

Sanctions Investigations and Combatting Evasion

Sanctions SOS: Immersive Training Series

Delivery: In-person

Course code: SOSIP-IE



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Course Description

This course is a one-day, in-person programme, offering a practical deep dive into carrying out sanctions investigations, understanding evasion typologies and how to combat these risks, bringing the topic to life. Combining taught sessions with a developing scenario, the course allows attendees to tackle real-world challenges as they unfold - gaining hands-on experience in structured investigations, identification and management of evasion risks, regulatory reporting and enforcement actions. Designed for professionals across compliance, sanctions, trade, maritime and government, this interactive session supports peer learning and dynamic discussion in a small-group setting.

This one-day course includes breakfast, buffet lunch, coffee/tea, and refreshments throughout the day.

Learning Outcomes

By completing this training day, you will be able to:

- Understand the theory of completing investigations, both structure and unstructured
- Identifying the relevant tools to investigate cases and possible sanctions evasion
- How to undertake Open-Source Intelligence and different elements such as geo-location
- Understanding some of the common sanctions evasion typologies
- The importance of completing reporting, and the enforcement actions taken by regulators

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Participants receive a certificate of attendance, Sanctions SOS credits, and access to all course materials.

Syllabus

| Key topics | Learning points |
|--|---|
| Overview of the theory of Sanctions Investigations <i>Examination of the key theories of undertaking sanctions investigations, including management involvement.</i> | <ul style="list-style-type: none">• Define the life cycle of an investigation• Knowing why an investigation is being carried i.e. what will be done with findings• Understanding the three stages of an investigation: Identifications, Assessment, and decision making.• Understanding differences between structured and unstructured triggers |
| Best practices and tools for carrying out investigations <i>Identifying and utilising the best investigation tools, including common OSINT techniques.</i> | <ul style="list-style-type: none">• Understanding the flow of an investigation and who is responsible for what• Determining what's happened, what's the impact and who needs to be informed, ensuring complexity does not impact clarity• Examining the tools and skills required to undertake an investigation, including paid for tools• Examining Open Source Intelligence (OSINT) techniques and how these can be incorporated into investigations |
| Evasion Typologies <i>Examine different evasion typologies including those specific to certain sectors and industries</i> | <ul style="list-style-type: none">• Examination of common typologies and how to identify these: Professional Enables; Third Countries; Crypto; Foreign Workers; Mercenaries; and Complex Ownership.• Understanding how the maritime sector is vulnerable to evasion typologies and what these look like• Explore options for countering evasion |
| Reporting and Enforcement <i>Focus on investigation methods, evasion tactics, and enforcement processes.</i> | <ul style="list-style-type: none">• Building an investigation case resulting in specific and actionable outcomes• The importance of both internal and regulatory reporting and how to do this• Examining the roles of key enforcement agencies and likely action taken |