



Executive Summary: National Strategy for Combating Money Laundering, the Financing of Terrorism and the Financing of Proliferation of Weapons of Mass Destruction



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National Strategy for Combatting Money Laundering, the Financing of Terrorism and the Financing of Proliferation of Weapons of Mass Destruction, 2022-26

Jersey has had a long-term commitment to preventing and eliminating financial crime. The purpose of the national strategy and action plan is to clearly document Jersey's position in supporting international efforts in the fight against all forms of financial crime and areas of focus to increase effectiveness.

The strategy includes:

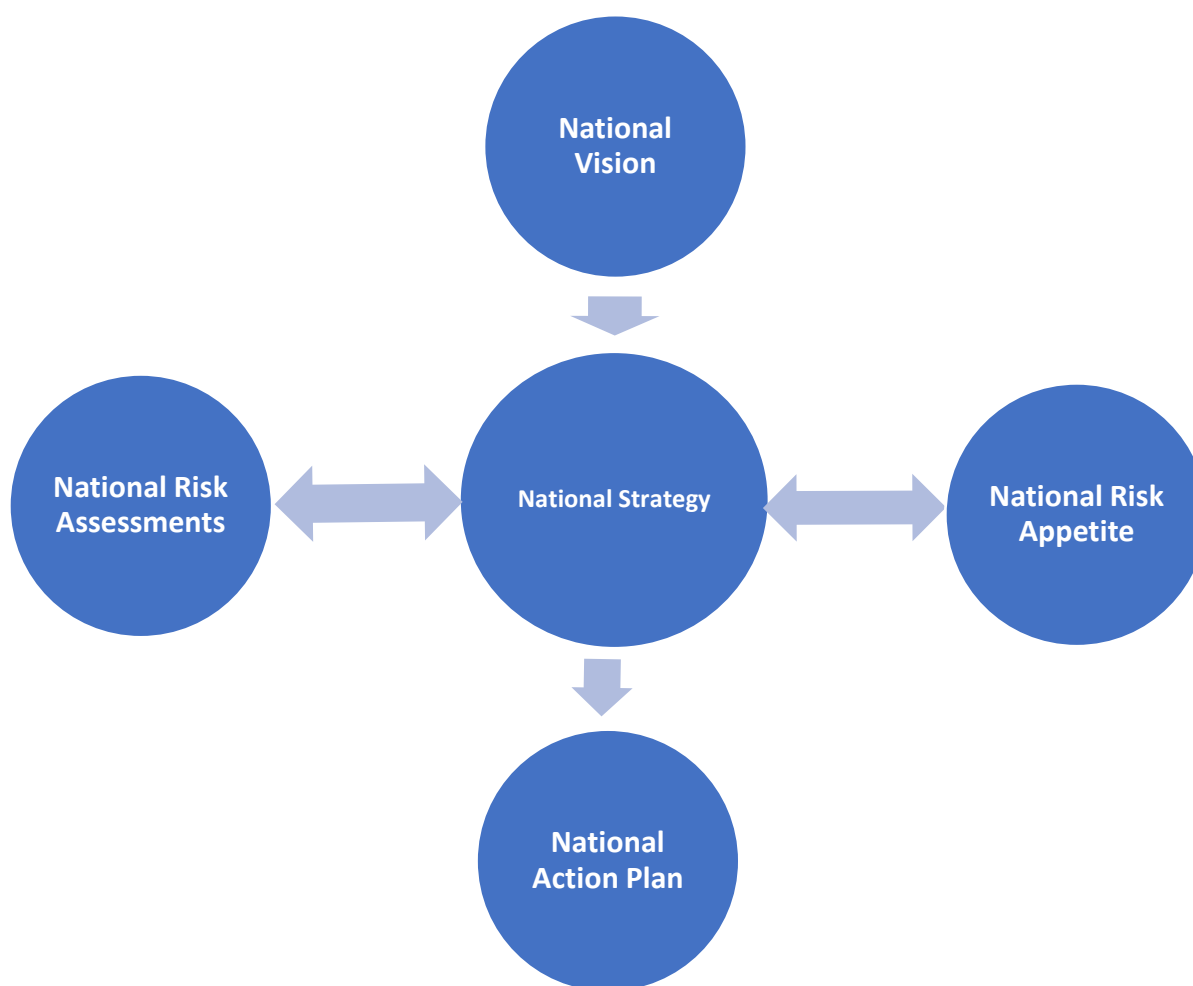
- A vision to provide a clear direction of travel as we combat financial crime together
- The strategic priorities to ensure the FATF recommendations are fully implemented
- A national action plan to deliver the strategic priorities

The vision helps shape the strategic priorities, which align with the findings of the NRAs. The risk appetite defines what risks are accepted and which are not and the overall risk is removed or reduced via the actions in the plan.

The National Strategy is published alongside the National Risk Assessments and the National Risk Appetite.

Overall these contribute to one single National Financial Crime Workplan.

Relation Between Key Documents



Vision

Jersey has a responsibility to its domestic customer base as well as to a wider international market. To ensure the continued integrity of the global financial system, Jersey must play its part in successfully combatting financial crime. This can only be achieved through cooperation between industry, government, agencies, and the regulators. Industry is the first line of defence, interacting with customers and ensuring that they know their customers. Industry invests extensively on combatting financial crime through their staff, systems and procedures.

To provide a clear direction of travel, Jersey has agreed to the following vision:

Vision: For the public and private sectors to deliver a holistic plan that protects Jersey against financial crime, which prevents harm to our jurisdictional society and international stakeholders, upholds the position of Jersey as a responsible and cooperative international financial centre and supports legitimate growth and prosperity. Combatting Financial Crime TOGETHER.

This aligns with the overall Government vision and that for the finance sector.

Strategic Priorities

Strategic Priority One: Understanding the threat and performance metrics

Outcome: Develop a better understanding of the threat posed by financial crime domestically and internationally and our performance in combatting financial crime. Increase understanding across both competent authorities and Industry of current and emerging financial crime risks and facilitating a coordinated approach to combat and mitigate those risks.

Strategic Priority Two: Better information sharing and coordination

Outcome: Pursue better sharing and usage of information to combat financial crime within and between the public and private sectors across all participants, including competent local and international parties.

Strategic Priority Three: Powers, procedures, preventative measures, and tools

Outcome: Ensure the powers, procedures, preventative measures and tools of law enforcement, the justice system and the private sector are fit for purpose and as effective as possible. Consider, implement, and monitor all international standards relevant to financial crime to ensure Jersey continues to play its part in the global fight to combat money laundering, the financing of terrorism and the financing of proliferation of weapons of mass destruction.

Strategic Priority Four: Enhanced capabilities of law enforcement, the justice system and private sector

Outcome: Strengthen the capabilities of law enforcement, the justice system and private sector to detect, deter and disrupt money laundering, the financing of terrorism and the financing of proliferation of weapons of mass destruction.

Strategic Priority Five: Risk-based supervision and risk management

Outcome: Build greater resilience to financial crime by enhancing the management of financial crime risk in the private sector and the risk-based approach to supervision. detect, deter, and disrupt money laundering, the financing of terrorism and the financing of proliferation of weapons of mass destruction.

Strategic Priority Six: Transparency and ownership

Outcome: Improve our systems for transparency of ownership of legal entities and legal arrangements.

Strategic Priority Seven: International strategy

Outcome: Deliver an international strategy to enhance Jersey’s leading position on financial crime prevention with a hostile environment to criminals.

Action Plan Summary

Action	Responsible Agency(s)	Due Date
<p>Strategic Priority One: Understanding the Threat and Performance Metrics Outcome: Develop a better understanding of the threat posed by financial crime domestically and internationally and our performance in combatting financial crime. Increase understanding across both competent authorities and Industry of current and emerging financial crime risks and facilitating a coordinated approach to combat and mitigate those risks.</p>		
9.1.1 Maintain the national strategy and national action plan for combatting financial crime and countering the financing of terrorism.	GoJ	September 2024
9.1.2 Update the National Risk Appetite statement	GoJ	H2 2022 H2 2023
9.1.3 Update existing National Risk Assessments and conduct new NRAS	GoJ	December 2023
9.1.4 Develop a fully operational performance system to measure what works in combatting financial crime – National Statistics Database	GoJ	June 2023
9.1.5 Improve data related to freezing, seizing and confiscation	GoJ	June 2023
9.1.6 Data to improve risk understanding	JFSC	Q4 2023
9.1.7 Review exemptions	JFSC	December 2022
9.1.8 Monitoring of jurisdictional risk at a national level	GoJ	Q4 2022
9.1.9 Coordinated approach to risk analysis for financial services for new jurisdictions	JFL	varies
<p>Strategic Priority Two: Better Information Sharing and Coordination Outcome: Pursue better sharing and usage of information to combat financial crime within and between the public and private sectors across all participants, including competent local and international parties.</p>		
9.2.1 FIU Industry engagement: Jersey Financial Information Network (JFIN)	GoJ	December 2022
9.2.2 Undertake a cross agency review of lessons learnt from the recent sanctions exercise	GoJ	Q1 2023
9.2.3 Enhance domestic operational information sharing between key financial crime agencies	All agencies	Q3 2023
9.2.4 Develop international information sharing mechanisms	All agencies	Q4 2023
9.2.5 Enhance Public private Partnership approach	GoJ	H1 2023
<p>Strategic Priority Three: Powers, Procedures, Preventative Measures and Tools Outcome: Ensure the powers, procedures, preventative measures and tools of law enforcement, the justice system and the private sector are fit-for-purpose and as effective as possible. Consider, implement, and monitor all international standards relevant to financial crime to ensure Jersey continues to play its part in the global fight to combat money laundering, the financing of terrorism and the financing of proliferation of weapons of mass destruction.</p>		
9.3.1 Prosecutions	LOD	Q1 2023
9.3.2 LOD policies and manuals	LOD	December 2022
9.3.3 NPO	GoJ	December 2022
9.3.4 Legal powers to prevent activity outside of National Risk Appetite	GoJ	Post H1 2023
9.3.5 Deferred Prosecution Agreement regime	GoJ,	Q1 2023

<p>Strategic Priority Four: Enhanced Capabilities of Law Enforcement, the Justice System and Private Sector Outcome: Strengthen the capabilities of law enforcement, the justice system and private sector to detect, deter and disrupt money laundering, the financing of terrorism and the financing of proliferation of weapons of mass destruction.</p>		
9.4.1 Develop a sustainable and long-term resourcing model for financial crime reform	GoJ	Q4 2022
9.4.2 FIU strategic review	FIU	H1 2023
9.4.3 Training and succession planning	JFL	Subject to plan
9.4.4 Continue to disrupt fraudsters and reduce the number of people who become victims of fraud	SoJ Police JFPF	Q4 2023
<p>Strategic Priority Five: Risk-Based Supervision and Risk Management Outcome: Build greater resilience to financial crime by enhancing the management of financial crime risk in the private sector and the risk-based approach to supervision.</p>		
9.5.1 Wire transfers	GoJ,	Q1 2023
9.5.2 Enhance JFSC 's approach to risk-based supervision	JFSC	H2 2023
9.5.3 Support innovation in regulatory compliance for AML/CFT/CPF	JFSC	2024
9.5.4 Adoption of digital ID Systems	GoJ	Q4 2022
<p>Strategic Priority Six: Transparency and Ownership Outcome: Improve our systems for transparency of ownership of legal entities and legal arrangements.</p>		
9.6.1 Local Agencies Direct Access to Beneficial Ownership	JFSC	Q4 2022
9.6.2 Beneficial ownership registers	GoJ	H1 2023
9.6.3 Limited information is presently available to authorities in relation to trusts.	GoJ	H1 2023
<p>Strategic Priority Seven: International Strategy Outcome: Deliver an international strategy to enhance Jersey's leading position on financial crime prevention with a hostile environment to criminals.</p>		
9.7.1 Awareness raising activities in respect of proliferation financing	JFSC	ongoing
9.7.2 Seek international best practice	GoJ	Q3 2023
9.7.3 The effectiveness of tax enforcement and cooperation	GoJ	Q4 2023