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Full name	
Date of Birth	
Home Address	
Address of Property to be sold (if different to home address)	

A

Evidence of name and address

(Tick to confirm evidence received and confirm details are correct (A and B below))

Evidence of name	<<>>
Evidence of address	<<>>

M

Initial Risk Assessment

Risk level (circle relevant level)	Reasons for conclusion and level	If risk level is medium or high, describe action taken to mitigate risk
Low		
Medium		
High		

P

Interim Risk Assessment

Risk level (circle relevant level)	Reasons for conclusion and level	If risk level is medium or high, describe action taken to mitigate risk
Low		
Medium		
High		

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Final Risk Assessment

Risk level (circle relevant level)	Reasons for conclusion level	Risk level is medium or high, be action taken to mitigate risk
Low		
Medium		
High		

If the risk is assessed as high at the time of the assessment, you must report this to the MLRO before continuing to act for the customer.

Certification

I have verified the identity of customer	
I have not verified the identity of customer	Verifying customer identity: <<>>
I have seen the original document	
Copies of the customer's documents are attached to this form	
Any photographs in the documents bore a good likeness to the customer	
Name of person giving this certification	
Position	
Company and branch (if applicable)	
Telephone number	
Signature	
Date	

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(A) Evidence of name (complete name)

Current full signed passport

Passport number	<<>>	
Country code	<<>>	
Place of birth	<<>>	
Date of birth	<<>>	
Expiry date	<<>>	

Current UK photo card driving licence

Licence number	<<>>	
Date of birth	<<>>	
Expiry date	<<>>	

National Identity Card

Unique number/reference	<<>>	
Country of origin	<<>>	
Date of birth	<<>>	
Expiry date	<<>>	

Firearms Certificate

Certificate number	<<>>	
Date of birth	<<>>	
Expiry date	<<>>	

Identity card issued by the Electoral Commission in Ireland

Card number	<<>>	
Date of Birth	<<>>	
Expiry date	<<>>	

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(B) Evidence of assets (to be completed for all of the tables below)

Current UK photo card driving licence

(Cannot be used here if already used elsewhere)

Licence number	<<>>	
Current address?	Yes / No (circle)	
Date of issue	<<>>	

Current year's council tax bill

Reference/account number	<<>>	
Current address?	Yes	
Local authority	<<>>	
Document date	<<>>	

Benefits Entitlement Letter

(Cannot be used here if already used elsewhere)

Reference/account number	<<>>	
Current address?	Yes	
Issuing authority	<<>>	
Document date	<<>>	

Tenancy agreement

Reference/account number	<<>>	
Current address?	Yes	
Local authority	<<>>	
Document date	<<>>	

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Most recent mortgage statement

Reference/account number	<<>>	
Current address?	Yes	
Lender	<<>>	
Document date	<<>>	

Bank or building society statement

Reference/account number	<<>>	
Current address?	Yes	
Institution name	<<>>	
Document date	<<>>	

Utility bill (excluding mobile phone)

Reference/account number	<<>>	
Current address?	Yes	
Utility company	<<>>	
Document date	<<>>	

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Examples of Suspicious Activity

The examples of suspicious activity are provided to help you assess whether the transaction is suspicious. This is not a Firm Wide Risk Assessment. This is not a checklist.

Consider on each transaction to determine if it is 'high risk'. You should also consider the Firm Wide Risk Assessment. This is not a checklist but includes:

New Customers:

1. Have you met your customer in person?
2. Is your customer reluctant to provide information?
3. Are either party to the transaction from a 'high risk' third country?
4. Have intermediaries been used in the transaction?
5. Has false information been provided?
6. Is there an apparent reason why the customer should be placed to act?
7. Are there complex companies or structures which make it difficult to identify the true owner?
8. Are any of the individuals involved in the transaction based in or from locations that carry a higher risk of money laundering?
9. Are there multiple properties being sold or other sales?
10. <<Other>>

1. Is the customer's identity and/or source of funds clear?
2. Is the customer from a 'high risk' third country?
3. Have intermediaries been used in the transaction?
4. Has false information been provided about the customer's identity?
5. Would another firm have been better placed to act?
6. Are there complex companies or structures which make it difficult to identify the true owner?
7. Are any of the individuals involved in the transaction based in or from locations that carry a higher risk of money laundering?
8. Are there multiple properties being sold or other sales?
9. Are there multiple properties being sold or other sales?

Existing Customers:

1. Is the transaction different from the customer's normal business?
2. Is the transaction being carried out by a person who is not the customer?
3. What is the value of the transaction and is the customer not disclosing the source of funds?
4. Have any monies been paid to the customer with the customer?
5. Are you being instructed to carry out the transaction in a short space of time?
6. <<Other>>

1. Is the transaction different from the customer's normal business?
2. Is the transaction being carried out by a person who is not the customer?
3. What is the value of the transaction and is the customer not disclosing the source of funds?
4. Have any monies been paid to the customer with the customer?
5. Are you being instructed to carry out the transaction in a short space of time?

Transaction:

1. Are either party to the transaction instructed to be carried out quickly?
2. Are funds being sent abroad to a third party?
3. Has the property been inspected or viewed?
4. Are there any late changes to the transaction?

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5. Is the value of the property (within the top 5% of the local market values)?
6. Are we being asked to hold title for [above <<add sum>>] especially for no apparent reason which?
7. Are funds being paid in part in foreign currency?
8. Are multiple payments being made through bank accounts?
9. Are there unusual sources of funds (use of complex loans, mortgage from an unknown/overseas)?
10. Are both or either party not meeting their legal obligations?
11. Is one party reluctant to use their name for the conveyancing process?
12. Is the transaction unnecessary (what are the parties hoping to achieve)?
13. Is the counterparty known to be the legal owner?
14. <<Other>>

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