



UNIVERSITY OF SUSSEX SANCTIONS POLICY

1 OVERVIEW AND PURPOSE

- 1.1 The purpose of this policy is to ensure that the University complies with sanctions law.
- 1.2 This policy sets out areas of responsibility for University staff and the sources used in assessment of University activities.
- 1.3 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, the University may also have to comply with certain US sanctions, which apply more broadly than UK measures and include some persons in the UK.
- 1.4 This policy aims to clarify which activities are within the scope of sanctions law and which are not

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 will be followed.

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 Export Control Manager, who shall consult the Export Control Director. No contacts with such prospective partners, including initial contacts, shall proceed without prior written approval from the Export Control Director.

3 RESPONSIBILITIES

- 3.1 The University is legally required to comply with sanctions as determined by UK and, in certain cases, US law. Non-compliance could lead to fines, withdrawal of funding, and reputational damage.
- 3.2 All University staff are responsible for understanding this policy and for arranging a sanctions assessment where necessary to determine whether a person is subject to sanctions and, if so, whether the proposed activity may proceed and under what conditions.
- 3.3 Assessments are completed by the relevant

4.4.2.2 In respect of trade sanctions: HM Revenue and Customs following HMRC guidelines:

<https://www.gov.uk/guidance/export-controls-dual-use-items-software-and-technology-goods-for-torture-and-radioactive-sources#breaches-of-export-control-legislation>;

4.4.2.3 Relevant external stakeholders e.g. Barclays bank;

4.4.2.4 The school or division which holds the arrangement; and

4.4.2.5 The party which is being investigated.

4.5 Sources

4.5.1 Sanctions assessments must be made by checking details against the three following sources:

Source	Link
UK financial sanctions list (asset freeze targets)	https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets
UK trade sanctions	https://www.gov.uk/guidance/current

Assessment template

Sanctions review approval form	
Prepared by	
Requested by (name and school/ department)	
Division/Department identifier (if available)	
Full name and address of person/entity being assessed	
Project Summary	
Supporting documents (if applicable)	
Strategic context	
Governance	Contracts and other agreements are governed by UK and international sanctions law, international financial regulations and University policy.
Level 1 - recommendation	I confirm that the checks performed do/ do not reveal any sanctions restrictions relating to this person/entity [delete as appropriate] Further comments (if any): Signature: [Y1-Y5 2f tNŠLJH-NŠŘ oëX] [w2fŠ 2f tNŠLJH-NŠŘ oëX]
Level 2 - approval	I approve/ do not approve/ pass for further review [delete as appropriate] Further comments (if any): Signature: [Y1-Y5 2f tNŠLJH-NŠŘ oëX] [w2fŠ 2f tNŠLJH-NŠŘ oëX]
Level 3 - special approval	I approve/ do not approve engaging with this person/entity [delete as appropriate] Further comments (if any): Signature: [Y1-Y5 2f tNŠLJH-NŠŘ oëX] [w2fŠ 2f tNŠLJH-NŠŘ oëX]
Sanctions review detailed assessment	
Sanctions register ref number	
Person/Entity full name	

Person/Entity address	
Person/Entity country/ies based in or linked to	
Date of request	
Date of checks	
Date of review	
Cleared for use?	

APPENDIX A

COUNTRY LIST

Please note this list