



PCC INDUSTRY BRIEFING

Family-Office Programme, CFT/CPF Strategy and Lending Enforcement

CLIENT BRIEFINGS | 1 OCTOBER 2026

Review period: 25 September–1 October 2026

By L. Ryan Pinder K.C. | Pinder Commercial Chambers

Related practices: Financial Services Regulation | Private Client and Family Office | AML/CFT/CPF | Trusts and Estates | Corporate and Commercial | Digital Assets and FinTech

Executive position. The Bahamas has published its first national CFT/CPF strategy, the Government has given further policy detail on its proposed family-office and investor-concierge framework, SCB's announced enforcement phase for unlicensed lending has begun, and a 28 September UN sanctions-list amendment requires immediate screening and action. The family-office measures remain proposals; no implementing legislation or application process has been published.

Key developments

- **National CFT/CPF strategy published.** The 2026–2029 strategy signals continuing risk-based inspections, periodic TF/PF assessments, stronger sanctions enforcement and closer attention to legal arrangements, digital assets, cross-border business, real estate and investment-linked insurance. It is a policy framework, not an amendment to firms' legal duties.
- **Family-office policy receives further detail.** A 25 September ministerial address described a coordinated Bahamas Invest Concierge framework spanning immigration, tax, business licensing and approvals, with an emphasis on local substance. Legislation, eligibility criteria and commencement remain outstanding.
- **Lending enforcement phase begins.** SCB's 30 September engagement date has passed and its stated enforcement start date is **1 October 2026**. The position of private, intra-family and group lending remains fact-sensitive.
- **Immediate sanctions action.** A UN amendment effective 28 September requires SCB-regulated firms to rescreen, freeze without delay where applicable and report matches, suspected matches and attempted transactions forthwith.
- **SCB consultations remain drafts.** The fee and CFD consultations closed on 25 September; no final or gazetted rules were identified.

1. National CFT/CPF strategy sets supervisory direction

STATUS

Government strategy published 25 September 2026 — policy framework, not new legislation

The [Bahamas National Counter-Terrorist Financing and Counter-Proliferation Financing Risk Strategy 2026–2029](#) is the jurisdiction's first dedicated CFT/CPF strategy. It draws on the 2024 terrorist-financing and 2025 proliferation-financing national risk assessments and covers banks and trust companies, securities and investment-fund businesses, insurers, money-transmission businesses, credit unions, FCSPs, casinos and supervised non-financial businesses.

The strategy calls for periodic review of legislation and guidance; continuing risk-based on-site and off-site inspections; periodic TF and PF risk assessment by regulated firms; sector-specific training and typologies; stronger sanctions, intelligence and enforcement; and improved cross-border cooperation. It identifies particular vulnerabilities involving legal persons and arrangements, payment services, non-profit organisations, securities, investment-linked life insurance, high-value real estate, attorneys and complex structures, digital assets and casinos.

Why it matters. The strategy does not itself create a new filing or override the Financial Transactions Reporting Act, Anti-Terrorism Act or regulator rules. It does, however, give regulated firms a clear view of likely supervisory emphasis as The Bahamas undergoes its CFATF Fifth Round evaluation.

Practical considerations. Boards should reconcile enterprise and customer risk assessments with the national TF/PF findings; evidence a distinct PF analysis; test sanctions ownership-and-control logic; document why resources match cross-border, legal-arrangement, digital-asset and other material risks; and retain proof that remediation and training are effective. The source document contains internal dating and editorial inconsistencies, so implementation dates should be confirmed from regulator-specific notices.

2. Family offices and private wealth

STATUS

Policy elaboration announced 25 September and reported 30 September — not enacted or open for application

In a ministerial address at the New York Outbound Summit, the Government gave further detail on the proposed Bahamas Invest Concierge framework. A qualifying family office is intended to receive coordinated support across immigration, tax, business licensing and necessary

approvals. The policy objective is substantive local presence: decision-making in The Bahamas, Bahamian employment and use of local legal, accounting, trust and financial-advisory services. [Government report of the ministerial address](#)

The address also referred to:

- An intended Tax Residency Certificate for qualifying residents spending at least **90 non-consecutive days** in The Bahamas during a calendar year; and
- Economic permanent-residence routes which, depending on applicable requirements, may involve qualifying real estate or a **\$1 million government-bond investment**.

Legal status and verification. These are policy statements. No Bill, regulations, application forms, commencement date or complete eligibility criteria were identified. Existing immigration, tax, exchange-control, business-licensing and regulated-services rules continue to apply. The 90-day statement should not be treated as determining foreign tax residence, treaty residence or domicile. Advice is required in every relevant jurisdiction.

Family-office implications of this week's regulatory changes. Family offices and family investment companies that lend, extend credit or finance assets for income should urgently review the FCSP perimeter described below; isolated private or intra-family arrangements should not be assumed either inside or outside that perimeter without analysing the facts. The new sanctions update also requires service providers to keep current ownership-and-control maps for settlors, founders, protectors, beneficiaries, council members, authorised persons and counterparties.

No consequential new trusts, foundations, private-trust-company, qualified-executive-entity, wills, succession, custody or work-permit measure was identified during the completed publication sweep.

3. SCB's unlicensed-lending enforcement phase begins

STATUS

Enforcement development under existing FCSP law — SCB's stated start date is 1 October 2026

SCB's [Public Notice No. 9 of 2026](#) directed potentially unlicensed providers to engage the Commission by **30 September** and stated that enforcement would begin from **1 October**. The notice addresses non-bank money lending, payday and cash advances, consumer and mortgage loans, ancillary lending and seller-provided instalment finance. Lay-away is excluded. The notice also reaches relevant online services offered to Bahamian residents from outside The Bahamas.

Who is affected. Retailers, vehicle dealers, property developers, fintechs, service businesses, investment companies and family offices that provide credit or loans for income should reassess whether they are carrying on a regulated business. Banks, credit unions and other Central Bank-regulated credit institutions are outside this notice.

Practical considerations. Inventory all loans, instalment sales, shareholder and connected-party advances; distinguish lay-away, incidental accommodation and business lending; obtain Bahamian advice on licensing and exemptions; and engage SCB urgently where potentially in scope. Contacting SCB or filing an application does not itself authorise continued activity or cure earlier non-compliance. Consider pausing new activity where the legal basis is uncertain.

4. UN sanctions entry amended

STATUS

Immediate legal and operational obligation — effective 28 September 2026

The UN amended the entry for Khatiba Jama'at al-Tawhid wal-Jihad and associated aliases on 28 September. SCB's [29 September notice](#) directs licensees and registrants to determine immediately whether they hold or control relevant assets or provide services, freeze without delay, refrain from making assets or services available, and report any match, suspected match or attempted transaction forthwith using the targeted-financial-sanctions form. Separate reporting duties to the FIU and Office of the Attorney General may apply.

Practical considerations. Rescreen customers, beneficial owners, controllers, beneficiaries and connected parties against the amended name and aliases. Preserve evidence of list ingestion, screening scope, no-match results, alert decisions, freezes and notifications. SCB cites a statutory fine of up to **\$250,000** for failure to report and possible disciplinary fines from **\$200 per day**.

5. SCB consultation status and digital assets

STATUS

Consultation periods closed — no final or gazetted instruments identified

SCB's proposed DARE, FCSP, investment-fund and securities fee rules, and proposed CFD amendments, closed for comment on 25 September but remain listed as drafts on the [consultation register](#). The August DARE and FCSP AML/CFT/CPF instruments and wallet-information policy also remain drafts.

No new final DARE rule was identified. DARE registrants should continue preparing the Q3 Travel Rule Compliance Return due **28 October 2026** under the [existing SCB notice](#).

Practical considerations. Do not implement draft fee rates or CFD requirements as law. Maintain implementation scenarios so budgets, capital, data and systems can be adjusted promptly when final instruments and commencement provisions are published.

No-change confirmations

- **External insurance:** No consequential status advancement was identified. The proposed External Insurance Bill and ICB AML/CFT/CPF and outsourcing frameworks remain consultative; no final instrument or new operative deadline was located.
- **Commercial law:** No consequential financial-services or private-wealth commercial judgment or enactment was identified during the review period.
- **Central Bank:** No new prudential measure materially affecting the focus areas was identified.
- **FATF/CFATF:** No new Bahamas-specific determination was identified. The national strategy records that the Fifth Round mutual-evaluation report is expected in 2027.

What regulated firms, family offices and private clients should consider now

1. **Align risk assessments with the national strategy.** Document TF and PF exposure separately and show how identified national and sectoral risks drive controls, budgets and testing.
2. **Complete the sanctions delta screen.** Include beneficial owners, controllers and all relevant family-structure parties, and retain auditable evidence of outcomes.
3. **Resolve lending-perimeter uncertainty.** Escalate potentially licensable arrangements now that SCB's stated enforcement phase has begun.
4. **Treat family-office announcements as a planning signal.** Build a provisional substance, staffing, residency and service-provider model, but do not rely on the proposed concierge or 90-day certificate until implementing materials are issued.
5. **Monitor closed consultations.** Prepare for final SCB fee, CFD, DARE and AML/CFT/CPF instruments without assuming draft text or dates will survive.

Priority dates

Date	Action or milestone
Immediate	Complete sanctions rescreening and report any match, suspected match or attempted transaction forthwith.
1 October 2026	SCB's stated enforcement phase begins for unlicensed money lending and in-house financing.
28 October 2026	DARE Q3 Travel Rule Compliance Return due.
By year-end 2026 — policy target only	Government's stated target for trust-services VAT and related family-office measures; implementing law remains outstanding.
Not announced	Family-office concierge and Tax Residency Certificate commencement and application dates.
2027 — expected	Publication of The Bahamas' CFATF Fifth Round mutual-evaluation report, according to the national strategy.

Primary sources and further reading

1. [Compliance Commission — Bahamas National CFT/CPF Risk Strategy 2026–2029](#)
2. [Government report — ministerial address on family offices, investment and residence, 30 September 2026](#)
3. [SCB — Public Notice No. 9 of 2026 on unlicensed lending and in-house financing](#)
4. [SCB — sanctions notice for the 28 September UN amendment](#)
5. [SCB — consultation documents register](#)
6. [SCB — Travel Rule guidance and return notice](#)
7. [ICB — consultative documents register](#)
8. [Bahamas Judiciary — judgments register](#)

Discuss this briefing with PCC

Email L. Ryan Pinder K.C. at rpinder@pinderchambers.com | pinderchambers.com/ryan-pinder/

Discuss the CFT/CPF strategy, sanctions controls, the FCSP lending perimeter, family-office establishment, private-wealth structures or regulatory implementation with Pinder Commercial Chambers.

Disclaimer. This briefing provides general information and commentary as at 1 October 2026. It is not legal, tax, accounting, investment, immigration, fiduciary or regulatory advice and should not be relied upon as such. Advice depends on the facts, documents and applicable jurisdictions. Policy statements, strategies, consultation documents and administrative guidance do not override enacted law. Obtain specific advice from qualified Bahamian counsel and other professional advisers.