



**Integra Solicitors Limited**  
**Affinity House, 1 Station View, Hazel**  
**Grove, Stockport,Cheshire. , SK7**  
**5ER**  
**Recognised body**  
**624193**

*Fined Date: 12 December 2023*

***Decision - Fined***

Outcome: Fine

Outcome date: 12 December 2023

Published date: 18 January 2024

***Firm details***

No detail provided:

***Outcome details***

This outcome was reached by SRA decision.

***Decision details***

***Who does this disciplinary decision relate to?***

Integra Solicitors Limited (the firm) is a recognised body whose office is at Affinity House, 1 Station View, Hazel Grove, Stockport, SK7 5ER. Summary of Decision

We fined the firm £10,760.40 for failing to ensure it had relevant documentation in place to prevent activities relating to money laundering and terrorist financing as required by the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (MLRs 2017).

***Facts of the misconduct***

In February 2023, the SRA's Anti-Money Laundering (AML) Proactive Team undertook a desk-based AML review at the firm to assess its compliance against the MLRs.

On 15 February 2023, the firm confirmed that its AML firm wide risk assessment (FWRA) was first drafted on 14 February 2023. It also confirmed that it's AML policies, controls and procedures (PCPs) were first

drafted on 26 September 2018 and that it last updated them on 14 February 2023.

An SRA investigation found that the firm did not have a FWRA in place until 14 February 2023. The firm had been undertaking in-scope work since 2017 but did not have a FWRA when the MLRs 2017 came into effect on 26 June 2017. A FWRA was only put in place shortly after the firm received notification of the SRA's AML review. However, it was not properly compliant with the MLRs 2017.

The firm did not make any amendments to its FWRA until 17 August 2023. It amended its FWRA so that it was compliant by 15 September 2023.

The firm's PCPs were first drafted on 26 September 2018. However, they were not adequate for the purposes of effectively managing the firm's risk of money laundering. The firm's PCPs lacked important information and guidance. The firm did not review or update its PCPs between 27 September 2018 and 14 February 2023.

It was found that:

1. Between 26 June 2017 and 14 February 2023, the firm failed to have in place a FWRA as required by Regulation 18 of the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (MLRs 2017), and:
2. Between 14 February 2023 and 17 August 2023, it failed to have in place a 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.

In doing so the firm had, to the extent the conduct took place between 11 October 2011 and 24 November 2019:

- i. breached Principles 6 and 8 of the SRA Principles 2011, and
- ii. failed to achieve Outcomes 7.2 and 7.5 of the SRA Code of Conduct 2011

and where the conduct took place from 25 November 2019:

- iii. breached Principle 2 of the SRA Principles 2019, and
  - iv. breached Paragraphs 2.1(a) and 3.1 of the SRA Code of Conduct for Firms (2019).
3. Between 26 June 2017 and 26 September 2018, the firm failed to establish and maintain policies, controls, and



procedures (PCPs) to mitigate and effectively manage the risks of money laundering and terrorist financing in any risk assessment pursuant to Regulation 19(1)(a) of the MLRs 2017, and;

4. Between 26 September 2018 and 14 February 2023, it failed to regularly review and update them pursuant to Regulation 19(1)(b) of the MLRs 2017.

In doing so the firm had, to the extent the conduct took place between 11 October 2011 and 24 November 2019:

- v. breached Principles 6 and 8 of the SRA Principles 2011, and
- vi. failed to achieve Outcomes 7.2 and 7.5 of the SRA Code of Conduct 2011

and where the conduct took place from 25 November 2019:

- vii. breached Principle 2 of the SRA Principles 2019s, and
- viii. breached Paragraphs 2.1(a) and 3.1 of the SRA Code of Conduct for Firms (2019).

#### *SRA Principles 2011*

Principle 6 You must behave in a way that maintains the trust the public places in you and in the provision of legal services

Principle 8 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.

#### *SRA Code of Conduct 2011*

Outcome 7.2 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 You comply with legislation applicable to your business, including anti-money laundering and data protection legislation.

#### *SRA Principles 2019*

Principle 2 You act in a way that upholds public trust and confidence in the solicitors' profession and in legal services provided by authorised persons.

#### *SRA Code of Conduct for Firms 2019*

Paragraph 2.1(a) 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 You keep up to date with and follow the law and regulation governing the way you work.

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