

SARs IN ACTION

Issue 9 - February 2021



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Message from the head of the UKFIU

Debbie Price, Deputy Director

Welcome to the ninth edition of the UKFIU magazine. In this issue we look at the gambling sector, with articles from the Gambling Commission (GC), Gambling Anti-Money Laundering Group and reporters. The UKFIU has a strong working relationship with the GC, evidenced by our facilitating meetings across the SARs regime to illustrate the harm caused by illegal lotteries and also introducing a new SAR glossary code to help the GC analyse the extent and full nature of this crime. We have also made videos with the GC on how to submit better quality SARs - and in fact SAR submissions from the gaming/leisure sector increased by 23.71% in 2019-20.

Since the last magazine, I have taken over the role of head of the UKFIU following Ian Mynot's departure. Ian was a key part of the leadership team within the UKFIU for over three years and we wish him well for his future career and thank him for everything he has done over the last few years to strengthen the position of the UKFIU on the global stage.

Just before Christmas the UKFIU issued its fourth podcast online. The latest focuses on a specific international project led by the UKFIU alongside the FIUs of Australia and the Philippines. This project focused on child sexual abuse and exploitation and the financial flows associated with it. This, and other UKFIU podcasts, can be found at ukfiu.podbean.com and on a variety of streaming sites.

In January we also published our latest SARs Reporter Booklet on the NCA website. This contains a sanitised summary of feedback from law enforcement agencies (LEAs) on their use of SARs and is definitely worth a read.

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Who is this magazine aimed at?

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

We'd love to hear what you think of the publication, what topics you'd like us to consider and we're always open for possible articles/collaborations.

Previous issues of this magazine are available on the NCA website.

Please send any feedback to **ukfiufeedback@nca.gov.uk**

Updates can also be found on Twitter at [NCA_UKFIU](https://twitter.com/NCA_UKFIU) and via our LinkedIn page.

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.

UKFIU guidance

SAR Online

When registering for SAR Online please make sure you complete your details as accurately as possible. It is important to make sure that company names are filled in using the same format if you are registering more than one account - for example, standardising the use of 'Limited' or 'Ltd'.

The inclusion of company numbers is also recommended. By providing accurate information you will assist law enforcement should they need to contact you for further information. For further advice on registering for SAR Online please refer to the *SAR Online Quick Start Guide* available on the NCA website.

Submitting better quality SARs

The 2020 SARs Annual Report confirmed a 20% increase in annual SARs volume, at a record level of 573,085 reports received in 2019/20 and subsequently processed by UKFIU teams. Defence requests were up to 62,408 - a percentage increase of 81%.

The increase in Defence Against Money Laundering (DAML) volumes means that SAR quality is even more important, especially as the UKFIU works under time constraints prescribed by legislation to get the financial information out to LEAs.

There is plenty of guidance relating to better quality SARs available from the UKFIU page on the NCA website, but below are some key notes for reporters when preparing a SAR:

- Reasons – summary: open a report with a brief outline, illustrating suspicions, the chronological sequence of events and setting out relevant dates/activity.
- Avoid use of acronyms/jargon in SARs but if necessary, explain their meaning.
- Set out your reasons for suspicion e.g. no sales receipts; lack of supporting evidence etc. Use the who/what/why/where/how to help the reader understand the financial activity.
- Content – keep all SAR content clear. Keep it simple to inform the reader. Aid our understanding of your suspicions by paragraphing appropriately.
- Lower case only please – and provide as much personal detail about the suspect/s as possible with dates of birth shown as day/date/year and bank accounts as sort code 00/00/00 account number 12345678.

Gambling

A sector overview in relation to the SARs regime

UKFIU engagement with the sector

Yunis Martin-Hussain

Senior Officer

UKFIU Reporter Engagement Team (RET)

Over the past year or so the UKFIU RET has worked with the gambling sector to increase the quality and impact of SAR submissions from the sector.

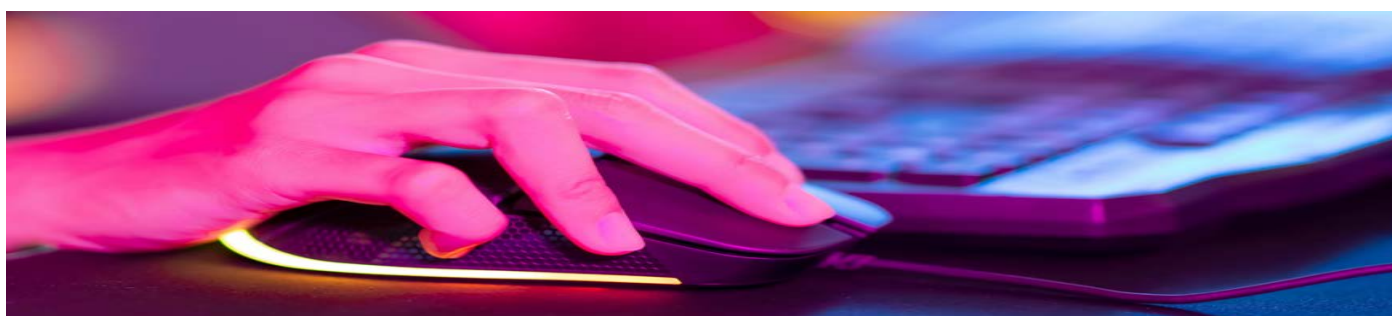
In November 2019, in collaboration with the gambling sector, a new SAR glossary code was introduced for illegal lotteries. The introduction of the new code has been crucial in enabling the UKFIU and LEAs to identify trends, high risk cases and take immediate action where needed. Under the Gambling Act 2005 it is an offence to facilitate or promote a lottery unless the operator holds an operating licence. Profits from illegal lotteries may be considered criminal property under the Proceeds of Crime Act 2002 (POCA), therefore there is a possibility that the operator may have committed a money laundering offence.

The UKFIU has engaged extensively with the Gambling Anti-Money Laundering Group (GAMLG). The group was established in January 2016 with the aim of improving the gambling industry's ability to combat money laundering. The UKFIU's engagement with the GAMLG and the gambling sector has helped to build strong working relationships and forged strong links to help increase awareness of what the UKFIU does and what help and support the UKFIU can give to support the gambling sector with any challenges they might face.

Working with the gambling sector on SAR quality has seen positive benefits for the gambling sector and the UKFIU – this can be seen by the correct use of glossary codes, better quality SAR submissions and a better understanding of the SARs regime and the support and help that the RET can offer when any issues arise or important messages need to be shared within the sector.

Through our close working relationship with the GAMLG the UKFIU has seen an increase in the number of SARs submitted. The UKFIU will continue to build on the already successful work we have done with the sector to improve the quality of SARs and the number of SARs submitted.

During the ongoing COVID-19 restrictions the UKFIU will endeavour to continue engagement with the gambling sector through the GAMLG, utilising digital engagement through UKFIU webinars and podcasts and offering digital knowledge building sessions for all our stakeholders.



Overview of the Gambling Commission

John Lewell-Clarke

Accredited Financial Intelligence Officer

The Gambling Commission is an executive non-departmental public body sponsored by the Department for Digital, Culture, Media & Sport and we regulate the following types of gambling: arcades, betting, bingo, casinos, gaming machine providers, gambling software providers, lottery operators (excluding small society lotteries) remote gambling (gambling done either online or by phone) that use British-based equipment and interact with British consumers, and the National Lottery.

The Commission is primarily a regulator, but we are also designated as a self-prosecuting agency. We work within the principles of the National Intelligence Model. Having a regulatory and enforcement side makes the job very interesting. We can work alongside law enforcement, helping their criminal investigations or conducting our own investigations where we deem regulatory action to not be sufficient.

Those investigations can then inform changes we may wish to make to the Licence Conditions and Codes of Practice (LCCP) to make gambling safer. This dual function allows us to take a risk-based approach to how we regulate, within our principles of escalating enforcement action, we will aim for compliance in the first instance.

Gambling websites which trade or advertise to customers in Great Britain must have a Gambling Commission licence. We are responsible for issuing personal gambling licences for individuals and gambling operating licences for businesses. We set requirements for all our licensees through our LCCP. We carry out assessments to make sure that licensees are following our requirements.

This means the gambling industry is a very diverse industry with a variety of ever-changing products. With this ever-changing environment it can present challenges within SAR reporting to upskill the knowledge to understand the SARs regime.

The Commission interacts with the SARs regime from both sides. We are an LEA as we have criminal powers under the Gambling Act and POCA. So we are an end user for SARs, making decisions on DAMLs, extracting intelligence to inform tactical reporting and the intelligence picture.

We are also a supervisor designated under the Money Laundering Regulations. This means we have our own Money Laundering Reporting Officer (MLRO) who will submit SARs to the NCA when suspicions of money laundering are found as part of our core licencing function. Under this function the Commission shares knowledge and best practice to improve the quality of SARs reporting in our supervised sector. This is achieved through training videos and communications.

Needless to say, SARs are an invaluable source of intelligence. They provide us with typologies and are sources of information for us to use to increase our understanding of how criminals may be exploiting the gambling sector. We look for suspicions that people are committing any Gambling Act offences and associated money laundering.

This usually entails people acting as unlicensed bookmakers, taking bets or acting as a betting intermediary. It also allows us to review gambling syndicates and prioritise those running illegal lotteries. We also have the Sports Betting Intelligence Unit who review SARs that relate to cheat offences.

The UKFIU has been brilliant with recent engagement where we have worked with them to create an illegal lotteries SAR glossary code (XXILTXX) to assist partners in identifying SARs on this threat area to us. Not only that, they gave us the opportunity to speak at one of their SARs working groups and gave us the opportunity to speak to reporters themselves. This has no doubt led to some good SARs being produced with actionable intelligence.

The Commission identified an increasing offering of illegal lotteries where no gambling licence was held. A lottery is gambling that has three elements: payment to participate; prizes awarded; and prizes awarded by way of chance. A lottery would be deemed illegal where an operator facilitates or promotes a lottery unless the operator holds an operating licence; this would be considered a criminal offence under the Gambling Act.

The profits from an illegal lottery may also be considered criminal property under POCA and therefore the operator may have committed a money laundering offence. It is not an offence to participate in an illegal lottery. The Commission has seen that the majority of illegal lotteries are promoted via social media sites.

In response to this emerging risk, we and the UKFIU introduced a glossary code which has fundamentally changed how we review SARs relating to lotteries. The code allows the Commission to run reports and quickly identify the SAR as being related to an illegal lottery. It has allowed detailed analysis to identify repeat offenders and prioritise high risk lotteries to ensure they are investigated accordingly. The code has also led to an unexpected benefit of further joint working between the Commission and police.

A special thanks must also go to the UKFIU for helping to integrate Arena (SARs analytical software) into our daily processes. This has helped build upon our use of SARs through MoneyWeb which is the basic SAR viewing software.



Entain Group



Geoff Maggs
Head of UK AML External Operations
Entain Group

For the UK, Entain Group owns a comprehensive portfolio of online and retail brands plus licences in over 20 further jurisdictions. We employ a workforce of more than 24,000 across five continents. We take very seriously the risk that money laundering and terrorist financing poses to our business. Every colleague, wherever they are based, has a role to play in reporting suspicions. In recent years, the expanded brand range and geographical span has meant that we have situated customer due diligence (CDD) and AML teams in a number of jurisdictions, including the UK. Our international reach has allowed us to view evolving financial crime trends across different markets. We have developed advanced technology in house, which assists us to mitigate the money laundering risks for the business and our customers.

Within the UK, Entain Group must comply with POCA. For retail and remote customers situated in the UK, we also act in accordance with all of the requirements set out by our regulator, the Gambling Commission. Unusually, only land based and remote casinos are subject to the UK money laundering regulations, whereas our retail shops within the UK are not.

Entain Group report suspicions of money laundering to a number of international FIUs, including to the UKFIU. We have reported on a range of issues, including suspected members of organised crime groups and professional enablers suspected of stealing funds from their clients or employees. We believe that the SARs regime provides important intelligence to the law enforcement community; our SARs/DAMLs include lifestyle information as to customer activity and their movements as well as personal customer information to support financial and non-financial investigations.

For the UK market, the AML External Operations Team was created with the specific responsibility of handling all internal SARs and their appropriate escalation to the UKFIU and partner FIUs. The team is also responsible for handling and responding to all Data Protection Act requests from UK LEAs as well as preparing evidential packages in support of criminal investigations being undertaken by these agencies. The team also handles post SAR/DAML outcomes.

Senior members of the Entain Group AML Management Team are also members of the UK GAMLG and have contributed to their remit of reducing money laundering risks within the gambling sector and to develop best practice amongst operators.

Genting Casinos



Luci Biscaia Da Costa
AML Manager
Genting Casinos

Casinos have been viewed as an easy way to launder criminal funds. It remains a common misconception that you can walk into a casino with a suitcase full of cash and spend it, no questions asked. However, as any MLRO in the gambling sector will tell you, those days are (thankfully) far behind us and the UK gambling sector is now recognised as being one of the most stringently regulated gaming industries in the world. Many people do not realise that UK casinos are subject to the same AML legislation as banks and other regulated industries, including the requirement to report suspicious activity to the UKFIU.

Whilst SARs from the gambling sector account for a relatively low percentage of the overall number of reports submitted, they still have a part to play. NCA engagement with MLROs from the UK gaming sector have offered valuable insight into the way in which intelligence from SARs is used, resulting in a clearer understanding of what should (and should not) be included.

Many of the SARs submitted by the gaming sector are bespoke reports submitted by the MLRO rather than bulk uploads of data. Understanding how LEAs use the information also allows the MLRO to provide relevant training to operational staff, so improving the internal SAR process. A casino may not seem the obvious place to look for information relating to the subject of a criminal investigation; however, feedback from both the UKFIU and other LEAs would suggest otherwise. Being a leisure industry, we record information on our customers which other sectors may not deem relevant – when this is included in a SAR it can provide valuable intelligence to investigating officers.

As well as face to face engagement, the UKFIU has worked in collaboration with the Gambling Commission to create a series of videos offering guidance on producing better quality SARs. The inclusion of the Commission in the project ensures all UK operators are aware of, and can access, this innovative and valuable resource on the Gambling Commission website.

If there is one constant in the AML it is that criminals will continue to evolve and find new ways to launder the proceeds of crime. Casinos are inherently vulnerable to 'criminal lifestyle laundering' (the act of spending criminal funds as opposed to trying obscure its origin) and this will doubtless increase as a consequence of COVID-19.

10bet



Valentin Dikov
MLRO and Head of Compliance
10bet online betting operator

Our digitalised world has proven to be responding appropriately to the challenges that are temporarily or permanently changing real life outside the internet. This shapes new industries which progress at a fast pace requiring an immediate risk management response from various angles and on multiple institutional and societal dimensions.

One of these industries is online/remote gaming where development has been extraordinary thanks to the overall online mobility boom. Managing and prospering a healthy business within the gambling sector requires a tight grip over your operation and compliance development involving day-to-day learning, 24/7 vigilance and continuous risk assessment.

It is a challenge to maintain a healthy business when your customers' safety and maintaining your operational gambling licence is priority. This requires our compliance and operations team to achieve, adopt and master a high level of understanding of both business and regulatory requirements.

Recognising and managing risks is a key to a healthy and prosperous business. To have the ability to do so means you need to be at the top of your game, putting in practice each piece of newly acquired knowledge all the time. The risk assessment process is delicate, requiring the calculation of many variables in a dynamic equation to produce the most efficient and reasonable outcome for your customers, public safety and wellbeing.

In this context, I am grateful to have the UKFIU's guidance and the NCA SAR Online portal to help our business units address the suspicions which arise every day. Determining a SAR or DAML SAR is a subjective matter, but an experienced money laundering reporting officer should be able to easily resolve this dilemma. Over-use of the SAR Online portal to continue the customer relationship or to justify the transaction authorisation without an actual suspicion being present can lead to unnecessary SAR submissions and, in turn, cause huge pressure for a small organisation as they require exploitation of vital resources which reduces the efficiency of the business. Moreover, if that is multiplied, it may logically reduce the efficiency of the entire SAR process.

In my view, the gambling sector, and specifically online casinos, must remain vigilant of the behaviours that suggest interaction with the UKFIU might be required. While pure money laundering rings might be less common in the gambling industry, there have been quite a few recent publicly announced examples of proceeds of crime money entering into the industry with some being prompted by or closely associated with the harm gambling may cause.

That is why it is crucial to constantly look for signs and behaviours that may suggest obscure money origin entering the gambling platform to fund excessive and even obsessive gambling behaviours. Affordability reviews and analysis are key for identifying the above, this is even more important in the current COVID-19 situation.

My key advice based on my practical experience includes a formula of eight simple rules:

- Build automated or semi-automated mechanisms and algorithms to detect erratic and unusual gambling patterns and constantly assess the efficiency of their identification within your business.
- Increase the customer risk rating when concerning signs are present and obtain as much data on the person as possible.
- Explore the gambler's past on public social media and independent information sources as this may often turn out to be a key element in producing an efficient risk assessment.
- Interact with the person to get to know their personal circumstances first-hand and act upon any new piece of information while monitoring their behaviour further. This is a must.
- Don't be afraid to involve the UKFIU where you consider that would be in the public interest and where you believe suspicion of money laundering or the funds have been derived from criminality is present.
- Supply as much data as possible when disclosing information via the SAR Online portal. Not only does this help in the further examination of the case, but it also ensures crucial time is saved for all parties involved.
- Be mindful your organisation applies tipping-off precautions (or follows tipping-off instructions) that guarantees your compliance in this process.
- Always remember that the first Gambling Act's objective is preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime. Helping the UKFIU by producing expert based straight-to-the-point SARs ensures gambling remains free of crime.

Videoslots



Priscilla Gatt
MLRO
Videoslots

COVID-19 has impacted in some way on all sectors and the gaming sector is no exception. Restrictive measures aimed to limit the spread of the pandemic and financial assistance provided by governments to businesses and citizens have created new avenues for criminals to launder proceeds earned from illicit crime.

The closure of land-based casinos has contributed to an increase in activity on online gambling platforms, particularly on those platforms which offer casino games. Whilst games like slots present a low risk for money laundering and funding of terrorism (ML/FT) purposes, the increase in activity may be used by criminals to fuel online gambling with illicit funds and to disguise the origin of such funds.

The 'lockdown' period and the travel bans which were enforced by governments within Europe had a direct effect on how individuals, affected by such restrictions, spent their free time and personal income. Unfortunately, certain industries experienced a considerable amount of turmoil due to COVID-19 and as a result, unemployment increased and economic instability persisted.

As reported by UK Rehab (a service which offers advice and support to addicts and families), gambling addiction can lead to crime and problem gamblers may be at risk of resorting to theft in order to support their gambling pattern. They may also attempt to impersonate other individuals in order to bypass self-exclusion requirements (players have the option to self-exclude when they wish to stop gambling; once the player opts for this option, the gaming account will not be available for player to use). Given the circumstances, the industry undoubtedly has had to refocus on making sure that vulnerable persons are protected and that gaming is kept free from crime and money launderers.

In light of COVID-19 related crime and emerging threats, an assessment of the ML/FT risks is crucial in understanding the vulnerabilities to which the company's operations are exposed to and the controls which need to be strengthened. To this end, international bodies like the Financial Action Task Force (FATF) and MONEYVAL (the Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism) also had their sights on the ML/FT threats and vulnerabilities arising from the COVID-19 crisis.

In May 2020 the FATF issued a paper which detailed the COVID-19-related ML/FT Risks and Policy Responses while in September 2020, MONEYVAL issued a report detailing the ML/FT trends that could be noted from the pandemic, based on feedback received from jurisdictions within the Committee's remit. The risks which were mainly reported entail fraud, medicrime (this is an umbrella term used for all national and international activities to combat medicinal related crimes), corruption, cybercrime and late demand in moving illicit funds. (Due to temporary closing of national borders, the movement of physical cash [generated from illicit activity] was impacted and now criminal organisations face a 'late demand'. A flow of such funds is expected when restrictions will ease.)

Businesses also had to respond to the measures being imposed in their home country by changing the way in which their operational activities are conducted. Governments and health authorities stressed the importance of remote working and how this 'new' way of working was key in curbing the spread of COVID-19. Gaming operators had to adapt to this new way of working without compromising the ability to report suspicious activity or respond to requests for information received from FIUs in a timely manner. Although a transitional phase was expected, gaming operators had to ensure that this change did not impact on either the number of internal reports which are submitted to the MLRO or the frequency of training provided to employees on the importance of anti-money laundering and combatting the funding of terrorism (AML/CFT) procedures. Training employees regularly on emerging threats of money laundering and funding of terrorism typologies is regarded as key in ensuring that any unusual activity is detected and reported promptly to the MLRO.

During the past months Videoslots has actively reported accounts which showed signs of suspicious activity or illegal activity. The predicate offences that were suspected during 2020 entail, inter alia, identity fraud, account impersonation or takeover, card theft, forgery and tax evasion. Adverse media screening is also a key tool in understanding the player's reputability, business activities or criminal conduct. The use of money mules to facilitate financial crime and obscure the true origin of funds was also on the rise during the pandemic, as reported also by the Gambling Commission of Great Britain.

In certain cases, it was noted that gambling activity was being financed either through cash deposited in bank accounts, funds received from other individuals or government benefits received to alleviate the impact of COVID-19. In such circumstances, it was therefore crucial to fully understand and investigate the source of funds and financial standing of players.

In short, 2020 proved to be very challenging for the gaming industry. The rapid outbreak of COVID-19 required gaming operators to constantly review and tighten their AML/CFT control framework to ensure that emerging threats and suspicious activity are detected and reported to the respective FIUs. To this end, the adoption of risk-based processes has assisted the gambling industry in recognising the inherent risks to which it is exposed to and respond rapidly to the changing risk environment and also circumstances affecting both society and the industry itself.

Sky Betting & Gaming

Mike Frost

**Anti-Money Laundering Manager
Sky Betting & Gaming**

The AML team is part of the wider legal and compliance function at Sky Betting & Gaming and we provide AML advice and support to our colleagues across the business. Investigating and reporting suspicious activity is a key focus for us to ensure that the products and services we offer are not attractive to a launderer as part of the layering phase of the process.

One of the unique money laundering risks we have to also consider and manage is the possibility that our products could be used by criminals for leisure, so the skillset of our team and the controls we put in place need to be geared towards identifying criminal spend as well as indicators of the traditional money laundering cycle.

Indicators of suspicious transactional activity can sometimes be similar to safer gambling risk triggers displayed by customers and, with that in mind, the team works very closely with our dedicated safer gambling, risk and customer due diligence teams to not only keep our customers safe but to also keep crime out of gambling.

Key risk indicators for the business include the identification of customers who appear to be spending beyond the risk profile we hold for them, unusual betting patterns and changes in spend patterns, amongst others.

As is the case for all businesses, this past year has presented us with new challenges posed by the pandemic and in turn the opportunities and the changed mode of operation for criminals. With the widespread cancellation of professional sports at certain times throughout the year customers have sought to utilise alternative products, like playing online poker with friends for instance.

The AML team adapted quickly to these new customer behaviours and proactively provided the business with enhanced training on the relationship between COVID-19 and money laundering. This also meant going the extra mile by reviewing important and insightful information such as the SAR guidance provided by the NCA and UK Gambling Commission, so that our work as a team was as thorough as possible.

As a team we've dealt with a variety of issues during the last year: from suspected cases of money laundering in relation to the abuse of government priority schemes, to instances in which it has appeared that a customer's activity has not been in line with their adjusted circumstances as a result of the pandemic, which we treated very carefully and worked closely with other teams in the business to investigate.

We are constantly growing as a team and developing our controls to ensure that we are identifying potentially suspicious activity at the earliest possible opportunity. Moving forward, a strong relationship between the gambling sector, financial services and the UKFIU will be more important than ever in the fight against financial crime.

Gambling Anti-Money Laundering Group

Keith Bristow

Independent chair

NCA Director General 2011-16

The GAMLG was established in 2016 with the remit of reducing money laundering risks in the gambling sector and to encourage best practice amongst operators. The group is funded by the Betting and Gaming Council, which represents over 90% of the gambling sector, including licenced betting offices, remote (online) gambling and land-based casinos.

The sector includes both regulated and non-regulated entities for money laundering purposes. Both land-based and remote (online) casinos are subject to the Money Laundering Regulations whereas the rest of the industry sits outside them. All sectors within the industry must comply with POCA and with requirements set out by the industry regulator, the Gambling Commission, in its LCCP and specific AML guidance.

SARs form a fundamental basis by which the industry interacts with law enforcement. When GAMLG was first established, it was noted by the NCA that the number of SARs submitted by the gambling industry was low and the quality submitted variable. The industry has since worked to improve the quality and number of SARs submitted. Looking at consecutive SAR Annual Reports it is possible to see a clear increase in the number of SARs submitted - with the number from the gaming and leisure sectors growing from 2,154 in 2018 to 5,150 in 2020; and from bookmakers from just 872 in 2018 to 1,984 in 2020. GAMLG has also received feedback from the UKFIU that the quality of SARs submitted by the sector has improved with greater consistency.

However, the issue of data sharing within the sector – which would greatly enhance the ability of the industry to improve and coordinate anti-money laundering efforts – remains an unanswered challenge. The inability to share data – via a secure and proper mechanism – results in the multiple submission of SARs which could relate to the same person or group of people about whom there is suspicion of attempts to launder money or spend the proceeds of crime. This results not only in multiple, uncoordinated submissions of SARs, but also enables criminals the opportunity to move from one operator to another to avoid identification; and to spread activities across a range of operators.

Enabling operators to share information with each other will result not only in better quality SARs submitted; but reduce duplication and ultimately allow for a more effective SARs regime and prosecution of those who may be attempting to use the gambling sector as a means by which to clean illicit funds. GAMLG is looking with renewed efforts to address the issue of data sharing within the sector in 2021.

UKFIU EDITORIAL COMMENT

The complex issues around information sharing are being reviewed as part of a broader information sharing workstream to develop information sharing gateways, being led by the Home Office and HM Treasury.

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