

UK Moving to a Single List for UK Sanctions Designations

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Executive Summary

- **What's new:** On 28 January 2026, the UK will move to a single list for sanctions designations. From that date, the UK Sanctions List will be the sole list detailing UK sanctions designations and the Consolidated List of Asset Freeze Targets will no longer be updated.
- **Why it matters:** The government hopes that the change will simplify checks of who is subject to UK sanctions, but companies must ensure that their systems are using data from the UK Sanctions List for sanctions screening ahead of the move on 28 January.
- **What to do next:** Organisations need to ensure their systems are using data from the UK Sanctions List for sanctions screening, and would be well advised to make these checks ahead of 28 January. Companies that use specialist screeners or other third-party providers should speak to their suppliers to understand the impact, if any, on data they receive. Contracts may also need to be revised to ensure they are drafted sufficiently broadly to cover the UK Sanctions List.

Since the creation of the UK's autonomous sanctions regime post-Brexit, UK sanctions designations have been detailed in two lists:

- The UK Sanctions List, published by the Foreign, Commonwealth and Development Office.
- The Consolidated List of Asset Freeze Targets, published for HM Treasury by the Office of Financial Sanctions Implementation (OFSI).

While the Consolidated List provides information only on those subject to UK financial sanctions, the UK Sanctions List provides a comprehensive list of all UK sanctions designations (e.g., financial, immigration, trade or transport sanctions).

The UK government has announced that, from 9 a.m. (UK time) on Wednesday, 28 January 2026, the UK Sanctions List will be the only list which details UK sanctions designations. From that date, the OFSI Consolidated List and its search tool will no longer be updated.¹

Why Is the UK Moving to a Single List?

In May 2025, the UK government published a policy paper, the [Cross-government review of sanctions implementation an enforcement](#), in which it was announced that the UK would be moving to a single list for all UK sanctions designations.

¹ This client alert is for informational purposes only and does not constitute legal advice. Complex assessments often have to be made regarding which sanctions regime applies in any given instance, given the multinational touchpoints of many entities and individuals. In that regard, given the complex and dynamic nature of these sanctions regimes, there may be developments not captured in this summary. Additionally, while the summary was accurate when written, it may become inaccurate over time given developments. For all of these reasons, you should consult with a qualified attorney before making any judgments relating to sanctions, as there are potentially severe consequences for failing to adhere fully to sanctions restrictions.

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The review noted that a single list would aid industry in screening for designated persons, especially those with non-financial designations, and [guidance published in October 2025](#) also cited industry feedback that a single list would remove duplication of effort and simplify checks of who is subject to UK sanctions.

Key Points and Next Steps

The move to a single list for UK sanctions designations will impact both UK organisations and non-UK organisations that are required to comply with UK sanctions.

Organisations should consider the following ahead of the switch to a single list on 28 January 2026:

- Ensure that any systems that currently use the OFSI Consolidated List for screening purposes are instead using the data from the UK Sanctions List. In particular, any systems that use “OFSI Group ID” as an identifier will need to use the UK Sanctions List’s “Unique ID#” for new designated persons.²

² To note, all UK Sanctions List formats will retain historic OFSI Group ID identifiers for persons designated prior to 28 January 2026. These historic Group IDs will remain valid for use, for example in licence applications, frozen asset or suspected breach reporting, though UK Sanctions List Unique IDs can also be used.

Organisations should switch to the UK Sanctions List as their primary source of designations data as soon as possible, but in any case no later than 28 January 2026. Internal policies and procedures should also be updated to reflect that the UK Sanctions List will be sole list against which UK sanctions screening should be conducted.

- Organisations that use a specialist screener or other third-party providers should speak to their supplier(s) to understand the impact, if any, on data they receive, and to ensure that no additional steps need to be taken to ensure that UK sanctions screening will be conducted against the UK Sanctions List.
- Contracts should also be reviewed to ensure that, where appropriate, references to the OFSI Consolidated List are either updated to refer to the UK Sanctions List or are drafted sufficiently broadly to cover the UK Sanctions List.