



Economy

Access to beneficial ownership information by persons with legitimate interest

Consultation Paper

OCTOBER 2025



Introduction

The Government of Jersey is publicly consulting on the proposal to extend access to the central register of beneficial ownership to persons who can demonstrate a legitimate interest in accessing beneficial owner information for the purpose of preventing, detecting, or investigating money laundering, terrorist financing and proliferation financing.

Beneficial ownership transparency is a cornerstone of global efforts to combat illicit finance. It is embedded in the recommendations of the Financial Action Task Force (FATF), the international standard-setter in this area. However, there is no single solution to achieving transparency. It involves more than simply making information available to anybody. It requires a comprehensive and responsible approach to ensure that accurate information is collected, maintained, and made accessible to those who need it to prevent and detect financial crime.

Jersey has a long-standing commitment to upholding the highest standards in anti-money laundering (AML), countering the financing of terrorism (CFT), and countering the financing of proliferation (CPF). It is widely recognised that countries should adopt a risk-based approach when implementing these standards. This means carefully balancing the need for transparency with broader policy considerations, ensuring that measures are proportionate, effective, and respectful of individual rights.

In the context of beneficial ownership transparency, this balance is particularly important. While increasing access to information to certain categories of person can support efforts to tackle illicit finance, it cannot come at the expense of an individual's fundamental right to privacy.

This consultation paper seeks to explore that balance. We invite views from stakeholders and the wider community to help shape a policy that will enable Jersey to meet its international commitments while maintaining a fair, proportionate, and effective framework.

Date published:	Closing date:
31 October 2025	30 January 2026

Ways to respond

Responses to the consultation should be submitted no later than the closing date of the consultation.

Responses may be submitted as follows:

- a) online at gov.je/consultations
- b) directly via email to Economy@gov.je, marked FAO Legitimate interest access consultation
- c) indirectly via email to timothy.hart@jerseyfinance.com, marked FAO Legitimate interest access consultation
- d) in writing to -
 - Legitimate interest access consultation
 - Department for the Economy
 - Government of Jersey
 - Union Street
 - St Helier Jersey
 - JE2 3DN

How will your information be used

The information you provide will be processed in compliance with the Data Protection (Jersey) Law 2018 for the purposes of this consultation.

For more information, please read the [Department for the Economy's privacy notice](#).

The Government of Jersey may quote or publish responses to this consultation including (sent to other interested parties on request, sent to the Scrutiny Office, quoted in a published report, reported in the media, published on www.gov.je, listed on a consultation summary etc.) but will not publish the names and addresses of individuals without consent.

Confidential responses will still be included in any summary of statistical information received and views expressed. Under the Freedom of Information (Jersey) Law 2011, information submitted to this consultation may be released if a Freedom of Information request requires it but no personal data may be released.

Contents

Introduction	1
Ways to respond	2
How will your information be used	2
Background	4
International discourse on access to beneficial owner information	7
Consultation	10
Introducing legitimate interest access.....	10
What is a legitimate interest?	11
Who will be able to demonstrate a legitimate interest for the relevant purposes?	12
Information provided to legitimate interest applicants.....	14
Protecting privacy and safety	15
Exemption from disclosure.....	16
Restriction on processing of information	17
Establishing a clear application process	18
Legislative change	19
Conclusion	20
Annex 1 – Consultation Questions	21

Background

Jersey has been a leading international finance centre (IFC) for more than 60 years. Our strong and respected regulatory framework sets us apart from other jurisdictions, as does our 800 years of autonomy in fiscal, legal and administrative matters, with our own elected Parliament and judicial system.

Jersey is a jurisdiction which offers political and economic stability alongside a highly skilled workforce, attracting business from around the world. Underpinned by robust regulation, Jersey's finance centre is a global gateway for investors, enabling cross-border capital flows and facilitating investment into overseas markets, notably the UK.

However, as a leading IFC Jersey is also highly vigilant of, and responsive to, the threat from illicit finance. We have remained steadfast in our commitment to being one of the best-regulated IFCs globally. This commitment was reaffirmed by Jersey's Mutual Evaluation Report¹, published in May 2024.

Jersey provides a broad suite of legal entities designed to meet the specific needs of islanders and international users of Jersey's financial services sector. Recognising the inherent risks associated with the use of such entities, Jersey has implemented a wide range of measures to prevent their misuse, including robust transparency requirements.

Jersey adopts a “four cornerstone approach” to prevent the misuse of legal persons for illicit finance purposes. These cornerstones are:

- a centralised registry acting as a gatekeeper;
- supervision of DNFBPs and regulated gatekeepers, in place since 2000;
- a requirement for companies and other entities to maintain accurate information, particularly beneficial owner information; and
- Registry supervision to ensure ongoing compliance and accuracy.

Jersey recognises that transparency cannot be achieved through a single measure but rather through the effective application of multiple mechanisms – a concept referred to in the 2023 FATF guidance² as the multi-pronged approach.

Jersey's central registry, established in 1861, has a long-standing history of leadership in corporate transparency. Notably, it was among the first jurisdictions to introduce a centralised beneficial ownership register in 1989. Today, the registry serves as the

¹ MONEYVAL Mutual Evaluation Report of Jersey – 2024, <https://www.fatf-gafi.org/en/publications/Mutualevaluations/MER-Jersey-2024.html>

² FATF (2023), Guidance on Beneficial Ownership for Legal Persons, FATF, Paris, <https://www.fatf-gafi.org/en/publications/Fatfrecommendations/Guidance-Beneficial-Ownership-Legal-Persons.html>

principal authority for collecting, maintaining, and providing both basic and beneficial owner information on legal persons, ensuring timely access for competent authorities. Today the registry is operated by the Jersey Financial Services Commission (JFSC) with the beneficial ownership register now established under the Financial Services (Disclosure and Provision of Information) (Jersey) Law 2020 (DPI Law). Central to the registry's effectiveness is the comprehensive collection and maintenance of verified information.

This is underpinned by disclosure requirements at incorporation, mandatory update requirements, periodic confirmation processes, a well-established supervisory regime for regulated business and Designated Non-Financial Businesses or Professions (DNFBPs) providers, and registry supervision under the DPI Law.

Jersey has focused on maintaining verified information for over a decade – with formal requirements for verification being introduced in 2008 - distinguishing itself from many other jurisdictions whose registries remain unverified.

As noted in the 2024 Mutual Evaluation Report -

“Jersey has a fully populated Registry concerning legal persons, whose basic information is publicly available, and the BO information is accessible by competent authorities. The Registry has put in place comprehensive and thorough checks, risk assessment and vetting processes at the registration phase and on an ongoing basis.”

Alongside ensuring that the registry holds the complete and accurate information, Jersey ensures that such information is made available to those involved in the detection and prevention of financial crime. Information is routinely shared with local competent authorities in line with Article 9 of the DPI Law. Local authorities with direct access include the JFSC, the Financial Intelligence Unit (FIU), the States of Jersey Police Force, the Attorney General (which facilitates access by the Economic Crime and Confiscation Unit (ECCU)), and Revenue Jersey, enabling them to fulfil their statutory functions effectively.

It is also well established that Jersey shares information with its international partners. Such exchanges are predominantly conducted through globally recognised mechanisms, such as the Egmont Secure Web facilitated by the FIU, Tax Information Exchange Agreements through Revenue Jersey and mutual legal assistance facilitated by ECCU.

In addition, Jersey exceeds international standards through the operation of its Exchange of Notes Agreement with the UK, dated 1 July 2017. Under this agreement,

Jersey's FIU provides information to the UK in as little as one hour. Reporting consistently demonstrates Jersey's effectiveness in operating this data-sharing framework.

With regards to broader sharing of beneficial owner information, the 2024 Mutual Evaluation Report states -

“Jersey authorities consistently and proactively share BO information related to legal entities and arrangements with foreign authorities. The process of sharing this information has been notably smooth, without significant practical obstacles.”

It should be noted that the information shared with foreign competent authorities is often of enhanced quality compared to that information which may be obtained through direct register access. The FIU leverages its knowledge of local legal persons and arrangements, along with its powers to request and obtain information from Jersey entities and industries, to provide more comprehensive and contextualised intelligence, including screening for additional or related data held.

This demonstrates Jersey's firm commitment to beneficial ownership transparency, consistently delivering against international standards. In parallel, Jersey has remained cognisant of the ambitions of the United Kingdom and the European Union to enhance mechanisms for access to beneficial owner information. In response, Jersey has committed to further enhancements of its access policy to reflect evolving international standards.

It must be recognised that the policy surrounding this discourse has not followed a linear path, with diverging policies being adopted by different jurisdictions across the globe. Jersey remains steadfast in its commitment to aligning its beneficial ownership framework with the continued development of global standards and best practice, while ensuring that it robustly protects individuals' rights to privacy and safety.

International discourse on access to beneficial owner information

It is well recognised that corporate vehicles can be misused to facilitate illicit financial flows across multiple jurisdictions, providing a means for criminals to conceal corruption, tax evasion, and other forms of illicit finance. This issue has consistently attracted political attention, with beneficial ownership transparency gaining prominence on the global agenda as early as 2000, when the G7 mandated the Organisation for Economic Co-operation and Development (OECD) to develop mechanisms to improve transparency in beneficial owner information. This initiative marked a turning point, highlighting the need for jurisdictions to maintain accurate and up-to-date beneficial ownership data – something that, at the time, many countries lacked.

A new defining moment came in 2013, when the G8 summit hosted by the United Kingdom shifted the balance between transparency and privacy. Amid growing concerns over the scale of illicit financial outflows – and driven by civil society advocacy for full transparency of corporate vehicles – the UK committed to establishing public access registers. This culminated in the launch of the People with Significant Control (PSC) register in 2016.

With momentum building around increased access to beneficial ownership, and with the UK advocating for this to become an international norm, Jersey made an initial commitment in 2019 to provide public access to beneficial ownership data, aligning with the implementation of the EU’s Fifth Anti-Money Laundering Directive (5AMLD).

The implementation of mandatory public access in line with 5AMLD did, however, face numerous challenges in particular around concerns regarding its disproportionate interference with privacy. In November 2022, the Court of Justice of the European Union (CJEU) issued a landmark ruling in the cases of *WM and Sovim SA v Luxembourg Business Registers* (C-37/20 and C-601/20; ECLI:EU:C:2022:912) (the *Sovim decision*)³. The Court acknowledged that combating money laundering and terrorist financing is a priority for public authorities and entities such as financial institutions, and that providing some access to beneficial owner information plays an important role in achieving this objective.

However, the CJEU found that the nature of public access mandated under 5AMLD constituted a serious interference with the fundamental rights to respect for private life. The removal of the “legitimate interest” requirement – present in earlier versions of the directive – and the granting of unrestricted public access were deemed not strictly necessary to meet anti-money laundering objectives. The Court concluded that this

³ Judgment of the Court (Grand Chamber) of 22 November 2022., *WM and Sovim SA v Luxembourg Business Registers*, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:62020CJ0037>

approach breached Articles 7 and 8 of the Charter of Fundamental Rights of the European Union.

This caution is reflected in the 2023 revision of beneficial ownership transparency standards and guidance issued by the FATF. Notably, Recommendation 24⁴ was updated to encourage countries to facilitate timely access to basic and beneficial owner information by financial institutions (FIs) and designated non-financial businesses and professions (DNFBPs) for compliance with customer due diligence (CDD) obligations.

The FATF provides examples of how jurisdictions can effectively manage the collection and disclosure of, and access to, beneficial ownership information. One such example reflects Jersey's regime at the time⁵ Within that example, the FATF recognises that a robust regime should include:

"Data protection and privacy safeguards ... including restrictions on the information available to the different users of the register and other beneficial ownership information sources to prevent the improper disclosure of this information."

While the FATF considered broader access, including public access, this was not incorporated into the formal standards or interpretive notes. The 2023 FATF Guidance states that:

"...countries may consider facilitating public access to basic and beneficial ownership information. Public access to this information can enable civil society, other organisations and individuals to cross check the information, which may in turn help to; ensure that information is accurate, adequate, and up-to-date and to identify potential misuse of legal persons (e.g., in tax evasion, fraud, or corruption schemes). However, public access alone is not a sufficient mechanism to ensure accuracy of information. In contemplating the extent and arrangement of public access, countries should take into account data protection rules and other privacy, security, and confidentiality concerns, and consider limiting what basic and beneficial ownership information is made publicly available or applying a tiered approach to information disclosure (basic to detailed information), e.g., based on legitimate interest."

Following careful consideration of the CJEU ruling, Jersey – alongside the other crown dependencies and many other jurisdictions – concluded that granting unlimited public

⁴ FATF (2012-2025), International Standards on Combating Money Laundering and the Financing of Terrorism & Proliferation, FATF, Paris, France, www.fatf-gafi.org/en/publications/Fatfrecommendations/Fatf-recommendations.html

⁵ FATF (2023), Guidance on Beneficial Ownership for Legal Persons, *supra*, at para 89

access to its beneficial ownership register would not be compatible with its international obligations under the European Convention on Human Rights, nor with domestic laws. In recognition of this, Jersey acknowledged the EU's refocus on a legitimate interest-based access policy and revised its commitment to enhanced access accordingly.

In December 2023, Jersey – alongside Guernsey and the Isle of Man – revised its original 2019 commitment, setting out two key objectives to enhance transparency and accessibility of beneficial owner information:

1. To deliver obliged entity access during 2024; and
2. To develop and implement legitimate interest access within a leading timeframe.

With obliged entity access now delivered and operational, attention has turned to the consideration of a legitimate interest access framework.

Government is working closely with the JFSC to consider permitting enhanced access to individuals who can demonstrate a legitimate interest. Through this consultation, we are seeking input from all relevant stakeholders, including in relation to the definition of legitimate interest and the necessary safeguards to ensure the protection of personal privacy and safety.

Consultation

Introducing legitimate interest access

Access for individuals who can demonstrate a legitimate interest is, though not a new concept, beginning to become a feature in the beneficial ownership regime in a number of jurisdictions. Over the past decade, several jurisdictions have explored and implemented such access frameworks. Notably, the European Union required Member States to provide access to individuals demonstrating a legitimate interest under the Fourth Anti-Money Laundering Directive (4AMLD).

However, significant variation in implementation across Member States led to a subsequent push for full public access under 5AMLD – a move later reversed by the Sovim decision due to interference with privacy rights. This reversal informed the development of the EU's Sixth Anti-Money Laundering Directive (6AMLD) which is yet to be implemented by Member States. As such, it cannot currently be said that there is a demonstrable accepted standard or best practice within the EU.

Legitimate interest access is proving challenging, with those in the EU who have implemented the regime being subject to operational, legal, and procedural challenges. The implementation of legitimate interest access is likely to remain complex, with persistent challenges expected to place sustained pressure on registry resources and potentially affect service delivery. We continue to monitor these developments closely, with the aim of learning from emerging practices and the experience of others, in order to navigate potential obstacles more effectively.

Beyond the EU, other jurisdictions – including the Cayman Islands, the British Virgin Islands, and the United Kingdom (through access to certain information within the Register of Overseas Entities) - are also exploring or implementing forms of legitimate interest access. The Government of Jersey has carefully considered the policy developments in these jurisdictions, particularly the practical implementation of such regimes, to ensure that any proposed framework for Jersey is both appropriate and workable.

What is a legitimate interest?

Central to this policy is the definition of legitimate interest, which serves as the key parameter to ensure that access does not result in unnecessary interference with the privacy or safety of data subjects, whilst supporting and enhancing efforts to tackle illicit finance.

It is therefore proposed that access be provided:

<i>Proposed Definition of Legitimate Interest</i>	<i>“To natural persons who can demonstrate a legitimate interest in accessing beneficial owner information for the purpose of preventing, detecting, or investigating money laundering, terrorist financing and proliferation financing offences.”</i>
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This approach anchors access within the scope of anti-money laundering and counter-terrorist financing objectives and would ensure that Jersey maintains consistency with leading international regimes that have adopted legitimate interest access frameworks.

Question 1: Please provide your feedback on this proposed definition of legitimate interest.

Who will be able to demonstrate a legitimate interest for the relevant purposes?

With the specific definition of legitimate interest outlined above, it is important to consider who may reasonably be expected to qualify for access. As previously noted, access to beneficial owner information is already provided to competent authorities and obliged entities in line with existing international standards. The focus, therefore, is on identifying those beyond these groups who may reasonably be granted access under a legitimate interest framework.

To demonstrate a legitimate interest the following must be met and evidenced:

- | | |
|---------------------------------|---|
| <i>Legitimate Interest Test</i> | <ol style="list-style-type: none"><i>1. Legitimate purpose – The person is engaged in the prevention, detection or investigation of money laundering; and</i><i>2. Access is necessary – access to the information is necessary for that purpose</i> |
|---------------------------------|---|

Question 2: Please provide your comments on the proposed legitimate interest test.

Legitimate purpose - Emerging standards from jurisdictions developing legitimate interest access frameworks suggest that certain individuals or groups, by virtue of their societal functions, may be able to demonstrate a legitimate purpose.

Drawing on categories applied in other jurisdictions – including Article 12(2) of the 6AMLD – it is proposed that the following categories may be considered to have a legitimate purpose:

- Persons acting for the purposes of journalism whose work is directly connected to prevention of money laundering, terrorist financing or proliferation financing;
- Civil society organisations and academic institutions involved in bona fide research or advocacy related to the prevention of money laundering, terrorist financing or proliferation financing; and
- Digital know your customer and business service providers whose products or services support Jersey obliged entities in meeting their customer due diligence obligations.

Question 3: Please provide your feedback on which categories of persons may demonstrate legitimate purpose, including how such persons may be appropriately identified as having such purpose.

Access is necessary - In addition to establishing a legitimate purpose, applicants must demonstrate that access to the information is necessary for that purpose. This will require evidence of a specific interest in the corporate entity as to which information is sought. In line with prevailing data protection requirements under the Data Protection (Jersey) Law 2018 (the Data Protection Law), applicants must show that the information requested is directly applicable to the work being undertaken and that access is proportionate to the stated purpose.

It is important to note that the existence of a legitimate purpose alone will not automatically qualify an applicant for access to information within the register. It is recognised that the EU, through provisions in 6AMLD (to be transposed in 2026), intends to remove the necessity requirement for journalists and civil society organisations – thus granting them access to all register information. However, in absence of clear legal definitions for such categories – noting the absence of legal definition and regulation of such persons particularly in Jersey – it would not be considered balanced or proportionate to provide uncontrolled access at this stage.

Question 4: Please provide your comments on how applicants should demonstrate their purpose to justify the necessity of accessing registry information.

Information provided to legitimate interest applicants

Where an applicant is approved under the legitimate interest access provisions, beneficial owner information will be provided for all beneficial owners holding an interest of 25% or more. Although broader information fields are collected in line with Article 2 of the Financial Services (Disclosure and Provision of Information) (Jersey) Order 2020, it is proposed that disclosure is restricted to what is considered necessary, this being the following fields:

- Name of the beneficial owner
- Month and year of birth
- Country of residence
- Nationality if the beneficial owner
- Nature and extent – aligned with proposals in the recent JFSC consultation paper⁶ to include a statement on the nature and extent of the beneficial interest.

Requests for bulk data downloads will not be permitted as a matter of course, due to the significant interference with privacy rights and the disproportionate nature of such access in relation to the policy aims pursued. However, consideration may be given to grouped requests where access to multiple related entities is required for the same stated purpose. This approach seeks to reduce administrative burden while maintaining appropriate safeguards for data protection and proportionality.

Question 5: Please provide your feedback on the information it is proposed will be provided to applicants.

Question 6: Please provide your views on how grouped requests should operate in practice.

⁶ [Consultation on disclosable beneficial owner information — Jersey Financial Services Commission](#)

Protecting privacy and safety

As has been previously highlighted, balancing the pursuit of policy objectives to combat illicit finance with the need to safeguard fundamental rights to privacy, alongside protection of personal and sensitive information, is central to the development of this policy. This balance was a key consideration in the invalidation of public access provisions through the *Sovim* decision.

Jersey has a strong and enduring commitment to the protection of fundamental rights, given effect through the Human Rights (Jersey) Law 2000, which incorporates the European Convention on Human Rights (ECHR) into Jersey's legal framework. In particular, Jersey places high importance on the right to privacy as enshrined in Article 8 of the ECHR. This commitment is further reinforced through practical data protection measures, with Jersey aligning to the EU General Data Protection Regulation (GDPR) via the Data Protection Law.

Together, these frameworks require Government to protect privacy in a comprehensive and proportionate manner as it works to develop and deliver public policy. While the establishment of a defined access mechanism is the primary means of achieving proportionality, it is equally necessary to implement measures that give effect to the principles of lawful, fair, and transparent processing, ensuring that any interference with privacy is limited and justified.

At the same time, it is important to acknowledge the genuine and evolving risks to the safety of beneficial owners. Recent fraud reporting in the UK has highlighted an increase in identity theft, targeted scams, and synthetic identity fraud – often enabled by the misuse of personal data. Globally, concerns have grown around the potential for sensitive information to be exploited by criminal actors, exposing individuals and their families to threats such as extortion, theft, and kidnapping. These risks are increasingly documented and deserve careful consideration. It is therefore essential that Jersey takes appropriate steps to minimise the potential for misuse of its data, including practical measures to safeguard individuals from harm.

Exemption from disclosure

It is recognised that some beneficial owners will have extenuating circumstances which would require information to not be disclosed to applicants accessing information subject to legitimate interest provisions.

Regulation 4 of the Financial Services (Disclosure and Provision of Information) (Jersey) Regulations 2020⁷ (the DPI Regulations) provides that a nominated person may apply for information to not be made public. Such an application can be made if:

- It is believed that sharing the information could put the beneficial owner, their family and/or those they live with at serious risk of violence, intimidation or physical or mental harm;
- It is believed that sharing the information could expose a serious risk of threat or damage to property;
- The person who is the subject of the information lacks capacity to manage their own affairs; or
- There are exceptional circumstances that justify the making of the application.

It is proposed that such provisions are extended to access under new legitimate interest provisions.

In addition to the provisions under Regulation 4, Regulation 2(2) of the DPI Regulations includes specific safeguards to ensure that certain categories of individuals are not subject to public disclosure. In the context of beneficial ownership information, the following exemptions from disclosure are particularly relevant:

- Minors – individuals under the age of 18;
- Owners of Jersey share transfer property – individuals recorded solely in this capacity.

These relevant exemptions are also proposed to be extended to apply to access requests made on the basis of a legitimate interest.

Question 7: Please provide your feedback on the adequacy of these exemptions, and if additional exemptions should be considered.

⁷ https://www.jerseylaw.je/laws/current/ro_138_2020

Restriction on processing of information

Access to information in the register will be granted strictly for the legitimate purpose evidenced by the applicant in their application. Individuals granted access will be required to ensure that the information obtained is used solely for the purposes outlined in their application. Any use or dissemination of the information beyond the stated purpose will be subject to appropriate penalties, including fines and/or criminal prosecution. In such cases, the individual or their organisation may be barred from future access.

To reinforce this, consideration is being given to requiring applicants to confirm, at the point of application, that the information will be used exclusively for the accepted legitimate purpose and handled in accordance with applicable data protection requirements as established under the Data Protection Law.

The JFSC Registry will be required to maintain records of all applications – both granted and rejected. These records will include details of the applicant, the purpose for which access was requested, and the beneficial ownership records accessed. This data will support performance monitoring, compliance oversight, and the facilitation of data subject access requests.

Furthermore, it is proposed that beneficial owners be granted the right to request access to records indicating who has accessed their information under the legitimate interest access framework. This measure supports transparency and accountability in the use of registry data.

At the same time, it is recognised that, in certain circumstances, applicants may face significant risks if their personal details are disclosed. To address this, consideration is being given to allowing legitimate interest applicants to request that their personal name not be disclosed to the beneficial owner where a credible risk of harm exists. Such protections would align with the application for making information not public in line with Regulation 4 of the DPI Regulations. In such cases, disclosure may be limited to the name of the organisation the applicant represents (e.g., a civil society or media organisation).

Question 8: Please provide your feedback on the proposed measures for protecting data. Are there any additional safeguards or approaches you believe should be considered to strengthen such protections?

Establishing a clear application process

To ensure the application process is both robust and administratively efficient, the JFSC Registry will implement a structured application process to assess requests for access on a case-by-case basis, in accordance with legislative requirements.

The application process will include the following:

- Identification and verification of the applicant
- Verification of the applicant's occupation, demonstrating its relevance to the legitimate purpose. Supporting evidence will be required.
- Details of the legal entity whose beneficial owner information is being requested.
- Explanation of how the requested information relates to the applicant's work, including any connection to an ongoing investigation or research.
- Identification of the specific details of intended use of the information
- Completion of a data protection declaration

The submission of false or misleading information within an application will be subject to appropriate penalties. These may include financial sanctions and/or criminal prosecution, depending on the severity of the breach.

It is proposed that decisions to grant access will be made only upon receipt of a complete application supported by the necessary evidence. The JFSC will maintain records of all decisions.

In the event that access is denied, applicants will have the right to appeal to the Royal Court upon the ground that the decision was unreasonable having regard to the facts presented in the application made.

If the application and access process is operated via an online portal, it will be subject to appropriate identification controls, including multi-factor authentication.

Applications will be subject to a fee, set by the JFSC Registry, which will reflect the administrative costs incurred in relation to operating access for those with a legitimate interest.

Question 9: Do you have any further comments on the application process described above?

Question 10: Do you have any further comments on the appeals process outlined above?

Legislative change

It is anticipated that implementation of this policy will require amendments to the DPI Law and/or the DPI Regulations.

Question 11: Are there any other comments you wish to make on the proposals presented in this consultation?

Conclusion

The proposed policy seeks to deliver a balanced and considered framework for enhanced access to beneficial owner information. It aims to provide access to individuals who can demonstrate a legitimate interest, where such access is necessary to support combatting of illicit finance objectives. The policy is designed to minimise interference with privacy and includes provisions to ensure the protection of personal data.

The consultation will remain open until 30 January 2026, and the Government welcomes engagement from all stakeholders to help shape the policy and ensure it meets the needs of the Island.

Annex 1 – Consultation Questions

1. Please provide your feedback on this proposed definition of legitimate interest.
2. Please provide your comments on the proposed legitimate interest test.
3. Please provide your feedback on which categories of persons may demonstrate legitimate purpose, including how such persons may be appropriately identified as having such purpose.
4. Please provide your comments on how applicants should demonstrate their purpose to justify the necessity of accessing registry information.
5. Please provide your feedback on the information it is proposed will be provided to applicants.
6. Please provide your views on how grouped requests should operate in practice.
7. Please provide your feedback on the adequacy of these exemptions, and if additional exemptions should be considered.
8. Please provide your feedback on the proposed measures for protecting data. Are there any additional safeguards or approaches you believe should be considered to strengthen such protections?
9. Do you have any further comments on the application process described above?
10. Do you have any further comments on the appeals process outlined above?
11. Are there any other comments you wish to make on the proposals presented in this consultation?