POCA Advisory Issue 2

JUNE 2026

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POCA ADVISORY AND ASSET FORFEITURE

Welcome to the second edition of QEB's POCA Advisory Newsletter.

Our second issue of the POCA Advisory Newsletter arrives just weeks after the enactment of the Crime and Policing Act 2026. The Act substantially amends Part 2 of the Proceeds of Crime Act 2002 and provides the courts with more assistance when dealing with confiscation proceedings. It also extends corporate criminal liability in a significant way and the implications for MLROs is something we discussed in our first issue.

Attracting less attention is the prospect of more challenges to restraint orders in time to come. New section 41ZA of the Proceeds of Crime 2002 removes the preclusion on reasonable legal fees relating to the offence in s 41(4). Until now the difficulty for many who are subject to all-asset restraint orders is that once imposed there will be no means available to challenge it or seek a variation but this looks set to change. Section 41ZA is not yet in force and is subject to commencement regulations.

The last quarter has seen several notable cases. These include decisions on two unexplained wealth orders, search warrants in the context of a cryptoasset investigation and an injunction application to prevent the closure of bank accounts after a Suspicious Activity Report was filed.

Alex Mullen also shares his experience of successfully acting for a bank with subrogated rights asserting a proprietary claim over assets liable to forfeiture in the Magistrates' Court. All of these cases highlight that a POCA angle can arise in a wide variety of contentious matters. Alex's experience shows that sometimes there can be little precedent to draw upon and that increasingly the Magistrates' Court is dealing with more involved asset forfeiture matters.

We hope this next instalment is of interest and many thanks to those who joined us in May – our POCA Advisory and Asset Forfeiture Group has officially launched. If you would like to contribute to the newsletter or join a future event please do get in touch.

Edited by:
Allison Clare KC & Anita Clifford

QEB HOLLISWHITEMAN

Recent noteworthy AML and POCA developments in the UK and beyond.

16 June 2026

Justice Ministers of 46 Council of Europe Member States pledge greater commitment to combating money laundering. At a conference in Strasbourg Member States supported a declaration to strengthen efforts to freeze, seize, confiscation and recover the proceeds of crime, particularly digital and cryptoassets. The declaration follows the adoption by Member States on 15 May 2026 of an addition protocol to the Council of Europe Convention on laundering, search, seizure and confiscation of the proceeds of crime (Warsaw Convention). The additional protocol prioritises victims where confiscation or recovery proceedings are pursued (Article 26) and encourages seized assets to be used for identifiable social or public purposes (Article 16). A victim could be the legitimate owner of the property sought to be recovered or confiscated or a victim of a crime entitled to compensation. The UK is a founding member of the Council of Europe.

9 June 2026

Insolvency Service announces shut down of further companies providing a false UK business presence to clients without AML checks. Two companies registered more than 4,300 UK companies for primarily China-based clients and provided no evidence of carrying out Customer Due Diligence. The companies were wound up by the High Court on 2 June 2026 following a referral to the Insolvency Service by Companies House and is part of an enforcement drive against unregulated Trust and Corporate Services Providers.

9 June 2026

Money Laundering and Terrorist Financing (Amendment) Regulations 2026 made. The amending Regulations include a cryptoasset business within the definition of a credit institution, expand the definition of a trust and company service provider to include persons selling "off-the-shelf firms", substitute all references to euros with sterling which is an overdue post-Brexit amendment, impose new requirements for Customer Due Diligence for institutions providing customers with pooled accounts and replace references to high risk third countries with a "FATF call for action country". The amendments also vary the threshold for enhanced Customer Due Diligence so that they apply to transactions that are unusually complex or large "given the nature of the transaction".

3 June 2026

The EU's Authority for Anti-Money Laundering and Countering the Financing of Terrorism launches consultation on draft guidelines for the ongoing monitoring of business relationships and transactions. The draft guidelines will not be applicable in UK but will affect regulated persons with EU operations and offer practical guidance on how to meet the ongoing requirement which is also a key feature of the Money Laundering, Transfer of Funds (Information on the Payer) Regulations 2017. The draft guidelines address matters such as review frequency, the sources that can be used to update customer information and the types of events that will trigger further Customer Due Diligence.

24 May 2026

The Finance Innovation Lab releases 'The UK's Dirty Money Problem: Estimating the Scale of Illicit Flows in the UK Financial System'. The report seeks to quantify the illicit financial flows (defined as financial flows that are illicit in origin, transfer, or use, and that cross national borders) which pass through the UK financial system. Based on the available data, the report estimates that some £325 billion in illicit financial flows pass through the UK financial system each year, increasing to £788 billion if Crown Dependencies and Overseas Territories are included. Illicit tax and commercial practices are identified as the single largest illicit financial flows, in particular the clandestine movement of profit by multinational corporations and income associated with offshore wealth assets.

29 April 2026

The Crime and Policing Act 2026 achieves Royal Assent and substantially impacts confiscation, civil recovery and money laundering matters. Corporate criminal liability is extended under s 250 of the Act and exposes a company to the risk of prosecution if a senior manager commits "an offence" under the law of England & Wales. This could include an offence of money laundering. The reforms to the confiscation regime in the Proceeds of Crime Act 2002 include a statutory objective of the criminal confiscation regime *("to deprive the defendant of the defendant's benefit…so far as within the defendant's means")*, measures which prioritise victim compensation and a new mechanism for early resolution of confiscation proceedings. Environmental offences are also added to the list of criminal lifestyle offences and the prohibition on legal expenses "related to an offence" being paid out of assets subject to a restraint order is removed with the insertion of new s 41ZA. Costs protections for enforcement authorities pursuing civil recovery are bolstered with s 288A POCA requiring an authority to have acted unreasonably, dishonestly or improperly. The commencement date of the new POCA provisions is awaited but the extension of corporate criminal liability under s 250 takes effect from 29 June 2026.

28 April 2026

New bank account closure rules enter into force. The Payment Services and Payment Accounts (Contract Termination) (Amendment) Regulations 2025 provide new protections to existing and prospective bank customers. Where an application to open a bank account is refused and a reason is provided it must be "*sufficiently detailed and specific to enable the consumer to understand why the application has been refused, unless providing that information would be unlawful.*" There is a new 90-day notice period for account closures if the contract was entered into on or after 28 April 2026 but the mandatory notice period is subject to a reasonable grounds to suspect serious crime exception under regulation 51C(c).

27 April 2026

Dentons UK and Middle East LLP v SRA Limited [2026] EWCA Civ 508

The Court of Appeal upheld the High Court's decision to quash the decision of the Solicitors Disciplinary Tribunal (SDT) dismissing allegations of breach of Principle 7 of the SRA Principles, requiring compliance with legal and regulatory obligations, and failure to comply with the SRA Code, requiring compliance with AML legislation, despite it accepting that a law firm had breached Regulation 14 of the Money Laundering Regulations 2007. The SRA had conducted an investigation and found that the firm had failed to conduct adequate source of funds checks when acting for a client, later convicted of embezzlement in a foreign country, on high-value transactions. The SDT dismissed the case brought by the SRA as the breach was considered inadvertent and not sufficiently serious, reprehensible or culpable to amount to professional misconduct. The Court of Appeal agreed that an allegation of a breach of Principle 7 can only be upheld if the conduct is sufficiently serious but had difficulty in understanding why the Tribunal was entitled to characterise the firm's breach of MLR 2007 as "entirely inadvertent" and not serious. The case has been remitted back to the SDT to consider whether the firm was in breach of Principle 7.

8 April 2026

Firms' customer due diligence processes and controls: our findings | FCA

The FCA's 2025 multi-firm review highlights material weaknesses in firms' customer due diligence (CDD), enhanced due diligence (EDD) and ongoing monitoring frameworks across a range of sectors. The FCA identified deficiencies in the design and implementation of policies and procedures, including insufficient practical guidance for staff, unclear approaches to periodic and event-driven reviews, and gaps in customer risk assessment and documentation. While examples of good practice were observed, the FCA emphasised that effective frameworks typically go beyond minimum regulatory requirements, with clear risk differentiation, robust governance and comprehensive audit trails. The findings form part of the FCA's broader financial crime supervisory strategy and signal an expectation that firms enhance the operational effectiveness, clarity and evidential basis of their AML controls.

24 March 2026

Unexplained Wealth Order and Interim Freezing Order obtained by the Crown Prosecution Service. CPS secures landmark £81m Unexplained Wealth Order (UWO), signalling expanded use of civil recovery powers. The CPS has obtained its first UWO and Interim Freezing Order over a London property portfolio of more than 85 properties valued at over £81 million, amid suspicions regarding the source of funds used for their acquisition. The orders require the respondent, a Chinese national and associated companies, to demonstrate that the assets were purchased with legitimate income within a set timeframe or risk their recovery through civil proceedings. The case highlights the growing willingness of UK enforcement authorities to deploy UWOs as an investigative tool, particularly in cross-border contexts where criminal prosecution may be challenging.

24 April 2026

NCA v GKC (No.2) v BBC, Times Media, Associated Newspapers, Telegraph Media [2026] EWHC 929 (Admin)

The High Court discharged an anonymity order and reporting restrictions granted for the benefit of GKC in earlier UWO proceedings (see below 13 March 2026). The starting point was open justice, and previous case law had not changed that. The party seeking relief had to show that an order was necessary, including that interference with their art.8 rights was sufficient to justify derogation from the principle. Proceedings at an early investigative stage, based on suspicion, still engaged the fundamental principle. While without-notice applications may include a presumption of privacy this did not apply to hearings *inter partes* where the respondent had been fully heard. GKC had not satisfied the Court to derogate from the open justice principle, not least given significant reporting of the broader case in the public domain.

26 March 2026

The FCA publishes its Annual Work Programme for 2026/27 with priorities that include launching and processing applications for firms that want to undertake new cryptoasset-regulated activities, proactively assessing AML systems and controls for firms deemed higher risk and preparing to become the AML supervisor for all legal, accountancy and trust and company service providers. The latter is subject to legislation being proposed by the government which if passed, will see the FCA supervising approximately 60,000 new firms.

23 March 2026

Ahmad, R (On the Application Of) v The Crown Court at Leeds [2026] EWHC 684 (Admin)

The High Court refused a challenge by judicial review of the lawfulness of search and seizure warrants granted pursuant to POCA 2002 s.352 and prior approval to seize cryptoassets under s.47G. The Claimant had been convicted in Germany for his role in a high-value carousel fraud, and prior to his conviction had purchased 261 Bitcoin worth some £13 million at the time Judgment was handed down. The High Court found that there were reasonable grounds to grant the warrants, their scope was not too broad so as to be unlawful, the s.47G approval did not overlap with the s.352 warrants, and that even if there had been defects in the Judge's decision or drafting (the estimated reading time for the material was just 15 minutes, and the Judge remarked that "*I cannot say I understand Bitcoin…*") the outcome would not have been substantially different.

23 March 2026

New regime for cryptoassets regulation – Introduction to anti-money laundering regulations webinar - FCA Webinars

FCA sets a clear supervisory benchmark for cryptoasset firms' financial crime controls. The FCA's webinar of 18 March 2026, delivered in the context of the UK's new cryptoasset regime under the Financial Services and Markets Act 2000, outlined its expectations for firms' anti-money laundering, counterterrorist financing and proliferation financing frameworks. It emphasised that firms must maintain robust, well-integrated AML/CTF systems that comply with the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 while also addressing broader financial crime obligations. Particular focus was placed on the pivotal role of the Money Laundering Reporting Officer (MLRO), who must demonstrate sufficient seniority, expertise, independence and resourcing, alongside the need for detailed, proportionate business-wide risk assessments (BWRA) evidencing effective risk identification and control.

11 March 2026

Isle of Man Government publishes updated Money Laundering National Risk Assessment. The three sectors most exposed to money laundering are banking, trust and company services providers and online gambling. Online gambling is one of the largest contributors to Isle of Man's national income and identified AML risks include exposure to Asia-facing organised crime, misuse of gaming platforms to facilitate fraud proceeds and source of funds vulnerabilities. Financial flows to/from the Isle of Man principally concentrate on the UK, US and Germany. 50.5% of all outgoing and incoming payments were with the UK.

10 March 2026

Ping Fai Yuen v Fun Yung Li & Anor [2026] EWHC 532 (KB)

High Court limits availability of conversion claims in cryptoasset disputes. *In Yuen v Li [2026] EWHC 532 (KB)*, the High Court struck out claims in conversion and trespass to goods relating to the alleged misappropriation of Bitcoin valued at up to £180 million, holding that these apply only to tangible property. While recognising that cryptoassets constitute property (including under the Property (Digital Assets etc) Act 2025), the court held that they remain outside the scope of traditional possessory torts such as conversion and trespass to goods, which are confined to tangible property. The claimant was permitted to pursue alternative causes of action, including proprietary and restitutionary claims. The judgment provides important clarification on the current limits of common law remedies in digital asset disputes.

30 January 2026

Gilbert v Broadoak Private Finance Ltd [2026] EWHC 153 (KB)

The High Court discharged a Worldwide Freezing Order (WFO) pursuant to TSB Private Bank v Chabra [1992] 1 WLR 231 and revoked permission to serve outside the jurisdiction. The Claimant had significantly breached the duty of fair presentation in the without notice WFO application, particularly regarding extra-jurisdictional service, however this was not sufficient to warrant discharge. While typically a party seeking *Chabra* relief need only show a good arguable case on one or more of the jurisdictional gateways, where a question of law arose on jurisdiction then the court would normally determine the issue rather than only asking if there were a good arguable case. None of the jurisdictional gateways applied and accordingly the WFO was discharged.

18 March 2026

The Finance Act 2026 achieves Royal Assent and introduces changes to the calculation of the economic crime (anti-money laundering) levy. The levy is payable by persons who carry on an AML-regulated business and is charged according to UK revenue. Persons with UK revenue below £10.2 million are not subject to the levy. Four new revenue bands apply and the changes have effect for the financial year beginning with April 2026 and subsequent financial years.

13 March 2026

R (on the application of National Crime Agency) v GKC (No.1) [2026] EWHC 573 (Admin)

The High Court refused GKC's application to discharge an Unexplained Wealth Order and associated Interim Freezing Order. The question was "*…whether the Court can be satisfied that proper enquiries have been made before making the application; and whether a material failure to do so justifies discharging the orders.*" The NCA's enquiries into GKC's wealth were sufficient and not properly challenged. Open-source material could be relied upon by the NCA without a need for primary, independent or corroborating information from authorities. It could not be said that a Singaporean gambling offence had no England and Wales equivalent because the same relied on the supposition that a licence would be obtainable which was a contention "*without any visible support*". In any event the suspicion of serious crime extended to online scam frauds which would satisfy the dual criminality requirement.

26 February 2026

Academic Dr Samantha Mapston examines money laundering through the UK's higher education sector in "Money Laundering in Universities: Implementing a Risk-Based Approach to Regulation" published by the Criminal Law Review. The piece identifies a regulatory lacuna and considers the exclusion of higher education institutions from AML regulation despite acceptance of cash payments by some universities, source of funds concerns over large donations, increased use of student money mules by organised crime groups and examples of student involvement in terrorist-financing. Historically educational institutions submit very low numbers of Suspicious Activity Reports as they are outside of the AML-regulated sector but reports are marginally increasing.

12 February 2026

Yasin al-Yasin v Starling Bank Limited [2025] EWHC 3582 (KB)

The High Court dismissed an application for an interim injunction to prevent the closure of the applicant's bank accounts. The applicant had been notified that his accounts would be closed due to suspicions of fraud and alleged that the bank was in breach of contract and that it had failed to make reasonable adjustments for his disability. Applying the *American Cyanamid* test the Court considered that there was not a serious issue to be tried as the bank's terms and conditions clearly provided for accounts to be closed without notice where a Suspicious Activity Report was submitted and for restrictions to be applied "at any time". It was disclosed right before the hearing that a Suspicious Activity Report had been submitted by the bank. The case highlights the wide berth that is given to banks when mitigating financial crime risks and hints at the procedural hurdles that must be crossed before a Suspicious Activity Report can be disclosed in civil litigation which can lead to late disclosure.

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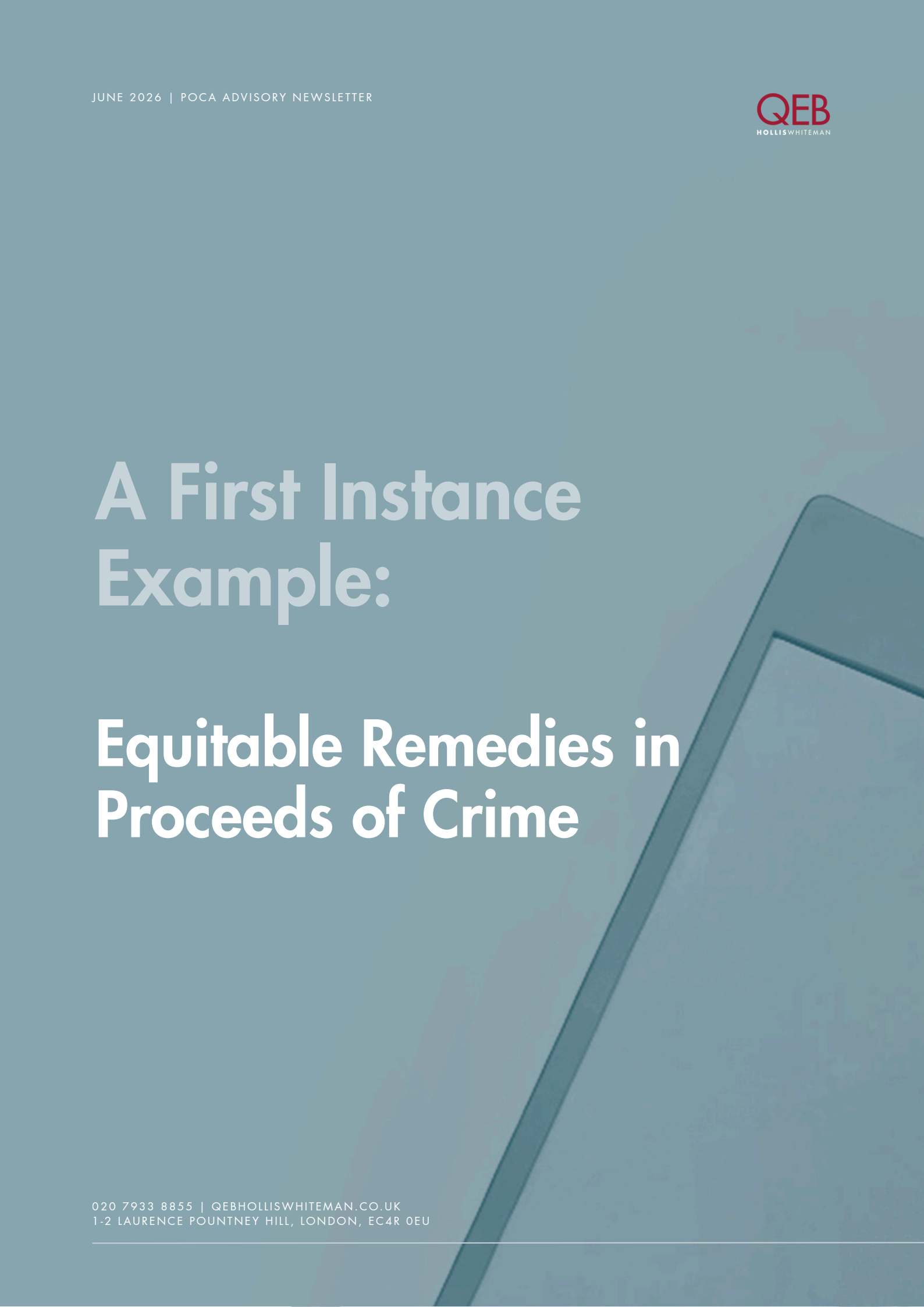
A First Instance Example:

Equitable Remedies in Proceeds of Crime



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Alex Mullen successfully represented an intervening major bank in summary forfeiture proceedings, securing the release to the intervener of seized gold bars. The case highlights the utility of equitable subrogation and unjust enrichment in resolving competing proprietary claims under Part 5 of the Proceeds of Crime Act 2002 (POCA).

Factual Background

In 2023, fraudsters induced an elderly victim to purchase gold bars from a Leicester jeweller and transfer them to a courier. Following a tip-off, police arrested the courier and seized the gold. Leicestershire Police subsequently initiated summary forfeiture proceedings against the seized property under Chapter 3A, Part 5 of POCA.

The Bank's Intervention

Shortly after the fraud was complete, the victim's bank fully indemnified him for the stolen funds and the capital used to purchase the gold.

The bank later intervened in the POCA proceedings, asserting a proprietary claim under s.303V of the Act to secure the release of the gold to the bank. Critically, during this period, the seized bullion appreciated significantly in value.

Subrogation and Unjust Enrichment

The primary legal hurdle was establishing the bank's proprietary interest, given the lack of an express assignment of rights or a formal subrogation agreement with the victim at the time of indemnification (as is common in, for example, contracts of insurance).

To establish ownership under s.303V, the bank relied on the equitable doctrine of subrogation and unjust enrichment, citing the Supreme Court's decision in *Bank of Cyprus UK Ltd v Menelaou* [2015] UKSC 66, advancing as follows:

1. Permitting the Applicant to forfeit the gold, or the victim to retain an interest in it after being fully indemnified, would in either case constitute unjust enrichment.
2. By indemnifying the victim for the exact funds used to purchase the gold, the bank stepped into the victim's shoes. It acquired the victim's possessory and proprietary rights by operation of the principle of equitable subrogation, even without express agreement.
3. Consequently, the bank qualified as the rightful "other owner" under s.303V, superseding the Applicant's claim for forfeiture and any claim that could be made by the victim.

Outcome

The Court accepted the submissions. It ruled that the bank's equitable proprietary interest defeated the state's forfeiture application and ordered the immediate release of the gold bars to the bank.

Implications for POCA Practitioners

While the decision by the Magistrates' Court is limited in terms of precedent applicability, practitioners may wish to consider the following:

- The decision may reassure practitioners that equitable restitutionary rights can satisfy ownership definitions within POCA.
- Section 303V interventions provide a direct mechanism for indemnifying banks to recover assets seized, including where those assets have appreciated in value.
- The principles are likely to be cross-applicable to similar sections of the Act relating to frozen assets, cash etc (s.303V concerns listed assets including precious metals).
- Given recent developments designed to encourage prompt and effective reimbursement in Authorised Push Payment (APP) frauds, financial institutions may have more opportunities to make claims in similar cases where funds or other assets are seized.
- Financial institutions may wish to consider mechanisms by which, when reimbursing victims, banks can crystallise their subrogation rights in order to avoid the need to rely on equitable principles.

Compiled by:
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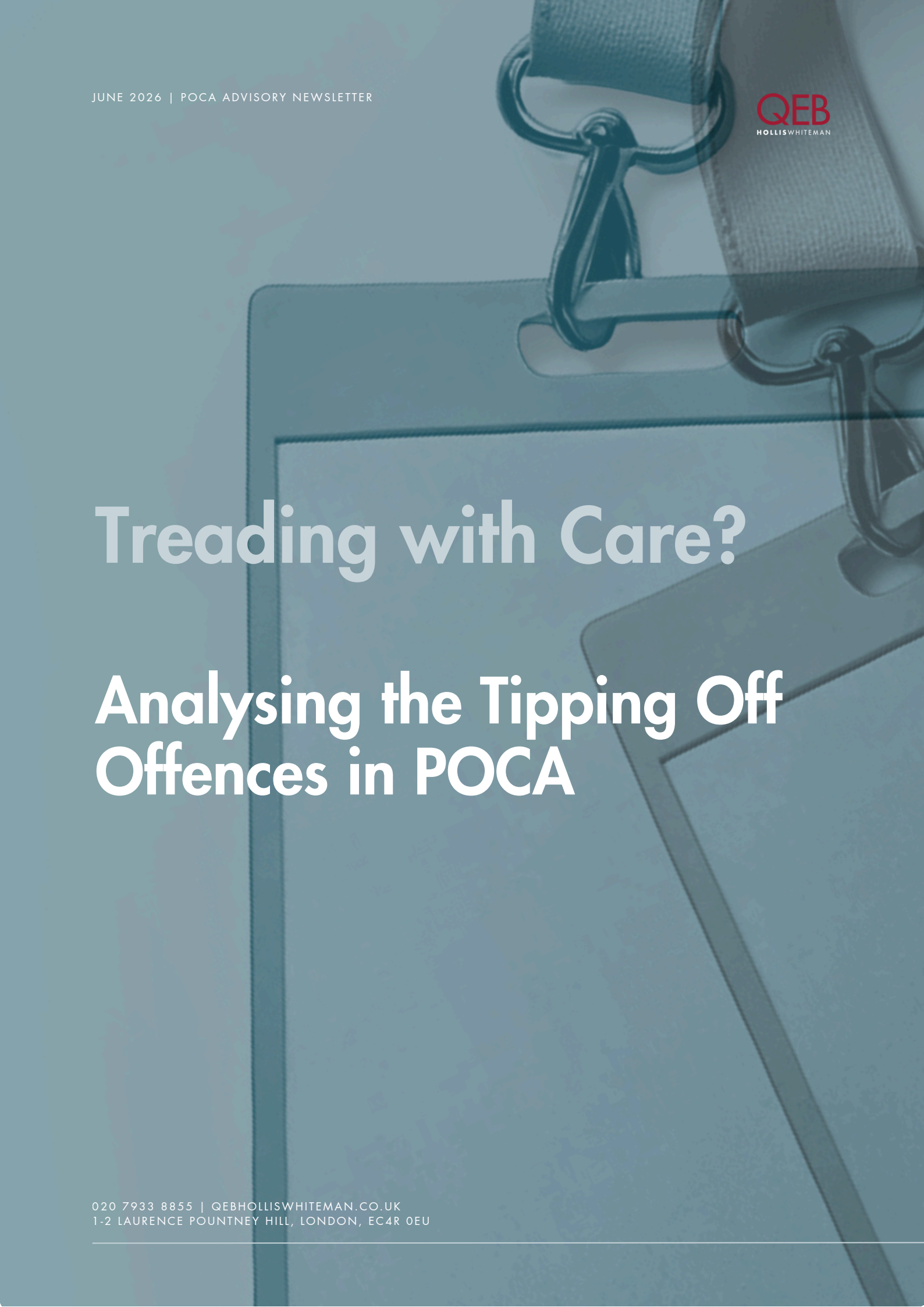

Treading with Care?

Analysing the Tipping Off Offences in POCA

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The tipping off prohibition in s 333A of the Proceeds of Crime Act 2002 (POCA) and the separate offence of prejudicing an investigation in s 342 is an established source of anxiety for reporters of suspicious activity. Most recently this was acknowledged by the court in *The Wine Enterprise Investment Scheme Limited v Crowe UK LLP* [2026] EWHC 692 (Ch), a case concerning a dispute between a company's shareholders and an audit firm which had allegedly failed to spot dishonesty and alert the directors. Despite not receiving detailed submissions on the application of POCA the court had regard to ss 333A and 342 and examined the tension that can arise in the aftermath of a person discovering suspicious activity and discharging their reporting duty.

As the court noted, had the auditors identified a concern they would have risked committing an offence of failing to disclose under s 330 POCA unless they had made a report to an enforcement authority. If, however, a report had been made the auditors would have risked prejudicing an investigation if it *"told anyone other than the law enforcement agency"* of their concerns as the directors were at the centre of them. It was also observed that that an auditor has to *"take care that any other conduct…(e.g. dragging its heels) does not alert the suspect(s) to the possibility that a Suspicious Activity Report will be or has been made".*[1]

The comments highlight that following the submission of a SAR difficult questions can arise over how to manage a client or whether any of the information in the SAR can or should be shared. A regulated person may need to consider other responsibilities, such as to its own client if the SAR relates to a counter party to a transaction or to a person that one of the firm's other clients is dealing with. In other cases there may be concern that unless the information is shared suspected criminal activity will continue or another in the regulated sector will be unwittingly drawn in.

In all of the above scenarios the tipping off prohibitions will require careful consideration and little guidance is provided by the National Crime Agency. It has long been the position that *"the UKFIU does not provide or approve standard wording for you to use in such circumstances or give advice on methods to answer client queries or awkward questions".*[2] Depending on who is to receive the information the exceptions to tipping off in ss 333B – 333D POCA and in s 339ZB may assist but they are highly circumscribed. Under s 333C only professional advisers "of the same kind" may share information. An accounting firm which, for example, shares information with an estate agency would not be protected. Section 339ZB permits disclosures to be made by one regulated person to another of a different kind but only if the NCA or the proposed information recipient has requested that it is disclosed and an "authorised officer" of the NCA has been notified. The conditions are unnecessarily cumbersome.

Section 333D(1)(b) allows, in principle, information to be shared with anyone but the purpose must be to detect, investigate or prosecute a criminal offence or in furtherance of an investigation under POCA. The exceptions are limited in scope and are unlikely to capture a situation where a regulated person has submitted a SAR and considers that, subject to considerations of legal privilege, they should tell their client or another person of their concerns so that the risks of dealing with the SAR's subject are appreciated.

Properly examined, the sharing of information in situations which do not fall within the scope of the tipping off exceptions would not necessarily offend the prohibitions in s 333A or s 342 POCA. The offences are not so easy to commit and there is no blanket ban on information being provided. Section 333A is only triggered when a SAR has been submitted[3] and the subsequent disclosure of information is "likely to prejudice an investigation". Confidentially informing a client of concerns about a counter party so that they may consider their own next steps, such as seeking a Defence Against Money Laundering or extracting themselves from a relationship, is unlikely to meet the threshold, particularly if the relationship between the two is at arms length. Discussing concerns *before* any SAR is submitted will also not engage s 333A. For s 342 to bite the person must know or suspect that an enforcement authority is investigating or proposing to do so which is unlikely before a SAR is submitted unless the would-be reporter is aware that an investigation is already in train or soon will be.

It is also difficult to see how the court's suggestion in *The Wine Enterprise* that a regulated person "dragging its feet" following a SAR could ever contravene ss 333A or 342. The former requires disclosure of a matter[4] which arguably requires a positive act of providing information to another. The latter offence in s 342, furthermore, is only committed if a disclosure is made knowing or suspecting that it is likely to prejudice an investigation.[5] Although suspicion could be inferred from the circumstances it is a subjective test. A regulated person who goes slow on a client matter is neither disclosing information nor acting with the requisite knowledge or suspicion that their actions are likely to jeopardise an investigation. The tipping off offences may be a stick but it is not one easy to use.

Compiled by:
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[1] §414
[2] https://www.nationalcrimeagency.gov.uk/who-we-are/publications/775-ukfiu-chapter-2-submitting-a-sar/file, page 31
[3] Section 333A(2) POCA
[4] Section 333A(1)(a) POCA
[5] Section 342(3)(a) POCA

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