

## Sanctions Policy and Procedure

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### 1. Background, Purpose and Scope

- 1.1. Financial sanctions are restrictions put in place by the UN or UK to achieve a specific foreign policy or national security objective. They can limit the provision of certain financial services, and restrict access to financial markets, funds and economic resources.
- 1.2. The UK Government maintains lists of those subject to financial sanctions.
- 1.3. Broadly financial sanctions prohibit:
  - a) making funds available, directly or indirectly, to or for the benefit of, those subject to financial sanctions;
  - b) dealing with funds owned or controlled by those subject to financial sanctions, or a person acting on behalf of those subject to financial sanctions; and
  - c) making economic resources available to those subject to financial sanctions, or dealing with the economic resources of those subject to financial sanctions.
- 1.4. The Government can licence activity that would otherwise breach prohibitions imposed by financial sanctions.
- 1.5. The purpose of this policy is to help prevent breaches of UK financial sanctions.
- 1.6. This policy sets out the principles that all staff, business partners and contractors must follow.
- 1.7. This policy applies to all member of staff, business partners (including collaborative provision), contractors.

- 1.8. It applies to all University activity, including teaching and our relationship with our students, research, consultancy, and when contracting with third parties (for example, buying goods and services). Particular risk activities include:
- a) Receiving tuition fees
  - b) Sending or receiving payments
  - c) Accepting donations
  - d) Engaging with contractors or suppliers
  - e) Research activity
  - f) Collaborations with partners.
- 1.9. Requirements under this policy are separate from, and additional to, any requirements under export control legislation.

## **2. Principles**

- 2.1. The University's policy is to:
- a) Follow all UK legislation on financial sanctions.
  - b) Take into account UN, EU and US financial sanctions, as these affect some of our key suppliers (for example, banking and insurance) and therefore affect University operations.
- 2.2. Staff must carry out risk based sanctions list screening of third parties whom the University deals with or intends to deal with, including suppliers, collaborative partners and prospective students.
- 2.3. Any suspected dealings with a target of financial sanctions must be reported to the COO and Head of Legal Services.
- 2.4. Any application for a Government licence to authorise otherwise prohibited activity may only be made with the prior written consent of the Vice Chancellor on the recommendation of the Chief Operating Officer.
- 2.5. Travel to sanctioned countries for University business is not permitted.

## **3. Screening**

- 3.1. Sanctions list screening must be carried out when dealing or proposing to deal with a person or an entity from, or with links to, a sanctioned country or region:

<b>Broad Sanctions Restrictions</b>	<b>Narrow Sanctions Restrictions (sanctions applied to specific person and entities)</b>
<ul style="list-style-type: none"> <li>• Crimea and Sebastopol</li> <li>• Cuba</li> <li>• Donetsk and Luhansk</li> <li>• Iran</li> <li>• North Korea</li> <li>• South Sudan</li> <li>• Sudan</li> <li>• Syria</li> <li>• Venezuela</li> </ul>	<ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Armenia</li> <li>• Azerbaijan</li> <li>• Belarus</li> <li>• Bosnia and Herzegovina</li> <li>• Burundi</li> <li>• Central African Republic</li> <li>• Democratic Republic of the Congo</li> <li>• Guinea</li> <li>• Guinea-Bissau</li> <li>• Iraq</li> <li>• Lebanon</li> <li>• Libya</li> <li>• Mali</li> <li>• Myanmar</li> <li>• Nicaragua</li> <li>• Russia</li> <li>• Somalia</li> <li>• Yemen</li> <li>• Zimbabwe</li> </ul>

3.2. UK nationals and UK residents can be on the sanctions lists, so in addition sanctions list screening must be carried out where:

- a) a UK bank has declined a payment without giving a reason.
- b) the person or entity the University is dealing with or proposing to deal

with proposes to receive or send funds from a bank account outside the UK, EU or US that is not in their name.

- c) the person or entity the University is dealing with or proposing to deal with is evasive regarding their identity or ownership structures or seeks anonymity.
- 3.3. As sanctions apply to businesses and other organisations owned or controlled by a person subject to sanctions, so additional due diligence may be needed when dealing with a corporate entity.
- 3.4. Screening list searches can be carried out:
- a) For UK sanctions lists:  
<https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets>
  - b) For UN sanctions lists:  
<https://www.un.org/securitycouncil/content/un-sc-consolidated-list>
  - c) For EU sanctions lists:  
<https://data.europa.eu/data/datasets/consolidated-list-of-persons-groups-and-entities-subject-to-eu-financial-sanctions>
  - d) For US sanctions lists:  
<https://sanctionssearch.ofac.treas.gov/>
- 3.5. Where a proposed transaction involves a person or an entity on the UK sanctions lists, all dealings with the person or entity and the matter must be paused and the matter referred to the COO and Head of Legal Services.
- 3.6. Where a proposed transaction involves a person or an entity on the UN, EU or US sanctions lists, but not on the UK lists, legal advice must be taken as UK Blocking laws may apply.

#### **4. Travel**

- 4.1. Travel to sanctioned countries for University business (whether broadly or narrowly sanctioned) is not permitted. The Vice Chancellor may permit travel to sanctioned countries on a case-by-case basis, in line with government guidelines. Any request for permission must be supported by a full risk assessment and be supported by an SLT member. The risk

assessment must include consideration of the availability of insurance cover.