



**Good Practice  
for SAR and Consent  
Submission to the FIU  
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## 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 IOM 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

- Clearly state your suspicions of money laundering or terrorist financing.
- 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, where appropriate.
- If requesting consent to enter into an arrangement, please ensure you have clearly described the services you will be undertaking as part of the proposed arrangement.
- If you are not requesting consent – **do not** type in the consent box. Any text in the consent box will automatically be regarded in Themis 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.