



STATES OF JERSEY
POLICE

Jersey FIU Terrorist Financing Presentation Radisson Hotel

23 February 2023

National Risk Assessment of Terrorist Financing

- Overall Medium - Low Risk
- IFCs face particular challenges in detecting TF due to the absence of common indicators
- Not immune from terrorist financing risk
- IFC's can be misused for cross-border movement of TF including flow-through of TF; service provision; use of complex structures, abuse of philanthropy; funds generated domestically by illicit activities
- Focus on financial flows from/to and activities in target jurisdictions
- Raising / **Storing** / **Moving** / Using
- Activities of legal entities incorporated in Jersey in Target jurisdictions / Activities of NPOs and Charities in **HIGH RISK JURISDICTIONS**

FIU Data on TF Reporting 2018-2022

- 59 SARS received where industry chose Terrorism as a Criminality
- 74 Pieces of Intelligence received (SARs, MIRs and RFAs) as a code 1 due to terrorism
- 125 Intelligence shares times with counter terrorism organisations in Jersey, UK and USA (US Ofac-related)
- All of the above pieces of intelligence were put on 153 case files

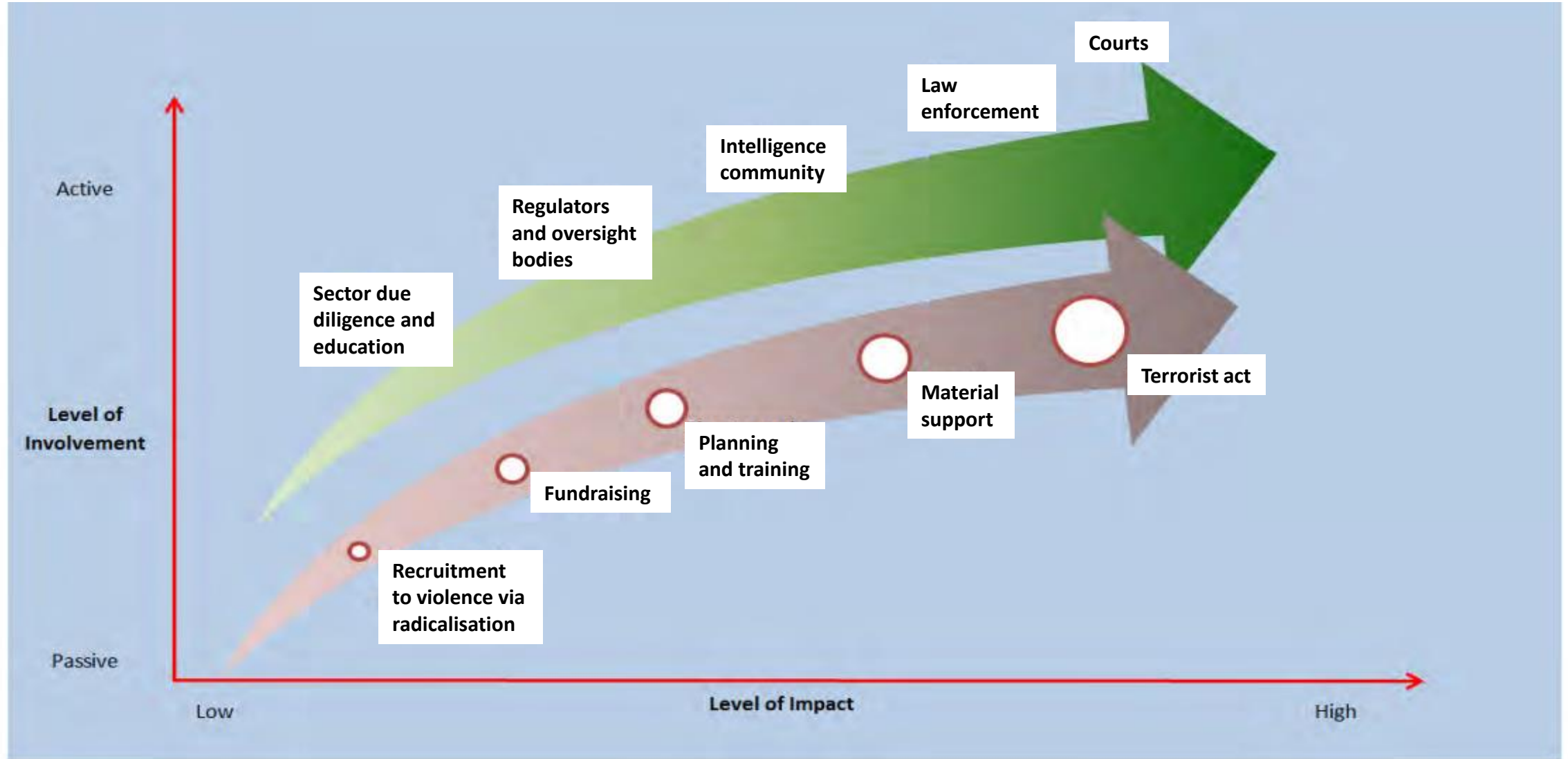
OUTCOME OF THE FILES

Outcome	Number of files
Analysed - No TF identified in Jersey	117
JFCU Ops Inv/ No TF concerns	1
No Jersey Nexus	6
RFA - Analysed - No TF identified in Jersey	7
RFA – No Trace	17
RFA – Special Branch name check - No TF*	5
Grand Total	153

Jurisdictions linked to the FIU shares

Country	Number	Country	Number	Country	Number	Country	Number
UK	33	Pakistan	3	Spain	1	Finland	1
Russia	22	Libya	3	Argentina	1	Botswana	1
Syria	11	Bangladesh	2	Zimbabwe	1	Algeria	1
Lebanon	9	Bahrain	2	Kazakhstan	1	Palestine	1
Saudi Arabia	8	Gambia	2	Morocco	1	Czech Republic	1
Qatar	8	Ukraine	2	Yemen	1	Niger	1
Jersey	6	Turkey	2	New Zealand	1	Nigeria	1
Jordan	4	Iraq	2	Germany	1	Belarus	1
UAE	3	France	2	Ireland	1	Liechtenstein	1
Belgium	3	United States	2	Sudan	1		
Kuwait	3	Hong Kong	1	Israel	1	TOTAL	153

Risk of Terrorist Abuse – the support continuum



Terrorism Financing vs Money Laundering - differences

- The Terrorism Support Continuum illustrates a subtle but important difference between money laundering and terrorism financing
- The FATF recognises that terrorism financing and money laundering, while often appearing together, are operationally different
- On a simplified level:
 - Money laundering is the process of making dirty money appear clean
 - Terrorist financing most often involves clean money being utilised for nefarious purposes

TF Risk Assessment

- No 'one size fits all' approach
- Methodology used to assess TF risk should be flexible

- Risk assessment of TF requires qualitative/quantitative data
- Upskill on use of new technologies (Crypto) to fund TF (Dark Web)

- Know your client / activities / clarity on Beneficial Ownership information
- Co-ordination between Competent Authorities including PPP/Quad Island
- Co-ordination with UK Anti-Terrorist intelligence services
- Ongoing review of TF landscape and risk at sectoral and organisational level



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Questions?