

Suspicious Transaction Reporting

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重要告示

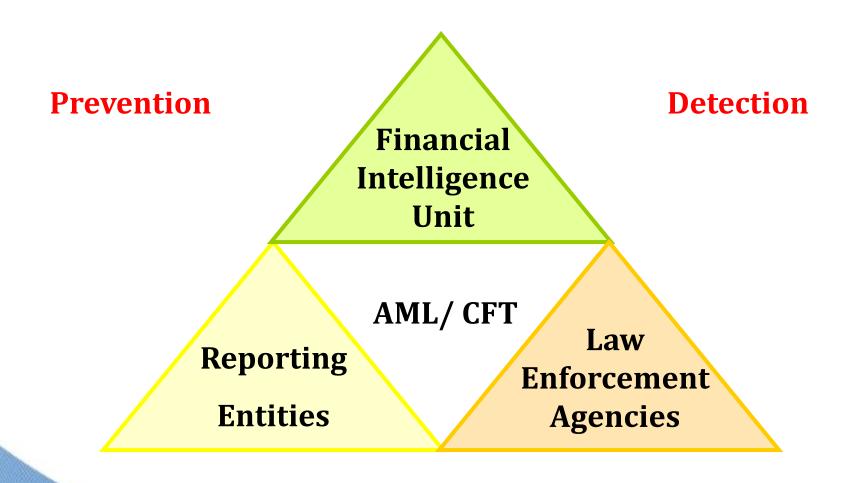
香港警務處持有並保留本簡報檔案包括版權在內的所有權益。除預先獲得警務處處長書面許可外,本簡報檔案只可用作個人學習及處理公務上用途。

Agenda

S T R

- 1. STR Mechanism
- 2. STR Reporting
- 3. How to File Quality STRs?
- 4. STR Content
- **5.** Recommended Structure
- 6. STR Feedback

STR Mechanism



STR Mechanism

← Public-Private Partnerships →

Reporting Entities

Financial Institutions
& DNFBPs

CDD + KYC

Record Keeping

Internal Controls

STR Filing

Financial Intelligence Unit

<u>JFIU</u>

STR Regime

Intelligence Exchange

International Cooperation

Training & Outreach

Law Enforcement Agencies

e.g. Police, Customs, ICAC

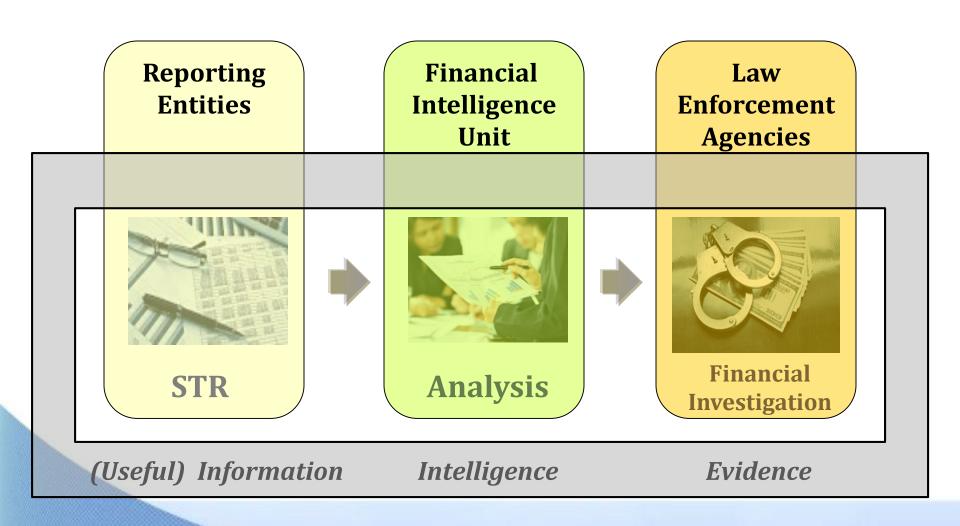
Financial Investigation

Asset Tracing

Restraint & Confiscation

Mutual Legal Assistance

STR Mechanism



STR Reporting

How to submit an STR?

Suspicious Transaction Report And Management System (STREAMS)

Suspicious transaction reports can be made in one of the following ways:



- · by e-reporting system, STREAMS
- by email to jfiu@police.gov.hk



by fax to: (852) 2529 4013





by mail, addressed to Joint Financial Intelligence Unit, GPO Box 6555 Hong Kong



by telephone (852) 2866 3366 (for urgent reports during office hours)

If you want to file STR via STREAMS, you have to complete **the application form** and return to JFIU either by fax (2529 4013) or email (**jfiu@police.gov.hk**). If you need any further information, please feel free to contact JFIU staff.

How to File Quality STRs?

SAFE Approach

Screen

subject entities' background & transactions

Ask

appropriate questions to clarify circumstances

Find

relevant records for review

Evaluate

whether suspicion is substantiated

STR Content

Particulars

of the subject persons / organizations / beneficial owners (including details of ID document or company registration)

What Suspicious?

- Property involved (e.g. company, real estate, vessel, etc.)
- Accounts & transactions (including. amount, currency, source of fund)

Why Suspicious?

- Suspected crimes / suspicious indicators / news
- Assessment and analysis?
- Explanation by clients, if any
- Previous STR ref. / Police case ref., if any

Recommended Structure of STR Narrative

- 1) Triggering Factors
- 2) Background of Subject(s)
- 3) Transactions
- 4) KYC/CDD Result & Open Source Information
- 5) Conclusion & Way Forward

Recommended Structure of STR Narrative

STR Summary Suspected Crir	Reporting Body Subject Comes Suspicious Indicators Open			ccount (Transaction) Check Save Print							
Subject											
Sequence No:	1			• -							
English Name:	Family Name: Giv	en Name:	Middle Name:								
Chinese Name:	ccc:]HKID:(_)								
Other ID	Type: if Others:										
+ -	ID No.:	Co	ountry:	•							
DOB:	Gender: ☐ M ☐ F ☑ U Occupation:										
Nature:											
Phone:			(STR Summary)	Reporting Body) (Subject) (Organization (Phone (Add	dress (Account)(Transaction					
Email: + -	Suspected Crimes Suspicious Indicators Open Source Info. Entity Lists Check Save Print										
Address:			Account								
			Sequence No:	1		+ -					
Additional Information:			Account Institution:								
			Account Number:		Account Type:	if Others:					
			Opening Date:		Closing Date:						
			Balance:	Currency: HKD	Amount + •	Date:					
			Related Person:		Role:	if Others:					
			Related Company:		Role:	if Others:					
			Additional Information:								
		777									

STR Feedback

- Acknowledgement of receipt
- Consent/ No Consent/ N/A
- Quarterly STR Analyses
- Meetings with Stakeholders

STR Observation

No. of STRs	2015	2016	2017	2018	2019 Q1-Q3		
Annual Total	42,555	76,590	92,115	73,889	37,816		
Filed by	22	27	31	81	86		
TCSPs	Less than 0.1%						



Thank you



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