

STATES OF JERSEY



Jersey

DRAFT SANCTIONS AND ASSET-FREEZING LAW (JERSEY) AMENDMENT REGULATIONS 202-

**Lodged au Greffe on 22nd January 2026
by the Minister for External Relations
Earliest date for debate: 10th March 2026**

STATES GREFFE

REPORT

The [Sanctions and Asset-Freezing \(Jersey\) Law 2019](#) (“SAFL”), along with the [Sanctions and Asset-Freezing \(Implementation of External Sanctions\) \(Jersey\) Order 2021](#) which is made under SAFL, are the key pieces of sanctions legislation, through which Jersey implements all United Nations sanctions and all autonomous UK sanctions.

The Draft Sanctions and Asset-Freezing Law (Jersey) Amendment Regulations 202- (the “**Draft Regulations**”) would, if adopted, ensure that sanctions implementation in Jersey remain aligned with the UK, where appropriate, and that the Minister for External Relations (the “**Minister**”) continues to meet his international obligations in his role as competent authority for sanctions in Jersey.

Regulations 2 and 4 of the Draft Regulations provide additional clarification of the meaning of “making available indirectly to, or for the benefit of, a designated person” in relation to economic resources, funds or financial resources, following a similar amendment to the UK sanctions legislation in 2024.

Regulation 3 of the Draft Regulations amends Article 32(1) of SAFL, which requires a relevant financial institution to provide the Minister with information about a person where it knows or has reasonable cause to suspect, as a result of information obtained in the course of its business, that the person is a designated person or has committed, is committing or intends to commit an offence under SAFL. Currently, this requirement only applies in circumstances where the financial institution has a connection to the person (i.e., that it holds an account of the person, has entered into dealings or an agreement with the person, or has been approached by or on behalf of the person). The Draft Regulations remove these criteria, so that if, in the course of carrying on its business, a relevant financial institution knows, or has reasonable cause to suspect, that a person is a designated person or has committed, is committing or intends to commit an offence under SAFL, it is obliged to report to the Minister.

Regulation 5 of the Draft Regulations amends the Minister’s powers of disclosure under Article 36 of SAFL, to expand the category of information that may be disclosed, and the entities to whom the Minister may disclose such information, provided the Minister is satisfied that such disclosure is appropriate in the circumstances.

Regulation 6 provides that the draft Regulations, if approved, will come into force 7 days after they are made.

Financial and staffing implications

There are no additional financial or staffing implications for Government as a result of this proposition.

Children’s Rights Impact Assessment

A Children’s Rights Impact Assessment (CRIA) screener has been prepared in relation to this proposition and is available to read on the States Assembly website.

EXPLANATORY NOTE

These Regulations, if made, would amend the Sanctions and Asset-Freezing (Jersey) Law 2019 (the “Sanctions Law”).

Regulation 1 states that the Regulations amend the Sanctions Law.

Regulation 2 inserts new Article 9A, which provides a meaning in Part 3 of “making available indirectly to, or for the benefit of, a designated person” in relation to economic resources, funds or financial resources. In 2024, the UK made the Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2024 (the “2024 UK Regulations”), which amended 35 sets of UK sanctions Regulations made under the Sanctions and Anti-Money Laundering Act 2018 of the United Kingdom to insert an explanation of what was meant by making funds or economic resources available. New Article 9A implements that element of the 2024 UK Regulations so that Jersey’s sanctions regime is aligned with the UK regime.

Regulation 3 amends Article 32, which sets out obligations on relevant financial institutions and statutory authorities to report certain information to the Minister for External Relations (the “Minister”).

Article 32(1) currently requires a relevant financial institution to provide the Minister with information about a person if it knows or has reasonable cause to suspect, as a result of information obtained in the course of its business, that the person is a designated person or has committed, is committing or intends to commit an offence under the Sanctions Law. But the obligation to provide information only applies if the financial institution has a connection to the person (that it holds an account of the person, has entered into dealings or an agreement with the person, or has been approached by or on behalf of the person).

Amendments made by *Regulation 3* expand the scope of the obligation in Article 32(1) by removing the limitation that the financial institution must have a connection to the person.

Regulation 4 amends Article 33 to apply the new Article 9A meanings (see *Regulation 2* above) to this Article.

Regulation 5 amends Article 36, which gives the Minister a power to disclose information to other entities. The amendment widens the category of information that may be disclosed to include information not only *obtained* by the Minister but also *held* in connection with the exercise of their functions under the Sanctions Law. In addition, the list in paragraph (1) of entities to whom the Minister may disclose is expanded to include competent authorities of a state, other than the United Kingdom or a member State of the EU, for the purpose of assisting or co-operating with the performance of that authority’s functions under a provision of the law of that state that corresponds to a provision of or under the Sanctions Law. Finally, a new paragraph (1A) is inserted giving the Minister the power to disclose to a person other than those listed in paragraph (1) provided they are satisfied that it is appropriate in the circumstances.

Regulation 6 provides for the name of the Regulations and that they will come into force 7 days after they are made.



Jersey

DRAFT SANCTIONS AND ASSET-FREEZING LAW (JERSEY) AMENDMENT REGULATIONS 202-

Contents

Regulation

1	Sanctions and Asset-Freezing (Jersey) Law 2019 amended	5
2	Article 9A (meaning of making available indirectly to, or for benefit of, designated person) inserted.....	5
3	Article 32 (reporting obligations of relevant financial institutions and statutory authorities) amended	5
4	Article 33 (powers to require information) amended	6
5	Article 36 (general power to disclose information) amended.....	6
6	Citation and commencement	6



Jersey

DRAFT SANCTIONS AND ASSET-FREEZING LAW (JERSEY) AMENDMENT REGULATIONS 202-

Made [date to be inserted]

Coming into force [date to be inserted]

THE STATES make these Regulations under Articles 39 and 47A of the [Sanctions and Asset-Freezing \(Jersey\) Law 2019](#) –

1 [Sanctions and Asset-Freezing \(Jersey\) Law 2019](#) amended

These Regulations amend the [Sanctions and Asset-Freezing \(Jersey\) Law 2019](#).

2 Article 9A (meaning of making available indirectly to, or for benefit of, designated person) inserted

After Article 9 there is inserted –

9A Meaning of making available indirectly to, or for benefit of, designated person

In this Part, making economic resources, funds or financial services available –

- (a) indirectly to a designated person includes making them available to a person who is owned or controlled directly or indirectly (within the meaning of Article 2A) by the designated person;
- (b) to a person for the benefit of a designated person includes making them available for the benefit of a person who is owned or controlled directly or indirectly (within the meaning of Article 2A) by the designated person.

3 Article 32 (reporting obligations of relevant financial institutions and statutory authorities) amended

For Article 32(1) there is substituted –

- (1) A relevant financial institution must inform the Minister as soon as practicable if –
 - (a) it knows, or has reasonable cause to suspect, that a person –
 - (i) is a designated person; or

- (ii) has committed, is committing or intends to commit an offence under this Law; and
- (b) the information or other matter on which the knowledge or reasonable cause for suspicion is based came to it in the course of carrying on its business.

4 Article 33 (powers to require information) amended

In Article 33(5)(a)(ii), after “a designated person” there is inserted “(within the meanings given in Article 9A)”.

5 Article 36 (general power to disclose information) amended

- (1) In Article 36(1), for “by him or her in exercise of his or her powers under this Part (including any document so obtained and any copy or extract made of any document so obtained)” there is substituted “or held in connection with the exercise of their functions under this Law”.
- (2) After Article 36(1)(g) there is inserted –
 - (ga) to a competent authority of a state, other than the United Kingdom or a member State of the EU, for the purpose of assisting or co-operating with the performance of any of that authority’s functions under a provision of the law of that state that corresponds to a provision of or under this Law.
- (3) After Article 36(1) there is inserted –
 - (1A) The Minister may disclose any information obtained or held in connection with the exercise of their functions under this Law to any person, other than those listed in paragraph (1), if the Minister is satisfied that disclosure of the information is appropriate in the circumstances.
 - (1B) In paragraphs (1) and (1A), “any information” includes any document and any copy or extract made of that document.

6 Citation and commencement

These Regulations may be cited as the Sanctions and Asset-Freezing Law (Jersey) Amendment Regulations 202- and come into force 7 days after they are made.