

Hunter's Solicitors LLP
Suffolk House, 54-55 The Green, High Wycombe,
Buckinghamshire , HP10 0EU
Recognised body
597315

[Agreement Date: 30 April 2025](#)

Decision - Agreement

Outcome: Regulatory settlement agreement

Outcome date: 30 April 2025

Published date: 2 May 2025

Firm details

Firm or organisation at time of matters giving rise to outcome

Name: Hunter's Solicitors LLP

Address(es): Suffolk House 54-55 The Green High Wycombe,
Buckinghamshire, HP10 0EU

Firm ID: 597315

Outcome details

This outcome was reached by agreement.

Decision details

1. Agreed outcome

1.1 Hunter's Solicitors LLP (the firm), a recognised body, authorised and regulated by the Solicitors Regulation Authority (SRA), agrees to the following outcome to the investigation:

- a. Hunter's Solicitors LLP will pay a financial penalty in the sum of £24,820, under Rule 3.1(b) of the SRA Regulatory and Disciplinary Procedure Rules.
- b. to the publication of this agreement under Rule 9.2 of the SRA Regulatory and Disciplinary Procedure Rules; and
- c. Hunter's Solicitors LLP will pay the costs of the investigation of £600, under Rule 10.1 and Schedule 1 of the SRA Regulatory and Disciplinary Procedures Rules.



2. Summary of Facts

2.1 We carried out an investigation into the firm following an inspection by our AML Proactive Supervision Team.

2.2 Our inspection and subsequent investigation identified areas of concern in relation to the firm's compliance with the Money Laundering, Terrorist Financing (Information on the Payer) Regulations 2017 (MLRs 2017), the SRA Principles 2019 and the SRA Code of Conduct for Firms 2019.

Firm-wide risk assessment (FWRA)

2.3 Between 4 January 2021 and 7 May 2024, the firm failed to take appropriate steps to identify and assess the risks of money laundering and terrorist financing to which its business is subject, and therefore failed to have in place an up to date record in writing of the risks of money laundering and terrorist financing, to which its business was subject (a FWRA), pursuant to Regulations 18(1), 18(3) and 18(4) of the MLRs 2017.

Policies, controls and procedures (PCPs)

2.4 Between 4 January 2021 and 7 May 2024, the firm failed to establish and maintain compliant PCPs to mitigate and effectively manage the risks of money laundering and terrorist financing, identified in any risk assessment (FWRA), pursuant to Regulation 19(1)(a) of the MLRs 2017, and regularly review and update them pursuant to Regulation 19(1)(b) of the MLRs 2017.

AML Training

2.5 Between 4 January 2021 and 7 May 2024, the firm failed to take appropriate measures to ensure that its relevant employees were made aware of the law relating to money laundering and terrorist financing, as required by Regulation 24(1)(a)(i) of the MLRs 2017.

2.6 The firm has since confirmed it has put in place measures to ensure continuing and future compliance, updated and amended its FWRA and PCPs, implemented an independent audit of the firm's AML control environment and files, trained the staff on implementing the firm's PCPs and set out a rolling programme of training. The firm now meets the requirements of Regulations 18, 19 and 21 of the MLRs 2017.

3. Admissions

3.1 The firm admits, and the SRA accepts, that by failing to comply with the MLRs 2017, it has breached:

- a. (a) Principle 2 of the SRA Principles 2019 – which states you act in a way that upholds public trust and confidence in the solicitors'



- profession and in legal services provided by authorised persons.
- b. (b) Paragraph 2.1(a) of the SRA Code of Conduct for Firms 2019 – which states you have effective governance structures, arrangements, systems and controls in place that ensure you comply with all the SRA's regulatory arrangements, as well as with other regulatory and legislative requirements, which apply to you.
 - c. (c) Paragraph 2.2 of the SRA Code of Conduct for Firms 2019 – which states you keep and maintain records to demonstrate compliance with your obligations under the SRA's regulatory arrangements.
 - d. (d) Paragraph 3.1 of the SRA Code of Conduct for Firms 2019 – which states that you keep up to date with and follow the law and regulation governing the way you work.

4. Why a fine is an appropriate outcome

4.1 The SRA's Enforcement Strategy sets out its approach to the use of its enforcement powers where there has been a failure to meet its standards or requirements.

4.2 When considering the appropriate sanctions and controls in this matter, the SRA has taken into account the admissions made by the firm and the following mitigation:

- a. The firm took steps to rectify its failings and reviewed and amended its AML control environment and, in doing so, is now compliant with the MLRs 2017.
- b. An independent audit was undertaken to conduct a wholesale review of the firm's AML control environment and the firm acted upon the recommendations made within the audit outputs.
- c. The firm has cooperated with the SRA's AML Proactive Supervision and AML Investigation teams.
- d. The firm has admitted the breaches listed above at the earliest opportunity.

4.3 The SRA considers that a fine is the appropriate outcome because:

- a. The conduct showed a disregard for statutory and regulatory obligations and had the potential to cause harm, by acting in conveyancing matters without a compliant AML control environment in place, and a lack of AML training for its relevant staff, that could have led to money laundering (and/or terrorist financing). This could have been avoided had the firm taken into account its changed size and nature, had a compliant AML control environment in place, and ensured a rolling programme of AML training for staff.
- b. It was incumbent on the firm to meet the requirements set out in the MLRs 2017. The firm failed to do so. The public would expect a firm of solicitors to comply with its legal and regulatory obligations, to protect against these risks as a bare minimum.
- c. The agreed outcome is a proportionate outcome in the public interest because it creates a credible deterrent to others and the

issuing of such a sanction signifies the risk to the public, and the legal sector, that arises when solicitors do not comply with anti-money laundering legislation and their professional regulatory rules.

4.4 Rule 4.1 of the Regulatory and Disciplinary Procedure Rules states that a financial penalty may be appropriate to maintain professional standards and uphold public confidence in the solicitors' profession and in legal services provided by authorised persons. There is nothing within this Agreement which conflicts with Rule 4.1 of the Regulatory and Disciplinary Rules and on that basis, a financial penalty is appropriate.

5. Amount of the fine

5.1 The amount of the fine has been calculated in line with the SRA's published guidance on its approach to setting an appropriate financial penalty (the Guidance).

5.2 Having regard to the Guidance, the SRA and the firm agree that the nature of the misconduct was more serious (score of three). This is because, although there was no direct loss to clients, the firm's failure to ensure it had proper documentation in place for over three years shows a persistent disregard of the firm's regulatory obligations. The firm's FWRA had not been reviewed or updated since 2021, despite the firm opening other branches and acquiring multiple firms throughout 2021-2023. The firm's FWRA was therefore not reflective of its client demographic and nature of business, nor did it contain a proliferation financing risk assessment pursuant to Regulation 18(A) from 2022 onwards. The firm's PCPs were also not reviewed, updated, or maintained since 2021, and were also missing some mandatory areas. The firm had therefore not had effective arrangements in place to manage compliance. This is more serious given the lack of AML training at the firm too.

5.3 The firm only became compliant with the MLRs 2017 because of our AML inspection and guidance we have provided. The breach has arisen because of recklessness and a failure to pay sufficient regard to money laundering regulations and published guidance.

5.4 The impact of the harm or risk of harm is assessed as being low (score of two). This is because, while the nature of conveyancing is considered high-risk, owing to the risk of abuse of the system by criminals, we note there is no evidence of there being any direct loss to clients or actual harm caused as a result of the firm's failure to ensure it had compliant AML documentation in place. We also note the firm does a small amount of conveyancing compared to other services it offers, and this puts it at a lower risk of being used to launder money.

5.5 The 'nature' of the conduct and the 'impact of harm or risk of harm' added together give a score of five. This places the penalty in Band "B", as directed by the Guidance.



5.6 We and the firm agree a financial penalty towards the lower end of the bracket. This is because the firm had some documentation in place, and is not a case of no AML compliance across the board. The firm has confirmed it has put in place measures to ensure continuing and future compliance, updated and amended its FWRA, PCPs and client and matter risk assessments (CMRAs), reviewed all live in-scope files and ensured the necessary documentation has been placed on them, registered as a TCSP and tax adviser, implemented an independent audit of the firm's AML control environment and files, and trained the staff on implementing the firm's PCPs and set out a rolling programme of training.

5.7 Based on the evidence the firm has provided of its annual domestic turnover, this results in a basic penalty of £29,200.

5.8 The SRA considers that the basic penalty should be reduced to £24,820. This reduction reflects the mitigation set out at paragraph 4.2 above.

5.9 The firm does not appear to have made any financial gain or received any other benefit as a result of its conduct. Therefore, no adjustment is necessary, and the financial penalty is £24,820.

6. Publication

6.1 Rule 9.2 of the SRA Regulatory and Disciplinary Procedure Rules states that any decision under Rule 3.1 or 3.2, including a Financial Penalty, shall be published unless the particular circumstances outweigh the public interest in publication.

6.2 The SRA considers it appropriate that this agreement is published as there are no circumstances that outweigh the public interest in publication, and it is in the interest of transparency in the regulatory and disciplinary process.

7. Acting in a way which is inconsistent with this agreement

7.1 The firm agrees that it will not deny the admissions made in this agreement or act in any way which is inconsistent with it.

7.2 If the firm denies the admissions, or acts in a way which is inconsistent with this agreement, the conduct which is subject to this agreement may be considered further by the SRA. That may result in a disciplinary outcome or a referral to the Solicitors Disciplinary Tribunal on the original facts and allegations.

7.3 Acting in a way which is inconsistent with this agreement may also constitute a separate breach of Principles 1, 2 and 5 of the SRA Principles and paragraph 3.2 of the Code of Conduct for Firms.

8. Costs

8.1 The firm agrees to pay the costs of the SRA's investigation in the sum of £600. Such costs are due within 28 days of a statement of costs due being issued by the SRA.

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