

Irene Polieri Writes About OFSI's New Enforcement Framework for Law360

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Following a public consultation, [discussed in her previous article](#), the U.K. Office of Financial Sanctions Implementation (OFSI) enforcement framework is being fundamentally overhauled with major reforms being adopted, writes London associate Irene Polieri for [Law360](#) [PDF].

With the U.S. Department of Treasury's Office of Foreign Assets Control (OFAC) framework as a reference, Irene looks in detail at the changes — including a new case assessment matrix with higher baseline penalty ranges, the reduced voluntary self-disclosure discount and OFSI's aims to double maximum penalties — and discusses OFSI's new approach prioritizing cases of the highest seriousness, supporting specific foreign policy objectives and exposing vulnerabilities in particular sectors.

Irene writes: "The era of OFSI as a passive responder to disclosed breaches is over, and a clearer sense of direction now informs the agency's operations. While the changes bring OFSI into closer alignment with the U.S. Department of Treasury's Office of Foreign Assets Control — its U.S. counterpart and formal enforcement partner since 2022 — OFSI has made deliberate choices to diverge, and the two frameworks remain structurally distinct in ways that carry real consequences for exposure modelling and enforcement strategy."

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