

# ICA Advanced Certificate in Managing Sanctions Risk Syllabus

## Unit 1: Global Sanctions Architecture – Political, Legal and Implementation Context

- Why are sanctions important?
- The politics of sanctions as a foreign policy tool
- Legal context and scope
- The collective architecture of economic sanctions
- Sanctions – impact and influence
- Emerging political challenges and questions of legitimacy

## Unit 2: Evolving Scope of Sanctions – A Changing Tool

- Implementation context – evolving scope of financial tools in responding to international security threats
- Russia sanctions
- The growth of global Magnitsky-type sanctions
- Non-state terrorist actors – ISIL
- Inter-relationship between sanctions and the growth of piracy and kidnap for ransom concerns
- The counter proliferation financing framework – chemical, biological, radiological and nuclear sanctions

## Unit 3: US Sanctions – Jurisdictional Scope, Role of Congress and Enforcement Trends

- Jurisdictional reach of US sanctions
- Enacting US sanctions: the role of Congress
- The global reach of US enforcement

## Unit 4: Sanctions Lifting, the Iranian JCPOA and the Emerging Divergence of EU – US Sanctions Policy

- Political process of sanctions lifting and roll back
- Political uncertainty over the permanency of sanctions easing – suspensions and multi regime disconnect
- Iran and the JCPOA – A turbulent and unpredictable journey
- Post-sanctions preparation

## Unit 5: Developing the Control Environment

- Regulatory expectations
- Identifying higher risk jurisdictions, activities and relationships
- Trade finance and sanctions risk assessment
- Internal high-risk areas – techniques for evasion

## Unit 6: Screening Responses and Dealing with Control and Ownership Factors

- The role and importance of sanctions screening controls
- Sanctions screening controls in response to sectoral sanctions
- Transparency, control and ownership

## Unit 7: Licensing and Permissible Payments

- Licensing
- Humanitarian factors and licensing approaches
- Humanitarian dual-use goods – the situation with respect to Syria
- North Korea sanctions and NGO activity

## Unit 8: Management of Frozen Assets, Incident Management and Self Reporting

- International importance of asset freezing and 'without delay'
- Determining what funds and other assets need to be frozen
- Reporting frozen assets