

MONEYVAL: Fifth Round Evaluation Report on Guernsey



eu crim

European Law Forum: Prevention • Investigation • Prosecution

Thomas Wahl

News

On 10 February 2025, MONEYVAL published its [5th round mutual evaluation report on Guernsey](#), a self-governing dependency of the British Crown. The report acknowledged Guernsey's good understanding of the risks of money laundering/terrorist financing (ML/TF) and its highly effective application of targeted financial sanctions. Positively assessed is also the high-quality of analytical reports and strategic analysis by Guernsey's Financial Intelligence Unit (FIU). However, these products are used by law enforcement authorities to initiate investigations only to a limited extent. The quality of suspicious activity reports (SARs) remains a concern, in particular those from the e-gambling sector generally have limited intelligence value. Other key findings of MONEYVAL's report include the following:

- The types of ML investigated and prosecuted in the assessment period have only to some extent been in line with the risk profile of the Bailiwick, mainly due to the previous, less risk-based approach of the authorities;
- In addition, despite the country's risk profile, no legal persons have been investigated or prosecuted for ML in the assessment period and most cases related to low-level ML conduct;
- Proceedings for conviction-based confiscation as well as civil forfeiture have been routinely launched as result of financial investigations pursued alongside investigations into ML and predicate crimes, even though their results remained moderate;
- Understanding of the specific ML risks in the material sectors is generally good and business and customer risk assessments are regularly conducted/updated; there is, however, room for improvement, e.g. better mitigating risk measures associated with complex corporate structures in the sectors of trust and company service providers as well as investment;
- Regulatory authorities, such as the Guernsey Financial Services Commission (GFSC) and the Alderney Gambling Control Commission (AGCC) have a very good understanding of risks; however, also here, there is room for improvement, e.g. with regards to risk data for trust and company service providers and risk categorisation;
- The GFSC and AGCC exercise their enforcement powers, however there are shortcomings in effectively sanctioning entities;
- Guernsey has comprehensive measures to prevent the misuse of legal persons and arrangements for ML/TF, and to ensure beneficial ownership transparency for legal persons; registries perform effective checks at registration and upon changes to ensure data accuracy;
- Law enforcement authorities seek and provide international cooperation through various formal and informal channels, but these possibilities appear to be not fully exhausted (such as the use of CARIN network by the Economic and Financial Crime Bureau);

AUTHOR

Thomas Wahl

Senior Researcher
Max Planck Institute for the
Study of Crime, Security and
Law

Published in
2025, Vol. 20(1) [eu crim](#)
ISSN: 1862-6947
<https://eu crim.eu>



- The Guernsey FIU cooperates regularly and effectively with its foreign counterparts (mainly the UK) actively seeking and providing information in a timely way and good quality; however, the number of requests to foreign counterparts appears not to be in line with the country's risk profile as an international financial centre.

Guernsey is expected to report back about the measures taken on MONEYVAL's recommendation by May 2027 under MONEYVAL's regular follow-up reporting process.

About eucrim

eucrim is the leading journal which regularly informs about current developments in European criminal and "criministrative" law.

All news items are freely accessible at: <https://eucrim.eu/news/>

Stay informed by emailing to eucrim-subscribe@csl.mpg.de to receive alerts for new releases of issues.

The project is co-financed by the Union Anti-Fraud Programme (UAFP), managed by the European Anti-Fraud Office (OLAF).



**Co-funded by
the European Union**