

U4 HELPDESK ANSWER 2024: 29

Antigua and Barbuda, Bahamas, Barbados, Dominica, Guyana, Jamaica, St. Lucia, St. Kitts and Nevis, St. Vincent and the Grenadines, Trinidad and Tobago: Overview of corruption and anti-corruption

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Corruption acts as a driver and facilitator of drug, human and arms trafficking in many of the ten countries discussed in this paper. Money laundering is enabled through financial secrecy and citizenship and residency by investment programmes. Involvement in corrupt acts by high and low-level state actors is also observed. However, progress in countering money laundering and corruption has been made in the region, particularly in several legal frameworks and international cooperation in investigations, as well as regional initiatives on anti-corruption.

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[Overview of corruption and anti-corruption in Antigua and Barbuda, Barbados, Dominica, Guyana, Jamaica, St Lucia, and Trinidad and Tobago \(2019\)](#)

[Kleptocrats' trusted helpers: The professions that enable illicit financial flows \(2023\)](#)

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Caveat

This Helpdesk Answer provides an update to the [2019 paper](#) on the same topic, with the addition of the Bahamas, St Kitts and Nevis, and St Vincent and the Grenadines.

Query

Please provide an update on corruption, anti-corruption and illicit finance issues and initiatives in Antigua and Barbuda, Bahamas, Barbados, Dominica, Guyana, Jamaica, St. Lucia, St. Kitts and Nevis, St. Vincent and the Grenadines, and Trinidad and Tobago.

Main points

- Deep links are observed in several of these countries between high-level state actors and organised criminal groups. State actors there have reportedly been involved in criminal activities and have engaged low-level state actors to gain government contracts or monetary payment.
- The police, customs and border control institutions are particularly vulnerable to corruption in the region.
- A few of these countries are known as secrecy jurisdictions (or tax havens), and money laundering and tax evasion can be facilitated by high-level state actors, particularly through the use of their residency and citizenship investment schemes, which have come under heavy criticism by the international community for their use in facilitating illicit financial flows.

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Background

This paper discusses ten countries in the Caribbean region: Antigua and Barbuda, Bahamas, Barbados, Dominica, Guyana, Jamaica, St. Lucia, St. Kitts and Nevis, St. Vincent and the Grenadines, and Trinidad and Tobago¹. Given the susceptibility of most of these ten countries to external shocks like climate change, natural disasters, and more recently the Covid-19 pandemic, it is considered crucial for the region to enhance its financial resilience and social safety nets (World Bank 2023). A sizeable proportion of this region is also crippled by economic hardships, high unemployment rates, increasing levels of crime and corruption at high and low levels in the public and private sectors.

Many of these ten countries offer financial services to boost their local economies and to diversify their economies away from a heavy reliance on the traditional tourism industry (Mavrellis 2022). Some of these financial services include low (or zero) tax rates and commercial and banking secrecy, leading to some of these countries being considered secrecy jurisdictions, or tax havens (Sharafutdinova and Lokshin 2020; Tax Justice Network n.d.).

The regional geography also contributes to attracting criminal activities. The northern part is bordered by the Gulf of Mexico, the Straits of Florida and the Atlantic Ocean to the east and northeast. The south of the region lies near the coastline of South America. This makes the region an attractive gateway to major markets, such as North America and Europe, for crimes that are often facilitated by corruption, such as drug, human and arms trafficking (InSight Crime 2023). These elements combined create a friendly environment for organised criminal groups to conduct criminal activities.

The overall findings in the literature reveal that, despite notable progress, corruption is still a problem in the region and organised criminal groups have well-established links. In certain countries, these links are deep and are found at both high and low levels among state actors. Through these, and with the help from gangs in each country, organised criminal groups are able to traffic drugs using these countries as transit hubs. The literature describes drug trafficking to be the most significant issue and predicate offence to money laundering facing these ten countries. Human trafficking and arms trafficking are also significant challenges in these countries.

¹ Most of these are islands in the Caribbean Sea, with the exception of Guyana which is in South America.

These crimes are found, in many cases, to be linked to and facilitated by corruption. Involvement of both high-level state actors, such as politicians and senior state officials, and lower-level officials in law enforcement, customs and immigration, have been reported. The literature also suggests that the police are particularly vulnerable to corruption in the region. Finally, while many of the countries in the region have made significant progress in closing loopholes that previously facilitated money laundering, financial crimes are still prevalent in the region.

Regional risks and trends

At a regional level, corruption is a concern in all ten countries. According to the most recent Corruption Perceptions Index (CPI 2023), perceptions of corruption are high in many of the countries with only one country (Barbados) in the top 25% of least corrupt countries. Three of the five countries (Jamaica, Trinidad and Tobago and Guyana) received scores indicating high levels of corruption (69, 76 and 87² respectively). Based on the Worldwide Governance Indicators control of corruption scores³, only two countries (Barbados (89.15) and the Bahamas (84.43) were placed in the top 80 percentile range. Jamaica (54.25), Guyana (45.28) and Trinidad and Tobago (40.57) scored particularly low. Overall, corruption in the ten countries is highest in Trinidad and Tobago, followed by Guyana, and Jamaica, with Antigua and Barbuda in a distant fourth place and St. Kitts and Nevis, and Dominica further behind (Kaufmann and Kraay 2023).

The forms of corruption commonly found among the three countries with the highest levels of corruption (Trinidad and Tobago, Guyana and Jamaica) are both high- and low-level corruption, which reportedly occur frequently. Strong ties between high-rank state officials, including politicians and organised criminal groups, the involvement of state actors in activities in criminal markets, and the rewarding of government contracts to persons linked to organised criminal groups persist. At lower levels, there are reports of systemic corruption among police officers, customs and immigration officials and state actors, particularly in accepting bribes. Collusion between law enforcement officers and organised criminal groups to facilitate activities in criminal markets is a frequently reported problem. Customs and immigration officials have reportedly facilitated the smuggling and trafficking of drugs, humans and firearms. The judicial system of these three countries is

² The CPI ranks countries and territories on a scale of 0 (highly corrupt) to 100 (very clean) (CPI 2023).

³ The percentile rank (0-100) indicates rank of country among all countries in the world. 0 corresponds to lowest rank and 100 corresponds to highest rank (World Bank n.d.).

reportedly overburdened and under-resourced rendering them inefficient and ineffective in carrying out their functions.

A recent public survey on corruption in the Caribbean found that, in the majority of the countries in the region, the public considers political parties to be corrupt and that the hiring and career advancement of public officials was through favouritism and cronyism (World Justice Project 2022). There are also significant implementation gaps in several of the jurisdictions in the region related to lobbying and political finance (Commonwealth Secretariat 2022).

Drug trafficking is another significant problem facing all ten countries. Due mainly to their geography, these countries are used as transit points to transport mainly cocaine and cannabis to markets in North America and Europe. Human trafficking is the second major problem facing all ten countries as it is closely linked to drug trafficking. Based on the criminality score on the Global Organised Crime Index (GI-TOC), Guyana (ranked 145th) and Jamaica (135th) followed by Trinidad and Tobago (109th) are ranked highest among all ten countries and are considered highly ranked among countries in the world in the scope and scale of criminal activities carried out by organised criminal groups. Another sector of concern in the region is the natural resources sector, particularly in Guyana, but also in Jamaica where the state-owned oil refinery was recently embroiled in a major corruption scandal.

Money laundering and tax evasion are also noted in most of these countries. Particularly in Antigua and Barbuda, Guyana, Jamaica, and Trinidad and Tobago it is considered a severe problem. There are several factors which enable money laundering and tax evasion, particularly in regard to legal loopholes provided by financial secrecy. Some of key features of some of the countries include low-income tax, secrecy laws and special structures which help facilitate individuals and corporations bypass the rule of law in the jurisdiction where they live and operate and pay less income taxes in those countries (Tax Justice Network 2023). The perpetrators of money laundering and tax evasion tend to be organised criminal groups and non-residents, sometimes facilitated by high and low-level state actors and financial institutions, particularly in these three countries.

Many of these countries offer citizenship and resident investment schemes that allow overseas people to become citizens or permanent residents through financial investment (FATF/OECD 2023: 5). While these are legitimate schemes that are often implemented by governments to spur on economic growth, they are also at risk of being abused by criminals who seek to launder and conceal the proceeds of corruption or commit new financial crimes (FATF/OECD 2023: 5). Such schemes can provide criminals with the opportunities to place their ill-gotten gains overseas to hinder asset recovery assets, making it harder for investigating authorities to trace (FATF/OECD 2023: 5).

Despite these issues, there has been progress noted in the region. In particular, in the literature highlights improvements in aspects of anti-money laundering (AML) frameworks, anti-corruption legislation, regional anti-corruption initiatives, as well as international cooperation in the investigation of transnational corruption cases (Commonwealth Secretariat 2022). Countries that have traditionally been considered as secrecy jurisdictions (such as Barbados) have recently been removed from the Financial Action Task Force (FATF) grey list, suggesting greater compliance and commitment to AML. Moreover, petty corruption, (predominantly bribery) in the region is generally perceived as being low (in most but not all countries), particularly in the private sector (World Justice Project 2022).

Recommendations for improvement in the region include that the governments of many of these countries should further develop their engagement with civil society, the private sector, and regional partners to ensure that they implement a fully inclusive approach to their anti-corruption efforts (Commonwealth Secretariat 2022). While there are some governance groups which advocate for transparency and anti-corruption legislation⁴ these could be worked with more closely to address corruption issues (Commonwealth Secretariat 2022). Furthermore, regional cooperation could also be strengthened in the region to support domestic anti-corruption initiatives and the integrity commissions and anti-corruption agencies of several of the countries should be adequately funded in order for them to conduct their duties fully (Commonwealth Secretariat 2022).

⁴ For example: the Organization for Responsible Governance in the Bahamas, Trinidad and Tobago Transparency Institute, Transparency Institute Guyana Inc. (TIGI), Integrity Group Barbados, National Integrity Action in Jamaica etc.

Corruption and illicit finance by country

Antigua and Barbuda

Table 1: Measurements of corruption and illicit finance in Antigua and Barbuda.

	Control of corruption		Presence on Blacklists	Criminality scores				Money laundering and terrorist financing score
	Score	Percentile rank		Criminality	Criminal markets	Criminal actors	Resilience	
Latest available data (year in brackets)	0.31 (2022)	63.21	OECD list of high-risk residence/citizen by investment schemes (2023). Removed from the EU list of non-cooperative tax jurisdictions (2024).	2.98 (2023)	2.67	3.30	4.58	4.91 (2023)

Extent of corruption and illicit finance

Based on the World Bank's Worldwide Governance Indicators 2022 report, Antigua and Barbuda scored 0.31 on control of corruption. This is a slight improvement in the perceptions of the degree of corruption, compared to its score in 2018. The country's scores on government effectiveness and rule of law also indicate that the government has become less effective in curbing corruption and upholding the rule of law in the past four years (Kaufmann and Kraay 2023).

In the area of illicit finance, the Global Organised Crime Index (GI-TOC) scored Antigua and Barbuda 2.98/10 in criminality. As for its resilience to withstand and counter criminal activities, the country scored 4.58 on a scale of 10, which ranks as the highest level. In terms of money laundering and terrorist financing risks, the jurisdiction ranked 88th out of 152 jurisdictions Basel AML Index, indicating a comparatively moderate risk (Basel Institute on Governance 2023).

Corruption and illicit finance activities

High-level corruption has been recognised and addressed by the government of Antigua and Barbuda, resulting in some successful prosecutions. The country's former chief of the financial services regulatory commission was imprisoned for ten years as a result of his participation in a US\$7 billion Ponzi scheme involving a local foreign owned bank in 2021 (US Embassy Barbados 2021). The investigation was jointly conducted by the US Justice Department and the government of Antigua and Barbuda, illustrating successful international cooperation in corruption cases (De Shong 2021).

Nonetheless, low-level corruption continues to undermine the government's capacity to effectively counter corruption. High levels of corruption have been noted among prison guards, where the high population of the country's prison (Global Organized Crime Index 2023) seems to translate into a higher demand for contraband by inmates and in turn more collusion among prison guards to satisfy the demand. Prison officers reportedly accept bribes in exchange for smuggling contraband for inmates (US Department of State 2019). The level of collusion among prison officers has risen to a point where it has become a concern for the prison's superintendent (ABS TV Radio 2022).

Acceptance of bribes within police ranks and among senior officials and immigration officers from syndicated groups involved in human trafficking has also been observed (Global Organized Crime Index 2023). Despite some cases of prosecution, a shortcoming of the country's anti-corruption framework is that the government lacks the financial and human resources to investigate corruption cases (Global Organized Crime Index 2023).

The most notable type of organised crime observed in Antigua and Barbuda is human trafficking, which is reportedly facilitated by state actors (Global Organized Crime Index 2023; Yansura et al. 2021: 5). The country is a destination and transit island for this type of crime, and syndicate groups lure women and young people from mainly Guyana, Jamaica, and Saint Lucia under the false hope of employment in the hospitality sector but then subject them to forced labour and sexual exploitation (Global Organized Crime Index 2023). Antigua and Barbuda is also used as a transit hub for narcotics trafficking by drug producers in South American countries, largely due to its location (Global Organized Crime Index 2023). Drugs such as cocaine and cannabis, with the latter being the most prevalent, are transported by sea and air to reach consumers in North America, facilitated by inadequate border control measures. Pyramid and Ponzi schemes are also a particular risk in the country (Gibbings 2020).

Antigua and Barbuda has several structures and legal loopholes which facilitate the laundering of the illicit proceeds of these crimes (Global Organized Crime Index 2023). For example, its citizenship through investment and permanent residence certificate schemes are an area of concern as the country remains on the OECD residence/citizen by investment schemes list for the potential high-risk exposure it poses to the integrity of the Common Reporting Standard⁵ (OECD 2023). These programmes are at particular risk of being used to hide funds obtained through corrupt activities as they can be used to place the illicit funds away from the home jurisdiction (FATF 2023).

Finally, the supervision of attorneys, accountants, real estate and car dealerships along with international banks is considered to be inadequate in the country, which is significant given that these are the primary conduits and facilitators for financial crime and money laundering (Yansura et al. 2021: 4-5).

Anti-corruption and illicit finance framework

The anti-corruption framework in Antigua and Barbuda contains several key pieces of legislation. Its integrity legislation is the Integrity in [Public Life Act 2004](#), which establishes an integrity commission and provides a framework for accountability, integrity and probity in public office. This piece of legislation also requires publicly elected officials to disclose their assets, income and liabilities. Antigua and Barbuda also has freedom of information legislation in place by way of the [Freedom of Information Act](#), 2004. This act contains provisions for maximum information to be disclosed in the interest of the public and gives the public the right to access information.

The anti-corruption legislation is the [Prevention of Corruption Act 2004](#), which outlines provisions to prevent corruption. Antigua and Barbuda's public procurement legislation consist of its [Procurement Administration Act 2011](#) which repealed the [tenders board act](#) and sets out the procedures for the government's procurement administration. The country's campaign finance legislation consists of the [People's Act 2001](#), which was amended to include keeping records of monetary contributions above US\$25,000, particularly from businesses or persons. However, the jurisdiction lacks legislation for whistleblowing, and a recent report by the US Bureau of

⁵ The Common Reporting Standard is a standard for the automatic exchange of information of financial accounts between tax authorities globally. Citizenship and resident schemes undermine the standard as they can be used to conceal assets across jurisdictions, making it more difficult for authorities to report on assets and exchange adequate information with other jurisdictions.

Democracy, Human Rights and Labor have expressed concern regarding the effectiveness of the country's implementation of anti-corruption legislation (US Government 2023).

The country has also enacted laws to address financial crimes. Its [Money Laundering Prevention Act](#) of 1996 prohibits money laundering, sets out provisions of supervision, the freezing and forfeiture of assets and for international cooperation. Laws have been put into effect through the Money Laundering (Prevention) Regulation 2007 and its amendment in 2009. Its [Proceeds of Crime Act](#) of 1993 outlines provisions for the proceeds of certain crimes to be forfeited and confiscated. The [Prevention of Terrorism Act](#) of 2005 provides the necessary framework to put into effect the counter terrorism conventions of the United Nations Security Council. This act was recently amended in 2020 to deal more effectively with financial crimes. Antigua and Barbuda also introduced the latest version of its [Money Laundering and the Financing of Terrorism Guidelines for Financial Institutions](#) in 2022.

Antigua and Barbuda was found to have made significant progress on its AML framework in its most recent Financial Action Task Force (FATF) follow-up report (CFATF 2021). The report noted that Section 2 of the Money Laundering Act had been strengthened through widening the obligations for customer due diligence in the financial services sector and Section 15 which now allows for prompt access to all records by competent authorities (CFATF 2021: 4).

The jurisdiction is also party to the required international conventions and treaties pertaining to organised crime such as United Nations Convention against Trafficking in Narcotics and Psychotropic Substances (the Vienna Convention), United Nations Convention for the Suppression of the Financing of Terrorism, United Nations Convention against Transnational Organised Crime (the Palermo Convention) and its protocols, and the United Nations Convention against Corruption (UNCAC).

Bahamas

Table 2: Measurements of corruption and illicit finance in the Bahamas.

	Control of corruption		Presence on Blacklists	Criminality scores				Money laundering and terrorist financing score
	Score	Percentile rank		Criminality	Criminal markets	Criminal actors	Resilience	
Latest available data (year in brackets)	1.26 (2022)	84.43	OECD list of high-risk residence/citizen by investment schemes (2023). Removed from the EU list of non-cooperative tax jurisdictions (2024).	3.75 (2023)	3.60	3.90	5.50	5.49 (2023)

Extent of corruption and illicit finance

In 2023, the Bahamas scored 64 on the Corruption Perception Index (CPI), ranking it the 30th least corrupt country in the world (Transparency International 2023). In the Worldwide Governance Indicators, the jurisdiction scored 1.26 placing it in the 84th percentile, compared to a score of 1.13 in 2018 which placed it in the 82nd percentile. These numbers indicate an improvement in the perception of the degree to which public power is used for private gain. The government effectiveness and the rule of law indicators suggest that government effectiveness in countering corruption and upholding the rule of law have slightly declined within the past five years compared to other countries in the world (Kaufmann and Kraay 2023).

Regarding illicit finance, the Bahamas criminality score on the GI-TOC was 3.75 in 2023, which is a slight improvement on its 3.79 criminality score in 2021. Its criminal actors score was 3.90 in 2023 whereas, in 2021, it scored 3.63. These results indicate that, while the structure and influence of criminal actors increased in the past two years in the Bahamas, the government had taken effective measures to mitigate the criminal activities stemming from criminal markets. In money laundering and terrorist financing risks, the jurisdiction scored 5.49, which is an indicator that it is moderately highly susceptible to such risks, particularly given that it is recognised as a tax haven. The Bahamas also ranks 22nd in the world (out of 141) on the Financial Secrecy Index where it scores particularly high on trust and foundations register secrecy, legal entity identifier secrecy, secrecy of company ownership, and others (Tax Justice Network 2022).

Corruption and illicit finance activities

Over the last few years an increase in both high and low-level corruption and abuse of power cases have been prosecuted in the Bahamas. The perpetrators involved include government officials, prison officers and police officers. For example, corruption charges were brought against three high-level government officials during the Minnis administration, although two of whom were acquitted, with claims of witness intimidation and jury tampering, as well as alleged missteps by the police and prosecutors (US State Department 2019).

Moreover, some parliamentarians have failed to disclose their assets, income and liabilities, and no criminal action was taken (Commonwealth Secretariat 2022). 74% of citizens surveyed by the World Justice Project (2022: 10) believed that elected representatives and politicians use public funds or property for personal needs. Moreover, according to the 2023 Global Crime Index, generally, citizens do not trust law enforcement authorities in the Bahamas. Immigration officers and law enforcement officers can play a role in facilitating criminal activities or participating in them (Global Organized Crime Index 2023).

Human trafficking has been a problem for a long time in the Bahamas. Known for its human smuggling routes, migrant workers mainly from Haiti, Jamaica and the Dominican Republic are lured to the country through job advertisements and often fall victims to domestic servitude, sex trafficking or exploited through other types of low skill employment (Global Organized Crime Index 2023). The country also has a long history as a transit hub for cocaine and marijuana destined for North America and Europe (Global Organized Crime Index 2023). In both instances of human and drug trafficking, it is most likely that law enforcement and immigration officers are facilitating these crimes or participating in them (Global Organized Crime Index 2023).

Financial crimes are prevalent in the Bahamas, particularly since the onset of the Covid-19 pandemic. Known as a tax haven, the jurisdiction's financial secrecy laws and tax policies are considered regressive (Global Organized Crime Index 2023). For instance, in 2023 a major money laundering scandal was uncovered, where US\$58.47 million in fraud proceeds were laundered through a major Bahamian financial institution to the US (Hartnell 2023).

The residency/citizen programme in the Bahamas is also considered high risk for money laundering and tax evasion and, as a result, the jurisdiction was placed on the OECD's residence/citizen by investment schemes list in 2023 due to the potential high risk it poses to the integrity of the Common Reporting Standard (OECD 2023).

Nonetheless, according to its most recent FATF compliance report the country has taken notable steps toward improving its AML framework, and in 2020 it was

removed from the FATF grey list (CFATF 2022; Commonwealth Secretariat 2022). A series of sweeping legislative reforms created a much stronger framework to address financial crime (Yansura et al. 2021: 9). There are, however, still several concerns regarding the effectiveness of some of these changes. For example, while legislation has established a secure system to collect beneficial ownership information and getting the country off the FATF grey list, there are issues such as the capacity of its financial intelligence unit (FIU) (Yansura et al. 2021: 11). The FIU is reportedly understaffed and requires modernising of its IT infrastructure to create better quality financial intelligence (Yansura et al. 2021 :11).

Anti-corruption and illicit finance framework

Integrity legislation in the Bahamas consists of the Integrity Commission Bill 2017, which aims to create an integrity commission and promote ethical conduct among elected officials. However, this bill has not yet been passed in parliament. Its freedom of information legislation is composed of the [Freedom of Information Act 2017](#), which contains whistleblower provisions; however, more clarity is needed on how whistleblowers will be protected.

Its anti-corruption legislation includes the [Powers and Privileges Act 1974](#) which imposes restrictions on senators and members of parliament from accepting bribes, and the [Prevention of Bribery Act 2014](#) which criminalises giving bribes to or accepting bribes from government officials. The country recently passed the [Public Procurement Act 2023](#), which provides a framework to establish a public procurement department and outline bidding procedures for government contracts. Although the Bahamas has implemented legislation on public finance, such as the [Fiscal Responsibility Act](#) and the [Public Management Finance Act 2023](#), the jurisdiction does not have a campaign finance legislation in place. The [Public Finance Management Act 2021](#) has provisions for the financial management of state-owned enterprises and other government agencies. However, the country still lacks regulations on the financing of political parties and candidates running for elected office, as well as a lack of a law or clear policy to address the “revolving door” (Commonwealth Secretariat 2022).

The Bahamas also has an AML legislative framework in place, and the government is considered to have made significant steps in enhancing its AML regime since 2017 (Commonwealth Secretariat 2022). Its [Proceeds of Crime Act 2000](#) empowers customs, police and the courts to search, seize and confiscate the proceeds of crime pertaining to money laundering. This act was replaced by the [Proceeds of Crime Act 2018](#) which consolidated and fortified measures to recover proceeds and instrumentalities of crime. The implementation of AML laws in the country is considered to be weak in terms of prosecution (Yansura et al. 2021: 10).

The jurisdiction's [Financial Transactions Reporting Act 2018](#) replaced the Financial Transactions Reporting Act 2000. This act outlines the responsibilities of financial institutions and defines the compliance commission's role. Regulations pertaining to this act were introduced in 2018. Its [Financial Intelligence Unit Act 2000](#) establishes the financial intelligence unit and outlines its duties and powers. The Bahamas' [Terrorism Act 2018](#) was replaced by the Anti-Terrorism Act 2000. This act made terrorism, the proliferation of weapons of mass destruction and their financing, criminal offences. It also outlined provisions for detecting, preventing, prosecuting, convicting and punishing these activities, preventing preferential exemptions for foreign entities, improving its automatic exchange of tax information with other countries and for assets involved to be confiscated, forfeited and seized (Commonwealth Secretariat 2022).

The Bahamas has all the required conventions and treaties related to organised crime in place. Among them are the United Nations Convention against Trafficking in Narcotics and Psychotropic Substances (the Vienna Convention), United Nations Convention for the Suppression of the Financing of Terrorism, United Nations Convention against Transnational Organised Crime (the Palermo Convention) and its protocols, and the United Nations Convention against Corruption.

Barbados

Table 3: Measurements of corruption and illicit finance in Barbados.

	Control of corruption		Presence on Blacklists	Criminality scores				Money laundering and terrorist financing score
	Score	Percentile rank		Criminality	Criminal markets	Criminal actors	Resilience	
Latest available data (year in brackets)	1.28 (2022)	89.15	OECD list of high-risk residence/citizen by investment schemes (2023). EU list of high-risk third countries which have strategic deficiencies in their AML/CFT regimes (2020)	3.07 (2023)	2.43	3.70	6.13	5.32 (2023)

Extent of corruption and illicit finance

Barbados scored 69 on the CPI, ranking it the 24th least corrupt country in the world (Transparency International 2023). In the World Bank’s control of corruption indicator, the jurisdiction scored 1.28, placing it in the 89th percentile among all countries however, the World Governance Indicators show a decrease in government effectiveness and rule of law over the past five years, indicating a decline in its ability to curb corruption and uphold the rule of law (Kaufmann and Kray 2023).

Barbados showed slight improvements in measures against organised crime-related activities. GI-TOC’s scores on criminality, criminal markets and actors, which may indicate more effective government measures to mitigate these activities. However, the country shows a moderately high risk related to AML, particularly considering concerns regarding the scope of financial secrecy its financial system allows. It ranks 66th position among 152 countries in the Basel AML Index (Basel Institute on Governance 2023). This score indicates that these risks are moderately high in the jurisdiction, particularly given that it is considered by some to be a tax haven (Mohammed 2022). It is currently on the list of high-risk third countries which have strategic deficiencies in their AML/CFT regimes (as of 2020) but was removed from the FATF grey list in 2024.

Corruption and illicit finance activities

While Barbados has a relatively low ranking (24) on the CPI, corruption has still been a concern since its 2018 elections where vote buying was alleged and a distrust in politicians was expressed (Global Organized Crime Index 2023). Corruption has also aided the facilitation of organised crime. According to the Global Organized Crime Index (2023), bribes are paid to judges, politicians, local authorities, customs and police officers to facilitate the cocaine trade and to security guards at the border to facilitate human smuggling (Global Organized Crime Index 2023).

Bribes are also often paid to low-level officials, and reports suggest to politicians to facilitate trafficking flows (Global Organized Crime Index 2023). 36% of respondents to World Justice Project's citizen survey reported that elected representatives and politicians take bribes or gifts to influence public contracts or decision (World Justice Project 2022: 10). Moreover, law enforcement is also not considered to have the capacity to counter corruption, with its financial crime investigation unit lacking expertise and human resources to effectively do so (Commonwealth Secretariat 2022). Police officers and political parties were perceived as the most corrupt actors in the public sector by the general public (World Justice Project 2022: 11).

Barbados is a transit hub for the cocaine trade in the Eastern Caribbean (Global Organized Crime Index 2023). Originating mainly from Venezuela, Guyana and Trinidad, cocaine is destined for local consumption and the tourist market in Barbados or international markets such as the US, Europe and Canada. Customs and police officers as well as judges and politicians reportedly accept bribes from criminal actors to facilitate the drug trade. It is also a destination for cannabis shipped from nearby St Vincent and Jamaica to supply local consumers and tourists in Barbados (Global Organized Crime Index 2023). Low-level state actors have been reported to have been facilitating drug trafficking flows in exchange for bribes (Global Organized Crime Index 2023).

Although human trafficking is considered to have a limited influence on Barbados, it is on the rise with predominately women and children being forced into sexual exploitation (Global Organized Crime Index 2023). Known as a one of the top destinations for sex tourism in the Caribbean, legal immigrants entering the country from Jamaica, Venezuela, Haiti, Trinidad, and Guyana are especially vulnerable (Global Organized Crime Index 2023). Individuals operating independently or on behalf of businesses are said to be involved.

Organised criminal groups are also considered to be involved in human trafficking and smuggling and are observed to have influence over communities, families, politicians and political groups. Although limited, this influence over politicians and political groups appears to be based on collusion in facilitating criminal activities in

exchange for bribes (Global Organized Crime Index 2023). In an effort to counter crime, the present prime minister has fast tracked a number of laws and increased resources among the police force, border security and the judiciary.

The existence of money laundering and tax evasion are not considered as prevalent as in previous years in Barbados. Instances of foreigners engaging in money laundering are reportedly directly related to the drug trade, although the means through which money laundering occurs, has not been mentioned (Global Organized Crime Index 2023). For example, in 2021, the former minister of industry and member of parliament of Barbados was sentenced to two years in prison for his role in laundering bribe payments from a Barbadian insurance company through banks in New York (US Department of Justice 2021).

However, despite progress (which resulted in Barbados being removed from the EU blacklist of countries that are considered non-cooperative jurisdictions and the FATF grey list) there are still areas that are considered as needing further improvement. There is a continued lack of effective beneficial ownership legislation and law enforcement authorities are unable to access the data in a timely manner and it is not accurately kept and/or up to date (Yansura et al. 2021: 14). There are also capacity constraints of the FIU and law enforcement authorities in their ability to carry out investigations and prosecutions (Yansura et al. 2021: 14). Finally, delays in court proceedings in the country have limited foreign cooperation efforts in prosecuting financial crime (Yansura et al. 2021: 14).

Anti-corruption and illicit finance framework

The anti-corruption framework in Barbados consists mainly of the [Representation of the Peoples's Act 1991](#), the [Election Offences and Controversies Rules 1959](#) and the [Prevention of Corruption Act](#) which was passed in 2012 and enacted in parliament in 2021. Its objective is to prevent, investigate and prosecute corrupt acts. Barbados also drafted a [Freedom of Information Act](#) in 2008; however, despite ongoing calls from both political parties, no progress has been made in passing the bill. The country's integrity in public life bill was passed in January 2023. This bill aims to foster the integrity of public persons and enhance measures to prevent, detect, investigate and prosecute corrupt acts. The [Whistleblower Protection Act 2021](#) was brought into force to encourage the disclosure of improper conduct and corrupt acts, protect persons who make such disclosures and investigate such matters.

The Public Procurement Act 2023 was enacted to strengthen the jurisdiction's public procurement measures and enhance transparency. It also amended the public procurement bill of 2021 to enhance existing procurement proceedings. Other legislation pertaining to campaign finance is not yet in place despite calls from the Integrity Group Barbados (a local civil society organisation comprised of citizens

from various sectors of the Barbadian society) to complete the country's anti-corruption framework. Nonetheless, the government has had several engagements with private and civil society organisations, media and international organisations, including the Integrity Group Barbados which was invited to engage with the government through submission on critical pieces of anti-corruption legislation (Commonwealth Secretariat 2022).

The jurisdiction's AML regime consists of several pieces of legislation. The [Anti-Terrorism Cap 158](#) set out provisions to prevent and curb terrorism and made provisions for the implementation of the United Nations Convention with respect to the Suppression of the Financing of Terrorism and the United Nations Security Council Resolution 1373 on terrorism. The [Money Laundering & Financing of Terrorism \(Prevention & Control\) Act 2011](#) defines money laundering, the financing of terrorism and outlines their offences. It also sets out the responsibilities of financial institutions, non-financial business entities and professionals and other persons in this regard. Minor changes were made to the act in May 2019. Barbados also has introduced its targeted financial sanction omnibus guidelines (November 2019) and amended its suspicious/unusual transaction report in May 2020. Despite its robust AML framework, Barbados is on the OECD's residence/citizen by investment schemes list due to the potential high-risk exposure it poses to the integrity of the Common Reporting Standard (OECD 2023).

Barbados has also implemented all the required conventions and treaties related to organised crime, including the United Nations Convention against Trafficking in Narcotics and Psychotropic Substances (the Vienna Convention), United Nations Convention for the Suppression of the Financing of Terrorism, United Nations Convention against Transnational Organised Crime (the Palermo Convention) and its protocols, and the United Nations Convention against Corruption, which was fully ratified in October 2023.

Dominica

Table 4: Measurements of corruption and illicit finance in Dominica.

	Control of corruption		Presence on Blacklists	Criminality scores				Money laundering and terrorist financing score
	Score	Percentile rank		Criminality	Criminal markets	Criminal actors	Resilience	
Latest available data (year in brackets)	0.54 (2022)	69.34	OECD list of high-risk residence/citizen by investment schemes (2023).	2.63 (2023)	2.67	2.60	5.17	4.46 (2023)

Extent of corruption and illicit finance

Dominica scored 56 on the 2023 CPI, ranking it the 42nd least corrupt country in the world (Transparency International 2023). The Worldwide Governance Indicators suggest that the perception of the degree to which public power is used for private gain has slightly declined in the country (Kaufmann and Kray 2023). On government effectiveness and the rule of law, these indicate that the government effectiveness in countering corruption and upholding the rule of law have slightly improved in the past five years (Kaufmann and Kraay 2023).

In terms of illicit finance, Dominica’s criminality score on the GI-TOC was 2.63 in 2023, which is consistent with its 2.63 criminality score in 2021. There have been improvements in its criminal markets score, having obtained 2.67 in 2023 versus 2.75 in 2021. The criminal actors score was 2.60 in 2023, whereas it scored 2.50 in 2021. Its resilience score was 5.15 in 2023 compared to 5.08 in 2021. These results indicate that, while there was a slight increase in the criminal actors score, criminal activities stemming from criminal markets and the country’s resilience to such activities within the past two-year period has slightly improved in comparison to other countries. Regarding money laundering and terrorist financing risks, the jurisdiction ranked 115 among 152 countries in the Basel AML Index, indicating that these risks are moderate (Basel Institute on Governance 2023).

Corruption and illicit finance activities

Dominica is a small developing island state with a declining population and is one of the smallest countries in the Caribbean (FATF 2023: 21). The level of corruption in Dominica is perceived to be modest, with very few corruption incidents occurring in

recent decades (Commonwealth Secretariat 2022). However, there is a relative scarcity of literature and evidence on corruption in Dominica, indicating a gap in research on corruption and financial crimes (Yansura et al. 2021: 38).

Corruption offences are prosecuted by the director of public prosecution; however, securing adequate personnel and resources has been a challenge (Global Organized Crime Index 2023) and there are similar challenges in prosecuting cases adequately. There are also insufficient procedures to handle bribery and corruption matters, in resources and in public support. Indeed, 66% of the public in Dominica surveyed by the World Justice Project believed that elected representatives and politicians deliberately compromise on investigative functions (World Justice Project 2022: 10).

Allegations of corruption and money laundering have been noted in recent years in connection to Dominica's citizen by investment programme (which comprises of 30% of gross domestic product (GDP) (FATF 2023: 12)) particularly in the hospitality industry. Resorts in Dominica and other Caribbean countries are reportedly being built through funding raised in the country's citizen by investment scheme. The investors the scheme attracts reportedly brings its transparency and governance into question (The Guardian 2023). Several politically exposed persons were identified in a leak of those who have invested in local real estate in return for citizenship, including some accused of committing war crimes (The Guardian 2023; OCCRP 2023).

Dominica is a transit country for cocaine and cannabis trafficking to Europe, North America and other Caribbean islands such as Martinique and Guadeloupe (Global Organized Crime Index 2023). Cannabis is reportedly grown locally on the island for domestic use. The island's banking sector has reportedly been used for money laundering with suspicious transactions from drug-producing countries such as St. Vincent and the Grenadines, Panama and France (FATF 2023: 24). However, there has been an increase in local production to meet the growing demand in Martinique and Guadeloupe since the Covid-19 pandemic. The country also has a sizeable arms-trafficking market (Global Organized Crime Index 2023). There are also considerable risks of Pyramid and Ponzi schemes (Global Organized Crime Index 2023).

Dominica is not considered a regional or international financial centre, with financial institutions representing only 14.5% of its GDP (FATF 2023: 10). However, there are some risks of money laundering in the country with the country's National Risk Assessment identifying its three domestic banks and one development bank as being high risk (FATF 2023: 24). This is due to the volume and cross-border nature of the transactions that these institutions deal with. Moreover, another risk is that companies in Dominica are not under a general legal obligation to disclose beneficial ownership information (FATF 2023: 25).

Anti-corruption and illicit finance framework

Integrity legislation in Dominica comes by way of the Integrity in Public Office Act 2003. The [Integrity in Public Office \(Commencement\) Order 2008](#) provides for an integrity commission to be established and the declaration of the financial affairs of public officials. However, it reportedly lacks the investigative and enforcement capacity required by the UN's Convention Against Corruption (UNCAC) and its UNCAC report was not fully implemented (FATF 2023: 24).

The [Public Procurement and Disposal of Public Property Act No. 14 of 2021](#) sets out provisions to ensure diligent, impartial, conscientious and fair conduct is exercised by procurement officials. The country also has a [Finance \(Administration\) Act 4 of 1994](#) which outlines provisions to control and manage public finance. However, Dominica's anti-corruption framework does not contain key pieces of legislation pertaining to freedom of information, anti-corruption, whistleblowing and campaign finance.

Dominica's AML regime consists of three main pieces of legislation. The [Money Laundering Prevention Act 8 of 2011](#) contains provisions that make money laundering an offence, establishes a supervisory authority and determines its functions, outlines the duties of financial institutions, provides for freezing and forfeiture of asset and international cooperation. The act was amended in 2013, 2016 and 2020 to strengthen certain provisions, and regulations pertaining to this act have been brought into force. The country is considered by the FATF to have made significant improvements to its AML regime in recent years (FATF 2023: 11).

The [Proceeds of Crime Act 2014](#) contains several key provisions including the duties of the financial service unit and financial intelligence unit, establishing systems for internal control and due diligence procedures. The AML and Suppression of Terrorist Financing Code of Practice 2014 was enacted on 1 May 2014. The code of practice requires proper controls to be implemented to detect and counter money laundering and terrorist financing. In 2013, the jurisdiction also issued updated AML guidelines for financial institutions and other entities to prevent, detect and report money laundering activities. However, there are still shortcomings in its beneficial ownership requirements, such as no requirement for all types of persons to provide adequate, accurate and up to date information to the relevant authority (FATF 2023: 16). There is also a lack of effective AML supervision in place for designated non-financial businesses and professions (DNFBs) (FATF 2023: 15). Dominica has also been placed on the OECD's residence/citizen investment scheme list because of the potential high-risk exposure it poses to the integrity of the Common Reporting Standard (OECD 2023).

Dominica is also party to several conventions and treaties which address organised crime. They include, the United Nations Convention against Trafficking in Narcotics and Psychotropic Substances (the Vienna Convention), United Nations Convention for the Suppression of the Financing of Terrorism, United Nations Convention against Transnational Organised Crime (the Palermo Convention) and its protocols, and the United Nations Convention against Corruption.

Guyana

Table 5: Measurements of corruption and illicit finance in Guyana.

	Control of corruption		Presence on Blacklists	Criminality scores				Money laundering and terrorist financing score
	Score	Percentile rank		Criminality	Criminal markets	Criminal actors	Resilience	
Latest available data (year in brackets)	-0.30 (2022)	45.28	None	5.97 (2023)	5.13	6.80	4.04	N/A (2023)

Extent of corruption and illicit finance

Guyana scored 40 on the 2023 CPI, ranking it 87 out of 180 countries (Transparency International 2023). In the Worldwide Governance Indicators, the control of corruption indicates that the perception of the degree to which public power is used for private gain has slightly improved. On government effectiveness and rule of law, these indicators suggest that the government effectiveness in countering corruption and upholding the rule of law have slightly improved within the past five years compared to other countries (Kaufmann and Kraay 2023).

Guyana’s criminality score on the GI-TOC was 5.97 in 2023, which is moderately higher to its 5.10 criminality score in 2021. There have been increases in its criminal markets score, having obtained 5.13 in 2023 versus 4.70 in 2021. The criminal actors score was 6.80 in 2023 whereas it scored 5.50 in 2021. Its resilience score was 4.04 in 2023 compared to 4.29 in 2021. These results indicate criminal activities stemming from criminal markets and criminal actors increased in the past two years, whereas the country’s resilience to such activities slightly deteriorated in comparison to other countries. Its money laundering and terrorist financing risk score and ranking information is not available from the 2023 Basel AML Index (Basel Institute on Governance 2023).

Corruption and illicit finance activities

The 2019 Global Corruption Barometer (GCB) found that citizen trust in the government, courts and police in Guyana was relatively high compared to the rest of the region (Pring and Vrushi 2019). Nonetheless, corruption remains a problem in Guyana, particularly in the lack of accountability in complying with anti-corruption

laws in the public sector and with clientelism still reportedly rampant (Global Organized Crime Index 2023). The country also suffers from the “resource curse”, with corruption scandals relating to the oil industry being frequent (Sukhai 2020).

The 2019 GCB also found that 22% of citizens experienced sexual corruption or know someone who has and 27% of citizens reported paying a bribe for public services in the previous 12 months (Pring and Vrushi 2019). The World Justice Project’s citizen survey found that 21% of respondents believed that public officials frequently took public funds for private use in the country (World Justice Project 2022: 9).

The government’s credibility was undermined due to reports of a lack of transparency related to the mismanagement of public funds during the Covid-19 pandemic along with other corruption scandals (Global Organized Crime Index 2023). For example, US\$1 billion was reportedly invested in converting an ocean view hotel into a hospital to take care of Covid-19 patients but was never announced (Guyana Times 2020). System inefficiencies in the award process of government contracts are also widespread and remain a big concern in Guyana (Global Organized Crime Index 2023). An example of this is the awarding of two dubious contracts amounting to US \$585 million and US\$346 million for the construction of a secondary and primary school (Kaieteur News 2022).

Corruption among prison officers has reportedly led to the maximum extension of pre-trial detention for an overcrowded prison population. Bribery allegations, poor case tracking and slow case preparation by police officers have contributed to prison extensions (US Department of State 2023). Systemic corruption in law enforcement agencies is also a major concern, resulting from deficiencies in resources, weak institutions and a failed judicial system. There is a shortage of investigators in law enforcement as well as a relatively high turnover rate as police officers leave their jobs for other employment opportunities (Global Organized Crime Index 2023).

The scale of Guyana’s informal and illegal economy is noteworthy due to criminal activity and its linkages to corruption (Yansura et al. 2021: 57). Indeed, it is described as a known hub for human and arms trafficking, and a significant transit point for cocaine. Criminal organisations and corrupt officials in border control and other areas facilitate these activities. Human trafficking, particularly affecting Venezuelan female migrants and national vulnerable populations, is prevalent in sectors like mining, oil, and forestry. Extortion by criminal (known as “*sindicatos*”) and guerrilla groups along the Guyana-Venezuela border, and arms trafficking, primarily involving imports from Venezuela and Brazil, pose further challenges. High-level state officials, corporations, and foreign organisations facilitate criminal operations, with different criminal networks controlling various illicit activities.

Financial crimes, particularly public procurement fraud, are reported in Guyana. For instance, a state-owned sugar factory received over US\$3 billion for the purchase of

Fiat tractor spares for its inventory, but later discovery revealed that the company did not have Fiat tractors in operation (Guyanese Online 2018).

Money laundering is also prevalent, particularly among dealers in precious metals and there are reports of the Italian mafia laundering a significant amount of money each year in financial institutions in Guyana stones (Global Organized Crime Index 2023; FIU Guyana 2021: 8). In its 2021 National Risk Assessment, it was rated medium high risk of money laundering due to its weak national money laundering combating ability with sectors such as financial services, real estate, car dealers and precious metals at particularly high risk (FIU Guyana 2021: 8-9).

There is no requirement for disclosure of beneficial ownership information when applying for a prospective/production licence for the oil and gas sector and the ability to regulate the international oil and gas companies operating in the company is deemed to be limited (FIU Guyana 2021: 11). Moreover, there has been no recent FATF Mutual Evaluation Report or follow-up report, meaning there is a gap in further evidence on the issue of money laundering in the country.

Anti-corruption and illicit finance framework

Guyana's [Integrity Commission Act](#), bribery is prohibited as it pertains to government officials. Its [Criminal Law \(Offences\) Act](#) criminalises bribery and corruption. Schedule II of this act sets out a code of conduct specific to public officials. The jurisdiction also amended its code of conduct for persons in public life by way of the integrity commission (Amendment of Code of Conduct Order 2017), which establishes transparency, integrity and accountability guidelines for public officials.

Additional laws were also recently introduced to prevent bribery. These include the [Guyana Compliance Commission Act 14 of 2023](#), the [Real Estate Agents and Brokers Act 13 of 2023](#), and the [Planning and Single Window Act 11 of 2023](#), which creates a system for single window processing. Although Guyana has an [Access to Information Act 2011](#), its provisions are considered weak. This act sets out provisions which give persons the right to access information held by public authorities. The country has also implemented the [Procurement Act 2003](#), including several pieces of legislation pertaining to the act. This act promotes transparency and fairness in the procurement process. The country's whistleblower policy is covered in Section 230 of the [Customs Act](#). This policy offers a reward to anyone who informs the comptroller of any offence committed contrary to the customs laws or provides assistance in recovering fines or penalties. The [Representation of the People Act](#) contains provisions pertaining to campaign finance in Guyana. However, provisions on disclosure of donors are not included, nor those which put a cap on the total contributions an entity or person can make to a political party.

The [AML and Countering the Financing of Terrorism Act 2009](#). sets out comprehensive powers for prosecuting money laundering, terrorist financing and other financial crimes. It also provides for unlawful proceeds derived from all serious crimes to be identified, frozen, seized and forfeited. This act has been amended on a number of occasions, with the most recent in August 2023, mainly to strengthen provisions in the AML framework. Regulations pertaining to the act were brought into force in 2010, 2015 and 2023. Section 470(A) of the Companies Act requires beneficial ownership information for companies, but an electronic register is not yet up to date and accessible, and trusts or other legal arrangements are also not covered by the register (FIU Guyana 2021: 46-47).

Guyana is party to various international conventions and treaties to counter organised crime, illicit arms trade and drug and human trafficking. The key conventions to which Guyana is party includes, the United Nations Convention against Trafficking in Narcotics and Psychotropic Substances, United Nations Convention for the Suppression of the Financing of Terrorism, United Nations Convention against Transnational Organised Crime and its protocols and the United Nations Convention against Corruption.

Jamaica

Table 6: Measurements of corruption and illicit finance in Jamaica.

	Control of corruption		Presence on Blacklists	Criminality scores				Money laundering and terrorist financing score
	Score	Percentile rank		Criminality	Criminal markets	Criminal actors	Resilience	
Latest available data (year in brackets)	-0.02 (2022)	54.25	FATF grey list (2024) EU list of high-risk third countries which have strategic deficiencies in their AML/CFT regimes (2020)	5.80 (2023)	4.90	6.70	5.42	5.29 (2023)

Extent of corruption and illicit finance

Jamaica scored 44 on the 2023 CPI, ranking it the 69 out of 180 countries (Transparency International 2023). In the Worldwide Governance Indicators, regarding the control of corruption, the perception of the degree to which public power is used for private gain has slightly improved (Kaufmann and Kraay 2023). The other indicators suggest that the government’s effectiveness in countering corruption and upholding the rule of law has been consistent in the past five years compared to other countries (Kaufmann and Kraay 2023).

Jamaica’s criminality score on the GI-TOC was 5.80 in 2023, which is an improvement to its 5.91 score in 2021. Its results indicate that, while there is an increase in criminal markets score and a decrease in its resilience score, criminal activities declined in the past two years, indicating an improvement. Regarding the Basel AML Index, the jurisdiction scored 5.29, in 68th position among 152 countries. This score is an indicator that these risks are moderate in the jurisdiction (Basel Institute on Governance 2023).

Corruption and illicit finance activities

Corruption is a serious problem in Jamaica. The overall governance, lack of transparency and accountability, and high rates of violence, combined with a low level of trust in public authorities remains a significant challenge (Global Organized Crime Index 2023). Despite having established a relevant institutional framework, deep-rooted corruption continues to persist across the country. Rampant misconduct

exists among law enforcement officials, stemming from the inefficacies of the government's initiatives, and cronyism, nepotism, illicit enrichment and conflicts of interest are deep-rooted issues, reportedly extending all the way to the prime minister's office (Yansura et al. 2021: 68). Indeed, 80% of the public surveyed in 2022 believe that elected representatives and politicians in Jamaica use public funds or property for personal needs (World Justice Project 2022: 10).

A high-profile multi-million-dollar corruption case came to light in 2018, when the widespread mismanagement and corruption in the Jamaican state-owned oil refinery, Petrojam Limited was uncovered. This scandal implicated several high-ranking officials who had fraudulently obtained travel claims for travels which did not take place as well as other irregularities, nepotism and cronyism within the state-owned entity (Kaieteur News 2022).

Organised criminal groups are also said to have strong links to corrupt government officials and to their transnational counterparts (Global Organized Crime Index 2023). Corrupt state actors are reportedly engaged in organised criminal markets and have control over them (Global Organized Crime Index 2023). Corrupt law enforcement officers are rewarded with government contracts or paid by politicians for their support in facilitating criminal activities (Global Organized Crime Index 2023). 62% of the public surveyed by the World Justice Project believe that almost all police officers are involved in corrupt practices (World Justice Project 2022: 13).

Human trafficking in Jamaica is also a serious problem. Linked to the drug trade, organised criminal groups, local and foreign, with deep connections to corrupt state officials lure vulnerable people, mainly women and children, into forced labour, sexual servitude, begging and selling drugs (Global Organized Crime Index 2023). Extortion by private sector actors is also a critical concern especially in the construction and transportation industries (Global Organized Crime Index 2023).

Arms trafficking is one of the biggest criminal markets in Jamaica (Global Organized Crime Index 2023). Illegal weapons, mainly sourced from the US by members of Jamaican gangs, are transported to Jamaica and reportedly used to protect the production of drugs and trafficking networks, as payment in exchange for drugs, and to recruit gang members. Corrupt police officers are often implicated in arms trafficking in Jamaica, including in the rental and sale of the police stockpile, participating in a corruption ring involving licenced firearms, resulting in difficulties in distinguishing between legal and criminal gun holders (Global Organized Crime Index 2023).

Jamaica is also the biggest cannabis producer and supplier in the Caribbean (Global Organized Crime Index 2023). The Global Organized Crime Index (2023) notes that the growing market for this drug has led to an increase in violence in the country. Corrupt state actors are also involved in, and in some cases have control over

criminal markets as noted by the Global Organized Crime Index (2023). Corrupt police officers are often paid by politicians or awarded government contracts for facilitating criminal activities. Secondary to cocaine, synthetic drugs and heroin are also prevalent in Jamaica (Global Organized Crime Index 2023). Used as commodity drugs, they are traded with marijuana and then taken to international markets in small quantities through immigrant channels.

Despite having an extensive AML framework at the legislative levels and network of law enforcement and supervisory agencies, the threat of money laundering in Jamaica is still considered to be medium high (Bank of Jamaica et al. 2021: 10). DNFBPs such as attorneys and real estate dealers are considered at medium risk of money laundering and in the National Risk Assessment it was recommended that these sectors must prioritise the full implementation of risk-based supervisory frameworks and strengthen compliance functions regarding suspicious transaction reporting (Bank of Jamaica et al. 2021: 11). This concern was also identified in its 2023 FATF follow-up report (CFATF GAFIC 2023: 6).

Anti-corruption and illicit finance framework

Jamaica has a comprehensive anti-corruption framework in place. The [Integrity Commissions Act 2017](#) approves the establishment of an integrity commission and fosters ethical conduct among parliamentarians. The [Parliament Integrity of Members Act 1973](#) requires parliamentarians to declare their assets. The [Access to Information Act 2002](#) gives the public the right to access information. The [Corruption Prevention Act 2002](#) criminalises certain acts of corruption, creates a commission to prevent corruption and requires public officials to declare their assets.

The [Contractor General Act 1983](#) and the [Public Procurement Act 2015](#) promote accountability, integrity and transparency in the procurement and sale of public property. The [Protected Disclosure Act 2011](#) promotes disclosures of improper conduct in the public interest while the [Representation of People's Act 1944](#) regulates conduct during the course of elections. In 2017, Jamaica introduced its campaign finance legislation by way of the [Representation of the People \(Amendment\) Act 2016](#), which made way for the [Election Campaign Finance Regulations Act 2017](#).

The [Proceeds of Crime Act, 2007 \(POCA\)](#) sets out for AML provisions, including the duties of competent authorities. The regulations were set forth in the [Proceeds of Crime \(Money Laundering Prevention\) Regulations 2007](#). The [Terrorism Prevention Act](#) covers terrorist activities and offences, in addition to orders, warrants and reports. The country's AML/CFT rules are found in the [Banking Service Act](#) and the [Bank of Jamaica Act](#).

These pieces of legislation have been updated to strengthen the jurisdiction's AML framework to comply with the FATF Recommendations. Despite this, Jamaica remains on the CFATF enhanced follow-up list. On 31 March 2023, the Jamaican senate passed the Companies (Amendment) Act 2023, which provides for compliance with FATF Recommendation 24 which pertains to the transparency of beneficial ownership of legal entities. Despite this latest effort, the jurisdiction was placed on the FATF grey list in February 2024 (FATF 2024).

Jamaica is party to key conventions and treaties pertaining to combating corruption and organised crime. Among them are, the United Nations Convention against Trafficking in Narcotics and Psychotropic Substances, United Nations Convention for the Suppression of the Financing of Terrorism, United Nations Convention against Transnational Organised Crime and its protocols, and the United Nations Convention against Corruption.

St. Lucia

Table 7: Measurements of corruption and illicit finance in St Lucia.

	Control of corruption		Presence on Blacklists	Criminality scores				Money laundering and terrorist financing score
	Score	Percentile rank		Criminality	Criminal markets	Criminal actors	Resilience	
Latest available data (year in brackets)	0.58 (2022)	70.75	OECD list of high-risk residence/ citizen by investment schemes (2023).	3.53 (2023)	2.67	4.40	5.58	5.25 (2023)

Extent of corruption and illicit finance

St. Lucia scored 55 on the 2023 CPI, ranking it 45 out of 180 countries (Transparency International 2023). Its scoring on the Worldwide Governance Indicators indicates that the government effectiveness in countering corruption has deteriorated, whereas upholding the rule of law remained the same in the past five years compared to other countries (Kaufmann and Kraay 2023).

Regarding illicit finance, St. Lucia’s criminality score on the GI-TOC was 3.53 in 2023, which is an improvement to its 4.09 criminality score in 2021. There were improvements in its criminal markets score too, having obtained 2.67 in 2023 versus 3.05 in 2021. These results indicate that criminal activities from criminal markets and criminal actors, and the country’s resilience to such activities, have improved in the past two years in comparison to other countries. In the Basel AML Index, the jurisdiction scored 5.25, ranking in 69 out of 152 countries. This score is an indicator that these risks are moderate in the jurisdiction (Basel Institute on Governance 2023).

Corruption and illicit finance activities

Corruption and a lack of transparency is a moderate concern in St. Lucia. Although corruption perception in the country is low, allegations against high-profile state actors have been reported (Global Organized Crime Index 2023). 82% of the public surveyed by the World Justice Project believe that elected representatives and politicians take bribes or gifts to influence public contracts or public decision (World Justice Project 2022: 10). Patronage networks are also reportedly widespread (Saati 2022; World Justice Project 2022: 10). While anti-corruption efforts are undertaken

by various national bodies, due to a lack of funding, their ability to counter corruption is limited. The Global Organized Crime Index also report that corrupt officials, particularly customs officers, aid in the importation of cocaine and firearms to St. Lucia. The civil society organisation (CSO) sector is also not particularly developed in St Lucia and there are no anti-corruption CSOs (Commonwealth Secretariat 2022).

St. Lucia harbours a minor human trafficking market, predominantly for labour and sexual exploitation, involving both locals and migrants from Caribbean and South Asian countries. The small island also experiences arms trafficking, with illegal trade routes established to Martinique and facilitated by Venezuelan crime groups. Firearms from the US also find their way into the country before being transported to Martinique and France. Additionally, St. Lucia serves as a significant transit point for cocaine from Venezuela. Cannabis, both locally grown and smuggled from neighbouring islands like St. Vincent and Grenada, is widespread, with reports suggesting corruption among officials aiding these activities (Global Organized Crime Index 2023).

St. Lucia has a small economy which benefits from foreign direct investment (FDI) and has a small but active financial sector (CFATF GAFIC 2021: 8). It gains significant revenue from its citizenship by investment programme, which offers one of the lowest priced entry points for applicants who want a passport quickly (CFATF GAFIC 2021: 8; Elliott and Khatoon 2022).

However, the country is at risk from money laundering, particularly from the proceeds of organised criminal activity and offenses committed in other countries (CFATF GAFIC 2021). While there has been a move towards transparency in its citizenship by investment programme through the publication of Annual Reports, there have still been some problems with individuals who have been charged with money laundering purchasing St. Lucian passports (Elliott and Khatoon 2022). While the country offers high financial secrecy (such as little transparency of company ownership and opaque corporate tax disclosure) this is still relatively small given how few financial services are offered to non-residents (Tax Justice Network 2022).

Anti-corruption and illicit finance framework

St. Lucia's integrity legislation consists of the Integrity in Public Life Act, No. 6 of 2004, revised in 2021. This act defines corruption and requires the disclosure of assets and liabilities of certain public officers. The Freedom of Information Act 2009 grants the right to access information in the public interest. The Special Prosecutor Act, No. 19 of 2022 provides for a special prosecutor to receive and conduct investigations on complaints related to corruption.

The jurisdiction also has a public procurement act (amended by Act 13 of 2020), the [Public Finance Management Act 2020](#) and the [Public Service Commission \(Disciplinary Proceedings\) Regulations](#) to counter corruption. However, St. Lucia lacks whistleblower and campaign finance legislation. The Organization of American States (OAS) has made recommendations for the country to adopt a more comprehensive legal and regulatory framework to protect whistleblowers and witnesses and legal norms dedicated exclusively to political financing.

St. Lucia's AML framework consists includes the Proceeds of Crime Act Cap.3.04 and the [Money Laundering \(Prevention\) Act Cap.12.20](#) (2020 revision) criminalise money laundering on the basis of the Palermo and Vienna conventions and aim to make predicate crimes serious offences. Section 17 requires financial institutions to identify of the beneficial owner using reliable source documents (CFATF GAFIC 2024). However, the most recent FATF follow-up report notes some deficiencies in the beneficial ownership requirements such as the lack of obligation for financial institutions to determine whether the beneficiaries/beneficial owner is a politically exposed person or not (CFATF GAFIC 2024: 15).

Other relevant legislation includes the Registration of Supervised Entities Act No. 12 of 2023 and the UN Sanctions (Counter-Proliferation Financing) Act No. 29 of 2019. Both the Money Laundering (Prevention) Act and the Anti-Terrorism Act have been amended to strengthen their provisions to adhere to the FATF Recommendations.

St. Lucia is party to various international conventions and treaties to counter corruption and organised crime. Among them are the United Nations Convention against Trafficking in Narcotics and Psychotropic Substances (the Vienna Convention), United Nations Convention for the Suppression of the Financing of Terrorism, United Nations Convention against Transnational Organised Crime (the Palermo Convention) and its protocols, except the protocol against the smuggling of migrants by land, sea and air, supplementing the United Nations Convention against Transnational Organised Crime, and the protocol against the illicit manufacturing of and trafficking in firearms, their parts and components and ammunition, supplementing the United Nations Convention against Transnational Organised Crime. The jurisdiction is also party to the United Nations Convention against Corruption.

St. Kitts and Nevis

Table 8: Measurements of corruption and illicit finance in St Kitts and Nevis.

	Control of corruption		Presence on Blacklists	Criminality scores				Money laundering and terrorist financing score
	Score	Percentile rank		Criminality	Criminal markets	Criminal actors	Resilience	
Latest available data (year in brackets)	0.39 (2022)	65.09	OECD list of high-risk residence/ citizen by investment schemes (2023).	3.52 (2023)	2.83	4.20	5.00	6.11 (2023)

Extent of corruption and illicit finance

The level of corruption for St. Kitts and Nevis is measured by the World Bank’s Worldwide Governance Indicators. In control of corruption, the numbers indicate that the perception of corruption has remained the same for the country in the past five years (Kaufmann and Kraay 2023). On government effectiveness and rule of law, it indicates that government effectiveness in countering corruption and upholding the rule of law has deteriorated in the past five years compared to other countries (Kaufmann and Kraay 2023).

For illicit finance, St. Kitts and Nevis’s criminality score on the GI-TOC was 3.52 in 2023, which is an improvement on its 4.10 criminality score in 2021. There were improvements too in its criminal markets score, having obtained 2.83 in 2023 versus 3.20 in 2021; and its criminal actors score was 4.20 in 2023 whereas it was 5.00 in 2021. However, its resilience score remained the same (5.00) in 2023 as in 2021. These results indicate that criminal activities from criminal markets and criminal actors improved within the past two years, while the country’s resilience to these activities remained the same. As for the Basel AML Index, it scored 6.11, ranking in 38 of 152 countries, indicating that these risks are moderately high there (Basel Institute on Governance 2023).

Corruption and illicit finance activities

Analysis suggests that there does not seem to be as much of a dialogue around the issue of corruption in St. Kitts and Nevis as there are in the surrounding island nations (Yansura et al. 2021: 86). Despite this, corruption is considered to be systematic largely due to its citizen by investment programme (Global Organized

Crime Index 2023; Yansura et al. 2021: 86). Since it commenced in the early 1980s, the programme people linked to financial crimes, unexplained wealth, political power and sanction evasion have been granted citizenship without having an enhanced due diligence check by the local agency responsible (OCCRP 2022).

The anti-corruption framework is adequately enforced, and transparency in governance is also described as fair, according to assessments for the 2023 Global Crime Index. While investigations and prosecutions related to organised criminal groups occur, their success rates are low, perhaps due to the fact that the jurisdiction does not have a special unit to deal with organised crime. Despite this, the judiciary is independent and appears not to be influenced by levels of high corruption (Global Organized Crime Index 2023). The police force has a good level of public trust in St. Kitts and Nevis; however, evidence suggests that law enforcement officers are influenced by high-level politicians (Global Organized Crime Index 2023).

St. Kitts and Nevis is a transit and destination country for human trafficking (Global Organized Crime Index 2023). St. Kitts and Nevis is also a transit point and destination for arms trafficking, primarily from the US (Global Organized Crime Index 2023). Firearms are brought into the country concealed in commercial vessels for local gang use.

The trafficking of cocaine is significant in St. Kitts and Nevis. Due mainly to its geographic location, the country is used as a gateway to smuggle cocaine from South America to the US and Europe (Global Organized Crime Index 2023). Controlled by foreign actors, cocaine is smuggled via air and sea in collaboration with local gangs. According to the Global Organized Crime Index (2023), St. Kitts and Nevis also has a well-established market for cannabis. Most of the cannabis produced is reportedly consumed locally, which has contributed to a high-level of drug-related violence. Due to the high volume of drug trafficking in the country, St. Kitts and Nevis has been recognised by the US State Department as a high-risk jurisdiction for money laundering and terrorist financing (US Department of State 2020).

St Kitts and Nevis is a small international centre whose focus is company formation which leaves it vulnerable to money laundering, according to its 2022 FATF Mutual Evaluation Report (FATF 2022: 8). As an illustrative example of this issue, in 2018 a payday lending business owner was sentenced to 10 years in prison for racketeering, fraud and identify theft and had used companies incorporated in St. Kitts and Nevis to carry out this scheme (United States Attorney's Office 2018).

The jurisdiction has, however, recently implemented mechanisms to ensure that basic information on the types and forms of legal persons and arrangements is publicly available and companies are subjected to robust incorporation procedures and beneficial ownership requirements to reduce money laundering risks (FATF 2022: 7-8). The country's citizen by investment programme is estimated to be around

11% of the country's GDP and is also sometimes misused as a mechanism to launder money (Global Organized Crime Index 2023; FATF 2022: 19).

Anti-corruption and illicit finance framework

St. Kitts and Nevis's anti-corruption framework consists of the [Integrity in Public Life Act Cap.22.18](#), which establishes a code of conduct and provides for the financial affairs of public officials to be declared. Its [Freedom of Information Act 2018-6](#) makes provision for information to be disclosed by public bodies including persons who provide services on behalf of public bodies. It also passed a complementary bill in 2023 to ensure the protection of sensitive, privileged and confidential data from unauthorised leaks.

The jurisdiction also introduced the [Anti-Corruption Act](#), which defines corrupt conduct and establishes offences pertaining to corrupt conduct. It also appoints a special prosecutor and sets out the function for this role. Its [Whistleblower Protection Bill 2023](#) safeguards persons reporting illicit activities carried out in public service. On the other hand, the [Procurement and Contract Administration Act 2012](#), which was intended to address public procurement has not been enforced. A new public procurement act is expected to be introduced in 2024. Additionally, in 2017, local reports revealed that the government would be introducing a campaign finance law. However, further information on this law could not be found.

The AML regime in St. Kitts and Nevis consist of a number of pieces of legislation. The [Proceeds of Crime Act](#), Cap 4.28 defines money laundering and makes it an offence and the Anti-Terrorism Act Cap.4.02 criminalises terrorism. The [AML and Countering the Financing of Terrorism legislation](#) replaces obligations on regulated businesses in the jurisdictions to comply with its provisions and designates the financial services regulatory commission as supervisory authority over regulated businesses to ensure their compliance with its provisions.

The country has also issued several guidelines and regulations covering AML and countering the financing of terrorism. Despite this AML regime, St. Kitts and Nevis was placed on the OECD's residence/citizen by investment schemes list due to the potential high risk it poses to the integrity of the Common Reporting Standard (OECD 2023). The FATF also considers that significant improvements are needed to strengthen its money laundering investigations, prosecutions, convictions and confiscations, and the implementation of preventative measures regarding DNFBPs (FATF 2022: 9).

St. Kitts and Nevis has signed and ratified various international conventions and treaties aimed at countering organised crime and has laws to counter organised crime. Among them are the United Nations Convention against Trafficking in

Narcotics and Psychotropic Substances (the Vienna Convention), the United Nations Convention for the Suppression of the Financing of Terrorism, the United Nations Convention against Transnational Organised Crime (the Palermo Convention) and its protocols, and the United Nations Convention against Corruption.

St. Vincent and the Grenadines

Table 9: Measurements of corruption and illicit finance in St Vincent and the Grenadines.

	Control of corruption		Presence on Blacklists	Criminality scores				Money laundering and terrorist financing score
	Score	Percentile rank		Criminality	Criminal markets	Criminal actors	Resilience	
Latest available data (year in brackets)	0.76 (2022)	77.36	None	3.08 (2023)	2.67	3.50	5.38	N/A

Extent of corruption and illicit finance

St. Vincent and the Grenadines scored 60 on the 2023 CPI, ranking it the 36 out of 180 countries (Transparency International 2023). In the Worldwide Governance Indicators control of corruption, the jurisdiction scored 0.76, placing it in the 77th percentile among all countries in 2022 (Kaufmann and Kraay 2023). These numbers indicate that the perception of corruption in the jurisdiction has improved in the past five years. On government effectiveness and rule of law, the numbers indicate that while government effectiveness in countering corruption deteriorated, upholding the rule of law improved in the past five years compared to other countries (Kaufmann and Kraay 2023).

For illicit finance, St. Vincent and the Grenadines' criminality score on the GI-TOC was 3.08 in 2023, which is an improvement on its 3.30 score in 2021. There were improvements too in its criminal markets score, having obtained 2.67 in 2023 versus 2.85 in 2021; and for criminal actors, it scored 3.50 in 2023, compared to 3.75 in 2021. It scored 5.38 in 2023 for resilience compared to 5.46 in 2021. These results indicate that criminal activities from criminal markets and criminal actors improved in the past two years, including the country's resilience to these activities in comparison to other countries.

Corruption and illicit finance activities

The level of corruption in St. Vincent and the Grenadines is considered low (Commonwealth Secretariat 2022). The government is perceived as transparent and holds meetings to address citizens' concerns, and the judiciary operates

independently (Global Organized Crime Index 2023; Commonwealth Secretariat 2022). However, the Freedom of Information Act, passed in 2023 is not yet fully operational, resulting in difficulties in obtaining access to information. Additionally, there is no legislation requiring the public officials to declare assets, income or gifts. According to the Global Organized Crime Index (2023), the judiciary reportedly lacks resources and institutional weaknesses exist, rendering it ineffective to counter organised crime.

Human trafficking is limited in St. Vincent and the Grenadines (Global Organized Crime Index 2023). Foreign women are exploited sexually, and sex trafficking of children is facilitated by caregivers and parents. Persons employed by foreign companies are also at risk of forced labour (Global Organized Crime Index 2023).

Arms trafficking is also a relatively small market in St. Vincent and the Grenadines (Global Organized Crime Index 2023). The country is used as a transit point for arms originating from the US and Canada for South America. Locally, arms trafficking is propelled by the cocaine trade, mainly to protect stockpiles in the country. St. Vincent and the Grenadines has a very well-established cocaine market (Global Organized Crime Index 2023). The country is a transit point for trafficking cocaine from South America destined for other Caribbean countries, Europe and the US due to its geographical location, and this creates the country's main threat for money laundering (FATF 2024: 21).

Financial fraud occurs frequently in St. Vincent and the Grenadines (Global Organized Crime Index 2023). Criminal groups conduct deceptive, misleading and illegal schemes to deprive people of money. The country's citizen by investment schemes makes it vulnerable to financial crimes such as money laundering and tax evasion due to the low-income tax rate offered, according to the OECD residence/citizen by investment schemes (OECD 2023). Private sector actors are reportedly involved in money laundering and other types of financial crimes including financial fraud, online scamming and other types of illegal and deceptive practices (Global Organized Crime Index 2023).

Anti-corruption and illicit finance framework

St. Vincent and the Grenadines' anti-corruption framework consists of the draft [Integrity of Public Life Act 2004](#). This act gives effect to the provisions set out in the Inter-American Convention against Corruption, it forms an integrity commission and obligates certain public officials to declare their financial affairs. To date this act has not yet been passed into law. Its [Freedom of Information Act 2003](#) grants the right to access information held by the government and public authorities. However, this act has not yet been put into effect either.

The country's [draft Prevention of Corruption Act 2004](#) also brings into effect the Inter-American Convention against Corruption and sets out provisions to prevent corruption in conducting public functions. After further investigation, no information has been found to indicate that this draft bill has been put in place. The jurisdiction's [Public Procurement Act 2018](#) outlines provisions for public procurement, including procedures for the solicitation and awarding of contracts. This act was brought into effect by way of the [Public Procurement Regulations, no. 23 of 2019](#). In terms of whistleblowing and campaign financing legislation, research reveals that no such laws appear to exist on in the jurisdiction's anti-corruption legislation.

The government has engaged with local CSOs who have provided input into policies and made concrete recommendations on how transparency and anti-corruption initiatives could be strengthened (Commonwealth Secretariat 2022). The private sector and media have also been proactive in these initiatives (Commonwealth Secretariat 2022).

St. Vincent and the Grenadines has several pieces of AML legislation. The [Proceeds of Crime Act 2013](#), repeals and replaces the Proceeds of Crime Act, Chapter 181, and some provisions contained in the [Drug Trafficking Offences Act, 173](#). This act consolidates and updates the money laundering offences, confiscation orders and other relevant provisions, and introduces provisions to recover property obtained through illegal means. This act was amended in 2017 to make minor updates. The [AML and Terrorist Financing Code 2017](#) sets out measures for customer due diligence, policies, procedures, systems and controls, and compliance and record keeping. The Anti-Terrorist and Proliferation Act 2017 outlines the offences of terrorist financing, the recovery and forfeiture of cash and freezing of cash pertaining to terrorists. The [Financial Intelligence Unit Act](#), Chapter 174 establishes the financial intelligence unit to collect, analyse and distribute information to competent authorities related to suspicious transactions. The Commerce and Intellectual Property Office (CIPO) maintains basic information on beneficial ownership; however, the office does not verify or retain information on beneficial ownership other than shareholders and directors (FATF 2024: 16). The FATF's (2024) assessment of St. Vincent and the Grenadines' AML framework and FIU considers them to be generally effective.

St. Vincent and the Grenadines is party to a number of international treaties and conventions to counter organised crime, including the United Nations Convention against Trafficking in Narcotics and Psychotropic Substances (the Vienna Convention), United Nations Convention for the Suppression of the Financing of Terrorism, United Nations Convention against Transnational Organised Crime (the Palermo Convention) and its protocols, with the exception of the United Nations Convention against Corruption. It has ratified the Inter-American Convention against Corruption.

Trinidad and Tobago

Table 10: Measurements of corruption and illicit finance in Trinidad and Tobago.

	Control of corruption		Presence on Blacklists	Criminality scores				Money laundering and terrorist financing score
	Score	Percentile rank		Criminality	Criminal markets	Criminal actors	Resilience	
Latest available data (year in brackets)	-0.38 (2022)	40.57	EU list of non-cooperative tax jurisdictions (2024).	5.20 (2023)	4.80	5.60	5.33	4.51 (2023)

Extent of corruption and illicit finance

Trinidad and Tobago scored 42 on the 2023 CPI, ranking it the 76 out of 180 countries (Transparency International 2023). The Worldwide Governance Indicators suggest that the perception of corruption has slightly declined in the past five years and that government effectiveness in countering corruption and upholding the rule of law both declined in the past five years compared to other countries (Kaufmann and Kraay 2023).

Trinidad and Tobago’s criminality score on the GI-TOC was 5.20 in 2023, which is an improvement on its 4.94 in 2021. In its criminal markets score, the jurisdiction obtained 4.80 in 2023, and scored 5.33 for resilience in 2023 compared to 5.21 in 2021. These results indicate that criminal activities from criminal markets increased, with a slight decline in criminal actors in the past two years. However, the country’s resilience to these activities also increased, in comparison to other countries. In the Basel AML Index, the jurisdiction scored 4.51 ranking in 114 among 152 countries, indicating that these risks are moderate in the jurisdiction (Basel Institute on Governance 2023).

Corruption and illicit finance activities

Corruption is considered to be widespread in Trinidad and Tobago, with customs and police officers reportedly accepting bribes (Global Organized Crime Index 2023). Also, high-ranked government officials, police officers, customs and immigration officials, and army officers facilitate financial fraud in the country. Although the government has passed new laws to deal with corruption, they still have yet to be fully

implemented, which has contributed to the perception of corruption in the country remaining high (Global Organized Crime Index 2023).

Allegations of corruption and political pressure are reported to influence the judiciary in Trinidad and Tobago, which is perceived as weak, inefficient, slow and underfunded (Global Organized Crime Index 2023). The prison system is overcrowded with reports of corruption and abuse, which poses challenges for the country. The kinds of corruption reported include the trafficking and smuggling by prison officers of items such as cell phones, chargers and other banned goods for inmates who cut deals with the officers (Trinidad and Tobago Guardian 2021).

In 2023, a corruption lawsuit which began nearly 20 years ago was won by the current government (Salomon and Coto 2023). A former finance minister, various businessmen and several companies based in Florida, Panama and Portugal were sued for participating in a scheme in the 1990s that included illegally obtaining consulting and construction contracts at hyper-inflated prices via bribes, bid rigging and money laundering – all linked to the expansion of the Piarco International Airport in Port-of-Spain (Salomon and Coto 2023).

The Global Organized Crime Index (2023) also notes that there have been accusations of abusive force by police officers and that they have close links to criminal groups. There are also reports of customs and armed forces officials facilitating the smuggling and trafficking of drugs, firearms and humans, and that there are ties between the government and gang leaders to provide state services to impoverished communities (Global Organized Crime Index 2023).

Trinidad and Tobago is considered a source, transit hub and destination for human trafficking (Global Organized Crime Index 2023). Although human smuggling is a small market in Trinidad and Tobago, corrupt police officers are reportedly engaged in this activity (Global Organized Crime Index 2023). The extent of their engagement includes accepting bribes, failure to record a matter or investigate a report made against a fellow officer and facilitating information to benefit political groups (Trinidad and Tobago Newsday 2019). Extortion exists mainly in prisons in Trinidad and Tobago with inmates reportedly extorting citizens and even attorneys (Global Organized Crime Index 2023).

Local gangs in collusion with Venezuelan mafias in arms and drug trafficking reportedly profit from extortion and kidnapping for ransom among other criminal activities (Global Organized Crime Index 2023). Trinidad and Tobago is also a transit point for cocaine from South America to the US and Europe (Global Organized Crime Index 2023). The trafficking of cocaine is pervasive as a local market exists for the drug. At sea, cocaine is transferred to smaller vessels and taken ashore or dropped off at specific locations in the country and transported by air or boat to Europe.

Financial crimes have become more prevalent in recent years in Trinidad and Tobago. Foreign nationals are reportedly the perpetrators of these crimes, which are facilitated by locals including high-ranked government officials, police officers, customs and immigration officials, and army officers (Global Organized Crime Index 2023). Private sector actors, primarily in the automobile and real estate sectors, are reportedly engaged in tax evasion and schemes involving money laundering.

Anti-corruption and illicit finance framework

Trinidad and Tobago has a comprehensive anti-corruption framework. The [Integrity in Public Life Act 2000](#) established the integrity commission and requires assets to be publicly disclosed. The [Freedom of Information Act 1999](#) provides the public with the right to access information held by public authorities. The [Prevention of Corruption Act 1987](#) provides provisions for certain offences of corruption in public office to be punished. The [Public Procurement and Disposal of Public Property Act 2015](#) ensures accountability, integrity and transparency in the procurement and sale of public property. It also contains provisions to encourage whistleblowing and protect whistleblowers. To strengthen legislation on whistleblowing, the jurisdiction introduced the [Whistleblower Protection Bill 2022](#). Although the [Representation of the People's Act 1967](#) enacts laws to regulate conduct during elections, it lacks provisions on election campaign financing.

Trinidad and Tobago's AML framework consists of three main pieces of legislation. The [Proceeds of Crime Act Chapter 11:27](#) provides for money laundering to be criminalised and for the proceeds of specific offences to be confiscated. Regulations pertaining to this act came by way of the [Financial Obligations Regulations 2010](#). The [Anti-Terrorism Act Chapter 12:07](#) criminalises terrorism and its financing. It provides for terrorist activities to be identified, prevented, prosecuted, convicted and punished. It also sets out provisions for confiscating, forfeiting and seizing assets belonging to terrorists and persons engaged in terrorist financing. Regulations pertaining to this act were passed through the [Financial Obligations \(Financing of Terrorism\) Regulations 2011](#). The Financial Intelligence Unit of Trinidad and Tobago Act Chapter 72:01 established and empowered the financial intelligence unit to implement the FATF Recommendations.

In 2021, Trinidad and Tobago took steps to strengthen its AML framework by enacting laws, conducting investigations and prosecuting suspected cases. Despite taking these measures to strengthen its AML framework, the country was placed on the EU list of non-cooperative tax jurisdictions in 2024.

Trinidad and Tobago is party to various international conventions and treaties aimed at countering organised crime, which gives the country a rather strong legislative framework to counter organised crime. Some of the conventions and treaties to which

it is party includes, the United Nations Convention against Trafficking in Narcotics and Psychotropic Substances (the Vienna Convention), United Nations Convention for the Suppression of the Financing of Terrorism, United Nations Convention against Transnational Organised Crime (the Palermo Convention) and its protocols, and the United Nations Convention against Corruption.

Regional cooperation

Regional cooperation exists in many forms in the Caribbean region. These initiatives are divided into the following two main topics: i) anti-corruption and ii) countering illicit finance. The initiatives are listed in alphabetical order under each topic.

Anti-corruption initiatives

Caribbean Association of Supreme Audit Institutions

This body aims to strengthen and reinforce supreme audit institutions in the region through conducting training and continuing education, sharing audit techniques and programmes, as well as standards and requirements for public sector accounting. It has actively ventured beyond its traditional role in supervising transparency and accountability in the public sector to take on a more active role in curbing corruption. All ten countries are members of this initiative.

Caribbean Regional Technical Assistance Centre

The goal of this centre is to conduct diagnostic work to determine and develop measures required to bolster specific aspects of financial and economic governance. It creates detailed plans and helps to implement them. It reviews assessments and proposals of governments/donors to ensure compliance with international standards. It provides technical advice, arranges training, workshops, seminars and internships to improve skills and enhance development. The centre focuses on public finance management, tax and customs administration, financial sector supervision and financial stability, particularly in improving corporate governance rules and transparency frameworks, and assisting in creating and implementing laws and procedures pertaining to AML and the financing of terrorism. The centre also helps with debt management, financial and economic statistics, and macroeconomic programming analysis. The centre is financially supported by a number of foreign governments and international organisations and is spearheaded by the IMF. All ten countries are members of this initiative.

Commonwealth Caribbean Association of Integrity Commissions and Anti-Corruption Bodies

The aim of this association is to foster cooperation across borders, share best practices and develop anti-corruption initiatives for the region. Formed in May 2022, its main area of focus includes ethics and the prevention of corruption. The association also conducts training, policy research and undertakes the drafting of policies. It is supported by the Commonwealth Fund for Technical Co-operation, the Commonwealth Secretariat, and is headed by the Commonwealth. All ten countries are members of this association. It has helped to promote collaboration and the exchange of best practice and of practitioners among member countries in the region (Commonwealth Secretariat 2022).

OECD Latin America and Caribbean Anti-Corruption Initiative

This initiative seeks to advance the OECD Anti-Bribery Convention and strengthen its implementation in Latin America and the Caribbean region. It provides countries with a platform to share best practices, compare experiences and discuss challenges to counter corruption. The overall aim of this initiative is to develop a dialogue between countries and the business community to work together to prevent corruption in international business transactions and establish internal prevention measures in companies. All ten countries discussed in this paper are members of this initiative.

Regional Security System (RSS)

In the area of corruption, RSS has established the Office of Professional Responsibility. The underlying objective of this unit is to develop anti-corruption efforts in the region by strengthening institutions at national and regional levels. More details are noted below on RSS's work.

UNODC Caribbean Initiative

In October 2023, the United Nations Office on Drugs and Crime (UNODC) launched a platform to counter corruption in the Caribbean. This platform consists of the following countries: Antigua and Barbuda, Bahamas, Belize, Dominica, Grenada, Guyana, Jamaica, St. Lucia, and Trinidad and Tobago. The underlying objective of this initiative is to fully implement the UNCAC and the Inter-American Convention against Corruption. To this end, a strategic roadmap for 2023-2025 was agreed to by all countries to fast-track the implementation of the UN's convention in the region. Areas of priority include strengthening the legal and institutional framework to

counter corruption, enhancing accountability and transparency in the procurement process in the public and private sectors, ensuring reporting mechanisms and protection for whistleblowers, and facilitating investigations and prosecution of corruption and money laundering. This initiative assists in bringing about a unified approach to ensuring the key aspects of anti-corruption legislation are implemented in the region. However, only seven of the ten countries discussed in the paper are part of this initiative so far.

Initiatives to countering illicit finance

Antigua and Barbuda Trafficking in Persons Prevention Committee Cases Task Force

The task force coordinates national efforts to counter human trafficking and has established a national education anti-human-trafficking campaign. The campaign focuses on enhancing knowledge regarding red flags and trends associated with organised crime and human trafficking. Its goal is to establish and strengthen cooperation among countries within the region. Its partnership includes Belize, Jamaica, Trinidad and Tobago. and the Bahamas.

Caribbean Community (CARICOM)

CARICOM established a regional framework for crime and security for the region in July 2005 and designated its Implementation Agency for Crime & Security (IMPACS) to oversee its implementation. CARICOM IMPACS consists of a special department, Regional Crime and Security Strategy Central Coordinating Unit (RCSS-CCU), and two sub-agencies, Regional Intelligence Fusion Centre (RIFC) and the Joint Regional Communications Centre (JRCC). RCSS-CCU provides advisory services and critical technical assistance and support to member states. The unit is staffed by a coordinator, a committee coordinator and special advisers in border security, law enforcement and military affairs. Through its committee coordinator, RCSS-CCU has direct links with law enforcement, customs, military, immigration and other security agencies in member states. It acts as a liaison office between member states and international agencies including INTERPOL, OAS, SOUTHCOM and UN agencies.

The RIFC provides intelligence gathering, analysis and sharing of information to support CARICOM member states. This agency is mainly staffed by designated persons from member states assigned to the agency for an initial two-year period. One of its core functions is to provide 24/7 border protection support to JRCC. Its goals are to prevent criminal and terrorist activities, detect and contain persons of

interest, and profile and track persons of interest entering and traversing the region. The JRCC's responsibility lies mainly in the management and operation of an advance passenger information system. This system screens passengers entering and travelling by air and seaports throughout the CARICOM region. Another important role of the JRCC is managing and operating the CARICOM electronic advance cargo information (eACIS), which centralises cargo information on incoming, outgoing and transit shipments. The JRCC gathers information from these two databases, analyses and shares them with member states. All of the ten countries discussed in this paper are members of CARICOM.

Some of the current initiatives undertaken by CARICOM IMPACTS include the anti-human trafficking initiative jointly funded by the Spanish Scientific and Technical Cooperation. This initiative aims to effectively counter human trafficking by strengthening the capacity of officers in the criminal justice system. Another project is the integrated border system for the Organization of the Eastern Caribbean States (OECS), which enhances the border system within the OECS. Another initiative is the Caribbean Basin Security Initiative which aims to foster collaboration on security in the region between CARICOM members and the Dominican Republic in partnership with the US. Finally, the European Union's 11th development fund initiative is designed to develop the capacity of CARIFORUM members on asset recovery, cybercrime and financial compliance.

Caribbean Financial Action Task Force (CFATF)

The CFATF has an effective strategy to ensure the implementation of, and compliance with, the FATF Recommendations to prevent and control money laundering and to counter the financing of terrorism and proliferation of weapons of mass destruction. Its strengths include its ongoing programme of mutual evaluation of its members, and its training and technical assistance programmes, which it coordinates. It also has an extensive membership of countries throughout the Caribbean region, which includes all of CARICOM's members and associate members. It also has established a collaborative network with regional partners including CARICOM, the Caribbean Development Bank and the Eastern Caribbean Central Bank. CFATF's effectiveness in the region is also credited to its network of international partners, including the World Bank, the IMF, the Commonwealth Secretariat, the Inter-American Development Bank, UNODC and International Country Risk Guide and its cooperating and supporting network of countries in North America, Central America and Europe. All ten countries are members of the CFATF.

Regional Security System

The Regional Security System (RSS) mandate is to ensure the stability and well-being of member states through mutual cooperation to maximise regional security in preserving the social and economic development of its people. While its members consist of only eight of CARICOM's members, all fifteen members of CARICOM are members of its Asset Recovery Inter-Agency Network for the Caribbean (ARIB-CARIB). ARIB-CARIB's network is comprehensive, focusing on areas such as financial investigation and asset recovery, asset management and disposal, a financial action task force programme to ensure its members compliance with the FATF Recommendations, and countering terrorism and terrorist financing. RSS is the main collaborator with CFATF in designing and implementing an accredited training programme for financial analysts and investigators in the region. It has a strategic number of international partners, including EUROPOL, the Foreign and Commonwealth Office, OAS, STAR (special trust alternative regime), the US Department of Justice and UNODC, whereas its strategic regional partners include CFATF and CARICOM agencies.

In the area of policing and risk management, RSS developed common policing standards and a process to ensure compliance. RSS also established a regional crime observatory and digital forensic lab which are supported by the US Embassy Regional Security Office and the US Embassy's Office of International Narcotics and Law Enforcement. The regional crime observatory aims to make information available to support decision-making based on evidence in relation to policy and systematic responses to crime. It focuses mainly on cross-border analysis of the phenomenon of crime. The digital forensic lab assists by providing accurate analysis of cell phone data and other digital devices to facilitate investigations and successful outcomes in prosecutions.

With regard to its Transnational Organised Crime Task Force and the Office of Professional Responsibility, it has partnered with the US Bureau of International Narcotics and Law Enforcement Affairs (INL) to support its members in countering drugs and activities related to drug trafficking with regional and international targets. The underlying objective of the Transnational Organised Crime Task Force is to disarm, disrupt, dismantle and discourage the activities of criminal organisations and to develop a strong disincentive against organised crime. To achieve this, it conducts investigations to target and prosecute persons at all levels in criminal organisations ensuring that assets owned or in possession of subjects are seized and forfeited. The Office of Professional Responsibility aims to develop anti-corruption efforts in the region by strengthening institutions at national and regional levels. RSS also has a cyber crime programme listed on its website. No information was available for this programme.

In other areas, RSS has followed the same strategy and maintains relationships with an extensive number of regional and international partners to strengthen its operational network to achieve its objectives and enhance its overall effectiveness and national security among its members. Its members include seven of the ten countries discussed in this paper, namely Antigua and Barbuda, Barbados, Dominica, Guyana, St. Lucia, St. Kitts and Nevis, and St. Vincent and the Grenadines.

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