AML Compliance Health Check

Interactive self-assessment • UK Estate Agencies • MLR 2017 & POCA 2002

How to use this health check

Select your honest answer to each question below. Your score and verdict update automatically as you complete the assessment. Any NO or NOT SURE indicates a compliance gap requiring immediate attention — these are legal obligations, not optional improvements.

YOUR SCORE	VERDICT
	Answer all 10 questions to see your result.

Scoring: 10 = Fully compliant • 8–9 = Good, address gaps • 5–7 = At risk • 0–4 = High risk

1 HMRC Registration

MLR 2017, Reg. 56

Is your business registered with HMRC for anti-money laundering supervision under MLR 2017?

- [ ] YES
- [ ] NO
- [ ] NOT SURE

! *If NO: Trading as an estate agent without HMRC AML registration is a criminal offence. Register immediately at gov.uk/topic/business-tax/money-laundering-regulations.*

2 Nominated MLRO

MLR 2017, Reg. 21

Have you appointed a nominated Money Laundering Reporting Officer (MLRO) who has full autonomy to carry out their duties?

- [ ] YES
- [ ] NO
- [ ] NOT SURE

! *If NO: Every regulated firm must appoint a named MLRO. This person is personally responsible for receiving internal SARs and deciding whether to report to the NCA.*

3 Written AML Policy

MLR 2017, Reg. 19

Do you have a current, written Anti-Money Laundering Policy and Procedures document that has been reviewed within the last 12 months?

- [ ] YES
- [ ] NO
- [ ] NOT SURE

! *If NO: A written policy is a legal requirement. It must cover CDD procedures, risk assessment, suspicious activity reporting and staff training obligations.*

4 Firm-Wide Risk Assessment

MLR 2017, Reg. 18

Have you completed a written firm-wide risk assessment identifying the specific money laundering risks your business faces?

- [ ] YES
- [ ] NO
- [ ] NOT SURE

! *If NO: A documented firm-wide risk assessment is mandatory and must be reviewed annually or when significant changes occur in your business.*

5 Customer Due Diligence — Vendors

MLR 2017, Reg. 27–28

Do you conduct and document CDD on ALL vendors before marketing their property, including photo ID, proof of address, electronic check and Land Registry verification?

◯ **YES** ◯ **NO** ◯ **NOT SURE**

! *If NO: CDD on vendors is mandatory before marketing. Failure to conduct checks — even if the transaction completes without incident — is a regulatory breach.*

6 Customer Due Diligence — Buyers

MLR 2017, Reg. 27–28

Do you conduct and document CDD on ALL buyers before issuing a Memorandum of Sale, including source of funds verification for cash buyers?

◯ **YES** ◯ **NO** ◯ **NOT SURE**

! *If NO: Cash buyers represent the highest risk category. Source of funds must be traced back to its legitimate origin — bank statements alone are not sufficient evidence.*

7 PEP & Sanctions Screening

MLR 2017, Reg. 35; UK Sanctions

Do you screen every client against the UK Sanctions List and for Politically Exposed Person (PEP) status before transacting?

◯ **YES** ◯ **NO** ◯ **NOT SURE**

! *If NO: Dealing with a sanctioned person is a criminal offence regardless of knowledge. PEPs require mandatory Enhanced Due Diligence. Electronic screening tools (Checkboard, Creditsafe) should be used.*

8 Staff Training

MLR 2017, Reg. 24

Have all relevant members of staff completed AML training, and are training records (including signed declarations) retained on file?

◯ **YES** ◯ **NO** ◯ **NOT SURE**

! *If NO: All staff working on regulated transactions must be trained. Training records must be kept for 5 years. Untrained staff create personal liability for both the individual and the business.*

9 Suspicious Activity Reporting

POCA 2002, s.330; MLR 2017

Do your staff know how to recognise suspicious activity, who to report it to internally, and that tipping off a suspect is a criminal offence?

◯ **YES** ◯ **NO** ◯ **NOT SURE**

! *If NO: Failure to report suspicious activity is a criminal offence under POCA 2002. Every staff member must know the internal reporting chain and the absolute prohibition on tipping off.*

10 **Record Retention** *MLR 2017, Reg. 40*

Are all AML records (ID documents, risk assessments, source of funds evidence, SARs, training records) retained securely for a minimum of five years?

○ **YES** ○ **NO** ○ **NOT SURE**

! *If NO: Failure to maintain adequate AML records is itself an offence under MLR 2017. Records must be accessible to HMRC on request and stored securely in line with data protection obligations.*

Your Result

Tip: to start over, simply change your answers above.

FINAL SCORE	VERDICT
	Answer all 10 questions to see your result.

What this means

If you answered NO or NOT SURE to any question, your business has a compliance gap. Consequences of non-compliance include an unlimited fine, up to 2 years' imprisonment, HMRC deregistration (making it illegal to trade as an estate agent), and a permanent criminal record — applied personally to directors and staff, not just the company.