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**Counter-terrorism suspected breach reporting form**

**Guidance**

Use this form to report all counter-terrorism compliance-related information to HM Treasury’s Office of Financial Sanctions Implementation (OFSI), including information regarding and suspected breaches of financial sanctions.

The information you provide may be shared for the purpose of facilitating or ensuring compliance with counter-terrorism financial sanctions regulations, in accordance with the Treasury’s information sharing powers and UK data protection legislation.

Your counter-terrorism financial sanctions reporting and compliance obligations are described in [OFSI’s general guidance](https://www.gov.uk/government/publications/financial-sanctions-general-guidance/uk-financial-sanctions-general-guidance). You should consult this guidance first before completing this form. You should note that for some businesses there is a legal obligation to report, and that not doing so is a criminal offence.

[Read financial sanctions FAQs](https://www.gov.uk/government/publications/uk-financial-sanctions-faqs/uk-financial-sanctions-faqs)

[See the consolidated list of targets](https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets)

Ensure that when completing this form you believe that the facts and information provided in this form, and why they apply, are accurate and true to the best of your knowledge.

A criminal offence may be committed if you contravene any of the prohibitions in respect of the financial sanctions regime(s), or you intentionally participate in activities knowing that the object or effect of them is to circumvent any of those prohibitions or enables or facilitates the contravention of any of those prohibitions.

If you are unsure of your compliance or reporting obligations under financial sanctions, you should seek independent legal advice.

**1. Name**

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**2. Job title**

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**3. Company or organisation**

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**4. Sector of reporter**

Selection from a list, one option only

[ ] Agriculture

[ ] Aviation

[ ] Cryptocurrency or DeFi

[ ] Casinos

[ ] Education

[ ] Energy

[ ] Financial services – banking

[ ] Financial services – foreign currency and other cash

[ ] Financial services – insurance

[ ] Financial services – non-bank payment services providers

[ ] Financial services – tax, accountancy and insolvency

[ ] Financial services – other

[ ] Government/public sector/regulators

[ ] High value good and dealers

[ ] Legal services – law firms

[ ] Legal services – trust and corporate services providers

[ ] Manufacturing

[ ] Maritime – luxury yachting

[ ] Maritime – shipping/oil and gas

[ ] Members of the public

[ ] Mining and fertilizers

[ ] Not for profit

[ ] Other – architecture, arts and entertainment, sports etc

[ ] Pharmaceutical/healthcare

[ ] Professional services

[ ] Property and related services

[ ] Telecom, media and technology

[ ] Travel, tourism and hospitality

[ ] Transport

[ ] Wholesale and retail trade

**5. Address**

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**6. Phone number**

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**7. Email address**

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**8. Are you submitting this report on behalf of a third party?**

**Answer type**

Selection from a list, one option only

2 options:

[ ] Yes

[ ] No (Skip to Q11)

**9. Third party contact details**

**Guidance**

A designated person is an individual, entity or body, listed under UK legislation as being subject to financial sanctions.

The list of designated persons is on OFSI’s Consolidated List of asset freeze targets. You can [search the list](https://sanctionssearchapp.ofsi.hmtreasury.gov.uk/) or [view the full list](https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets).

The list shows the group ID for each target.

Include Group ID if they're a designated person.

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**10. Sector of third party**

Selection from a list, one option only

[ ] Agriculture

[ ] Aviation

[ ] Cryptocurrency or DeFi

[ ] Casinos

[ ] Education

[ ] Energy

[ ] Financial services – banking

[ ] Financial services – foreign currency and other cash

[ ] Financial services – insurance

[ ] Financial services – non-bank payment services providers

[ ] Financial services – tax, accountancy and insolvency

[ ] Financial services – other

[ ] Government/public sector/regulators

[ ] High value good and dealers

[ ] Legal services – law firms

[ ] Legal services – trust and corporate services providers

[ ] Manufacturing

[ ] Maritime – luxury yachting

[ ] Maritime – shipping/oil and gas

[ ] Members of the public

[ ] Mining and fertilizers

[ ] Not for profit

[ ] Other – architecture, arts and entertainment, sports etc

[ ] Pharmaceutical/healthcare

[ ] Professional services

[ ] Property and related services

[ ] Telecom, media and technology

[ ] Travel, tourism and hospitality

[ ] Transport

[ ] Wholesale and retail trade

**11. Under which counter terrorism financial sanctions regimes has the suspected breach occurred, if known**

Selection from a list

[ ] ISIL (Da’esh) and Al-Qaida (United Nations Sanctions) EU Exit Regulations 2019

[ ] Counter-Terrorism (International Sanctions) (EU Exit Regulations 2019

[ ] Counter-Terrorism (Sanctions) (EU Exit Regulations 2019

[ ] None of the above

**12. Does this information relate to a suspected completed, or suspected attempted, breach?**

Selection from a list, one option only

[ ] Suspected completed

[ ] Suspected attempted

**13. Who do you suspect has committed, or has attempted to commit, the suspected breach?**

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**14. On what date was the suspected breach completed or attempted?**

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**15. Total value of suspected breach**

In the currency of the original transaction.

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**16. Relevant sections, articles, regulations suspected of having been breached, if known (optional)**

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**17. Does this breach involve a designated person, including persons owned or controlled by them?**

Selection from a list, one option only

[ ] Yes

[ ] No (Skip to Q22)

**18. Group ID from the Consolidated List**

The Group ID is a unique identifier for a designated person which you can [find in their entry on the consolidated list](https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets).

**19. Name of the designated person as given on the consolidated list**

A designated person is an individual, entity or body, listed under EU or UK legislation as being subject to financial sanctions.

The list of designated persons can be found on [OFSI’s consolidated list of asset freeze targets](https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets).

Note that the financial sanctions also apply to persons and entities that are owned or controlled, directly or indirectly, by a designated person. Those persons or entities may not be designated in their own right, so their name may not appear on the consolidated list. However, those persons or entities are similarly the subject of the financial sanctions. For more information on ownership and control [see OFSI’s guide to financial sanctions](https://www.gov.uk/government/publications/financial-sanctions-general-guidance/uk-financial-sanctions-general-guidance).

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**20. Name of the person or entity if owned or controlled by a designated person (optional)**

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**21. Details of ownership and control (optional)**

For more information on ownership and control [see OFSI’s UK Financial Sanctions General Guidance](https://www.gov.uk/government/publications/financial-sanctions-general-guidance/uk-financial-sanctions-general-guidance).

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**22. Does the suspected breach involve trust services?**

‘Trust services’ are defined as:

* the creation of a trust, or similar arrangement;
* the provision of a registered office, business address, correspondence address, administrative address for a trust or similar arrangement;
* the operation or management of a trust or similar arrangement; or
* acting or arranging for another person to act as a trustee of a trust or similar arrangement.

Trust services are provided ‘for the benefit of’ a person (“B”) where -

* B is a beneficiary of a trust or similar arrangement
* B is referred to as a potential beneficiary in a document from the settlor relating to a trust or similar arrangement (such as a letter of wishes), or
* having regard to all the circumstances, B might reasonably be expected to obtain, or to be able to obtain, a significant financial benefit from the trust or similar arrangement.

Selection from a list, one option only

[ ] Yes

[ ] No (Skip to Q31)

**23. Information on the trust location**

Include registered office, business, correspondence or administrative address, and which type of location applies.

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**24. Address of the trust service provider**

International addresses

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**25. Type of trust**

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**26. Purpose of the trust**

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**27. Type and value of asset held in the trust**

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**28. Date the trust was set up**

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**29. Pre-determined end date (optional)**

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**30. Detail participants to the trust relevant to the suspected breach being reported on**

Add details of participants to the trust including:

* names
* addresses
* bank account details
* the date when the
* participant became a party to the trust
* if the participant is a beneficiary, trustee, settlor or protector or has any other connection to the trust

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**31. Give details of the events or series of actions that led to the suspected breach taking place**

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**32. When was the suspected breach discovered?**

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**33. Give details of how the suspected breach was discovered**

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**34. Types of funds involved**

Funds means financial assets and benefits of every kind, including but not limited to:

* cash, cheques, claims on money, drafts, money orders and other payment instruments
* deposits with financial institutions or other entities, balances on accounts, debts and debt obligations
* loans and mortgages
* publicly and privately traded securities and debt instruments, including stocks and shares, certificates representing securities, bonds, notes, warrants, debentures and derivatives contracts
* interest, dividends or other income on or value accruing from or generated by assets
* credit, right of set-off, guarantees, performance bonds or other financial commitments
* letters of credit, bills of lading, bills of sale
* documents evidencing an interest in funds or financial resources
* any other instrument of export-financing

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**35. Economic resources involved**

Economic resources mean assets of every kind, whether tangible or intangible, movable or immovable, (such as goods, property, or rights) which are not funds themselves but which can be used to obtain funds, goods or services.

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**36. Describe the financial services provided, including details of how and when they were provided**

Financial services mean any service of a financial nature, including, but not limited to:

\* insurance-related services consisting of:

* direct life assurance;
* direct insurance other than life assurance;
* reinsurance and retrocession;
* insurance intermediation, such as brokerage and agency;
* services auxiliary to insurance, such as consultancy, actuarial, risk assessment and claim settlement services.

\* banking and other financial services consisting of:

* accepting deposits and other repayable funds;
* lending (including consumer credit, mortgage credit, factoring and financing of commercial transactions);
* financial leasing;
* payment and money transmission services (including credit, charge and debit cards, travellers' cheques and bankers' drafts);
* providing guarantees or commitments;
* financial trading (as defined below);
* participating in issues of any kind of securities (including underwriting and placement as an agent, whether publicly or privately) and providing services related to such issues;
* money brokering;
* asset management, such as cash or portfolio management, all forms of collective investment management, pension fund management, custodial, depository and trust services;
* settlement and clearing services for financial assets (including securities, derivative products and other negotiable instruments);
* providing or transferring financial information, and financial data processing or related software (but only by suppliers of other financial services);
* providing advisory and other auxiliary financial services in respect of any activity listed in sub-paragraphs (i) to (xi) (including credit reference and analysis, investment and portfolio research and advice, advice on acquisitions and on corporate restructuring and strategy).
* “Financial trading” means trading for own account or for account of customers, whether on an investment exchange, in an over-the- counter market or otherwise, in:
* money market instruments (including cheques, bills and certificates of deposit);
* foreign exchange;
* derivative products (including futures and options);
* exchange rate and interest rate instruments (including products such as swaps and forward rate agreements);
* transferable securities;
* other negotiable instruments and financial assets (including bullion).

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**37. Methods of payment and/or transfer**

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**38. Remitter details**

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**39. Intermediary details (optional)**

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**40. Ultimate beneficiary details**

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**41. Details of all external parties made aware of this information being reported to OFSI, including any designated person**

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**42. Has the matter been reported to any other authority?**

Selection from a list, one option only

[ ] Yes

[ ] No

**43. Contact details**

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**44. Would you like to upload any supporting evidence on the online form?**

Maximum file size of 7MB. If this is insufficient, contact ofsi@hmtreasury.gov.uk stating the reference number given at the end of this form in the email subject line.

Selection from a list, one option only:

[ ] Yes

[ ] No

You will be able to upload on the online form up to four files of supporting evidence.