

UK Illicit Finance Summit 2026

Civil society recommendations on asset recovery

This briefing sets out civil society recommendations for international initiatives and concrete commitments on asset recovery for the UK-hosted Illicit Finance Summit. It was prepared by Spotlight on Corruption incorporating input from civil society partners as well as feedback from a wider range of non-governmental stakeholders.

Asset recovery: Taking the profit out of crime and restoring public trust

Asset recovery – the process of tracing, freezing, seizing, managing, preserving, disposing, and returning the proceeds of crime and corruption or compensating victims of crime – lies at the heart of any credible response to illicit finance. The Illicit Finance Summit should not only expose the scale of the problem of illicit finance but seek to get a grip on it – ramping up global enforcement efforts to seize the proceeds of crime and corruption so they can be repurposed to compensate victims, benefit communities, and drive further asset recovery. Asset recovery should not be seen as a consequence of a failure to control corruption but as an opportunity to advance meaningful anti-corruption reform.

Ambitious commitments on asset recovery would drive real impact in three important ways:

- **Break the business model of criminality:** The Summit is a major opportunity for global action to turn the tide on dirty money by cutting off the flow of funds to and from corrupt actors and organised crime groups. Without stripping criminals of their ill-gotten gains – whether stemming from corruption, the drug trade, human smuggling, or cyber scams – enforcement action risks being little more than a cost of doing business for those engaged in organised crime and corruption.
- **Foster global partnerships for shared growth and prosperity:** A serious commitment to asset recovery at the Summit would represent a significant new partnership offer to Global South countries – helping recover wealth lost through corruption and criminality, while protecting the integrity of the UK's financial system. Asset recovery is critical for low-middle income nations to reclaim billions in stolen funds, essential for financing sustainable development, strengthening healthcare and education and tackling poverty. It will be crucial to sustain this leadership on asset recovery as the UK takes on the FATF presidency in 2026 and the G20 presidency in 2027.
- **Restore public trust and deliver redress:** Illicit finance is not victimless – wealth diverted and stolen through organised crime and corruption erodes public trust in government and the criminal justice system, hollows out public services, undermines legitimate business, and funds further criminality. Asset recovery fosters public confidence in efforts to tackle illicit finance and delivers tangible benefits for victims and affected societies.

Driving international asset recovery

The UK is well positioned to show global leadership on asset recovery at the Summit. In particular, it could use the summit to drive increased and responsible use of non-conviction based asset recovery and explore innovative financing models for increasing asset recovery.

Any potential involvement of the private sector in asset recovery should include robust public interest safeguards along the lines [proposed](#) by the Latimer Network. Similarly, any initiative to increase the use of non-conviction based asset recovery powers would need to carefully consider appropriate safeguards to mitigate the risk of abuse that is particularly acute in jurisdictions with weaker rule of law.

Summit initiatives should build on existing strengths and capabilities – including the IACCC – and go beyond sharing best practice to drive concerted and coordinated action in concrete asset recovery cases. In particular, the summit presents an opportunity to:

1. Expand the IACCC to support the adoption and use of civil recovery tools

- Established after the global Anti-Corruption Summit in 2016, the [International Anti-Corruption Coordination Centre](#) (IACCC) has been a highly successful collaboration to improve cooperation in grand corruption cases, particularly around asset recovery and Mutual Legal Assistance (MLA).
- The Summit is an opportunity to expand IACCC membership in a strategic and focused way, preserving trust among like-minded partners while bringing in new members to benefit from shared expertise and capabilities. This expansion can also complement efforts to broaden the number of countries that benefit from the [Global Forum on Asset Recovery \(GFAR\) Action Series](#), which is supported by the IACCC.
- Practitioner-focused sessions at the Summit and beyond could drive focused IACCC collaborations on asset recovery cases and make better use of Interpol's new [silver notice](#) system, particularly in relation to illicit gold, real estate and crypto-assets.
- The IACCC's crucial role in supporting asset recovery should be recognised and enabled through increased resourcing of its work.

2. Develop global data standards on asset recovery

- The Summit should be leveraged to build on the UK's initiative announced at the UNCAC COSP11 on the publication of asset recovery data in grand corruption cases. This should include information on cross-border asset recovery actions that resulted in a return of assets to another jurisdiction, as well as confiscations or asset freezes with a cross-border element, where the asset recovery process requires international cooperation between the two countries.
- The UK's [annual asset recovery statistical bulletin](#) and the [EU's framework](#) for reporting on statistics about frozen and confiscated assets provide strong models for developing global data standards on asset recovery and the UK is well placed as these standards develop in the EU and beyond to share its experience and promote broad and accessible data sharing.

- In this way, the alliance would strengthen global transparency norms around asset recovery data and support efforts by the World Bank/UNODC StAR Initiative to build the global evidence base through its Asset Recovery Watch Database, encourage more countries to regularly report both ongoing and completed international asset recovery cases to the [StAR Asset Recovery Watch database](#), and provide data to inform research, analysis, and policy decisions.

3. Pilot a system for logging and tracking MLA requests

- Summit participants should commit to a pilot system – potentially drawing on blockchain technology or building on the [StAR Asset Recovery Watch database](#) – to track and promote accountability for responding to MLA requests. To ensure public accountability, aggregated statistics on response times should be published on an annual basis.
- This would include commitments by countries to maintain an electronic case system for MLA requests with internal tracking and prioritisation by central authorities, and to acknowledge receipt and respond to MLA requests within defined timeframes (drawing on the model established under the [Crime \(Overseas Production Orders\) Act 2019](#)).
- The Summit should drive wider adoption of new FATF standards on non-conviction based forfeiture powers to help address the equivalency challenges that currently exist where a requested state lacks an equivalent civil recovery mechanism or corresponding domestic offence.
- Summit participants should commit to developing mechanisms to surge expertise to jurisdictions lacking experience handling complex MLA requests, potentially through the proposed crypto enforcement academy.

4. Establish a global fund and expanded routes for asset recovery and victim compensation claims

- To ensure its asset recovery ambitions are matched by practical financing mechanisms, the Summit should be used to establish a global fund to support civil recovery and victim compensation claims.
- The global fund could be established and maintained through the [repurposing](#) of a proportion of recovered assets and/or the disgorged profits of illicit finance (where these receipts are not returned or repurposed as compensation) and must clearly publish information on portions of recovered assets held for the fund.
- These cases could be brought by national law enforcement authorities or victims' groups arising out of collaborative investigations, with a particular focus on supporting Global South countries that lack the resources to pursue complex, cross-border cases.
- To ensure overseas victims are not precluded from seeking asset recovery or compensation where their own authorities do not take action, the global fund should be complemented by expanded standing for NGOs and victims' groups to bring civil claims for collective redress.
- The global fund could draw on the model of successful case-based multi-jurisdictional task forces, such as those recently deployed in Malaysia and Seychelles, which has demonstrated what can be achieved when resources and expertise are pooled.

5. Increase recovery and return of proceeds stemming from cyber-enabled fraud.

- The alliance should commit to developing new and/or strengthening information-sharing channels and operational protocols capable of executing a 'rapid response' to cyber scams, in the form of payment holds and recalls that can quickly revert transactions and return funds to victims.
- The alliance should increase engagement with the private sector, aimed at encouraging financial institutions to enhance efforts to detect and block transactions linked to cyber frauds, increase awareness, report incidents, and quickly return funds to victims.
- The alliance should work to operationalize global mechanisms to trace, immobilize, and repatriate scam proceeds.

Demonstrating UK leadership to secure strong national level commitments from countries participating in the Summit

The Summit is not only an opportunity to build international alliances, but also a moment for the UK to encourage participating countries to make their own national level commitments that will ensure ambition is translated into concrete action. Civil society urges the UK to drive progress on asset recovery at the national level in four areas.

1. Reinvest recovered assets in law enforcement and the wider criminal justice system

- Asset recovery efforts must be properly resourced if they are to deliver results at scale.
- The UK should champion global best practice on [reinvesting](#) a proportion of recovered assets and fines into law enforcement to strengthen the systems that make future asset recovery possible and effective. This should include transparent public reporting on use of the reinvested funds.
- Reinvestment must complement rather than substitute for core law enforcement budgets. In other words, this model should augment capacity, not replace it.
- Victim compensation should always take precedence over reinvestment, with a responsible, transparent and fair division of any remaining funds between law enforcement and other 'social re-use' projects that benefit local communities.
- Reinvestment mechanisms must avoid creating perverse incentives that encourage law enforcement to pursue high value cases at the expense of cases that are lower value but of greater societal importance.

2. Deliver meaningful redress to victims

- The victims of corruption and crime must be placed at the heart of asset recovery.
- The UK should use the Summit to foster consensus on mechanisms for providing meaningful redress to those harmed by corruption and organised crime, including through the [repurposing](#) of disgorged illicit profits as victim compensation for investment in communities in affected countries.
- These mechanisms are particularly important in the context of cross-border illicit finance and foreign bribery cases, where victims are often far removed from enforcement processes.

3. Drive forward transparent and accountable asset return

- Building on the UK's Framework for Transparent and Accountable Asset Return, the UK should champion the adoption of strong domestic frameworks for asset return including developing clear, standardised guidelines governing the role of international organisations in asset return processes.
- This should include commitments to promote the meaningful participation of civil society in deciding how returned assets are used and in monitoring the return process as well as ensuring routine publication of MOUs or other agreements over the return of funds on official websites of both of the returning and recipient governments.
- The Summit is also a crucial opportunity to highlight the large gap between assets recovered and returned in grand corruption cases, build on work under the [GFAR Action Series](#), progress cooperation in high-profile asset return cases, and secure operational deliverables that demonstrate a commitment to promote transparent, accountable and victim-centred asset return.

4. Recognise and enforce foreign court orders

- The UK should urge countries attending the Summit to ensure the domestic legal frameworks require courts to recognise and enforce foreign orders in asset recovery – and non-conviction based asset recovery powers in particular.
- This would remove a significant barrier to effective cross-border asset recovery and strengthen the foundations for international cooperation.

Leading by example through ambitious UK domestic commitments

The UK's credibility in showing global leadership on asset recovery and the likelihood that other countries attending the Summit make strong national level commitments depend on the ambition of its own domestic commitments. As the government develops a new Anti-Money Laundering and Asset Recovery (AMLAR) Strategy, civil society urges the UK to announce bold domestic reforms on asset recovery at the Summit.

1. Enhance the UK's toolkit for recovering illicit wealth

- Integrate Unexplained Wealth Orders (UWOs) into asset recovery processes, with appropriate safeguards, so that non-compliance results directly in forfeiture, and amend the Code of Practice to embed UWOs as an early information-gathering tool.
- Expand the list of high-value movable assets subject to civil recovery powers to include vehicles and consider allowing the sale of such assets upon seizure, both to prevent their value depreciating over time and to avoid storage and maintenance costs.
- Extend the maximum duration of Account Freezing Orders (AFOs) to allow renewal for up to three years in total, rather than the current two-year limit, with the court retaining discretion to set extension periods of at least six months. This will reduce the burden on an overstretched criminal justice system of frequent, often unopposed renewal hearings in complex investigations.
- Develop a transparency tool for tracking how UK public bodies handle MLAs to complement the international pilot initiative mentioned above.

- Keep developments in other jurisdictions under review to ensure the UK does not fall behind best practice, such as the requirement for EU member states to have illicit enrichment offences which are currently absent from UK legislation, hindering its ability to provide Mutual Legal Assistance.

2. Pilot specialist asset recovery courts at the new Justice Quarter in London

- Create a specialist economic crime judicial ticket to help deliver the government's proposed criminal court reforms for jury-less trials.
- This should build on the Law Commission's recommendation for ticketed confiscation judges but also establish a broader judicial specialism in economic crime in order to create a clear career path for white-collar crime specialists across the legal profession.
- Pilot these proposals at the new Justice Quarter at Salisbury Square, a flagship £596 million facility funded by the City of London Corporation, which will provide 18 new courts for high-level fraud, cyber, and economic crime cases.

3. Reform ARIS and establish an Economic Crime Fighting Fund

- Address shortcomings with the Asset Recovery Incentivisation Scheme (ARIS), including annularity rules that prevent strategic, long-term investment in enforcement capacity and issues with transparency that raise the risk that funds are misspent.
- Establish an Economic Crime Fighting Fund (ECFF), pooling a proportion of receipts from economic crime enforcement into a single funding stream to support cross-system resilience in the UK's response to economic crime.
- Develop a clear framework for the repurposing of large crypto-asset recoveries, ensuring victims are compensated while maximising reinvestment. This should complement the initiatives under the dedicated thematic focus on crypto-assets for the Summit.

4. Strengthen protections and incentives for whistleblowers

- Introduce robust legal protections for whistleblowers who report suspected illicit finance at home and abroad, ensuring they are shielded from retaliation and have access to effective legal redress.
- Alongside the introduction of these protections, establish financial incentive mechanisms for whistleblowers whose disclosures lead to successful asset recovery, drawing on models such as the US False Claims Act and SEC whistleblower programme.
- Ensure that whistleblower reporting channels are accessible, well-resourced, and capable of handling complex financial disclosures, including in the crypto space.