



HM Treasury

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

Consultation response form

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|---|
| Name: [REDACTED] |
| Organisation: [REDACTED] |
| Please tick if you are responding on behalf an organisation |
| Name of organisation (if applicable) Click here to enter text. |
| Address: [REDACTED] Telephone: Click here to enter text. |
| <p>1. Do these introductory sections give you enough information to understand the scope of the law on monetary penalties? <input type="checkbox"/> Yes <input type="checkbox"/></p> <p>What else would be useful?</p> <p>Click here to enter text.</p> |
| <p>2. What are your views on OFSI's compliance and enforcement approach?</p> <p>It is very wrong for OFSI to act as judge and jury, and wrong to use anything less than a Criminal standard of proof.</p> |
| <p>3. Is there anything else you would expect a compliance model to tackle?</p> <p><input type="checkbox"/> <input type="checkbox"/> No</p> <p>(if yes please explain what below)</p> <p>Click here to enter text.</p> |
| <p>4. Do you understand our proposed case assessment approach?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/></p> <p>(if no please explain why below)</p> <p>Click here to enter text.</p> |
| <p>5. What are your views on our proposed case assessment approach?</p> <p>It is very wrong for OFSI to act as judge and jury, and wrong to use anything less than a Criminal standard of proof</p> |

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| <p>6. Does this guidance give you enough information to help you understand how a penalty is calculated?</p> <p><input type="checkbox"/> <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>It is very wrong for OFSI to act as judge and jury, and wrong to use anything less than a Criminal standard of proof</p> |
| <p>8. Is the process for imposing a penalty and making representations clear from this guidance?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/></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 type="checkbox"/> Yes <input type="checkbox"/></p> |
| <p>10. What are your views on the process for seeking a Ministerial review?</p> <p>It is very wrong for OFSI to act as judge and jury, and wrong to use anything less than a Criminal standard of proof</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 type="checkbox"/> Yes <input type="checkbox"/></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>Click here to enter text.</p> |
| <p>Please e-mail this form to: OFSIConsultation@hmtreasury.gsi.gov.uk</p> |

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