

propertymark

ANTI-MONEY LAUNDERING (AML)
AND COUNTER FINANCING
OF TERRORISM (CFT)

QUESTIONNAIRE

COMPANY DETAILS

Company legal name	
Trading name	

Head office

Address 1			
Address 2			
Town			
County		Postcode	

The following questions are an in-exhaustive list that may be covered during a supervisory inspection by HMRC. They aim to highlight possible areas for improvement in your business. PropertyMark will also use this information to help members comply with the Money Laundering Regulations.

1. RISK ASSESSMENT

a	Have you undertaken a risk assessment to identify transaction types, customers and the geographical nature of your business to determine vulnerabilities to Money Laundering and Terrorist Financing that your company may face?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
<i>If you answered 'Yes' to question 1a please answer the following three questions.</i>				
b	Has your Risk Assessment been documented?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
c	How often is the document reviewed?			
d	Who undertakes the review?			

2. POLICIES AND PROCEDURES

a	Does your business have written policies and procedures detailing your AML/CFT obligations and the steps that you undertake to meet those obligations?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
<i>If you answered 'Yes' to question 2a please answer the following two questions.</i>				
b	How often are your policies and procedures reviewed?			
c	Do you undertake regular audits of transactions to determine that policies and procedures are being followed throughout your business?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>

3. MONEY LAUNDERING REPORTING OFFICER (MLRO)

A	Has your business formally appointed a MLRO?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
b	Details of MLRO if applicable	Name		
		Phone		
		Email		
c	Has your business appointed a Deputy MLRO?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
d	Details of Deputy MLRO if applicable	Name		
		Phone		
		Email		
e	If you answered 'Yes' to question 3a, does the MLRO make regular reports to the management of the company on AML/CFT issues?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>

4. REPORTING SUSPICIOUS ACTIVITY

a	Is the Money Laundering Reporting Officer (MLRO) registered with the National Crime Agency website to report suspicious activity?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
b	Does your business continually monitor transactions for possible suspicious activity?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>

If you answered 'No' to question 4a we recommend that your MLRO registers your business at nationalcrimeagency.gov.uk (select 'Reporting SARs').

5. CUSTOMER DUE DILIGENCE (CDD)

How do you undertake CDD?

b	Do you have an external identification verification service?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
	If "yes", please provide the name of the service			
c	Do you check your customers against a database of Politically Exposed Persons?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
d	Do you check your customers against the Sanctions list?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
e	Do you undertake CDD on the purchasers of property being sold by your business?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
f	If you answered 'Yes' to question 5e at what point do you carry out the CDD?			

6. TRAINING

a	Has your company provided training for staff on AML/CFT obligations?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
b	If 'Yes' how often is training provided?			
c	Are you aware of Propertymark's Financial Crime Update course?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
d	If you answered 'Yes' to question 6c have you or any of your staff attended the course?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
e	Are you aware of Propertymark's Masterclasses?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
f	If you answered 'Yes' to question 6c have you or any of your staff attended a Masterclass?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>

MORE INFO

Financial Crime Update training course: naea.co.uk/training-qualifications

NAEA Propertymark Masterclasses: naea.co.uk/events/masterclasses

7. HOW CAN WE HELP YOU

a	Let us know how we can help you meet your AML/CFT obligations
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MORE INFO

NAEA Propertymark: naea.co.uk/lobbying/money-laundering-regulations

National Crime Agency: nationalcrimeagency.gov.uk

Gov.UK Money laundering regulations: www.gov.uk/topic/business-tax/money-laundering-regulations

Joint Money Laundering Steering Group (JMLSG): jmlsg.org.uk

False ID guidance: www.gov.uk/government/publications/false-id-guidance

DECLARATION

Name	
Date	
Position	
Branch postcode	

Signed

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