

PETER GIBSON MP



HOUSE OF COMMONS

LONDON SW1A 0AA

April 2023

Thank you for your email about sanctions implementation.

The war in Ukraine is a barbaric, illegal incursion into a sovereign nation by another. It has resulted in tens of thousands of deaths, mass displacement and an ongoing humanitarian catastrophe.

In relation to reports regarding Yevgeny Prigozhin, it is a long-standing custom that the Government does not comment publicly on individual cases and I, therefore, do not think it would be appropriate for me to comment either.

It may be useful to set out general guidance on how the sanctions regime operates. The Office of Financial Sanctions Implementation (OFSI) oversees the implementation of sanctions. Within the sanctions regime broadly, because everyone has a right to legal representation, it is possible for frozen assets to be used to pay for that legal representation. OFSI grants licences to allow sanctioned people to cover their own legal fees, provided that the costs are reasonable.

Decisions on the issuance of licences for legal fees are largely taken by OFSI officials in line with standard practice. The principles and guidance for assessing these applications are long-standing and have been published for a number of years. Applications are assessed solely on a cost basis.

Following an internal review to assess how legal fees licence applications are considered, the Government has updated its guidance in this area. As a result of the review, the Government has committed to further targeted changes to the process for issuing legal fees licences that safeguard the sanctions regime against the risk of manipulation and ensure that Ministers are accountable for OFSI decision-making. To strengthen the decision-making framework for specific licence applications in these and other cases, the Government have further updated the delegation framework under which decisions are taken by OFSI rather than Ministers. This framework will support and reinforce scrutiny of licensing decisions by making clear when it is appropriate for Ministers to take these decisions personally, or where officials can take these decisions.

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Once again, thank you for taking the time to contact me and if I can ever be of any further assistance to you then please do not hesitate to contact me again. If you would like to keep up to date with my activities as your Member of Parliament then please subscribe to my Darlington Matters newsletter using this link: [www.petergibson.org/signup](http://www.petergibson.org/signup)

A handwritten signature in blue ink that reads "Peter Gibson". The signature is written in a cursive style with a trailing flourish.

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