**Estate Agency Client Identity Check and Risk Assessment Form

Client details**

|  |  |
| --- | --- |
| Full name | << >> |
| Date of Birth | << >> |
| Home Address | << >> |
| Address of Property to be sold (if different) | << >> |

Evidence of name and address received and checked

(Tick to confirm evidence received and checked using lists A and B below)

|  |  |
| --- | --- |
| Evidence of name | << >> |
| Evidence of address | << >> |

Initial Risk Assessment

|  |  |  |
| --- | --- | --- |
| **Risk level (circle relevant level)** | **Reasons for conclusion as to risk level** | **If risk level is medium or higher, describe action taken to mitigate the risk** |
| Very low | << >> | << >> |
| Low |
| Medium |
| High |
| Very High |

**Interim Risk Assessment**

|  |  |  |
| --- | --- | --- |
| **Risk level (circle relevant level)** | **Reasons for conclusion as to risk level** | **If risk level is medium or higher, describe action taken to mitigate the risk** |
| Very low | << >> | << >> |
| Low |
| Medium |
| High |
| Very High |

**Final Risk Assessment**

|  |  |  |
| --- | --- | --- |
| **Risk level (circle relevant level)** | **Reasons for conclusion as to risk level** | **If risk level is medium or higher, describe action taken to mitigate the risk** |
| Very low | << >> | << >> |
| Low |
| Medium |
| High |
| Very High |

If the risk is assessed as high at any point, please speak to the MLRO before continuing to act for the client.

**Certification**

|  |  |
| --- | --- |
| I have verified the identity of the client | << >> |
| I have not verified the identity of the client | << >> Reason for not verifying client identity: << >> |
| I have seen the original documents | << >> |
| Copies of the client’s documents are attached to this form | << >> |
| Any photographs in the documents bore a good likeness to the client | << >> |
| Name of person giving this certificate | << >> |
| Position | << >> |
| Company and branch (if applicable) | << >> |
| Telephone number | << >> |
| Signature | << >> |
| Date | << >> |

(A) Evidence of name (complete one of the tables below)

Current full signed passport

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

Resident permit issued to EU nationals by Home Office

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

Current UK/EU photo driving licence

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

HMRC tax notification

|  |  |
| --- | --- |
| National insurance number | << >> |
| Document seen | P45 / P60 / Coding Notice (circle relevant document) |
| Expiry date | << >> |

State pension or benefits book or notification letter

|  |  |
| --- | --- |
| Reference/account number | << >> |
| Issuing authority | << >> |
| Expiry date | << >> |

(B) Evidence of address (complete one of the tables below)

Current UK/EU photo driving licence

(Cannot be used here if already used to prove name in section A)

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

Current year’s council tax bill

|  |  |
| --- | --- |
| Reference/account number | << >> |
| Current address? |  Yes / No (circle answer) |
| Local authority | << >> |
| Document date | << >> |

State pension or benefits book or notification letter

(Cannot be used here if already used to prove name in section A)

|  |  |
| --- | --- |
| Reference/account number | << >> |
| Current address? |  Yes / No (circle answer) |
| Issuing authority | << >> |
| Document date | << >> |

Local authority rent card or tenancy agreement

|  |  |
| --- | --- |
| Reference/account number | << >> |
| Current address? |  Yes / No (circle answer) |
| Local authority | << >> |
| Document date | << >> |

Most recent mortgage statement

|  |  |
| --- | --- |
| Reference/account number | << >> |
| Current address? |  Yes / No (circle answer) |
| Lender | << >> |
| Document date | << >> |

Bank or building society statement

|  |  |
| --- | --- |
| Reference/account number | << >> |
| Current address? |  Yes / No (circle answer) |
| Institution name | << >> |
| Document date | << >> |

Utility bill (excluding mobile phone)

|  |  |
| --- | --- |
| Reference/account number | << >> |
| Current address? |  Yes / No (circle answer) |
| Utility company | << >> |
| Document date | << >> |

Examples of suspicious activity

The examples of suspicious activity below are helpful to consider on each transaction to assess whether the transaction is perceived to be ‘high risk’. You should also consider the Firm Wide Risk Assessment. This list is by no means exhaustive but includes:

New Clients:

1. Have you met your client face to face?
2. Is your client reluctant to provide details of their identity and/or source of funds?
3. Are either party to the transaction established in a ‘high risk’ third country?
4. Have intermediaries been used to conduct the transaction?
5. Has false information been provided regarding the client’s identity?
6. Is there an apparent reason for using the firm or would another firm have been better placed to act?
7. Are there complex company structures in place which make it difficult to identify the true owner?
8. Are any of the individuals in public positions and/or locations that carry a higher exposure to the possibility of corruption?
9. Are there multiple properties for sale and are different professionals dealing with the other sales?
10. <<Other>>

Existing Clients:

1. Is the transaction different from the normal business of the client?
2. Is the transaction being carried out for less than market value with an unconnected person?
3. What is the value of the transaction? Is it unusually large and is the client not disclosing the source of funds?
4. Have any monies been paid by a third party who does not appear to be connected with the client?
5. Are you being instructed to act on successive sales, especially of the same property in a short space of time?
6. <<Other>>

Transaction:

1. Is either party to the transaction asking for the sale to be carried out quickly?
2. Are funds being sent abroad or to an unusual destination and/or to an unconnected third party?
3. Has the property been inspected prior to purchase?
4. Are there any late changes to the party in the transaction?
5. Is the value of the property ‘super-prime’ (usually within the top 5% of the local market values)?
6. Are we being asked to hold cash in our client account [above £---] especially for no apparent reason which may then be refunded?
7. Are funds being paid in part and/or using foreign currency?
8. Are multiple payments being made from different bank accounts?
9. Are there unusual sources of funds, for example, use of complex loans, mortgage from an unknown/overseas bank?
10. Are both or either party not complying with their legal obligations?
11. Is one party reluctant to use the usual professionals for the conveyancing process?
12. Is the transaction unnecessarily complex for what the parties are hoping to achieve?
13. Is the counterparty known to the client/beneficial owner?
14. <<Other>>