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| **Firm-wide risk assessment template**  **Regulation 18 of the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (MLR 2017)** | | | | | | | | | | | |
| Firm Name:  Money Laundering Compliance Officer:  Money Laundering Reporting Officer:  Number of fee-earners:  Percentage of work in scope of MLR 2017:  Before you begin, you need to read the following and take them into account when drafting your risk assessment.   * [SRA sectoral risk assessment](https://www.sra.org.uk/globalassets/documents/solicitors/code/lsag-anti-money-laundering-guidance.pdf) * [Legal Sector Affinity Group guidance](https://www.sra.org.uk/documents/solicitors/code/lsag-anti-money-laundering-guidance.pdf) * [HM Treasury National Risk Assessment](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/655198/National_risk_assessment_of_money_laundering_and_terrorist_financing_2017_pdf_web.pdf)   We have developed a [checklist](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.sra.org.uk%2Fglobalassets%2Fdocuments%2Fsolicitors%2Fanti-money-laundering-aml-firm-risk-assessment-checklist.docx%3Fversion%3D4a4d74&wdOrigin=BROWSELINK) which you can use to frame your risk assessment. | | | | | | | | | | | |
| **Customer Risk** | | | | | | | | | | | |
| **Reg 18 factor** | **Customer risk** | **What are the AML risks?** | | **Controls in place to mitigate identified risks** | | | | **Overall risk rating**  **Low/Medium/High/Not applicable - How have you arrived at your risk rating?** | | | **Departments to which this risk applies** |
| **18(2)(b)(i): your customers** | In this box describe your clients:  For example, individuals, corporate entities (UK), corporate entities (overseas), financial institutions, local authorities  Consider if you have a stable client base, high turnover of clients etc |  | |  | | | |  | | |  |
| Provide details if any of your clients are Politically Exposed Persons or has links to one |  | |  | | | |  | | |  |
| Clients that operate cash intensive or operate in a high-risk sector,  For example nail salons, car washes, cafés, casinos, arms dealers, oil industry etc |  | |  | | | |  | | |  |
| Clients with multiple layers of complex ownership |  | |  | | | |  | | |  |
| Clients seeking anonymity or cannot prove their identity |  | |  | | | |  | | |  |
| individuals or entities subject to sanctions |  | |  | | | |  | | |  |
| Other client risks |  | |  | | | |  | | |  |
| **Geographic risk** | | | | | | | | | | | |
| **Reg 18 factor** | **Geographic risk** | **What are the AML risks?** | | **Controls in place to mitigate identified risks** | | **Overall risk rating**  **(after mitigation):**  **Low/Medium/High/Not applicable** | | | | | **Departments to which this risk applies** |
| **18(2)(b)(ii): the countries or geographic areas in which you operate** | In this box describe the areas the firm provides services from and to (this can be local and international).  Include details of the geographic risks relating to the location of the firm, its clients and transactions. |  |  | | | |  | | |  | |
| Does the firm deal with countries with significant levels of corruption |  |  | | | |  | | |  | |
| Does the firm deal with countries subject to sanctions |  |  | | | |  | | |  | |
| Does the firm deal with [high-risk third countries](https://www.legislation.gov.uk/uksi/2022/1183/made), if so please describe |  |  | | | |  | | |  | |
| Does the firm deal with countries with stringent currency controls |  |  | | | |  | | |  | |
| Other geographical risks identified |  |  | | | |  | | |  | |
| **Products/Services Risks** | | | | | | | | | | | |
| **Reg 18 factor** | **Product/Service risk** | **What are the AML risks?** | | **Controls in place to mitigate identified risks** | | | | **Overall risk rating**  **(after mitigation):**  **Low/Medium/High/Not applicable** | | | **Departments to which this risk applies** |
| **18(2)(b)(iii): your products or services** | Client Accounts |  | |  | | | |  | | |  |
| Conveyancing/Real Estate  For example sales, purchases, leases |  | |  | | | |  | | |  |
| Tax Mitigation Strategies |  | |  | | | |  | | |  |
| Creating/managing companies |  | |  | | | |  | | |  |
| Services involving nominees |  | |  | | | |  | | |  |
| Details of any other product/service you provide:  for example probate, with a descriptor of the type of work carried out |  | |  | | | |  | | |  |
| Details of any other product/service you provide |  | |  | | | |  | | |  |
| Proliferation financing |  | |  | | | |  | | |  |
| **Transaction risk** | | | | | | | | | | | |
| **Reg 18 factor** | **Transaction risk** | **What are the AML risks?** | | **Controls in place to mitigate identified risks** | | | | **Overall risk rating**  **(after mitigation):**  **Low/Medium/High/Not applicable** | | | **Departments to which this risk applies** |
| **18(2)(b)(iv): your transactions** | Describe the typical types of transactions the firm deals with and the value of those transactions.  Provide details of large transactions you have been involved in. What would you consider to be an unusually high value transaction for your firm? |  | |  | | | |  | | |  |
| Complex transactions |  | | |  | | | |  | |  |
| Cash (clients paying in cash) |  | | |  | | | |  | |  |
| Transactions that don’t fit with your firm or clients’ normal patterns |  | | |  | | | |  | |  |
| Transactions or products that facilitate anonymity |  | | |  | | | |  | |  |
| New products, delivery mechanisms or technologies |  | | |  | | | |  | |  |
| Cryptocurrency and crypto assets (crypto), including digital assets |  | | |  | | | |  | |  |
| Any other transaction risks identified? |  | | |  | | | |  | |  |
| **Delivery Channels risk** | | | | | | | | | | | |
| **Reg 18 risk factor** | **Delivery Channel risks** | **What are the AML risks?** | | **Controls in place to mitigate identified risks** | | | | **Overall risk rating**  **(after mitigation):**  **Low/Medium/High/Not applicable** | | | **Departments to which this risk applies** |
| **18(2)(b)(v): your delivery channels** | Describe the methods used to provide services to your clients  For example, do you provide remote services, do you use emails etc |  | |  | | | |  | | |  |
| Combining services |  | |  | | | |  | | |  |
| Payments to or from third parties |  | |  | | | |  | | |  |
| Other delivery channel risks identified |  | |  | | | |  | | |  |

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| **Version** | **Approved by** | **Date** | **Comments** | **Date of Next Review** |
| 0.1 | (MLCO) | DDMMYYYY | Initial Draft | DDMMYYYY |
| 0.2 | (MLCO) | DDMMYYYY | Document Revised | DDMMYYYY |
|  |  | DDMMYYYY |  | DDMMYYYY |
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