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Sample Internal Escalation Note – Possible Terrorist Financing Indicator

This template provides a simple structure for staff to document and escalate concerns about possible terrorist financing indicators to the MLRO or compliance team. It should be adapted to your institution's policies, systems, and terminology.

1. Basic Details

Date of note	[Enter here]
Name and role of staff member	[Enter here]
Business unit / branch / team	[Enter here]
Customer name and ID / account number	[Enter here]
Related transaction reference(s)	[Enter here]

2. Context

Summarise why you are reviewing this customer or transaction (for example: alert from system, referral from colleague, or observation at branch).

[Enter short context description here]

3. Observations and Indicators

Describe the key facts you have observed and link them to any relevant indicators.

Examples of points to cover:

- Unusual customer behaviour or explanations.
- Transaction patterns (values, frequencies, routes, counterparties).
- Geographic aspects (countries or regions involved).
- Use of non-profit or fundraising channels, if applicable.
- Any potential sanctions or watchlist matches.

[Enter your observations here in clear, factual language]

4. Initial Risk View

Provide your initial assessment in simple, neutral terms.

[For example: "Based on the available information, I consider there may be indicators of terrorist financing because..."]

5. Actions Taken So Far

Record any steps already taken (for example: holding a transaction, requesting information, or reviewing additional activity).

[Enter actions taken here]

6. Questions / Request to MLRO or Compliance

Note specific questions or decisions required from MLRO or compliance.

[For example: "Please confirm whether to file a report, maintain a hold, or apply any sanctions-related measures."]

7. MLRO / Compliance Use Only

Space for MLRO or compliance to record their review, decision, and any regulatory reporting.

[Completed by MLRO / compliance]

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