

News

Trust Services sanctions

09 June 2023

HM Treasury brought the provision of trust services into its financial sanctions regime in December last year.

A number of questions have been raised about this approach since then. So the Office of Financial Sanctions Implementation (OFSI), which is responsible for enforcement of the sanctions regime, [has produced a blog](https://ofsi.blog.gov.uk/2023/05/30/trust-services-sanctions-5-months-on/) to address such issues.

Examples include clarity on the term '*Persons Connected with Russia*'. OFSI have confirmed this does not include Russian nationals who are not ordinarily resident or located in Russia. The 'domicile' test only applies to a person who is not an individual (eg a company).

The [General Licence](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1144418/Trust_Services_General_Licence_2023-2589788.pdf)

[\[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1144418/Trust_Services_General_Licence_2023-2589788.pdf\]](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1144418/Trust_Services_General_Licence_2023-2589788.pdf), applies to persons designated under the trust services sanctions, it does not apply to trust services provided to or for the benefit of persons connected with Russia.

It includes a [reporting obligation](https://www.gov.uk/government/publications/sanctions-trust-services) [\[https://www.gov.uk/government/publications/sanctions-trust-services\]](https://www.gov.uk/government/publications/sanctions-trust-services) to let OFSI know that you are winding down provision of a trust service.

[] Prior Obligations general licence

OFSI has also issued a new general licence covering prior obligations. Again, [a blog explains](https://ofsi.blog.gov.uk/2023/05/24/prior-obligations-general-licence/) [\[https://ofsi.blog.gov.uk/2023/05/24/prior-obligations-general-licence/\]](https://ofsi.blog.gov.uk/2023/05/24/prior-obligations-general-licence/) how the licence works.

The licence took effect from 22 May 2023 and expires on 21 November 2023.

OFSI's [consolidated list](https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets) [\[https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets\]](https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets) provides details of designated persons.