Financial Sanctions Payments Guidance

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Contents

Overview and Purpose

The purpose of this guidance is to ensure that the University complies with sanctions laws and regulations issued by the UK and US governments (reflecting the regions in which the University's financial service providers operate).

This guidance sets out areas of responsibility for all staff and the sources used in assessment of activities.

Sanctions are imposed by the UK and other governments to uphold international peace and security. Sanctions prohibit or restrict the transfer of certain items, services and economic resources to designated individuals, organisations and countries.

In addition to UK law and sanctions imposed by the UN Security Council, the University may also have to comply with certain US sanctions, in particular in relation to financial transaction processing; these often apply more restrictions than UK measures

This guidance aims to clarify which activities are within the scope of sanctions law and which are not. It outlines how the University will assess activities so that it can make informed decisions about which activities it can undertake. It also clarifies how the US sanction regime may apply at an organisational and personal level at the University.

Non-compliance could lead to fines, withdrawal of funding, reputational damage and in serious cases potential criminal consequences. Our Insurers will not be able to provide assistance to staff or students who require it if they are in a sanctioned country, as they are unable to move funds into these countries.

Scope

This guidance is relevant to all University staff who propose to conduct any activity with individuals or entities ('persons') in, from or with links to sanctioned countries. No substantive contacts with such persons may proceed without prior written approval from the Chief Financial Officer or delegated member of staff.

It also applies to all University entities established under UK law, irrespective of where staff are based or where the entities activities take place.

Sanctioned countries are divided into two categories: Broadly and Narrowly Restricted Countries. An up-to-date list of all current UK sanctions regimes can be found here: Sanctioned countries and individuals. The details of designated people or entities is found here: The UK Sanctions List (the list can be searched here: FCDO - UK Sanctions List Search - GOV.UK). Note that the UK Sanctions List fully incorporates all UN sanctions.

A Narrowly Restricted Country (NRC) is subject to closely cast sanctions targets, the majority of which are focused on the prohibition of activities related to the trading of weapons. For all proposed activities with persons in, from or to a narrowly restricted country, an assessment must be completed using the financial sanctions assessment template. This assessment screens countries against the UK and US sanctions lists. Any decision to continue to work with a person from a narrowly restricted country must be approved by the Chief Financial Officer or delegated member of staff.

A Broadly Restricted Country (BRC) is subject to a wide range of sanctions measures with a significant list of individuals who are subject to sanctions. For all proposed activities with persons in, from or to a broadly restricted country an assessment must be completed using the financial sanctions assessment template. This assessment screens countries against the UK and US sanctions lists. Any decision to continue to work with a person from a broadly restricted country must be approved by the Director of Finance, Estates, and Commercial Services or the Director of Research and External Engagement (if related to external funding) before receiving final approval from the Chief Financial Officer. The relevant teams involved will conduct enhanced checks on the proposed organisation or individual. If the proposal is approved, then assessments will be routinely repeated in case they become newly subject to sanctions. If work with a sanctioned person is approved, then enhanced compliance measures may need be followed, including a regular review of activity and associated risk.

Cuba, Iran, Crimea, Syria and North Korea. All proposals for collaboration with any individual or organisation from or based in these countries must be referred to the Chief Financial Officer in advance of any agreement being signed. US sanctions in these countries are very strict and it unlikely any activity can be undertaken with organisations based in these countries.

Responsibilities

All University staff are responsible for understanding this guidance and for arranging a sanctions assessment where necessary to determine whether a person or entity is subject to sanctions and, if so, whether the proposed activity may proceed and under what conditions.

Assessments are completed by the relevant Professional Service team or Academic School, as outlined below. In each instance, the responsible team completes assessments using the financial sanctions assessment template and a record the results will be retained on a shared sanctions register owned by the Assistant Director of Financial Operations.

Assessment Type	Responsibility
Students	Student Recruitment and Marketing
Donations	Research and External Engagement
Research Contracts & Grants	Research and External Engagement
Procuring goods and services	Procurement
New Suppliers	Procurement
Approval of contracts	As per scheme of delegations
Other income, including consultancy	Financial Operations as advised by relevant Professional Service/College

Academic Partners	Academic Quality and Partnership Enhancement with support of relevant Academic School

The University Vice Chancellors Executive Group (VCE) will be responsible for any amendments to the country list (although primarily driven by the UK sanctions list) and any changes to the assessment template and the procedures for its submission and review. VCE will also delegate to the Assistant Director of Financial Operations responsibility for recommending changes to them on the list of sanctioned countries, details of which will be maintained on a Finance, Estates and Commercial Services web page.

The Assistant Director of Financial Operations will support Academic Schools and Professional Services in undertaking assessments and maintain a register of assessments received and the outcomes. The post holder will recommend to the VCE any changes in procedures.

The Assistant Director of Financial Operations will assess training requirements and where appropriate make recommendation to the Director of Finance, Estates and Commercial Services for the procurement of training materials.

Export Control

Please note that even where a positive assessment may be attained under this guidance, nothing in this guidance overrides the requirements for a separate export control assessment depending upon the nature of the proposed transaction. Please see the University export control guidance for further details.

Completing Assessments

A sanctions check must be performed where a transaction is proposed with any persons in from or with links to a broadly or narrowly restricted country. A transaction in this case refers to contracting with a third party which may give rise to a payment or a receipt of money. In every instance the University must conduct a check on the third-party payer/recipient or rely upon a check performed by another organisation such as a financial service provider. This includes all students coming from a narrowly or broadly restricted country and they will check these individuals against the Office of Financial Sanctions Implementation and the Office of Foreign Assets Control - Sanctions Programs and Information.

Assessments are completed by Reviewer/s from the responsible team. Note that the dynamic nature of the imposition of sanctions means that the University may have to terminate financial relationships at short notice should the legal context change.

Instructions on completing assessments are available on the financial sanctions assessment template.

Approving Assessments

Assessments are approved by Approver/s from the responsible team. This cannot be the same person as the Reviewer and should ideally be the Head of Service or Academic School or one of their delegated staff members.

Teams may approve their own assessments for persons based in or working with NRCs. Teams will need secondary approval from the Chief Financial Officer where the person is based in or working with a BRC or if teams have any doubts about their own assessments. Secondary approval can be given by a delegated member of staff if the request relates to NRCs. If work with sanctioned persons is approved, the Chief Financial Officer will, if appropriate, agree with the team on enhanced compliance measures to be followed in all dealings with the sanctioned person.

If dealings with persons based in or working with a BRC are approved, the Assistant Director of Financial Operations will support the relevant Professional Service or Academic School to undertake an assessment review. An assessment review of each such person should take place at a minimum of every two years (depending on risk).

Saving Assessments

Reviewers will update and send completed assessments (along with any supporting documentation) to the Income Operations team who will save these, or where appropriate send them to Chief Financial Officer for approval. Confirmation of such approval will then be provided to the area concerned.

In the event of a breach

In the event of a suspected breach of applicable sanctions laws, whoever uncovered it will report this immediately to both:

- Their relevant Approver/s
- The Chief Financial Officer and the Assistant Director of Financial Operations.

The Assistant Director of Financial Operations will subsequently report the breach, if it is confirmed as such, to:

- In respect of financial sanctions: the Office of Financial Sanctions Implementation (OFSI) following OFSI guidelines: Reporting information to OFSI – what to do - GOV.UK
- In respect of trade sanctions: HM Revenue and Customs following HMRC guidelines

  If it is felt appropriate one or all the following organisations
- Relevant external stakeholders e.g. our main bank & OfS.

- The Professional Service or Academic School which holds the arrangement
- The party which is being investigated.

US Sanctions

Compliance with UK law is the primary legal framework for the University but US sanctions may also directly apply to our operations, counterparties, payment routes, insurers, funders, software/platform providers, and US staff. Therefore we must also take these into account, for example, our bankers, have US Banking licenses, meaning we cannot make payments to or receive funds from US sanctioned countries as well as individuals named on the US sanctions list. (The same requirements relate to any US based funders should we have any).

Staff members with non-UK nationalities, wherever resident, always have an obligation to comply with the sanctions regulations of their countries of nationality in addition to those of the UK. It is the responsibility of all staff members to ensure that they personally comply with sanctions in line with their nationality(ies).

Financial Sanctions Countries List

Please refer to the UK Sanctions List to ensure the most recent guidance is followed.