banks (CBs) reporting the organisation and facilitation of money laundering of illicit funds from illegal working in the UK. Illegal working is defined as the employment of foreign nationals, who either do not have the permission to work in the UK or who breach their visa conditions. Illegal working suspicions often involved the abuse of shared profiles on food delivery or ride sharing apps.





To review international connections, UKFIU looked for references to country names. A higher frequency was found to be related to Brazil, Romania and Albania and further research identified that they were highly likely to relate to either illegal working or potential victims of sexual and/or labour exploitation.

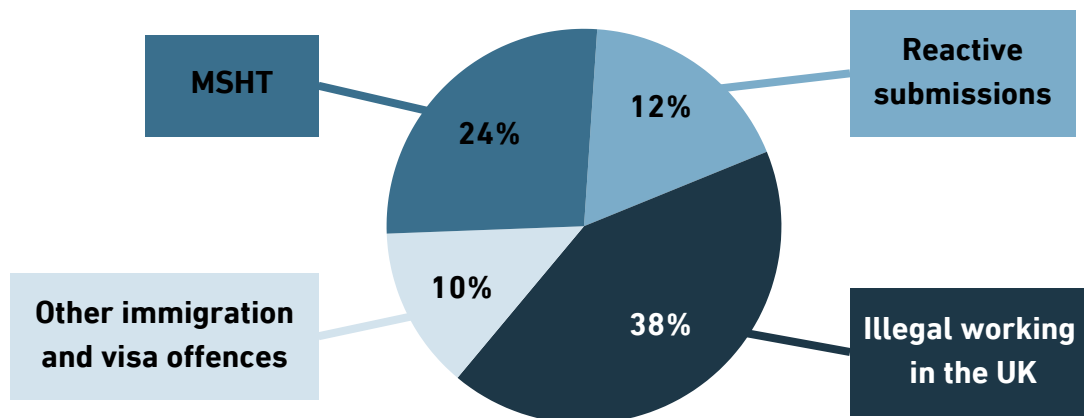


A dip sample of OIC-related SARs identified that <2% of reports submitted related to specific OIC topics that are priorities to the NCA. In these SARs, the reporter held concerns around their client's involvement in an organised crime group (OCG) facilitating illegal entry to the UK, including by the use of cross-channel migration/small boats.



Red flags that identified this type of criminality included the use of informal value transfer systems (IVTS), payments indicating frequent international travel and payments to marine navigation and nautical charting businesses.

### Common suspicions were grouped into four categories



The SARs classified as Reactive Submissions, were driven by reporters identifying adverse media material or direct Law Enforcement (LE) interest during customer due diligence (CDD) checks or following LE contact. These SARs typically did not report any new or specific additional reporter suspicions beyond the identification of adverse media or LE interest.

A small proportion of the SARs grouped under Other Immigration and Visa Offences reported a suspicion that care homes were funding excessive numbers of applications for UK Visas.

**The UKFIU SSA report has highlighted the need for significant collaborative work between UK LE and the regulated sector.** In particular, work to improve the understanding of the difference between OIC and MSHT and thereby achieve a more accurate use of the relevant Glossary Codes (XXOICXX and XXMSHTXX). We will seek to do this in partnership with the UKFIU Reporter Engagement Team and the JMLIT OIC Cell, which is co-chaired by the NCA and Western Union.





# DAML SARs uncover OIC

A reporter held concerns their customer's business account activity was indicative of money laundering. Large value funds were being paid into a business account that were not consistent with the business profile and included payments from firms unrelated to the business. **The reporter wanted to exit the relationship and submitted a DAML SAR to return over £200,000 to the business.**

The UKFIU refused the DAML and shared the intelligence with the relevant LEA prompting an



investigation into the business. The LEA's investigation uncovered a large number of payments made by the business were for visas and employee sponsorships. In less than 12 months, hundreds of sponsorship applications had been made by the business. The LEA successfully obtained an Account Freezing Order (AFO) against the business

account for the full amount, while the investigation continued.

The LEA found that the business had assigned an excessive number of sponsorship certificates to overseas workers and that a number of visa applications had been returned due to false supporting documentation.

While court proceedings continued, a second reporter submitted a DAML SAR in relation to a business account linked to the same business citing similar concerns. Thanks in part to these DAML SARs, **the LEA's investigation uncovered the business' links to organised immigration crime (OIC), resulting in another LEA revoking the business' licence and cutting the business' ability to partake in OIC. Over £220,000 was forfeited.**



---

# NCA's Joint Fusion Cell (JFC)

Siobhan, Intelligence Operations Manager,  
OIC JFC, National Targeting Centre

---

Reducing illegal migration to the UK is a priority for the UK Government. People try to enter illegally in a variety of ways, but small boats crossings via the English Channel have been the most utilised method since 2020. These attempts are extraordinarily dangerous, and we are increasingly seeing migrants, including women and children, drowning or being fatally crushed during the crossing.



Migrants use the services of groups who specialise in organised immigration crime (OIC) to help them travel to the UK border and enter or remain in the UK illegally. In doing so they entrust their lives to these criminal networks, many of which are based overseas, so more difficult for law enforcement to track down.

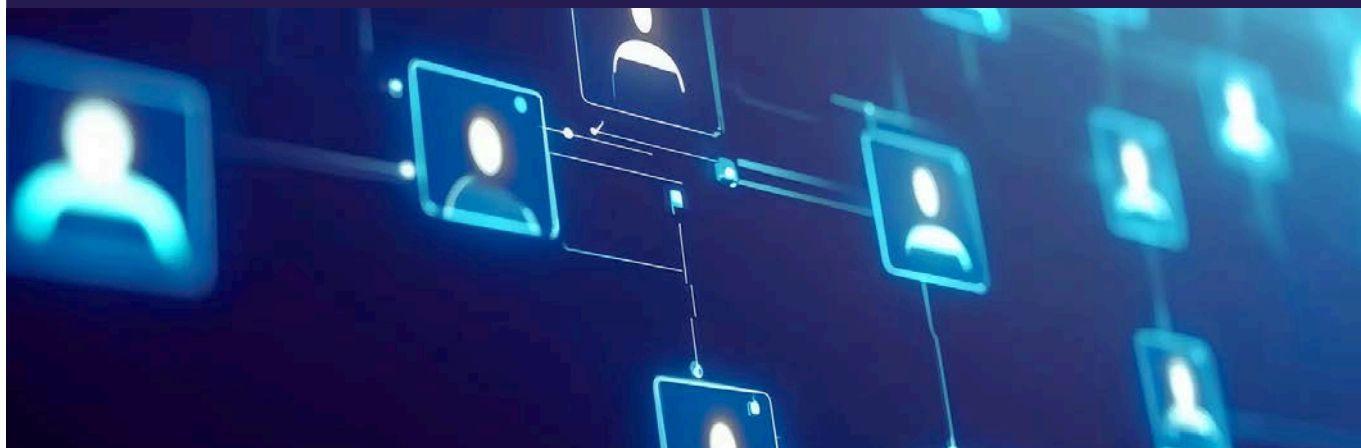
In June 2023, the NCA worked with Home Office Intelligence to create the **Joint Fusion Cell (JFC)**, a collaborative multi-agency initiative.

Bringing together the skills, tools and knowledge of staff from across HM Government Agencies, the JFC consolidates and amplifies the UK's efforts in combatting cross channel small boat movements and wider OIC threats.

The JFC receives intelligence from the Joint Debrief Team, Home Office Intelligence, NCA, police forces and Regional Organised Crime Units and has an on-call function that allows

it to deal with urgent matters in under 24 hours.


JFC staff develop, de-conflict and analyse data from all member organisations. The intelligence products can then be disseminated to partner agencies and beyond. For example, the JFC received intelligence relating to a mobile phone seized during an arrest. Staff from the JFC analysed data found on the mobile phone and identified organised crime group (OCG) members involved in facilitating small boat crossings. In July 2024, several members of the OCG were arrested for OIC offences because of this information.





## “Many migrants use forms of Informal Value Transfer Systems such as Hawala to pay for their facilitation to the UK.”


OCGs involved in immigration crime are highly exploitative and charge large sums of money for their services. The financial landscape behind OIC is complex and challenging to target. Touch points with the financial sector include payment for facilitation and for the equipment needed. Many migrants use forms of informal value transfer systems (IVTS) such as Hawala to pay for their facilitation to the UK.



IVTS is a regulated service, so hawala is legal in the UK, if Hawala agents are registered and adhere to regulations & standards and support suspicious activity to the NCA via SARs. They can nevertheless be exploited by criminals looking to move money.



**Those who do not comply risk criminal charges, heavy fines, business closures and severe reputational damage.**



**SARs are a critical intelligence resource for the JFC**, they provide information like alias names, contact details, bank accounts and details of other assets. Information provided through SARs can lead to the instigation of new investigations or enhance on-going operations. SARs relating to elements of immigration crime such as visa fraud, false documents and illegal working are invaluable for Immigration Enforcement and the police. The JFC also focuses on payment for facilitation & small boats equipment and the laundering of OIC derived funds .

---

# Op WIREWORKER: Fisherman to convicted people smuggler

Pete, Operations Manager, Investigations  
Multi Threat & Borders, National Crime Agency

---

Op WIREWORKER was an NCA investigation into the criminal activities of a subject, employing covert surveillance methods and utilising partnerships with the Home Office, Crown Prosecution Service (CPS), Border Force and Italian law enforcement authorities. This ran for a number of months before the subject's arrest in spring 2023 and ultimate conviction in spring 2025. In a significant case that has drawn national and international attention, the subject, a middle aged Egyptian national, was sentenced to 25 years imprisonment for his central role in a large-scale people smuggling operation.



The subject entered the United Kingdom illegally in 2022, arriving via a small boat. Within weeks, the subject began assisting in the smuggling of migrants across the Mediterranean Sea. Utilising his background as a former fisherman with intimate knowledge of Mediterranean waters, the subject provided boats, crews, and navigational advice to facilitate crossings. The subject's involvement was not limited to maritime operations; he also arranged accommodation and transportation for migrants prior to their journeys.



Op WIREWORKER revealed that the subject had been in regular contact with individuals aboard vessels carrying migrants. Between late 2022 and early 2023, the subject assisted in the crossings of close to 4,000 migrants from North Africa to southern Italy. The migrants paid an average of around £3,000 each for their passage, contributing to an estimated £12 million in profits for the organised crime group (OCG).



Further evidence gathered by the NCA included a notebook found in the subject's possession upon his arrest, containing detailed coordinates marking routes from North Africa to Italy. This documentation demonstrated his significant role in planning and executing the smuggling operations.



The prosecution presented a compelling case, highlighting the subject's extensive involvement and the scale of the operation. In addition to his maritime expertise, the subject's logistical coordination and financial transactions were integral to the success of the smuggling network. With the weight of the prosecution case the subject changed his plea to guilty to conspiracy to assist unlawful immigration.

During the sentencing, the judge emphasized the seriousness of the subject's crimes, noting the significant financial profits generated, hidden in the United Kingdom or abroad and the potential risks posed to the migrants involved. The judge also acknowledged the subject's prior conviction in Italy for attempted drug importation, which further demonstrated his disregard for the law.



The subject was sentenced to 25 years imprisonment. This is the highest sentence for organised immigration crime activities ever recorded to date in the United Kingdom and highlights the sheer scale and danger of this OCG's activities.

**"The conviction of this subject marks a significant achievement in the fight against people smuggling. It underscores the need for continued vigilance and cooperation among international law enforcement agencies to dismantle such networks. As the United Kingdom continues to grapple with the complexities of immigration and border security, cases like this serve as both a cautionary tale and a testament to the effectiveness of coordinated law enforcement efforts." — Pete Jones, NCA**

---

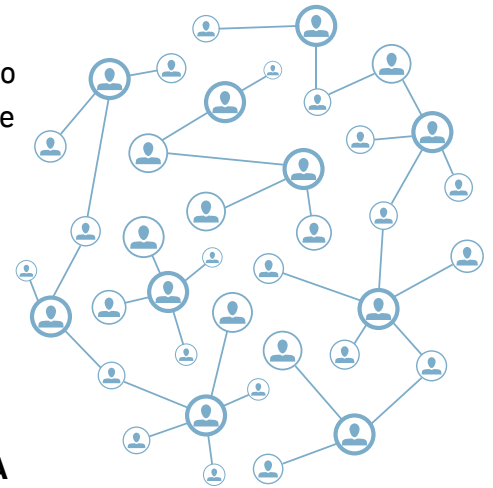
# Op TAKEFUL: Illegal business, money laundering, and people smuggling

Mark, NCA Investigations,  
National Crime Agency

---

An unregistered money service business operated by a subject formed part of a network of hawala bankers transferring money to and from other overseas jurisdictions. The subject was found to be facilitating organised immigration crime, i.e. assisting unlawful immigration.

Over a six month period, the subject declared a total income of under £15,000 and was in receipt of state benefits. However, an investigation found that millions of pounds were transferred through the subject's accounts and tens of thousands of pounds in cash was found during searches of the subject's premises. **NCA investigations recorded the subject admitting that "70-80% of our business is illegal".**



**The subject was arrested after a two-year investigation into their criminal activities and was found guilty of five counts of money laundering and facilitating illegal immigration.**



**The subject was sentenced to an eight-year jail term.**

One of the core harms of people smuggling is that those who are being helped to the UK are often vulnerable people who can be, and are, exploited. Not only are they put in harm's way, they are also exploited for thousands of pounds for the services provided by the people smugglers.

---

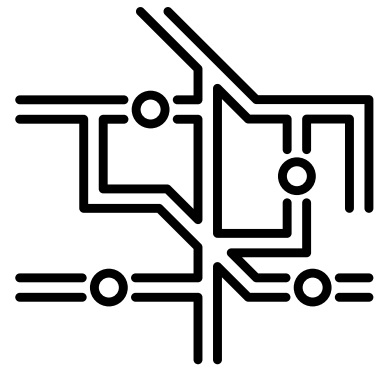
# Tackling OIC through a Public Private Partnership

Organised Immigration Crime, Threat Leadership,  
National Crime Agency

---

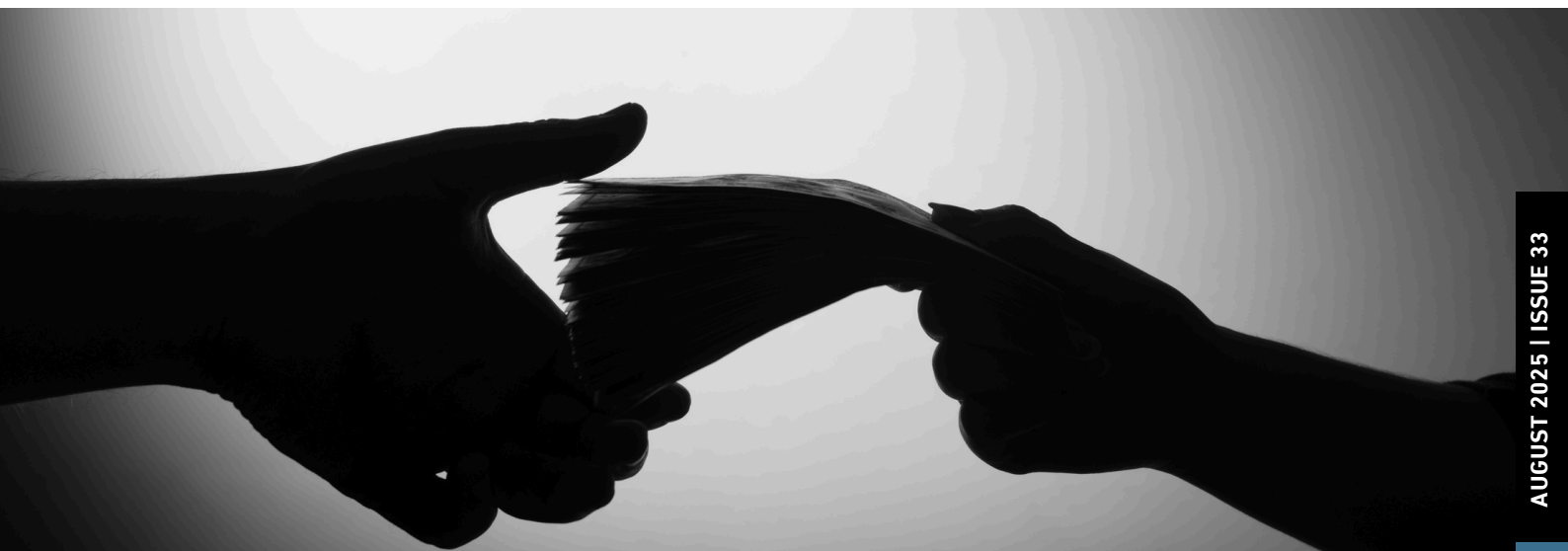
## Organised Immigration Crime (OIC) Illicit Finance (IF)

OIC is a financially motivated crime, with smugglers charging large sums for their illegal services. The financial flows of OIC are particularly complex, in large part due to the widespread use of informal value transfer systems (IVTS), particularly in the form of hawala banking. IVTS facilitates the transfer of the value of funds from one location to another without the money moving physically or through traditional banking structures. The system operates on the basis of reputation within a network of payment operators (known as hawaladars) who cooperate to settle accounts and execute payments.



In the UK, hawaladars are subject to regulations and standards. They must be compliant with the Money Laundering, Terrorist Financing and Transfer of Funds Regulations and are legally required to report anything suspicious to the UKFIU.

Some hawaladars act as a facilitator of OIC, given that many migrants refuse to deal directly with organised crime group (OCG) members in relation to payment for crossings. Having hawaladars acting as escrows for their payment reduces migrants' perceived risk at attempting the crossings. These broken audit trails that IVTS generate make the identification of OIC related money flows more difficult to trace.





## Public Private Partnerships (PPP)

The NECC's Public Private Partnership (PPP) model is a cross-sector partnership between the public and private sector to exchange, analyse and disseminate information and intelligence to detect, prevent and disrupt economic crime.

PPP includes over 200 partner organisations, including; domestic and international banks, financial services, investment firms, telecommunications, tech, payments processors, virtual asset service providers and many others. These partners work alongside law enforcement, regulators and other public sector bodies, targeting the full range of economic crime threats including; money laundering, fraud, terrorist financing, sanctions evasion, tax crime, as well as cross-cutting priorities; such as organised immigration crime.



## Using PPP to tackle OIC IF

OIC and its IFs are both high priorities for the government and UK law enforcement. The NCA are keen to improve our collective understanding of the OIC IF threat and in order to do this, the Agency is utilising and co-chairing, alongside Western Union from the private sector, a PPP Cell. The Cell includes members from government agencies, law enforcement and the UK financial sector, including money service businesses and high-street and online fin-tech banks.



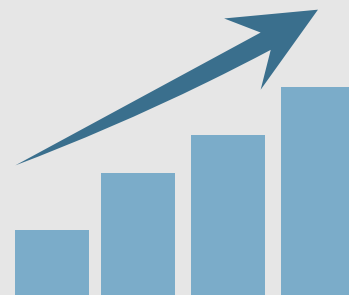
The aim of this Cell is to increase the knowledge of the different models of OIC IF and how they interact with the regulated sector within the UK. It will also seek to enhance the understanding of key OIC money flow models in operation across the UK and beyond (both IVTS and non-IVTs). Through a collaborative PPP approach, the Cell intends to create opportunities to enhance and design out control vulnerabilities and disrupt OCG business models through intelligence sharing.



The Cell will utilise several different methods of intelligence sharing, including the use of the Section 7 Gateway of the Crime and Courts Act 2013. This is an information sharing mechanism that enables the legal and voluntary sharing of information between the NCA and members of the private sector.

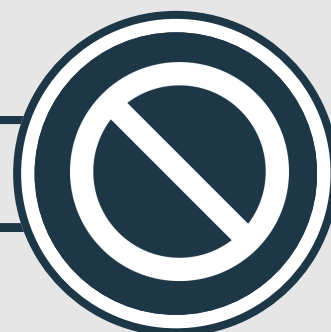
## PPP - The Successes

Since its inception in May 2015, the PPP as a whole has achieved:



More than **10,860** accounts identified that were not previously known to law enforcement.

Over **8,150** accounts closed



More than **410** arrests

Over **£255 million** identified and under restraint



Over **1,300** legislative orders granted in part due to PPP activity

**100+** alerts issued



---

# Important update from the UKFIU

---



There are circumstances where reporters in the regulated sector can carry out specified activities that would otherwise constitute a money laundering offence under the Proceeds of Crime Act 2002 (POCA), without committing such an offence. These are often referred to as the DAML exemptions or the DAML thresholds. Some of the exemptions only apply to specific entities within the regulated sector, so reporters are advised to seek legal advice on the application of these exemptions to their business.

**These exemptions do not remove the obligation to submit a SAR when there is knowledge or suspicion of money laundering.** They only exempt reporters from the requirement to seek a DAML before proceeding with the activity.

**The Proceeds of Crime (Money Laundering) (Threshold Amount) (Amendment) Order 2025** came into force on 31<sup>st</sup> July 2025, increasing the threshold amounts in section 339A of POCA from £1,000 to £3,000. This amendment applies to both the exiting and paying away exemption and the operating an account exemption.

**! IMPORTANT**

**None of the DAML exemptions or thresholds apply to offences under the Terrorism Act.**



## Exemption for exiting and paying away

POCA states that a person carrying on business in the regulated sector does not commit a money laundering offence if, in the course of that business, they carry out specified acts for the purposes of terminating their business relationship with a customer or client, and the total value of the criminal property transferred is less than the threshold amount. This exemption requires that the person relying on it has also complied with their customer due diligence duties.<sup>1</sup> **The threshold amount is determined under section 339A of POCA and, as of 31<sup>st</sup> July 2025, is set at £3,000.**

Please note, if the total value of the funds across several customer accounts is £3,000 or more, the reporter cannot take advantage of this exemption.

Should a member of the regulated sector seek a defence for this activity, the UKFIU is unable to process the request as there is no POCA offence triggered and we will close the case with a specific letter.

If the reporter is not within the regulated sector and seeks a defence to exit and pay away under £3,000, the UKFIU will deal with the case under existing triage criteria. Reporters should include “We believe section [xxx] of POCA does not apply to this DAML as the activity falls outside the regulated sector because.....”.

## Exemption for operating an account

POCA also states that deposit-taking bodies, electronic money institutions and payment institutions do not commit a money laundering offence if they carry out specified acts in operating an account and the value of the criminal property concerned is less than the threshold amount.<sup>2</sup> The threshold amount is determined under section 339A of POCA and, as of 31<sup>st</sup> July 2025, is set at £3,000.

## A note on threshold variations

Under section 339A(3) of POCA, deposit taking institutions, electronic money institutions, and payment institutions can ask the UKFIU for a threshold variation, which, if approved by the UKFIU, will increase the threshold amount for specific acts done by that institution in operating an account to the amount set out in the UKFIU's response.

This is called a “threshold variation”. Requests for a threshold variation can only be made with respect to acts done in operating an account. They cannot be made to vary the threshold amount for the exiting and paying away exemption.

<sup>1</sup> Sections 327(2D), 328(6) and 329(2D) of POCA 2002

<sup>2</sup> Sections 327(2C), 328(5) and 329(2C) of POCA 2002

There are two types of threshold variation that the UKFIU can consider:

**1**

**A request to pay a specified amount for a specified purpose on a specified timeline**

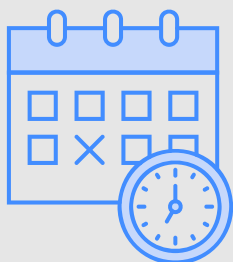
**2**

**A request to pay a specified amount per transaction from one or more accounts for more than one purpose**



The UKFIU may consult with partners to make an informed decision on a threshold variation request and, if the request is granted, the reporter will be emailed a letter providing a decision with the specific details of the variation included.

Unlike a DAML request under section 335 of POCA, there is no statutory time period attached to a threshold variation request and the UKFIU is not obliged to respond within any set timeframe. This means you cannot assume your request for a threshold variation has been granted if you do not receive a response to your request within a set timeframe. Reporters should not start applying the requested threshold amount until a response to the threshold variation request has been received from the UKFIU.



Reporters may wish to consider whether a time limited DAML request is more suitable to the specific circumstances than a threshold variation request. If seeking a time limited DAML, reporters must ensure all of the UKFIU's best practice guidance relevant to such requests is followed.

**For further guidance on how the DAML exemptions or sections relating to threshold variation request apply to your business, seek independent legal advice or consult your AML supervisor.**



# UKFIU

UK Financial Intelligence Unit



## SAR numbers are now 10 digits long!



SAR unique reference numbers (URNs) are now 10 digits long, indicative of the millions upon millions of SARs submitted by reporters across all sectors.

SARs are a critical intelligence resource for law enforcement – they provide information like phone numbers, addresses, company details, investment activity, bank accounts and details of other assets. They have been instrumental in identifying fraud victims, murder suspects, missing persons, people traffickers, sex offenders, fugitives and terrorist financing.



## Coming Soon



### New UKFIU Guidance coming soon

The UKFIU are currently in the process of reviewing all guidance. Keep a look out on UKFIU social media channels for updates on the new guidance.





# SIA

## SARs IN ACTION

You can download previous copies of the SARs  
IN ACTION magazine from the National Crime  
Agency's website [www.nca.gov.uk](http://www.nca.gov.uk)



# UKFIU

UK Financial Intelligence Unit

# Episode 23

**AVAILABLE HERE**



## THE UKFIU PODCAST

Educational podcast series discussing areas of interest related to the  
SARs regime and economic crime.



Our podcasts can be found  
on Spotify, Audible, Amazon  
Music and most streaming  
sites.



Updates can also be found on  
our LinkedIn page and on X at  
[NCA\\_UKFIU](https://twitter.com/NCA_UKFIU).

