

REPORTING & FEEDBACK – UPDATE

Working party

The inaugural meeting of the Reporting & Feedback Working Party was held on Tuesday 27th September at the Home Office. The Terms of Reference discussed at the previous meeting of the MLAC Plenary Group were agreed and members were asked to consider whether there were any sectors which were not represented on the membership of the Working Party.

Attendance was as follows:

Home Office
HM Treasury
Financial Services Authority
Association of Chief Police Officers - ACPO
National Criminal Intelligence Service - NCIS
Serious Organised Crime Agency - SOCA
British Bankers Association
Lloyds TSB & Royal Bank of Scotland
Law Society
Deloitte – representing the Institute of Chartered Accountants
Prudential Insurance
Association of Private Client Investment Managers & Stockbrokers – APCIMS

Items discussed

- **Jill Dando Institute Research on law enforcement use and management of Suspicious Activity Reports (SARs)**

Matt Fleming of the Jill Dando Institute (JDI) at University College London provided a presentation on the ACPO Commissioned / Home Office-funded project. It was published on Thursday 29th September.

The report make a wide range of recommendations. The presentation focused on four key issues:

- assigning an owner to the SAR regime;
- publication of a 'mission statement' to establish aims, objectives and principles for the regime;
- the NCIS Elmer database of SAR disclosures should be used more frequently by law enforcement agencies; and
- guidance should establish nationally agreed minimum work standards.

There was a wide range discussion on the findings of the report.

- **SOCA review of the SAR regime**

Taking forward the first recommendation of the JDI research, SOCA have undertaken to take ownership of the SAR regime. Sir Stephen Lander had been asked by the Chancellor and Home Secretary to conduct a review of the regime to establish how it will operate within the SOCA structure after the agency comes into being on 1st April 2006. Kirsten Siddell of the review team circulated terms of reference for the review and described how the work would be taken forward. She undertook to provide feedback on initial findings to the next meeting of the Working Party.

- **NCIS update**

NCIS undertook to forward a paper with statistics from the last 3 years of the SAR regime to members, along with a series of financial intelligence assessments which had been tabled .

- **Home Office update**

- **legislative issues:** apart from the amendment at s.102 (defence where overseas conduct is legal under local law) all other amendments to the Proceeds of Crime Act 2002 in the Serious Organised Crime & Police Bill 2005 were commenced on 1st July 2005. The Home Office published a Circular and guidance note on these amendments which is available on-line:

<http://www.knowledgenetwork.gov.uk/HO/circular.nsf/79755433dd36a66980256d4f004d1514/dd0399eeb16fb7c38025702a005554e3?OpenDocument>

- **confidentiality & sensitivity of SARs:** Regulated Sector members of the Working Party agreed to provide the Home Office with comments on the draft circular and guidance circulated to members by 30th October.