Firm-wide risk assessment

Harwood & Lane Accountants Ltd
Money Laundering Regulations 2017, regulations 18 and 18A
Version: 2026-10-30.1+1f2badaadcf7
Assessment date: the date of signature in section 8

3. Client base

The firm provided services to 101 - 250 clients in the past 12 months. Its customers are one of the risk factors it must take into account (reg 18(2)).

The table shows how many clients fall in each of the 13 categories the ACCA return asks about. A risk note appears only where the firm has clients in that category.

Client category	Clients	Risk note
Cash-based businesses	11 - 25	A business that is cash intensive is a customer risk factor the firm must take into account (reg 33(6)(a)(v)). > *"The risk is particularly high for clients with cash intensive businesses as this can disguise the real source of funds and allow for the easier mixing between legitimate and criminal earnings."* — NRA 2025, ASP chapter, ¶5.208 > *"You should understand the reasons why a business is still transacting in cash if this is not the expected norm."* — AASG risk outlook (22 Sep 2025), Clients: Cash based businesses
High-value dealers	0	
Property	1 - 10	Ongoing monitoring includes scrutiny of transactions and, where necessary, of the source of funds (reg 28(11)). > *"Large property transactions, where the source of funds is unclear, have also been linked to laundering the proceeds of crime."* — AASG risk outlook (22 Sep 2025), Clients: Other sectors highlighted by the NRA
Import and export	0	
Money service businesses	0	
Cryptoassets	0	
Visa and immigration services	0	
Investment services	0	
Charities	0	
Precious metals and stones	0	

SAMPLE — fictitious practice, for illustration

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Client category	Clients	Risk note
Wealthy individuals	1 - 10	Wealth alone does not make a client high risk; complex structures and secrecy do (AASG risk outlook (22 Sep 2025)). *"Not all high-net-worth individuals, or wealthy individuals, will be high risk simply because their income or assets meets the HMRC definition."* — AASG risk outlook (22 Sep 2025), Clients: High-net-worth individuals *"Risk will be greatest when the structures are complex and involve high secrecy jurisdictions."* — AASG risk outlook (22 Sep 2025), Clients: High-net-worth individuals
Clients with revenue over £10 million	0	
Politically exposed persons	0	

Clients that each represent more than 15% of the firm's total revenue: 0.

The firm has no existing client who has been convicted of a financial-related crime or appears on a sanctions list.

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- 4. Geography and delivery channel
- 5. Risk ratings
- 6. Controls
- 7. Proliferation financing risk assessment (regulation 18A)
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