



Elmhirst Parker LLP
17-19 Regent Street, Barnsley , S70 2HP
Recognised body
440335

[Agreement Date: 24 September 2025](#)

Decision - Agreement

Outcome: Regulatory settlement agreement

Outcome date: 24 September 2025

Published date: 7 October 2025

Firm details

No detail provided:

Outcome details

This outcome was reached by agreement.

Decision details

1. Agreed outcome

1.1 Elmhirst Parker LLP (the Firm), a recognised body, authorised and regulated by the Solicitors Regulation Authority (SRA), agrees to the following outcome to the investigation of its conduct:

- a. Elmhirst Parker LLP will pay a financial penalty in the sum of £25,000, under Rule 3.1(b) of the SRA Regulatory and Disciplinary Rules;
- b. to the publication of this agreement under Rule 9.2 of the SRA Regulatory and Disciplinary Rules; and
- c. Elmhirst Parker LLP will pay the costs of the investigation of £600, under Rule 10.1 and Schedule 1 of the SRA Regulatory and Disciplinary Procedure Rules.

2. Summary of Facts

2.1 We carried out an investigation into the firm following a desk-based review by our AML Proactive Supervision Team.

2.2 Our review and subsequent investigation identified areas of concern in relation to the firm's compliance with the Money Laundering, Terrorist



Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (MLRs 2017), the SRA Principles 2011, the SRA Code of Conduct 2011, the SRA Principles [2019], and the SRA Code of Conduct for Firms [2019].

Policies, controls and procedures (PCPs)

2.3 Between 26 June 2017 and 28 March 2025 the firm failed to establish and maintain fully compliant policies, controls, and procedures (PCPs) to mitigate and effectively manage the risks of money laundering and terrorist financing, identified in any risk assessment (firm-wide 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.

Client and matter risk assessments (CMRAs)

2.4 The firm failed to conduct CMRAs, as required by Regulation 28(12)(a)(ii) and Regulation 28(13) of the MLRs 2017.

2.5 The firm has since confirmed it has put in place measures to ensure continuing and future compliance by updating and amending its FWRA, PCPs and CMRAs, registering for tax adviser services, and training staff on ongoing monitoring and obtaining SoF checks; evidence of which was provided to the AML Investigation Officer.

3. Admissions

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

To the extent the conduct took place on or before 24 November 2019:

- a. Principle 6 of the SRA Principles 2011 - which states you must behave in a way that maintains the trust the public places in you and in the provision of legal services.
- b. Principle 8 of the SRA Principles 2011 - which states you must run your business or carry out your role in the business effectively and in accordance with proper governance and sound financial and risk management principles.
- c. Outcome 7.5 of the SRA Code of Conduct 2011 - which states you must comply with legislation applicable to your business, including anti-money laundering and data protection legislation.

To the extent the conduct took place from 25 November 2019 onwards:

- d. 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.



- e. 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.
- f. 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.
- g. 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, reviewed and amended its AML control environment, rolled out training, employed the services of an external compliance consultant to ensure ongoing and future compliance and, in doing so, is now compliant with the MLRs 2017.
- b. The firm were referred for failing to evidence to our AML Proactive Supervision Team that it had a FWRA in place, however the firm were able to later evidence that it did have one.
- 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, that could have led to money laundering (and/or terrorist financing). This could have been avoided had the firm had a compliant AML control environment in place, ensured its PCPs were updated and maintained, ensured it had a compliant CMRA process in place and completed CMRAs on its in-scope files.
- 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 the firm only became compliant with the MLRs 2017 because of our AML desk-based review and guidance we have provided. The breach has arisen because of recklessness and a failure to pay sufficient regard to money laundering regulations, published guidance and SRA warning notices. The firm has failed to ensure that it was fully compliant with its statutory obligations until March 2025, a period of over seven years since the MLRs 2017 came into effect.

5.3 The impact of the harm or risk of harm is assessed as being medium (score of four). The nature of conveyancing is considered high-risk, owing to the risk of abuse of the system by criminals. As previously mentioned, the firm undertakes the majority of its work in-scope of the MLRs 2017, primarily in the field of conveyancing. The lack of compliant PCPs or a CMRA resulted in none of the files we reviewed as having a CMRA present. This is a serious failing that left the firm vulnerable to facilitating money laundering and/or terrorist financing.

5.4 However, we note we have seen 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 proper AML documentation in place.

5.5 The 'nature' of the conduct and the 'impact of harm or risk of harm' added together give a score of seven. This places the penalty in Band 'C', 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 lack of a compliant AML control environment for over seven years shows a pattern of behaviour and increases the risks of the firm laundering illicit funds. We are however



pleased to see that the firm has put in place measures to ensure continuing and future compliance, updated and amended its FWRA, PCPs and CMRA, and trained the staff on implementing and completing the firm's new processes, including its CMRAs, ongoing monitoring and SoF checks.

5.7 Based on the evidence the firm has provided of its annual domestic turnover, this results in a basic penalty of £40,958.

5.8 The SRA considers that the basic penalty should be reduced to £25,000. This reduction reflects the mitigation set out at paragraph 4.2 above and the SRA's discretion permitted in the Guidance.

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 £25,000.

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 immediately upon a statement of costs due being issued by the SRA.

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