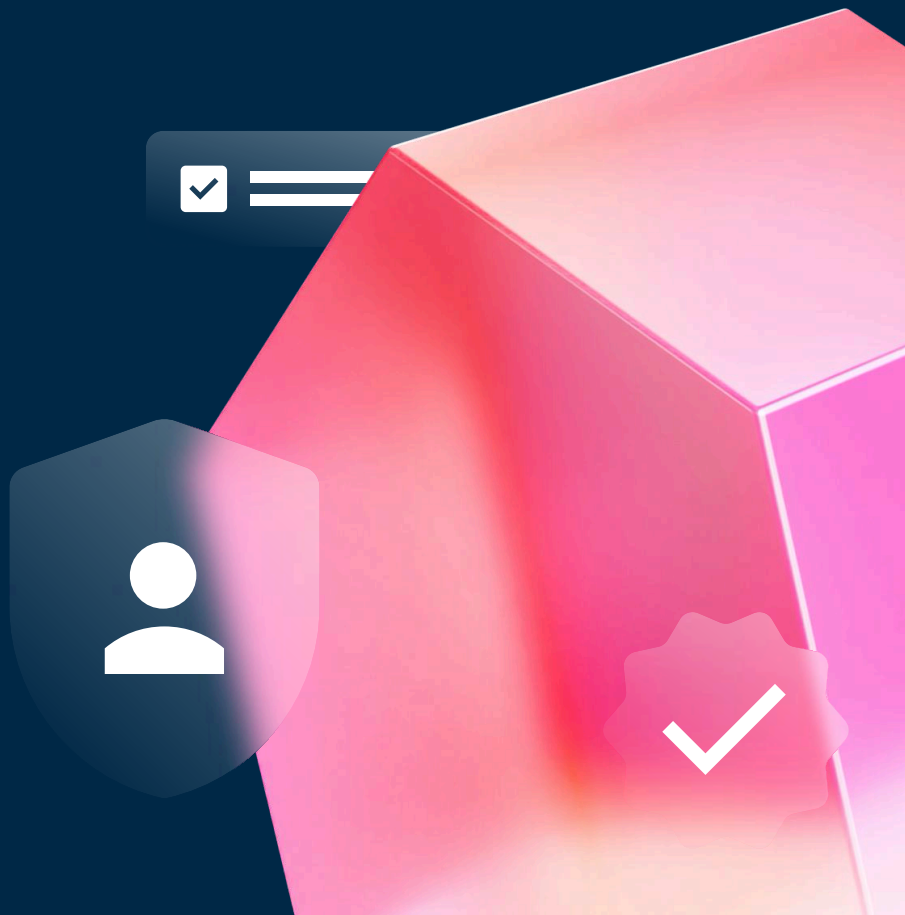


# The Assured Compliance Handbook

## Overview and Implementation Guide

A practical guide for estate agents implementing the Coadjute Assured Compliance Framework.



# Foreword

**Most estate agents work hard at compliance. They subscribe to ID apps, complete training and maintain policies. But when HMRC visits, they will ask: "How does this all fit together?" – The Coadjute Assured Compliance Framework enables you to answer that question.**

*£10 billion is laundered through UK property every year. HMRC has issued over £2.5 million in penalties to estate agents. The National Risk Assessment rates our sector as high risk, a rating that has increased since 2020 – AML compliance has never been more important.*

The industry has tools. What it lacks is methodology – a structured approach that connects regulatory requirements to business governance to the decisions made on every file, every day.

That's what the Coadjute Assured Compliance Framework provides. Built on ISO 31000, the international standard for risk management, the framework delivers what the law actually requires: a risk-based approach. Not data collection. Not document gathering. Genuine risk assessment, evaluation, and treatment – applied consistently across your entire business.

For the first time, estate agents can demonstrate complete coverage of all 34 HMRC risk indicators and 203 legal obligations. Not through a single product, but through a coherent system where your Business-Wide Risk Assessment drives your policies, your policies drive your controls, and your controls drive every transaction.

This guide introduces the framework and shows you how to implement it – whether you're starting from scratch or building on what you already have.

**John Reynolds**  
Chief Operating Officer,  
Coadjute

# Introduction

With 203 legal obligations and 34 risk indicators specified by HMRC guidance as 'must do', estate agents need a structured and systematic approach to organising and running their AML compliance.



# The AML problem

## Anti-money laundering (AML) is no longer a side issue for estate agents.

Estate agents are on the front line of the UK's defences against money laundering and terrorist financing, and HMRC expects you to prove it.

The regulations are clear on what you must have in place: a Business-Wide Risk Assessment (BWRA) that identifies your firm's specific risks; Policies, Controls and Procedures (PCPs) that explain how you manage those risks; and file-level records that evidence you followed those procedures on every transaction.

These three layers, governance, operations, and evidence, must join up. A BWRA that sits in a drawer, policies that staff haven't read, and records that don't trace back to either is not compliance. It's paperwork.

Yet in most agencies, that's exactly what's happened. AML has grown organically rather than strategically:

- A BWRA copied from a template and reviewed once a year
- Policies written in language that doesn't match how staff actually work
- A digital ID tool operating independently of your documented procedures
- File records that tick boxes but don't evidence risk-based decisions
- No clear thread connecting what you said you'd do to what you actually did

The result is a dangerous gap between documentation and reality. Your BWRA says one thing. Your PCPs say another. Your files show something else entirely. When HMRC asks "show me how this transaction reflects your risk assessment", most firms can't draw a straight line between the two.

Staff hold different mental pictures of what "our AML" actually means. One person thinks CDD, another thinks the ID app, another thinks policies. Without a shared structure, governance and operations drift apart, and the evidence trail breaks.



# Why a framework is needed

## You wouldn't run your sales pipeline on scattered spreadsheets and gut instinct, so why run AML that way?

Most estate agents have accumulated AML tools, training and paperwork over the years. But when you step back, there's no single system holding it all together. No common thread connecting your BWRA to your policies to your file-level workflow to your records.

That's the difference between activity and a framework.

A framework creates an end-to-end compliance architecture: a shared language and structure that connects what the regulations require, to how your business governs itself, to what happens on every transaction, to the evidence you keep. When these four layers use the same model, everything joins up, and you can prove it.

## A complete operating model that connects governance to operations to evidence.

Right now, many agencies are doing AML like navigating a city with no map: lots of individual instructions, but little sense of how they join up. When a staff member asks "what exactly should I do here?" or HMRC asks "how does this all fit together?", the answer shouldn't require digging through folders or making it up on the spot.

A framework changes that. It provides a shared mental model that helps everyone in your business answer three core questions:

1. **What are we required to do?** (Law, regulation, HMRC guidance)
2. **How does our business organise itself to comply?** (Governance, BWRA, PCPs)
3. **What must happen, step by step, on each transaction, and how do we evidence it?** (File-level workflow and records)

When your team all share this model, then BWRA drives your policies, your policies drive your workflow, and your records prove you have followed through. That's not just compliance, it's defensibility.

The Assured Compliance Framework is designed to be exactly that: a complete operating model that connects governance to operations to evidence, giving every estate agency a system they can explain, defend and rely on.

# The Framework

An ISO 31000-based AML risk management framework providing complete coverage of all HMRC requirements.



# The Assured Compliance Framework

**The Assured Compliance Framework (ACF) is an AML Risk Management Framework based on the ISO 31000 global risk management standard.**

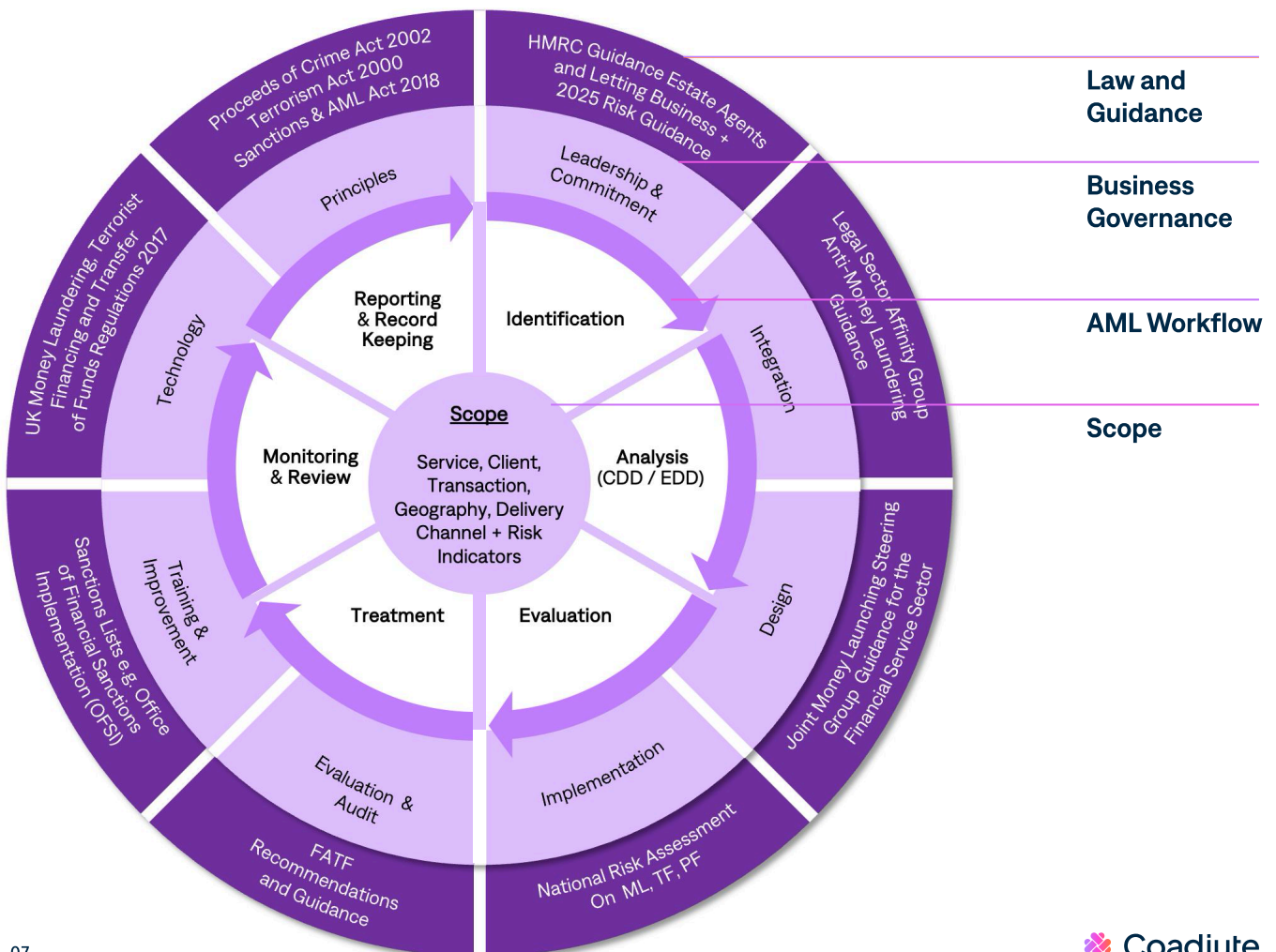
The framework helps UK property market firms consistently meet their AML/Combating Terrorist Financing/Proliferation Financing obligations by joining up law and guidance, business-wide risk assessment, policies and controls, and a standardised file-level AML workflow. All operationalised and evidenced through the Coadjute platform.

The ACF is organised into three concentric layers around a central Scope definition:

- 1. Law and Guidance (outer layer):** The external legal and regulatory environment that shapes our obligations.
- 2. Business Governance (middle layer):** The governance, principles, and enablement structures that support risk management.
- 3. AML Workflow (inner layer):** The operational workflow – the six-stage process (Identification, Analysis, Evaluation, Treatment, Monitoring, Reporting) executed on every file.

At the centre sits the Scope definition: what risks are being managed, defined through five dimensions (Service, Client, Transaction, Geography, Delivery Channel) and the 34 risk indicators.

**The full framework is shown below and described in detail over the following pages.**



# Outer layer: Law and Guidance



**The starting point for effective AML risk management is a clear understanding of the external context in which the firm operates – particular, the laws, regulations and official guidance that apply to UK property work.**

The Coadjute Assured Compliance Framework organises these materials into a single requirements layer. In ISO 31000 terms, this layer defines the external context and answers the question: **"Within our regulated role in the UK property market, what does the law and official guidance require us to do?"**.

This common, concise view of requirements underpins the firm's business-wide risk assessment, policies and controls, and file-level AML workflow.

The outer layer defines **WHAT is required**. It establishes the legal obligations, the regulatory expectations, and the risk context that the business must address.

## Primary Legislation

The Proceeds of Crime Act and the Terrorism Act create the main money laundering and terrorist financing offences, and offences such as failure to report and tipping off.

## Supervisory Guidance

For estate agents, HMRC guidance; for legal practices, relevant professional body guidance; for lenders, regulatory and supervisory expectations in the financial sector. These documents explain how supervisors expect the regulations to be applied.

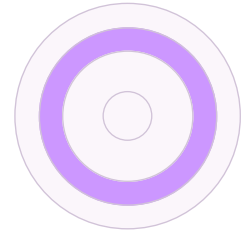
## Regulations

The Money Laundering Regulations set detailed requirements for risk assessments, customer due diligence, ongoing monitoring, policies, controls, procedures, record keeping and training.

## National & Sector Risk Assessments

These describe the overall money laundering and terrorist financing risks facing the UK and specific sectors, including property and financial services, and inform the firm's own risk assessment.

# Middle layer: Business Governance



**Once the external requirements are understood, the next step is to decide how the firm will organise itself to comply, consistently and demonstrably.**

In short, the Business Governance layer translates law and guidance into a firm-wide AML risk management framework, within which every client file and transaction is then handled using the standardised Coadjute AML workflow.

This layer ensures that AML risk management is:

- Integrated into strategy, operations and decision-making
- Directed and supported by leadership and clear accountability
- Implemented through documented PCPs, resources and tools
- Reviewed and improved via monitoring, audit and assurance

The middle layer defines **HOW the business organises itself to comply**. It establishes the governance, documentation, and control environment that enables consistent compliance.

## Leadership & Commitment

Board oversight, senior management accountability, MLRO appointment with sufficient authority & resources.

## Integration

Embedding AML into business processes – not treating it as a separate compliance function.

## Design

Business-Wide Risk Assessment (BWRA), understanding context & defining risk criteria.

## Implementation

Policies, Controls & Procedures (PCPs), training programmes, technology tools.

## Evaluation

Quality assurance, internal audit, management information and reporting.

## Improvement

Lessons learned, framework updates, continuous enhancement based on findings.

# Inner Layer: AML Workflow



**The third element of the Assured Compliance Framework is the AML Workflow – the repeatable Risk Management workflow that every relevant client and transaction should follow.**

In line with ISO 31000, the standard workflow follows the classic risk management cycle: Identification, Analysis, Evaluation, Treatment, Monitoring & Review, Reporting & Record Keeping.

In the Coadjute model, this is delivered digitally via the platform and executed by Service Delivery Agents.

## 1 Identification

Decide whether each risk indicator is in scope for the file. Anything unusual is flagged for structured analysis.

## 2a Analysis – Customer Due Diligence (CDD)

Build a coherent picture for each in-scope indicator using standard CDD. Check story and evidence make sense.

## 2b Analysis – Enhanced Due Diligence (EDD)

Where standard CDD is not enough, conduct deeper analysis and gather additional evidence.

## 3 Evaluation

Rate each indicator as Green, Amber or Red using predefined criteria. Record justification.

## 4 Treatment

Decide: proceed, proceed with conditions, or do not proceed – in line with risk appetite and approval requirements.

## 5 Monitoring & Review

Watch for changes throughout transaction; re-run indicators when needed; feed learning back into framework.

## 6 Reporting & Record Keeping

Capture evidence, decisions and rationales in digital AML file, including SARs or DAML submissions.

# Centre: The Scope



**At the centre of the model sits Scope – the definition of what risks the framework manages. Without a clear scope, risk assessment becomes inconsistent: different staff assess different things on different files.**

The ACF defines scope through two interconnected elements:

**Five Dimensions:** Every AML risk assessment considers the same five dimensions, ensuring nothing is missed and everything is assessed consistently.

The five dimensions are listed below.

**34 Risk Indicators:** Specific factors to assess across each dimension, covering all HMRC requirements.

Across these five dimensions, the ACF assesses 34 specific risk indicators – covering all 34 factors mandated by HMRC's September 2025 guidance. This ensures complete regulatory coverage on every file.

The 34 risks are listed on the next page.

The scope defines **WHAT RISKS are being managed**. It ensures completeness (nothing missed) and consistency (same risks assessed on every file).

## Service

What service are we providing? (Sales, lettings, multiple services)

## Geography

Where are the client, property, and funds located?

## Client

Who is the customer? (Individual, corporate, trust, PEP)

## Delivery Channel

How are we interacting? (Face-to-face, remote, via intermediary)

## Transaction

What is happening in the deal? (Price, source of funds, structure)

# The 34 risk indicators

















HMRC's September 2025 sector guidance mandates 34 AML risk checks. The framework covers all 34.

## Customer risks

-  Customer profile not in line with transaction
-  Customer behaviour (secretive/evasive)
-  PEPs, family, close associates
-  Corporate structure not wholly UK-based
-  Trust customers
-  REIT/OEIC
-  Cash-intensive businesses
-  Joint ventures & reliance agreements
-  Customers linked to governments of PF-sanctioned regimes
-  Customers sanctioned by the UK for terrorist activity

## Transaction risks

-  Super-prime property
-  Multiple property transactions
-  Price not reflective of market value
-  Complex/unusual corporate structure
-  Non-transparent legal entity
-  Potential professional enablers
-  No commercial purpose
-  Payment & Source of Funds risks
-  Bridging finance
-  Multiple connected companies/common BOs
-  Proof of Ownership
-  Identifying co-owners
-  Property used to manufacture dual-use goods
-  Linked to PF-sanctioned regimes


## Transaction risks

-  High-Risk Third Countries (HRTC)

-  Overseas (non-HRTC)

## Service risks

-  Multiple services on the same asset

-  Payments for EAB services

## Delivery channel risks

-  No face-to-face

-  Intermediaries

-  Virtual office locations

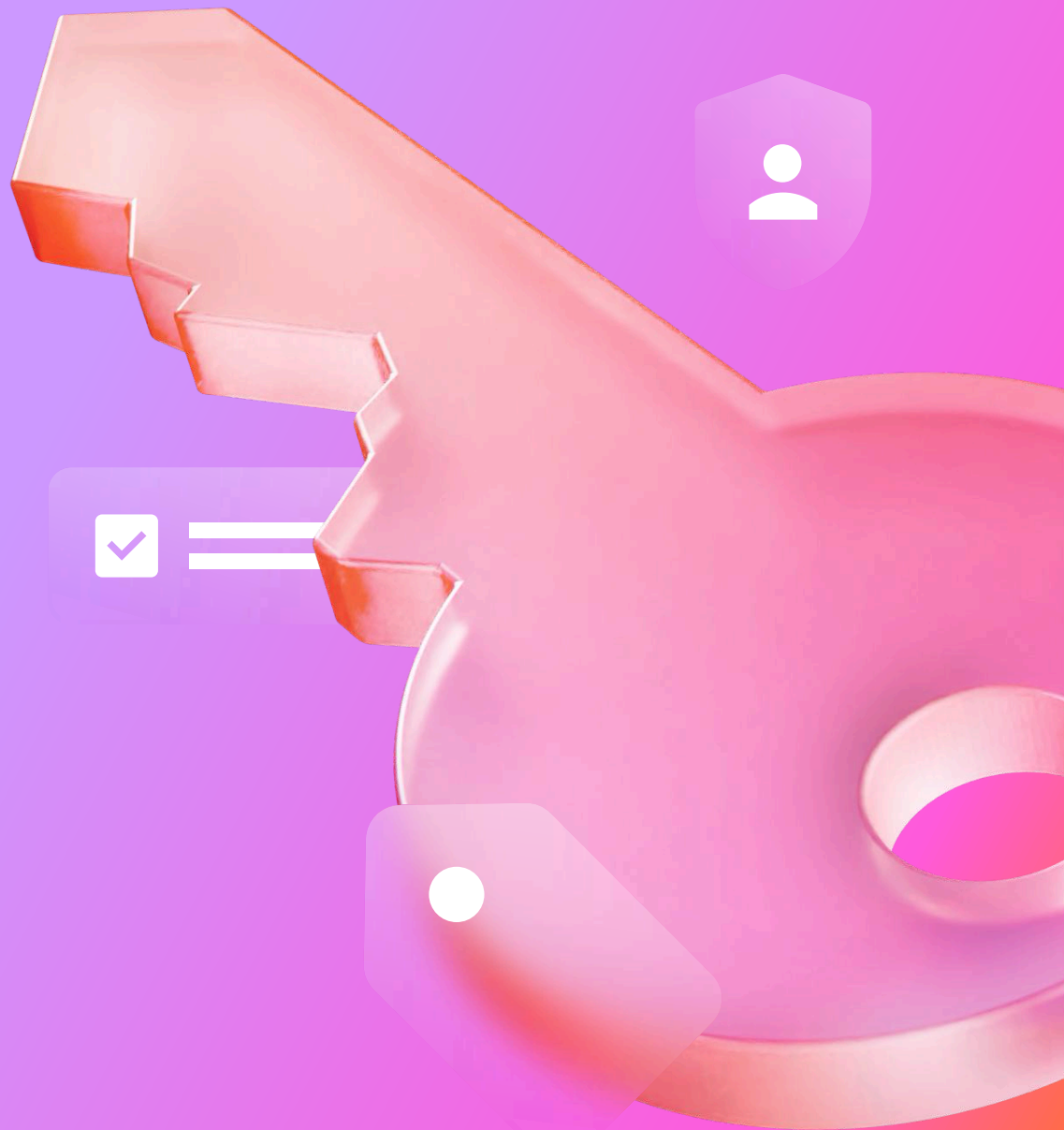
-  Offshore ownership/intermediary

-  Property auctions

-  Third-party ID/compliance providers

# In practice

How to implement the framework  
– practical steps to get started.



# Implementing the framework

As a Coadjute customer, the AML workflow is fully automated on the Coadjute platform. Your responsibility is to ensure you have up-to-date BWRA and PCPs. Most firms complete implementation in 2–3 hours, here's how:

1

## Read this handbook

Start with the Assured Compliance Handbook to understand the approach and how the documents work together.

Check you also have the Coadjute BWRA and PCP templates to hand.

2

## Complete your BWRA

Work through the Business-Wide Risk Assessment template section-by-section, completing the highlighted fields.

**This is the "why" – what risks affect your business.**

3

## Complete your PCPs

Fill in the Policies, Controls and Procedures template with your firm's details.

**This is the "how" – what your team does day-to-day.**

4

## Train your staff

Ensure your team receives training on the BWRA and PCPs so they understand the framework and their responsibilities.

## Key points

- **Keep these documents accessible** – HMRC can request them at any time
- **Review annually**, or sooner if your business changes significantly
- **Staff training** can be delivered as an online course – contact us for more information

# Training and accreditation

Professional development pathways aligned to the Assured Compliance Framework.



# Assured Compliance training and accreditation

**In other disciplines, a best-practice framework is usually supported by training and professional accreditation.**

Project managers have their own bodies of knowledge and certifications; service managers have theirs. AML in the property sector is now on a similar path: expectations, skills and accountability are rising, and firms increasingly need recognised ways to develop and evidence AML competence.

The Assured Compliance ecosystem reflects this by combining three elements:

- **The Framework:** A clear, property-focused model that links law and guidance, business governance and file-level workflow.
- **Training:** Structured learning for different roles, built directly around the framework so that staff see how their responsibilities fit into the bigger picture.
- **Accreditation:** Formal recognition that individuals understand and can apply the Assured Compliance Framework at different levels of responsibility.

This e-book is part of the foundation layer. It provides the mental model and shared language that sit beneath the Assured Compliance training and accreditation pathway.

## Assured Compliance Accreditation

Foundation and Practitioner levels are available and are described in more detail on the following pages.

Together, the Accreditations give firms a clear way to demonstrate that staff not only “know the rules”, but understand how the Assured Compliance Framework operates in their organisation.

Over time, this creates a professionalised pathway for those who specialise in AML within the property sector.

# Assured Compliance Accreditation: Foundation level



**Foundation is designed for front-line staff and managers who need a clear understanding of how AML works in their firm.**

It focuses on why AML matters in UK property, the three elements of the Assured Compliance Framework (AML Law & Guidance, Business Governance & Controls, AML Workflow) and what this means in day-to-day practice.

## **Outcomes**

**By the end of Foundation, delegates should be able to:**

- ✓ Explain the basic legal and regulatory duties that apply to their role
- ✓ Walk through the standard AML Workflow on a file
- ✓ Recognise higher-risk red flags (including those from national and sector risk assessments)
- ✓ Know when and how to escalate concerns to the MLRO or their manager

**Find out more how to start your AML Accreditation journey, speak to your Customer Success Manager.**

# Assured Compliance Accreditation: Practitioner level



Practitioner is aimed at MLROs, compliance leads, branch and regional managers, senior conveyancers, lender risk teams and others responsible for designing, overseeing or improving AML arrangements.

## What it covers:

- ✓ Developing and maintaining the Business-Wide Risk Assessment
- ✓ Building policies and procedures mapped to the AML Workflow
- ✓ Setting up monitoring and file reviews
- ✓ Making decisions on higher-risk cases and SARs
- ✓ Preparing for supervisory visits or lender reviews

**The emphasis is on practical design and governance rather than legal theory.**

**Find out more how to start your AML Accreditation journey, speak to your Customer Success Manager.**

# Get started

**With this handbook, and the BWRA and PCP templates, you have everything you need to get started.**

For help implementing the framework or for more information about accreditations, [contact us](#).



[www.coadjute.com](http://www.coadjute.com)

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