



HM Treasury

The process for imposing
monetary penalties for breaches
of financial sanctions:

Consultation response form

Name: [REDACTED]
Organisation: [REDACTED]
<input checked="" type="checkbox"/> Please tick if you are responding on behalf an organisation
Name of organisation (if applicable): [REDACTED]
Address: [REDACTED] Email: [REDACTED] Telephone: [REDACTED]
1. Do these introductory sections give you enough information to understand the scope of the law on monetary penalties? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No What else would be useful? Click here to enter text.
2. What are your views on OFSI's compliance and enforcement approach? In order to establish an effective sanctions regime it is necessary for the body that is responsible for the implementation of sanctions in the UK to have enforcement powers.
3. Is there anything else you would expect a compliance model to tackle? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (if yes please explain what below) Click here to enter text.
4. Do you understand our proposed case assessment approach? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (if no please explain why below) Click here to enter text.
5. What are your views on our proposed case assessment approach?

It appears to be reasonable and proportionate.
<p>6. Does this guidance give you enough information to help you understand how a penalty is calculated?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(if no please explain why below) Click here to enter text.</p>
<p>7. OFSI will reduce the level of penalty if there is voluntary disclosure. What are your views on OFSI's approach to this?</p> <p>This is a reasonable and proportionate approach.</p>
<p>8. Is the process for imposing a penalty and making representations clear from this guidance?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(if no please explain why below) Click here to enter text.</p>
<p>9. Do you understand the guidance on seeking a Ministerial review?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>10. What are your views on the process for seeking a Ministerial review?</p> <p>This is a necessary review process in order to ensure the process is fair and concerns over penalties are subject to a higher level of review where required.</p>
<p>11. Does this guidance clearly explain why and how OFSI will publish information on penalties imposed for breaches of financial sanctions regulations?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>What are your views on the level of information OFSI will publish? Click here to enter text.</p>
<p>12. Considering the document as a whole, does this guidance help you clearly understand OFSI's approach to imposing monetary penalties?</p> <p>Yes</p>
Please e-mail this form to: OFSIConsultation@hmtreasury.gsi.gov.uk

Or post to OFSI Consultation, HM Treasury, 1 Horse Guards Road, London SW1A 2HQ