

# Good Practice for SAR and Consent Submission to the FIU

Updated - June 2020

ORD  
LAND



A map of the Isle of Man is shown with a blue pushpin stuck into it. The pushpin is positioned over the eastern coast of the island, near the town of Douglas. The map labels several locations: Peel, Port Erin, Calf of Man, Douglas, Castletown, Ramsey, Maughold, and Snafell. The text 'ISLE OF MAN' is prominently displayed on the right side of the map. The background of the map is light green and blue, representing land and water respectively.

Peel  
Port Erin  
Calf of Man  
Douglas  
Castletown  
Ramsey  
Maughold  
Snafell  
ISLE OF  
MAN

# Good Practice Tips when submitting SARs and/or Consent Requests to the FIU

## Points to remember

- Identify the correct legislation to disclose under.
- Advise us if the disclosure has been dual reported to another jurisdiction and let us know which jurisdiction it is.
- If a generic sort code is used, state where the funds are domiciled.
- If a suspicion only has been raised in the IOM, but the relationship and accounts are domiciled outside of the IOM this should be detailed in your disclosure.
- Add subject details for each relevant subject/company detailed within your disclosure, providing as much detail as possible (see below for further detail).
- Outline the business relationship with the subject/company.
- Quote previous FIU Themis references if connected or previous disclosures have been made.
- Include all documents mentioned in the disclosure and any others which may be beneficial – copies of passports and media articles for example (PDF, Word, Excel, Images): Please do not add hyperlinks to disclosures as these can be changed/deleted before the SAR is reviewed.
- Fully explain your suspicions of money laundering or terrorist financing and if possible, identify the suspected criminality.
- When reporting a sanctions breach, identify which sanctions are involved remembering that subjects on the OFAC Designations list are not covered under the sanctions legislation.
- Use the 'Further Information' tab on the original disclosure if you don't have any new grounds of suspicion but would like to add extra information to the disclosure.

## When adding a subject always...

- Include all known details such as names, previous names, date of birth, addresses, nationality and ID documents – but do not enter 'unknown' if you are uncertain of this information; it can be left blank.
- Ensure that the details, particularly names, are spelt correctly and are in the right order throughout the disclosure; this is essential in identifying subjects when doing open and closed source checks for further analysis.
- Include the date of birth of a subject (if known) as it may be vital information in identifying an individual for meaningful research.
- **Create a separate record** for each subject / organisation that is mentioned in the reasons for suspicion description of the disclosure so that all parties are clearly identified.
- Ensure it is clear in the disclosure if a subject is a Politically Exposed Person (PEP) in order for the most appropriate research to be undertaken.

## Consent Requests

- When submitting a request for consent, ensure that all details of the remitting and beneficiary accounts (account number, sort code, account holder & bank name) and the transaction (amount, currency) are included in the request, if available.
- If you are not requesting consent – **do not** type in the consent box. Any text in the consent box will automatically be regarded as a consent request regardless of whether you require consent or not.
- Consent can only be requested when the disclosure is submitted under POCA or ATCA.
- The working day the consent request is submitted is Day 0; Under POCA, the FIU has 7 working days to provide a 'Consent' or 'No Consent' response.



Isle of Man  
**Financial Intelligence Unit**  
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