



Foreign &
Commonwealth
Office

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FREEDOM OF INFORMATION ACT 2000 REQUEST REF: 0896-17

Thank you for your email of 19 September 2017 asking for information under the Freedom of Information Act (FOIA) 2000. You requested:

- 1) *A list of Overseas Territories and Crown Dependencies that missed the 30 June 2017 deadline as referenced in the Joint Ministerial Council communique (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/565228/Overseas_Territories_Joint_Ministerial_Council_2016_Communique.pdf) to establish functioning central registers, or equivalent systems, of company beneficial ownership information (NB we think Guernsey, IoM and Montserrat missed the deadline and that Turks & Caicos and Cayman have delays in actually implementing the registers)*
- 2) *Details of Overseas Territories and Crown Dependencies that have established functioning central registers, or equivalent systems, since the 30 June 2017 deadline, including when this occurred.*
- 3) *A list of Overseas Territories and Crown Dependencies that have yet to establish central registers, or equivalent systems, and any correspondence between the Overseas Territories Directorate and counterparts in the OTs/ CDs explaining reasons for delays.*

I can confirm that the Foreign and Commonwealth Office (FCO) does hold information relating to the Overseas Territories which is relevant to your request. The FCO does not have responsibility for the Crown Dependencies; the Cabinet Office has the lead on the issue of beneficial ownership and can be contacted at foi-team@cabinetoffice.gov.uk .

In response to your first and third questions, British Virgin Islands (BVI), the Cayman Islands and Gibraltar had established a central register of beneficial ownership information or similarly effective arrangement by the 30 June 2017 deadline. Bermuda already had a long-standing central register. All these Territories have been taking forward as a priority full

population of the registers with data, but it is possible that this process will be delayed in BVI as a result of Hurricane Irma.

Anguilla and the Turks and Caicos Islands have not yet established a central register or similarly effective arrangement. We are continuing to monitor progress and offer support to both these Territories. Following a request from Anguilla's Chief Minister for financial support from the UK at the Joint Ministerial Council in November 2016, the UK has been working with the Government of Anguilla on providing support for the development of a beneficial ownership module in its existing Companies register, as well as for the drafting of underpinning legislation.

As reported to Parliament during the passage of the Criminal Finances Act 2017, implementation in the Turks and Caicos Islands (TCI) following the Exchange of Notes was initially delayed owing to elections in December 2016. Following the formation of a new government, legislation was introduced on an urgent basis in order to establish a central registry of beneficial ownership information in TCI's existing Companies Registry and to determine access to such information. This came into force on 26 June 2016. TCI reported that it intended have the initial module of its framework for capturing beneficial ownership data in place by the end of July 2017, but anticipated that it would take longer fully to populate the register with data on corporate and legal entities incorporated in its jurisdiction. Given the devastation caused by Hurricanes Irma and Maria and resulting communications difficulties, we have not yet been able to establish whether the module was delivered on schedule.

As Montserrat had committed in November 2015 to establishing a publicly accessible central register of beneficial ownership information, the UK did not seek to conclude an exchange of notes with this Territory. Montserrat will shortly introduce new legislation to implement its central register.

In response to your second question, no Overseas Territories have established central registers or similarly effective arrangements following the 30 June 2017 deadline.

Yours sincerely,

Overseas Territories Directorate



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