Solicitors Regulation Authority

Vine Orchards LLP
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Recognised body
640365

Agreement Date: 24 September 2025

Decision - Agreement

Outcome: Regulatory settlement agreement

Outcome date: 24 September 2025

Published date: 2 October 2025

Firm details

No detail provided:

Outcome details

This outcome was reached by agreement.

Decision details

Agreed outcome

Vine Orchards LLP (the Firm), a recognised body regulated and authorised by the Solicitors Regulation Authority (SRA) agrees to the following outcome to the investigation:

a. Vine Orchards LLP is fined £20,234 under Rule 3.1 (b) of the SRA Regulatory and Disciplinary Procedure Rules (RDPRs).
b. to the publication of this agreement under Rule 9.2 of the RDPRs.
c. Vine Orchards LLP will pay the costs of the investigation of £600, under Rule 10.1 and schedule 1 of the RDPRs.

Summary of Facts

We carried out an investigation into the firm following a review by our AML Proactive Supervision team.

Our investigation identified areas of concern in relation to the firm's compliance with the Money Laundering, Terrorist Financing (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].

Allegations

Between 1 October 2017 and 8 May 2025, the firm failed to have in place an appropriate FWRA that identified and assessed the risks of money laundering to which it was subject, taking into account all risk factors, pursuant to Regulation 18(2) of the MLRs 2017.

Between 1 October 2017 and 8 May 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 (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.

In three of the six files reviewed, the firm failed to sufficiently assess the level of risk, as required by Regulation 28(12) and Regulation 28(13) of the MLRs 2017.

In three of the six files reviewed, the firm failed to conduct ongoing monitoring, including scrutiny of transactions (including, where necessary, the customer's source of funds), as required by Regulation 28(11)(a) of the MLRs 2017.

Admissions

The firm admits, and the SRA accepts, that by failing to comply with the MLRs 2017, that it breached, for conduct up to 24 November 2019 (when the SRA Handbook 2011 was in force):

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 provisions of legal services.

Principle 8 of the SRA Principles 2011 – which states you must run in your business or carry out your role in the business effectively and in accordance with proper governance and sound financial risk management principles.

and the firm failed to achieve:

Outcome 7.2 of the SRA Code of Conduct 2011 – which states you have effective systems and controls in place to achieve and comply with all the Principles, rules and outcomes and other requirements of the Handbook, where applicable.

Outcome 7.5 of the SRA Code of Conduct 2011 – which states you comply with legislation applicable to your business, including anti-money

laundering and data protection legislation.

and from 25 November 2019 (when the SRA Standards and Regulations came into force), the firm breached:

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.

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.

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.

Why a fine is an appropriate outcome

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.

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. There is no evidence of harm to consumers, or third parties, and our view is that the risk of repetition is low.
b. The firm took steps to rectify its failures and has since implemented a FWRA and PCPs, which are now compliant with the MLRs 2017. The firm has cooperated with the SRA's AML Proactive Supervision and AML Investigations teams.

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 facilitating dubious transactions that could have led to money laundering (and/or terrorist financing). The AML control failings identified as part of this investigation are necessary requirements to help mitigate against these risks.
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.

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.

Amount of the fine

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).

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 there has been a number of AML control failings at the firm which demonstrates a pattern of misconduct. The firm was directly responsible for complying with money laundering legislation. It has failed to have sufficient regard to SRA warning notices and guidance published by us and the Legal Sector Affinity Group (LSAG).

In addition, the majority of the firm's work falls within scope of the MLRs 2017, therefore the firm should have been familiar with the obligations imposed by the regulations and should have implemented strict adherence.

The SRA considers, and the firm agrees, that the impact of the misconduct was medium (score of four). This is because although there was no evidence of any direct loss to any client, the failure to have in place proper documentation (in respect of the overall AML controls at firm level) for a considerable number of years, put the firm at greater risk of being used to facilitate money laundering and/or terrorist financing.

Currently, over half the firm's business comes from conveyancing. Conveyancing is a high-risk area of work, as highlighted in our sectoral risk assessments, as property is an attractive asset for criminals because of the large amounts of money that can be laundered through a single transaction.

The nature and impact scores add up to seven. This places the penalty in Band ‘C' as directed by the guidance.

The SRA and the firm agree that a basic penalty towards the higher end of the bracket to be appropriate.

Based on the evidence the firm has provided of its annual domestic turnover for the most recent tax year, this results in a basic penalty of £22,483.

The SRA considers that the basic penalty should be reduced to £20,234. This reduction reflects the mitigation set out in paragraph 5.2 above.

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 £20,234.

Publication

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.

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.

Acting in a way which is inconsistent with this agreement

The firm agrees that it will not deny the admissions made in this agreement or act in any way which is inconsistent with it.

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.

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.

Costs

The firm agrees to pay the costs of the SRA's investigation in the sum of £600.

The date of this Agreement is 24 September 2025.

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