

Independent Evidence and the UK's 2027 FATF Mutual Evaluation

The Joffe Trust April 2026

The UK's next Financial Action Task Force (FATF) Mutual Evaluation is scheduled for 2027, with the on-site visit expected in August. HM Treasury is already gathering data from regulated firms to present the UK's AML framework in the best light. This note sets out the major opportunity to ensure that the assessment also hears independent evidence from the rest of the world.

The FATF has formal mechanisms for this. Other jurisdictions can provide feedback on their experience of cooperating with the assessed country. Civil society can submit evidence via a dedicated mechanism. Both feed into the scoping note that determines what assessors focus on. The window for shaping that scoping note is open now.

This note, which has been developed with input from [Latimer Network](#) members, sets out initial analysis on what third-party evidence could contribute, why it rarely materialises, and how it could be delivered.

Why third-party evidence matters

The 2018 MER found the UK has a broadly sound legal framework. The question for 2027 is effectiveness: how well does the system actually work? Foreign jurisdictions are uniquely placed to answer that. Countries that have requested mutual legal assistance can document response times and refusal rates. Countries whose stolen assets sit in UK property or trusts can testify to whether the asset recovery apparatus functions or merely exists. Partner FIUs can report on how well the UKFIU's chronic under-resourcing – flagged in 2018 – has been addressed.

If the only evidence assessors receive is UK-curated, the assessment will reflect UK-framed strengths. Third-party evidence – holistic feedback and critical assessment that is fair, balanced, and honest – is a significant independent counterweight. FATF's 5th round methodology's emphasis on effectiveness means real-world evidence of system impact is directly relevant in a way it was not previously.

Why it is often overlooked

Third parties rarely submit evidence into the MER process of a major jurisdiction. This is despite broad consensus – including from the UK, which contributes to the majority of MERs – that well-rounded evaluations depend on input from a wide range of jurisdictions and sources. We believe three barriers help explain this.

1. **No incentive.** There is no reward for submitting third-party evidence, no mechanism for tracking whether a submission influenced the MER assessment, and no feedback loop. The effort is real and the payoff invisible.
2. **Capacity constraints.** The countries best placed to provide evidence are precisely those with the thinnest FIU and AML capacity. Drafting a formal FATF submission requires familiarity with the methodology and confidence that it will be taken seriously.
3. **Perceived political risk.** Jurisdictions may self-censure out of concerns about bilateral repercussions from submitting candid feedback on a major FATF member like the UK. Routing feedback through regional FATF-Style Regional Bodies (FSRB)

delegations – the standard channel – also means that all relevant parts of a country’s system may not be aware that the window to contribute is open.

What could be done

1. **Inform and support affected countries.** Direct submissions from affected countries are the strongest way to demonstrate the breadth and depth of real-world experience with the UK’s cooperation. There could be huge value in work to ensure that all relevant parts of a country’s system (FIUs, asset recovery units, MLA authorities, law enforcement) are aware of the process open to them to submit feedback on the UK via FRSBs, and providing hands-on drafting support.
2. **Extract evidence from existing MERs.** The mutual evaluation reports of other countries routinely reference the UK in relation to illicit flows, enabling structures and operational cooperation. These references are scattered across hundreds of pages in dozens of reports and have never been systematically assembled. AI-assisted text analysis could review the full corpus of published FATF and FSRB reports and extract and aggregate references to the United Kingdom — UK-registered companies, UK-based professionals, UK FIU cooperation, UK MLA responsiveness — categorised by Immediate Outcome. This evidence is already published, and would have distinctive authority because it comes from FATF’s own processes.
3. **Synthesise open source and academic evidence.** Investigative journalists have documented hundreds of UK-nexus cases. Public registries including Companies House, the Register of Overseas Entities, and Land Registry can also be systematically analysed. There is a growing body of academic work on the UK’s role in global illicit flows from institutions including RUSI, Chatham House, Exeter, and Sussex. Academic evidence is peer-reviewed, methodologically transparent, and independent. None of this currently has a structured route into the FATF process, but submission-ready analysis, mapped to FATF Immediate Outcomes, could be contributed.
4. **Convene an evidence roundtable.** HM Treasury is planning a series of civil society sessions over the coming year to support UK MER preparations, but these will likely be predominantly UK-focused. An independent roundtable held in advance of these with officials, civil society, journalists, and researchers from other countries could source wider input to feed into the Treasury conversations.

A fair and balanced evaluation depends on assessors hearing a full range of independent views, including from those affected by the UK’s system in practice. Aggregating outputs from these and other related activities into a single structured assessment for submission to the UK MER process could be the difference between a FATF process that strengthens an official narrative and one that genuinely and holistically contributes to and stress-tests it.