

The Financial Intelligence Unit (FIU) is the competent authority responsible for the receipt, analysis and dissemination of **Suspicious Activity Reports (SARs)** in the Bailiwick of Guernsey. The prescribed manner for the reporting of SARs to the FIU is via an online portal system named **THEMIS**, pursuant to **the Disclosure (Bailiwick of Guernsey) Regulations 2007** and subsequent amendments in 2011 and 2014.

❖ Who should be registered on THEMIS?

It is only necessary to register entities with a presence in the Bailiwick of Guernsey for which money laundering or terrorist financing reporting obligations apply.

It is at the submitting entity's discretion who they wish to nominate for access to THEMIS, although it is recommended that entities should only register **Money Laundering Reporting Officers (MLROs), Deputy MLROs, Compliance Officers, and/or Directors** to report on their behalf. Please be aware that there is currently only one type of access for all users, regardless of their role.

There is currently **no limit to the number of nominees** that can be registered on THEMIS for each entity. When updating current registration details, all current nominees must be included or you risk having accounts deactivated. Please use additional forms as required.

There is **no limit to the number of entities each nominee can be linked to**, however we do request that a separate form is completed for each entity OR a clear list of associated entities and their registration numbers is attached.

❖ How should I use the THEMIS Registration Form?

The THEMIS Registration form is provided for the **registration of entities** who are required to report to the FIU via the online reporting system. It should be used to **register new users** on behalf of one or more entities, or to **update** regarding any changes to contact details of existing users or entities, including the **removal of access** for users and/or entities to THEMIS.

Please complete all relevant fields as thoroughly as possible, noting that an **e-mail address** is required for all users and that a **status must** be selected for each person to indicate what action is required.

All forms must be signed by an **authorised signatory** i.e. a Senior Manager within the entity with relevant authority to nominate staff for access to the online reporting system.

❖ Where should I send the completed form(s)?

Completed forms can be scanned and emailed to fis@gba.gov.gg or posted to the address below.

❖ Please be aware that:

- Forms may take up to **ten working days** to process.
- Accounts registered with prolonged inactivity risk being disabled. **We strongly recommend logging onto the system once a month** to check notices and correspondences.
- It is the **reporting entity's responsibility** to ensure the FIU are kept up-to-date and informed of any changes to nominees or entities in a timely manner.

All information is processed in accordance with the Data Protection (Bailiwick of Guernsey) Law 2017.