

**The Financial Intelligence Service (FIS)** 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 FIS is via an online portal system named **THEMIS**, pursuant to **the Disclosure (Bailiwick of Guernsey) Regulations 2007** and supporting Regulations.

### ❖ 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 reporting 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 nominated officers** that can be registered on THEMIS for each entity. When updating current registration details, all current nominated officers must be included or you risk having their accounts deactivated. Please use additional forms as required.

There is **no limit to the number of entities each nominated officer can be linked to**, however we request that a separate form is completed for each entity OR a clear list of associated entities, with their registration numbers included, 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 FIS 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 reporting 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](mailto: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 deactivated. **We strongly recommend logging onto the system once a month** to check for any FIS notices or correspondence.
- It is the **reporting entity's responsibility** to ensure the FIS 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.*