Anti-Money Laundering (AML) Policy

Company Name: Atkins Residential Ltd
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1. Policy Statement

Atkins Residential Ltd is committed to preventing money laundering and terrorist financing. We comply fully with the **UK Money Laundering Regulations**, conducting business with integrity and maintaining robust risk controls. [1]

2. Risk-Based Approach

We assess the money laundering risks associated with our clients, properties, and geographic locations.

- **Customer Due Diligence (CDD)** is applied to all landlords and tenants where monthly rent equals or exceeds **£8,800** (the UK statutory threshold). [1]
- **Enhanced Due Diligence (EDD)** is applied to high-risk transactions, such as politically exposed persons (PEPs) or high-risk jurisdictions.

3. Core Compliance Controls

Nominated Officer

- **Louise Atkins** is the designated **Money Laundering Reporting Officer (MLRO)**.
- **Louise Atkins** is responsible for overseeing compliance, receiving internal reports, and submitting external reports to the National Crime Agency (NCA).

Customer Due Diligence (CDD)

1. **Manual Identity Verification**: Collect and verify government-issued photo ID and proof of address for landlords and tenants. All checks are conducted manually and personally by staff members.
2. **Beneficial Ownership**: Identify ultimate beneficial owners for corporate clients or trusts.

Transaction Monitoring

1. **Pattern Analysis**: Monitor rent payments for unusual patterns, third-party payments, or cash transactions.
2. **Source of Funds**: Request proof of the source of funds for high-value tenancy deposits or advance rent payments.

Suspicious Activity Reporting (SAR)

1. **Internal Reporting**: Staff must immediately report any red flags or suspicious activity to the MLRO.
2. **External Reporting**: The MLRO will evaluate internal reports and submit a **Suspicious Activity Report (SAR)** to the National Crime Agency (NCA) if required.

4. Record Keeping & Training

- **Data Retention**: Retain all CDD records, transaction logs, and risk assessments for a minimum of **5 years**.
- **Staff Training**: Provide regular AML training to all employees to ensure they can identify red flags and understand reporting paths. [1]

5. Policy Review Schedule

This policy will be reviewed, updated, and re-approved by the MLRO on a **standard 12-month schedule** to ensure alignment with changing UK legislation and business practices, or sooner if a material regulatory change occurs.

Appendix: Staff Red Flag Checklist (Manual Checks)

Staff must remain vigilant during personal ID verification and onboarding. Report to Louise Atkins immediately if a client:

- **Cash Upfront**: Offers large amounts of cash to pay rent or deposits in advance.
- **Identity Issues**: Reluctant to provide original photo ID or proof of address documents, or provides documents that look altered, forged, or suspicious.
- **Third-Party Payments**: Requests that rent or deposits be paid by an unrelated third party without a clear, legitimate reason.
- **Unusual Behaviour**: Appears overly secretive, provides contradictory information about their employment, or actively avoids face-to-face meetings.
- **Corporate Secrecy**: Uses complex corporate structures or trusts to hide the true identity of the landlord or tenant without clear commercial justification.