

**Gordons Partnership 2020 Limited
(Gordons Partnership)
First Floor, 1 Chancery Lane, London , WC2A 1LF
Licenced body
800769**

[Agreement Date: 27 May 2025](#)

Decision - Agreement

Outcome: Regulatory settlement agreement

Outcome date: 27 May 2025

Published date: 3 June 2025

Firm details

Firm or organisation at time of matters giving rise to outcome

Name: Gordons Partnership 2020 Limited

Address(es): First Floor, 1 Chancery Lane, London, WC2A 1LF

Firm ID: 800769

Outcome details

This outcome was reached by agreement.

Decision details

1. Agreed outcome

1.1 Gordons Partnership 2020 Limited (the Firm), a licensed body, authorised and regulated by the Solicitors Regulation Authority (SRA), agrees to the following outcome to the investigation:

- a. Gordons Partnership 2020 Limited will pay a financial penalty in the sum of £77,784, under Rule 3.1(b) of the SRA Regulatory and Disciplinary Procedures Rules,
- b. to the publication of this agreement, under Rule 9.2 of the SRA Regulatory and Disciplinary Procedures rules; and
- c. Gordons Partnership 2020 Limited will pay the costs of the investigation of £1,350, under Rule 10.1 and Schedule 1 of the SRA Regulatory and Disciplinary Rules.



2. Summary of Facts

2.1 Our Anti-Money Laundering (AML) Proactive Supervision team carried out an AML inspection at Gordons Partnership 2020 Limited, to assess its compliance with the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulation 2017 (MLRs 2017).

2.2 The Proactive Supervision team identified AML control failings in relation to failure to complete a client and matter risk assessment (CMRA) on at least four files reviewed, issues around identification and verification (ID&V) on one file, a lack of source of funds checks on four files, a failure to have adequate policies, controls and procedures (PCPs) and a failure to conduct AML audits.

2.3 This resulted in a referral to our AML Investigations Team, resulting in allegations relating to CMRAs, PCPs and independent audit.

CMRAs

2.4 Between 11 October 2021 and 24 November 2024, the firm failed to complete an appropriate CMRA on all six in-scope files reviewed, as required by Regulation 28(12)(a)(ii) and Regulation 28(13) of the MLRs 2017 and did not have a satisfactory way of assessing client and matter risk. Therefore, the firm was unable to demonstrate that the extent of the measures it had taken to satisfy the requirements of Regulation 28 were appropriate, as required by Regulation 28(16) of the MLRs 2017.

PCPs

2.5 Between 11 October 2021 and 29 April 2024, the firm failed to maintain fully compliant PCPs, pursuant to Regulation 19(1)(a) of the MLRs 2017.

Independent Audit

2.6 Between 11 October 2021 to 29 April 2024, the firm failed to carry out an independent audit, pursuant to Regulation 21(1)(c) 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. 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. 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. 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 regulations 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 The issues identified around not carrying out CMRAs and not having a satisfactory way of assessing client and matter risk, inadequate PCPs and not carrying out an independent audit are serious AML control environment failings, and the conduct had the potential to cause significant harm. The firm undertakes between a fifth and a third of its work in-scope of the MLRs 2017. This had the potential to exposing the firm to a significant risk of being exploited by criminals.

4.3 It is a regulatory obligation for the firm to meet the requirements set out in the MLRs 2017, which the firm failed to do.

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

- a. The agreed outcome is a proportionate outcome in the public interest because it creates a credible deterrent to others. 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.
- b. There is no evidence of harm to consumers or third parties.
- c. The firm recognises that it failed in its basic duties regarding statutory money laundering regulations and regulatory compliance, as identified during our inspection and subsequent investigation.

4.5 The firm has cooperated fully, has admitted the breaches, shown remorse and remedied the breaches, and there is low risk or repetition.

4.6 A fine is appropriate to maintain professional standards and uphold public confidence in the solicitors' profession and in legal services provided by authorised persons. A financial penalty therefore meets the requirements of rule 4.1 of the Regulatory and Disciplinary Procedure Rules.

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 it failed to conduct CMRAs on all six in-scope files reviewed and did not have a satisfactory way of assessing client and matter risk between 11 October 2021 and 24 November 2024, in breach of Regulation 28 of the MLRs 2017. Between 11 October 2021 and 29 April 2024 the firm failed to establish adequate PCPs in breach of Regulation 19 of the MLRs 2017. Further, between 11 October 2021 and 29 April 2024 the firm failed to carry out an independent audit, in breach of Regulation 21 of the MLRs 2017. Had an audit taken place, this could have identified the failings listed above sooner.

5.3 The SRA considers the impact or risk of harm was medium (score of four). The nature of conveyancing is considered high-risk, owing to the risk of abuse of the system by criminals. We note the firm undertakes over £1m worth of work in-scope of the regulations. This puts it at a greater risk of being used to launder money. 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 proper documentation in place.

5.4 The nature and impact scores add up to seven, placing the conduct in penalty bracket Band 'C'. The Guidance indicates a broad penalty bracket of between 1.6% and 3.2% of the firm's annual domestic turnover is appropriate.

5.5 The SRA agree a fine in this bracket because the firm should have been aware of its statutory obligations under the MLRs 2017, with the aggravating factor that it performs a significant amount of work in-scope of the regulations, but there is no evidence of any harm being caused or of an unwillingness to improve. Based on the firm's annual domestic turnover, the fine results in a basic penalty of £111,120.

5.6 The SRA considers that the basic penalty should be reduced, in terms of mitigation discount, to £77,784. This reduction follows the following factors in the Guidance that apply to this case:

- a. The firm has taken steps to rectify its failures, by taking remedial action regarding its CMRAs, by documenting them on in-scope files and establishing a compliant CMRA process. It also made the necessary amendments to its PCPs and independent audit guidance, ensuring audits will be carried out going forwards at regular intervals. 4 Sensitivity: Confidential
- b. The firm has shown a positive attitude towards the investigation and has cooperated with the SRA's AML Proactive Supervision and Investigations teams.

5.7 The firm does not appear to have made any financial gain or received any other benefit because of its conduct. Therefore, no adjustment is necessary to remove this and the amount of the fine is £77,784.

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 circumstances outweigh the public interest in publication.

6.2 The SRA considers it appropriate that this agreement is published in the interests of transparency in the regulatory and disciplinary process. The firm agrees to the publication of this agreement.

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 2 and 5 of the 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 £1,350. Such costs are due within 28 days of a statement of costs due being issued by the SRA.

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