

## **Alert | Export Controls & Economic Sanctions**



**March 2025**

### **OFSI Takes Enforcement Action Against UK Charities**

On 14 March 2025, the Office of Financial Sanctions Implementation (OFSI) issued a “Disclosure” against UK-registered and regulated charities Sahara Hands, Peculiar Peoples’ Palace Ministries, and Impact Planet for breaching Regulation 36 (6) of the Counter Terrorism (International Sanctions) (EU Exit) Regulations 2019 (the Regulations) by failing to respond to OFSI’s requests for information (RFI).

In accordance with the Regulations, OFSI can request information from any person if it believes that person can provide details to establish (a) the nature, amount, or quantity of any funds or economic resources owned, held or controlled by a designated person; or (b) the nature, amount, or quantity of any funds, economic resources or financial services made available to or for the benefit of a designated person; or (c) the nature of any financial transactions entered into by a designated person. This information must be provided where OFSI believes it is necessary for monitoring compliance, detecting evasion, and investigating financial offenses under Part 3 of the Regulations. Information must be provided within a specified or reasonable time, or in accordance with any ongoing obligations.

OFSI made several attempts to contact the charities via email and post, but no response was received within the stated timeframes from any of the charities, which, according to OFSI, hindered its ability to monitor compliance with the Regulations.

OFSI assessed the breach as moderately severe, though it did not warrant a monetary penalty. Publishing details of the financial sanctions breach via the Disclosure regime was considered the suitable enforcement response, given the specific nature and circumstances of the violation. The Disclosure highlights that the charities’ failure to respond to the RFIs, despite OFSI’s repeated attempts at

communication, and the importance of the RFIs for monitoring compliance with the Regulations, were aggravating factors in its decision. Although OFSI acknowledged that a failure by the charities to update their contact information could be viewed as a mitigating factor, it ultimately did not accept this as a valid excuse.

The Disclosure confirmed that all other charities contacted by OFSI complied with the Regulations by responding to the RFI. However, OFSI noted that it had identified multiple charities where contact information was not updated, or incoming correspondence was not regularly monitored. OFSI recommended that charities ensure contact information is up to date and incoming correspondence is regularly monitored.

### Takeaway

The Disclosure highlights the investigative steps taken by OFSI and its commitment to enforcement beyond merely relying on self-reports.

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