

Time to Switch: UK Moves to a Single Sanctions List by January 2026

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On October 13, 2025, the Foreign, Commonwealth & Development Office ("FCDO"), the Office of Financial Sanctions Implementation ("OFSI") and His Majesty's Treasury ("HM Treasury") confirmed that from January 28, 2026, the UK Sanctions List ("UKSL") will be the single official source of United Kingdom (UK) sanctions designations. The OFSI Consolidated List will close. The change follows a cross-government review and industry feedback to simplify screening.

Who Is Affected?

- **All Firms** conducting sanctions screening (banks, asset managers, insurers, professional services, marketplaces, FinTechs, crypto, trade/commodity firms) and any third-party screening vendors that source UK designations.
- Non-UK businesses operating outside the UK but screening for UK exposure should also align their sources and controls.

Why It Matters

A single list should cut duplication, reduce false negatives from mismatched fields, and streamline vendor integrations. Guidance has been published to help firms prepare; the UK Government recommends switching to UKSL as the primary data source now (and in any case before January 28, 2026).

What Firms Should Do Now

Firms should update policies to cite the UK Sanctions List as the authoritative source from go-live and brief teams while ensuring subscriptions to Foreign, Commonwealth & Development Office/Office of Financial Sanctions Implementation update alerts remain active.

For further information please contact ukreg@proskauer.com.

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