



# Customs & Immigration

## Sanctions Compliance Guide

### **Step 1 ADOPT A TOP-DOWN APPROACH TO COMPLIANCE**

- It is vital that there is corporate leadership and board and senior management buy-in – with this commitment clearly and forcefully emphasised to managers, employees, clients and suppliers.

### **Step 2 ESTABLISH & MAINTAIN AND OPERATE UP TO DATE POLICIES AND PROCEDURES**

- These should be clear and concise policies and procedures (which have been approved by senior management), available to all managers and employees; with clients, customers, suppliers and other third parties made aware of them as appropriate. They must be clearly communicated. They should include clear identification of responsibilities and reporting structures within the organisation, stress the policies of the organisation, including in respect of disclosures, reporting of suspicions and customer due diligence.

### **Step 3 ENSURE AWARENESS AND APPLICABILITY OF RELEVANT GUIDANCE**

- Guidance is provided by the regulator(s), the FIU, Customs and Excise and the Government as a whole; as well as by relevant UK Government, trade organisations, and other sources (e.g. the EU, UN, OFAC).

### **Step 4 UNDERTAKE SCREENING USING UP TO DATE INFORMATION – NAMES**

- Using such materials as provided by official bodies (news releases by Customs & Excise, subscribe to the RSS feed, OFSI Consolidated List, FCO, OFAC) and/or private sector organisations (e.g. World-Check, CS, Dow-Jones).

### **Step 5 USE OR CONSIDER USE OF OTHER CHECKS AND SCREENING**

- To protect the organisation against bribery, corruption, trade-based money laundering, terrorist financing, proliferation and proliferation financing. Using information from the UK's Export Control Joint Unit, Nuclear Supplies Group Guidelines, Strategic Export Control Lists etc.



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### Step 6 IMPLEMENT A RISK-BASED APPROACH

- There is no easy one size fits all approach that can be adopted. Adopt a risk-based approach and risk assessment process according to business types, customer profiles, countries involved, products and services, delivery channels, degree of practical control available and the supporting evidence. Ensure awareness of risks and of the latest trends, typologies and red flags.

### Step 7 IF IN DOUBT – ASK

- The regulators, FIU and Customs and Excise are there to help; it is better to be safe than sorry.

### Step 8 MAINTAIN RECORDS OF CHECKS AND DISCLOSURES

- Including “false positives” and contacts with regulators, FIU and law enforcement.

### Step 9 TRAIN AND KEEP UP TO DATE

- Regularly train and update employees and managers. Consider if (and how) to inform or educate third parties. Ensure your training and in-house knowledge is kept up to date. Require or encourage employees and managers to undertake external compliance training, undertake relevant CPD and to research and prepare training that can be used within the organisation and could be communicated to others outside the organisation. Encourage participation in local and national trade 41 bodies and interaction with official bodies (including in for a such as the AML/CFT Advisory Group and the GSC MLRO Forum).

### Step 10 DOCUMENT WHAT YOU DO AND HOW YOU ENSURE ITS ADEQUACY AND RELEVANCE

- As well as being useful as a part of any induction and ongoing training, this would also be of use to demonstrate to current or potential clients and customers your competency and commitment, as well as proving your credibility to regulators and other official bodies. It could also prove useful when applying for forms of licensing, authorisation (e.g. if applying for AEO status or the equivalent) or approvals, or when required to demonstrate standards to other outside bodies (e.g. if seeking ISO or similar approvals).