



# Guidance for CLC New Practice Applicants

## Council for Licensed Conveyancers

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### Document Purpose

This guidance document provides a comprehensive overview of the requirements, expectations, and key steps involved in the application process for businesses seeking to become CLC-regulated practices.

### Contents Include:

- Guidance Notes
- Preparing to Apply and Collating Evidence
- CLC New Practice Application Process
- Additional Information
- Index Of Documents

**Issued By:** Council for Licensed Conveyancers

**Contact:** [licensing@clc-uk.org](mailto:licensing@clc-uk.org)

**Website:** <https://www.clc-uk.org/>

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## Section 1: Guidance Notes

### 1 REGULATORY OVERVIEW

The CLC is the regulator of choice for businesses seeking to provide conveyancing and probate services. Practices regulated by the CLC are authorised exclusively to deliver the legal services for which they have been expressly licensed.

Established under the Administration of Justice Act 1985, the Council for Licensed Conveyancers (CLC) regulates specialist conveyancing and probate lawyers in England and Wales. The 1985 Act introduced the concept of the Recognised Body (RB): a legal practice wholly owned, managed, and operated by regulated professionals—referred to as Authorised Persons under the Legal Services Act 2007—who provide legal services directly to the public.

The Legal Services Act 2007 further expanded the regulatory framework by permitting non-lawyer ownership of legal practices, subject to specific checks and conditions. This legislative change led to the emergence of Alternative Business Structures (ABS). The CLC now regulates a diverse community composed of both RBs and ABSs, ranging from sole practitioners to large firms with multi-million-pound turnovers.

The CLC's status as a Professional Body Anti-Money Laundering Supervisor (PBS) is confirmed by His Majesty's Treasury under Schedule 1 of the Money Laundering Regulations (MLRs)—the United Kingdom's primary legislation governing anti-money laundering (AML) compliance.

CLC-regulated entities operate within various business models, including sole principals, partnerships, LLPs, and limited companies. Many practices are part of wider corporate groups offering multidisciplinary services, such as combined legal, financial, and professional solutions.

Our regulatory approach is tailored to support a diverse and dynamic commercial legal market. We actively encourage prospective applicants to engage with us at an early stage to discuss their current or proposed business arrangements. Our primary concern is the capacity of practice owners and managers to deliver compliant legal services and to effectively manage the associated regulatory risks.

Each CLC-regulated practice is assigned a dedicated Regulatory Supervision Manager (RSM) or Regulatory Supervision Officer (RSO), who acts as the principal point of contact. This relationship facilitates open dialogue regarding compliance matters, including adherence to the Code of Conduct and self-reporting of issues. Practices are encouraged to seek guidance proactively, enabling early identification and mitigation of risks before they escalate into more serious concerns.

The CLC employs a robust supervisory framework incorporating both proactive and reactive oversight mechanisms. Our engagement begins at the point of application, with a comprehensive desktop review of the applicant's policies and procedures. Regulatory oversight continues throughout the lifecycle of the practice and extends through the process of de-regulation upon

closure or wind-up. Newly authorised practices undergo an enhanced monitoring period, which includes a financial review and an introductory meeting with their designated RSM or RSO.

In support of its supervisory role, the CLC routinely publishes guidance and resources, including an AML Toolkit covering breach reporting and the submission of Suspicious Activity Reports (SARs). The quality of SARs is evaluated during inspections, and the CLC is preparing to conduct a thematic review to further support compliance and improve standards across the regulated community.

## 2 WHO CAN APPLY?

### A Legal Structures and Regulatory Framework for CLC Practices

CLC-regulated practices operate within a variety of legal structures, including sole proprietorships, partnerships, limited liability partnerships (LLPs), and limited companies.

Businesses must be structured to meet the licensing requirements of either:

- (i) a Recognised Body, or
- (ii) a Licensable Body (commonly referred to as an Alternative Business Structure (ABS)).

Each CLC-regulated practice should be established as a standalone legal entity, operating its own banking arrangements while potentially forming part of a broader group accounting function.

The practice must hold its own Professional Indemnity Insurance (PII), obtained under the CLC's Minimum Terms and Conditions (MTCs).

Businesses operating within a group structure may utilise shared business services or outsource support functions, such as cashiering. However, such arrangements must be fully disclosed within the application process, with copies of all contractual agreements provided.

### B Regulatory Structures

#### 1. Recognised Bodies

Recognised Bodies are businesses that are wholly owned and managed by Authorised Persons, as defined under the Legal Services Act 2007.

According to the [CLC Recognised Body Recognition Framework](#), a Recognised Body may be structured as:

A Company, which must

- a. be registered in England and Wales under the Companies Acts; and
- b. have its registered office in England and Wales, located at the place (or one of the places) of business of the company.

A Limited Liability Partnership (LLP), which must

- a. be registered in England and Wales under the Limited Liability Partnerships Act 2000;

- b. have its registered office in England and Wales at its place (or one of its places) of business; and
- c. have at least two designated LLP members.

At least one manager must be a CLC Lawyer. (See "[Registered Manager](#)" definition for further detail)

## 2. Licensable Bodies (Alternative Business Structures – ABS)

Licensable Bodies, more commonly known as Alternative Business Structures (ABSs), are businesses owned and/or managed by a combination of Authorised Persons (under the Legal Services Act 2007) and non-lawyers, or which have a material interest held by another company.

(See "[BOOM](#)" definition for more information.)

The [CLC ABS Licensing Framework](#) outlines the criteria for a Licensed Body (ABS), which may be a company or LLP. Such bodies must have:

- A practising address in England or Wales;
- A Head of Legal Practice (HoLP), who is an Authorised Person in relation to Reserved Legal Activities in England and Wales; and
- A Head of Finance and Administration (HoFA).

Further details regarding the threshold experience required for HoLP, HoFA, and MLRO appointments are available [here](#).

<b>C</b>	<b>Post-Qualification Experience Requirements</b>
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Qualified lawyers seeking to establish a CLC-regulated practice must, at a minimum, demonstrate the following:

- a. At least four years of post-qualification experience, commencing from the date of first authorisation or admission to the solicitor's roll, in a substantive middle management role—ideally progressing to senior management;
- b. Experience within a practice regulated by an approved regulator in England and Wales, delivering conveyancing and/or probate services to the public;
- c. Professional accountability in key operational areas, including client care, compliance, complaints handling, and policy and procedure implementation; and
- d. Direct supervisory experience, overseeing the legal work of others.

To help prospective applicants assess whether CLC regulation is suitable and whether their business is sufficiently developed to apply, we have outlined our key compliance principles under the following simplified headings:

**REGULATORY REQUIREMENTS FOR A CLC REGULATED BUSINESS**  
**BOOMS/MANAGERS/KEY PERSONNEL**  
**FIT AND PROPER TESTS**  
**SUITABILITY TESTS**  
**ABOUT THE LEGAL SERVICES**

3	<b>REGULATORY REQUIREMENTS FOR A CLC REGULATED BUSINESS</b>
	<p>1. A CLC-regulated business must:</p> <ol style="list-style-type: none"> <li>Have a registered office located in England or Wales.</li> <li>Provide conveyancing and/or probate services within England or Wales.</li> <li>Maintain valid Professional Indemnity Insurance (PII) to cover any civil liability arising from the provision of regulated services. <ul style="list-style-type: none"> <li>The PII must be obtained from an insurer that is a signatory to the CLC's Participating Insurers Agreement.</li> <li>Cover must be effective annually from 1 July to 30 June.</li> <li>A list of participating insurers and related documentation is available <a href="#">here</a>.</li> </ul> </li> </ol> <p>2. A CLC-regulated business must also:</p> <ol style="list-style-type: none"> <li>Employ an appropriately qualified and skilled individual to supervise legal work. This may include: <ul style="list-style-type: none"> <li>A CLC Licensed Conveyancer</li> <li>A Licensed Probate Practitioner</li> <li>A Solicitor</li> <li>A CILEX Lawyer (i.e. a Fellow with Authorised Practitioner Rights in Conveyancing or Probate)</li> </ul> </li> </ol> <p>This individual must be authorised under the Legal Services Act 2007 to:</p> <ul style="list-style-type: none"> <li>Act as the Principal Lawyer in a Recognised Body; or</li> <li>Be appointed as the Head of Legal Practice (HoLP) in a Licensable Body (ABS).</li> </ul> <p>b. In the case of Licensable Bodies (ABS), also employ a suitably qualified and experienced individual to:</p> <ul style="list-style-type: none"> <li>Oversee office operations and the client account; and</li> <li>Be appointed as the Head of Finance and Administration (HoFA).</li> </ul> <p>c. All CLC-regulated practices are required to appoint a CLC-approved Money Laundering Reporting Officer (MLRO).</p>
4	<b>BOOMs/MANAGERS/KEY PERSONNEL</b>
A	<b>Beneficial Owners, Officers and Managers (BOOMs)</b>
	<p>BOOMs are defined as individuals or entities that hold a direct or indirect material interest—whether financial, controlling, or beneficial—in a CLC-regulated business, its parent company, or the ultimate person with significant control (PSC). This may include individuals, group holding companies, investment bodies, or funds.</p> <p>The CLC will refer to company structures registered with Companies House, both in the UK and internationally, to identify BOOMs and determine the ultimate PSC.</p>

It is essential that all CLC-regulated practices are able to meet their regulatory obligations. A clear and accurate understanding of those who control or significantly influence the business is a critical component in identifying and assessing potential risks.

Therefore, all individuals and entities intending to hold a material interest in a CLC-regulated practice must be declared to the CLC, as they are subject to regulatory approval.

The CLC must be satisfied that the proposed ownership structure does not pose a significant risk of undue or improper influence over the business. Failure to provide sufficient information about beneficial ownership arrangements constitutes a material omission and will result in the application being deemed incomplete.

### **B BOOM Definition (Legal Services Act 2007)**

A person holds a material interest in a body ("B") if the person:

- a. holds at least 10% of the shares in B,
- b. is able to exercise significant influence over the management of B by virtue of the person's shareholding in B,
- c. holds at least 10% of the shares in a parent undertaking ("P") of B,
- d. is able to exercise significant influence over the management of P by virtue of the person's shareholding in P,
- e. is entitled to exercise, or control the exercise of, voting power in B which, if it consists of voting rights, constitutes at least 10% of the voting rights in B,
- f. is able to exercise significant influence over the management of B by virtue of the person's entitlement to exercise, or control the exercise of, voting rights in B,
- g. is entitled to exercise, or control the exercise of, voting power in P which, if it consists of voting rights, constitutes at least 10% of the voting rights in P,
- h. is able to exercise significant influence over the management of P by virtue of the person's entitlement to exercise, or control the exercise of, voting rights in P.

"the person" means—

- a. the person,
- b. any of the person's associates, or
- c. the person and any of the person's associates taken together.

### **C Material Interests Below 10%**

The CLC requires the following disclosures and checks for BOOMs with lower ownership thresholds:

- BOOMs with a 5% or greater material interest must be identified, undergo identity, AML, and sanctions screening, and have this information recorded.
- BOOMs with a 1% or greater material interest must be identified and subject to identity verification checks, with the information held on record.
- If the BOOM is a corporate body, the suitability assessment will broadly reflect that of Licensed Body applications.

<b>D</b>	<b>No Overall Control</b>
Where company shareholding indicates no individual owns or controls more than 25%, the CLC will consider appointing a senior manager (e.g., CEO, board member, controlling mind, or fund manager) as the 'nominated' beneficial owner.	
<b>E</b>	<b>Incorporated Limited Partnership (ILPs)</b>
For ILPs, at least one general partner must be identified as the 'nominated' beneficial owner.	
<b>F</b>	<b>Managers</b>
<p>A 'Manager' is defined as an individual who has been appointed at a CLC regulated practice as one the below:</p> <ul style="list-style-type: none"> <li>a. when the body is a limited company, a shareholding or non-shareholding director, registered at Companies House; or</li> <li>b. when the body is a Limited Liability Partnership, an LLP member registered at Companies House; or</li> <li>c. when the body is a partnership, a person held out as a partner who may be an equity or salaried partner e.g. listed as a partner on the Practice's headed paper or website; or</li> <li>d. Sole Proprietor, who is by default a Sole Practitioner under CLC rules; or</li> <li>e. Beneficial Owners/Investors, Private or Corporate Investors with a material interest.</li> </ul>	
<b>G</b>	<b>Key Personnel</b>
<p>Key Personnel are defined as:</p> <ul style="list-style-type: none"> <li>a. Managers, as defined above;</li> <li>b. Head of Legal Practice (HoLP) – an Authorised Person (under the Legal Services Act 2007) responsible for overseeing the delivery and supervision of legal services;</li> <li>c. Head of Finance and Administration (HoFA) – responsible for the oversight of financial operations, including the client account, in line with the CLC Accounts Code;</li> <li>d. Money Laundering Reporting Officer (MLRO) – responsible for overseeing all anti-money laundering (AML) activities.</li> </ul>	
<b>H</b>	<b>Requirements for BOOMs, Managers, and Key Personnel</b>
<p>All BOOMs, Managers, and Key Personnel are required to:</p> <ul style="list-style-type: none"> <li>a. Apply for CLC authorisation;</li> <li>b. Undergo fit and proper person checks, including identity verification, PEP status, financial and sanctions screening, and checks against FCA and other regulatory registers;</li> <li>c. Complete a Standard DBS criminality check;</li> <li>d. Comply with the CLC's AML procedures, including Source of Funds and Source of Wealth declarations;</li> <li>e. Be listed on the CLC Public Register (excluding Beneficial Owners only).</li> </ul>	



### 5 FIT AND PROPER TESTS

Under the CLC's Alternative Business Structure (ABS) Framework, the CLC must be satisfied that all proposed owners are fit and proper persons to hold an interest in a CLC-regulated body. The ownership structure must not give rise to a significant risk of undue or improper influence over the licensed body.

The CLC is also required to be satisfied that each manager—whether an individual or a body holding a restricted interest—is suitable, in accordance with [S.72](#) and [S.90](#) of the Legal Services Act 2007. Additionally, [Schedule 13, paragraph 6\(1\)](#) of the Act outlines specific criteria that must be met for approval.

In summary, the CLC must be satisfied that:

- a. The holding of the interest by the person or body does not compromise the regulatory objectives;
- b. The holding of the interest does not compromise compliance with the duties imposed by Section 176 of the Act, either by the licensed body or by any person to whom those duties apply;
- c. The person or body is otherwise a fit and proper person to hold that interest.

In reaching its determination, the CLC will consider a range of factors, including but not limited to:

- The probity and financial standing of the person or body;
- Whether the person or body is disqualified under Section 100(1) of the Legal Services Act or listed on the Board's disqualification register (paragraph 51);
- The conduct and suitability of any associates of the person or body;
- Any additional matters as may be specified in the CLC's Licensing Rules.

If the CLC determines that any individual or body is unsuitable, it will issue a formal objection, supported by a warning notice setting out the reasons. This applies both to new applicants and to notifications concerning incoming individuals or entities acquiring a material interest in an existing CLC-licensed body.

In accordance with the CLC ABS Framework, warning notices may be served in the following scenarios:

- 8.17 – Objections to a material interest or approval subject to conditions;
- 13.2 – Enforcement action due to non-compliance with regulatory requirements.

<b>6</b>	<b>SUITABILITY TESTS</b>
<b>A</b>	<b>Persons and Bodies Intending to Hold a Material Interest</b>
<p>The CLC must be satisfied that each manager—whether an individual or a body with a restricted interest—is suitable, in accordance with <a href="#">S.72</a> and <a href="#">S.90</a> of the Legal Services Act 2007.</p> <p>The criteria for approval are further set out in <a href="#">Schedule 13, paragraph 6(1)</a> of the Act. In summary, the CLC must be satisfied that:</p> <ol style="list-style-type: none"> <li>The person's (or body's) holding of a material interest does not compromise the regulatory objectives;</li> <li>The holding of that interest does not compromise compliance with the duties imposed by Section 176 of the Act, whether by the licensed body or any relevant person;</li> <li>The person or body is otherwise a fit and proper person to hold that interest.</li> </ol> <p>In assessing suitability, the CLC will have particular regard to:</p> <ul style="list-style-type: none"> <li>The probity and financial standing of the person or body;</li> <li>Whether the person or body is disqualified under Section 100(1), or is included on the disqualification list maintained by the Legal Services Board under paragraph 51;</li> <li>The conduct and suitability of the person's or body's associates;</li> <li>Any other matters specified in the CLC's Licensing Rules.</li> </ul> <p>The CLC will raise an objection where it determines that an individual or body is unsuitable to hold a material interest. In such cases, the CLC will issue a formal warning notice setting out the reasons for its decision. This process applies to both new applicants and existing licensed bodies where new individuals or entities are seeking to acquire a material interest.</p> <p>In accordance with the CLC's ABS Framework, warning notices may be issued in the following circumstances:</p> <ul style="list-style-type: none"> <li>8.17 – where the CLC objects to the holding of a material interest or grants approval subject to conditions; or</li> <li>13.2 – as an enforcement measure in cases of non-compliance with regulatory obligations.</li> </ul>	
<b>7</b>	<b>SOURCE OF FUNDS, SOURCE OF WEALTH, AND SANCTIONS COMPLIANCE</b>
<p>Beneficial owners must clearly identify whether any funds are derived—directly or indirectly—from a third party. Sources may include, but are not limited to:</p> <ol style="list-style-type: none"> <li>Personal wealth from a private individual (post-tax income);</li> <li>Cash reserves from a separate business entity;</li> <li>Credit facilities or loans provided by an individual or corporate entity.</li> </ol> <p>Where funding originates from a third party, that party will fall within the scope of identity verification, adverse media screening, sanctions checks, and Source of Funds/Source of Wealth</p>	

evidence requirements. In all cases, the terms and conditions under which the funds are provided must be clearly defined.

### A Source of Funds (SoF)

Source of Funds refers to the origin of the specific money used in a particular transaction or investment.

The CLC is required to obtain SoF information from BOOMs to ensure that:

- The funds are not linked to money laundering or other illicit activity; and
- Sanctions obligations are not breached.

BOOMs must provide at least six months of financial statements clearly showing where the funds have been held.

### B Source of Wealth (SoW)

Source of Wealth relates to the broader economic, commercial, or financial background through which an individual or entity accumulated the wealth used in the transaction.

Examples include:

- Sale of assets (e.g., property, shares, art, vehicles)
- Pension withdrawals
- Inheritance

Supporting documentation may include savings and investment statements, loan or credit agreements, and other relevant financial evidence. Screenshots or photos of bank statements, and modified documents, are not acceptable. Copies of original, unaltered documents must be provided.

### C Private Equity

Where a fund manager is not a shareholder in the Fund Holding Company, they must be identified and provide assurance that appropriate legal, regulatory, and compliance obligations have been fulfilled in the jurisdiction in which they operate.

This includes:

- Anti-Money Laundering (AML)
- Source of Funds and Source of Wealth checks
- Economic crime and sanctions compliance
- Politically Exposed Person (PEP) screening

The CLC requires confirmation that:

- a. No individual investor is subject to sanctions in the UK, EU, US, or other relevant jurisdictions; and

- b. No single individual (whether GP, LP, or fund manager) has exclusive control over the management of the fund.

Private equity managers must also provide evidence of the terms of investment and any non-performance provisions.

### D Gifts

Where funds are provided as a gift, the donor (“Gifto”) must be fully identified and satisfy the SoF/SoW evidence requirements. Depending on the context, the CLC may also request additional supporting evidence, such as payslips or other proof of earnings.

The Gifto must sign a Gifted Deposit Letter, confirming that:

- The funds are a non-repayable gift, and
- There is no expectation of repayment at any point in the future.

### E Sanctions Compliance

BOOMs must demonstrate full awareness of their responsibilities under relevant AML, Economic Crime, and Sanctions regimes. This includes an ongoing obligation to remain compliant throughout the lifecycle of their investment and any returns, recognising that these regimes may change at any time.

BOOMs are expected to maintain:

- Clearly documented and regularly reviewed systems, policies, and procedures;
- A capable and well-resourced compliance function capable of managing escalations (e.g., sanctions matches or breaches) in a timely manner; and
- A structured training programme covering AML, Economic Crime, and Sanctions compliance for all relevant staff.

As part of the application process, BOOMs will be required to demonstrate how they meet the CLC’s sanctions compliance expectations.

## 8 ABOUT THE LEGAL SERVICES

### A Defining the Scope of the Licence

Businesses must clearly define the legal services for which they are seeking regulation by the CLC. This process is relatively straightforward for practices intending to offer conveyancing services.

When assessing applications for a Probate Licence, the CLC typically considers the standard scope of the licence to include the following *post-death services*, encompassing both reserved and non-reserved legal activities:

- a. Obtaining a Grant of Probate or Letters of Administration
- b. Administration of the Estate

Applicants may also request to expand the scope of the Probate Licence to include commonly associated *pre-death non-reserved legal services*, such as:

1. Will Writing
2. Estate Planning
3. Tax Planning
4. Trusts
5. Lasting Powers of Attorney
6. Court of Protection Services (e.g. the administration assisting an individual to make an application)

### **B** Supervision Requirements

Reserved legal activities must be carried out directly by Authorised Persons holding the appropriate practising rights and regulated by an Approved Regulator, such as the CLC or the Solicitors Regulation Authority, or by an exempt person acting under appropriate supervision.

Non-reserved legal activities must also be delivered or supervised by suitably qualified and/or experienced individuals.

In accordance with the structural requirements under the CLC's Recognised Body and Licensable Bodies (ABS) Frameworks, the CLC expects regulated businesses to maintain an ownership and governance structure that includes a sufficient number of Authorised Persons to supervise the full scope of legal services listed on the CLC licence.

For example, a Recognised Body comprising two partners or directors that intends to offer both conveyancing and probate services must demonstrate that one or both partners/directors hold the appropriate qualifications and experience in each of the licensed areas.

This same principle applies to Licensable Bodies (ABS), where the Head of Legal Practice (HoLP) must be able to demonstrate the capability and credentials to supervise the entire range of legal services for which the licence is sought.

## Section 2: Preparing to Apply and Collating Evidence

Before submitting a CLC Practice Application, applicants must carefully prepare and gather the necessary supporting evidence to demonstrate compliance with regulatory requirements. This section outlines the key components of the application process, including:

1. The CLC Practice Application Supporting Synopsis
2. Policies and procedures
3. Financial Information
4. Any additional evidence relevant to the applicant's suitability

### 1 CLC PRACTICE APPLICATION SUPPORTING SYNOPSIS

The CLC Practice Application Supporting Synopsis is a mandatory document comprising of two key sections:

1. Business Viability and Sustainability
2. Owners and Managers Overview

You can access an editable PDF copy of the CLC Practice Application Supporting Synopsis [here](#).

### A Section 1: Business Viability and Sustainability

In this section, the applicant must provide comprehensive responses aligned with the following Licensing Outcomes:

#### 1. Financing and Ownership

Licensing Outcome: The CLC is satisfied that it can effectively regulate the business.

#### 2. Source of Funds/Source of Wealth (Financing/Investment Funds)

Applicants must disclose the origin of funds and provide supporting evidence for both Source of Funds (SoF) and Source of Wealth (SoW).

#### 3. Experience and Suitability of BOOMs, CLC Managers and Key Personnel

Licensing Outcomes:

- The business plan demonstrates the delivery of legal services that protect clients' interests.
- Clear lines of accountability are established for managers.
- The business has suitably qualified, skilled, experienced, and trustworthy managers.

#### 4. Business Overview, Operating Model, Confidentiality and Data Protection

Licensing Outcomes:

- The business plan demonstrates the delivery of legal services that protect clients' interests.
- Clear lines of accountability are established for managers.

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### 5. The Trading Profile

Licensing Outcome: The business plan demonstrates the delivery of legal services that protect clients' interests.

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### 6. Sources of Work and Referral Strategy

Licensing Outcome: The business plan demonstrates the delivery of legal services that protect clients' interests.

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### 7. Client Profile

Licensing Outcome: The business has compliant governance arrangements in place to protect both the business and its clients.

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### 8. Service Quality and Complaints Handling

Licensing Outcome: The business has compliant governance arrangements in place to protect both the business and its clients.

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### 9. Claims and Claims Management

Applicants must disclose historical claims, claim trends, and risk management strategies.

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### 10. Money Handling Arrangements, AML, Cyber Crime and Fraud Prevention

Licensing Outcomes:

- The business has compliant governance arrangements in place to protect both the business and its clients.
- Clear lines of accountability are established for managers.
- The business has suitably qualified, skilled, experienced, and trustworthy managers.

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### 11. Staff Training and Ongoing Competence Strategy

Licensing Outcomes:

- The business has compliant governance arrangements in place to protect both the business and its clients.
- The business has suitably qualified, skilled, experienced, and trustworthy managers.

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Applicants must provide supplementary evidence where necessary to demonstrate that BOOMs, Managers, and Key Personnel are fit to own and manage.

ABS Framework – Section 8.22(a)(i):

Unless there are exceptional circumstances, the CLC will not consider an individual to be a fit and proper person and will refuse the application if the individual has:

- Convictions or disqualifications involving dishonesty; or

- Engaged in deception, such as misleading academic institutions, employers, or the public.

### 12. Adverse Information

Any failure to disclose adverse information that later emerges during the CLC's screening process will be treated as a material omission and may adversely affect the application.

#### B Section 2: Owners and Managers Overview

This section requires the reporting of all Beneficial Owners, Officers, and Managers (BOOMs), CLC Managers, and Key Personnel (including the Head of Legal Practice (HoLP), Head of Finance and Administration (HoFA), and Money Laundering Reporting Officer (MLRO)).

A reporting template is provided in *Section 2: ANNEX 1* of the CLC Practice Application Supporting Synopsis.

A separate template must be completed for each BOOM, CLC Manager, and Key Personnel. For ease, a separate copy can be found [here](#).

#### 2 POLICIES AND PROCEDURES

##### A Required Documentation

Businesses must provide copies of the following documentation as part of the application and regulatory assessment process:

1. All Client facing Terms of Engagement
2. Relevant internal Policies and Procedures
3. A completed 'Practice-Wide' Anti-Money Laundering Risk Assessment.

As part of the AML assessment, businesses must demonstrate an understanding of the types of policies required. For ease of compliance, the CLC provides a template for AML Risk Assessments; however, businesses are welcome to use their own templates, provided they meet regulatory expectations.

#### B Anti-Money Laundering (AML)

The CLC has published an AML Policy Checklist, available in the AML Toolkit, to assist practices in ensuring their policies meet required standards. This checklist is used during routine CLC inspections and dedicated AML reviews.

- AML Policy Checklist – this can be found on the CLC website [here](#).
- AML, Counter-Terrorist Financing (CTF), and Sanctions Policy and Procedure Guidance – This includes a policy and procedure [template](#) and outlines the latest AML developments.

The AML Policy Checklist was published in February 2024 and can be found under the Resources Section.



AML Policies must detail the firm's ID&V (KYC) procedures, including enhanced due diligence measures where required. Firms must give due regard to the CLC's:

- [Code of Conduct](#)
- [Licensed Body Code](#)
- [Recognised Body Code](#)
- [Regulation and Enforcement Policy](#)

### C Risk Agenda

The CLC publishes an Annual Risk Agenda to support firms in identifying and managing areas of regulatory risk. The Risk Agenda for 2023 and 2024 have included key topics such as:

- Anti-Money Laundering (AML)
- Conflicts of Interest
- Sanctions Compliance
- Accounts Code Compliance
- Complaints Handling
- Breaches of Undertakings

#### 2024 Risk Agenda and Supporting Resources

- [Informed Choice](#)
- [Anti-Money Laundering Toolkit](#)
- [Cybercrime and Fraud Toolkit](#)
- [Customer Charter](#)
- [CLC Customer Charter](#)

### D Business Continuity Planning (BCP)

All CLC-regulated practices must have an up-to-date, functional Business Continuity Plan (BCP) in place. The BCP must address the management of legal services in the event of:

- a. The absence of the Authorised Person/HoLP/HoFA
- b. Short unplanned absences
- c. Medium and long-term planned absences
- d. Rapid Closure (triggered by death, external events, or foreclosure)
- e. Orderly Managed Closure (triggered by retirement, company wind up, planned closure)

Eventualities to be planned for include:

- Incapacity, bereavement, or other emergencies involving key personnel or owners.
- External events that prevent the proper conclusion of legal services, such as failure to obtain or renew Professional Indemnity Insurance (PII)

The BCP must include:

- a. Cover arrangements, including contact details and external notification protocols
- b. Banking mandates
- c. IT systems, website administration and access arrangements

- d. Premises access and management
- e. Legacy file storage and management
- f. PII policy details

In addition, businesses must ensure secure and accessible storage of:

- System passwords and administrative access credentials
- Banking details and authorisations
- Contact details for PII providers and other key stakeholders

<b>3</b>	<b>FINANCIAL AND TRANSACTIONAL FORECAST</b>
<b>A</b>	<b>Forecasts</b>
<p>Businesses are required to provide a financial and transactional forecast covering the first 12 months of trading. This must be submitted in Excel format, using the specified tabs outlined below.</p> <p>Each tab should include a clear explanation of any assumptions made in calculating averages, and must follow the format described:</p> <ul style="list-style-type: none"> <li>• <b>Tab 1:</b> Fee Structure – presented both in gross terms and broken down by transaction type</li> <li>• <b>Tab 2:</b> 12-Month Transaction Volumes – categorized by type, including referral and conversion rates</li> <li>• <b>Tab 3:</b> 12-Month Income – gross income, itemized by income stream</li> <li>• <b>Tab 4:</b> 12-Month Profit and Loss Forecast – including salary details (both gross and net)</li> </ul>	

### Section 3: CLC New Practice Application Process

Most applications will follow the steps outlined below. The CLC will discuss these steps with prospective businesses during a preliminary meeting held prior to the application stage.

<b>STEP 1:</b>	<b>EXPRESSION OF INTEREST</b>
<p>Applicants should email the Licensing Team at <a href="mailto:licensing@clc-uk.org">licensing@clc-uk.org</a> outlining the ownership, governance, and operating structure of the proposed business. The email should also specify whether there is a predecessor or parent business, or any third-party investors/beneficial owners.</p>	
<b>STEP 2:</b>	<b>MEETING WITH THE CLC LICENSING TEAM</b>
<p>Applicants are invited to attend a virtual Microsoft Teams meeting with the CLC Licensing Team. It is essential all Beneficial Owners, Officers and Managers (BOOMs), managers, and key personnel</p>	

attend this meeting, as we will discuss the investment and governance elements of your application, and the associated authorisations and licences required for any key personnel.

We will also assess the financial and regulatory viability and sustainability of the proposed business.

Additionally, we will explain the following documents and their importance in the application process, along with our expectations:

### **A. Sources and Evidence of Investment and Financing:**

Whether corporate or personal, this should include details of repayment terms or any conditions applying in the event of financial non-performance. You must also explain any relationship the proposed CLC business may have with existing businesses through common ownership or financing. We will seek to establish the appropriate AML checks and determine whether due diligence is required on any related business or its owners/officers.

We may request copies of the following legal agreements:

- Corporate investment, loan, or intercompany financing agreements
- Share purchase/shareholder agreements
- Exit or retirement packages
- Agreed payment plans (e.g., HMRC arrangements)
- Contracts of employment for key personnel
- Current employment contracts, including restrictive covenants—particularly for the HoLP and HoFA

**Please note:** This is an entirely confidential discussion, but to ensure the meeting is productive, you must come prepared to share information.

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### **B. Practice Application Supporting Synopsis (*see Section 2.1*):**

Describe how your organisational structure and operating procedures will manage risk and ensure consumer protection and regulatory compliance. The HoLP, HoFA, MLRO, and Registered Managers should contribute to this document.

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### **C. Organisational Chart:**

Upload a chart showing all operational and non-operational individuals with a material interest. Identify roles such as HoLP, HoFA, MLRO, GDPO, complaints handlers, and licensed professionals, including the name of their regulator, regulatory ID (e.g., SRA: 1234), and date of first licensure.

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### **D. Transaction and Financial Forecast (*see Section 2.3*):**

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### **E. Policies and Procedures (*see Section 2.2*):**

Submit only client-facing policies and procedures. Do not include employment-related documentation. Required policies include:

- Business Continuity Plan

- AML Policy
- Practice-wide AML Risk Assessment

**Please note:** Incomplete or vague explanations of systems, controls, and management processes may result in the rejection of the application.

### STEP 3: PROFESSIONAL INDEMNITY INSURANCE (PII)

Applicants should begin discussions to obtain a quotation for PII cover from an insurer that is a signatory to the **CLC Participating Insurers Agreement**. The CLC encourages firms to seek quotes from more than one insurer.

All CLC-regulated practices must maintain PII to cover civil liabilities. The current framework includes:

- Minimum cover of £2 million per claim
- Six years' run-off cover at no additional cost upon closure

Key documents (available on the [CLC website](#)):

- PII Minimum Terms and Conditions
- Participating Insurers Agreement
- CLC PII Framework
- PII Code and Guidance

Approved Brokers:

- Howden CLC Scheme
- Marsh JLT CLC Scheme
- Miller CLC Scheme
- HERA CLC Scheme

**Please note:** The absence of a current and valid PII quote is a material omission. As a result, the CLC will treat the practice application as incomplete.

More information on PII can be found on the [CLC website](#).

### STEP 4: SUBMIT ALL APPLICATION FORMS

All applications must be submitted via DocuSign. Related applications (e.g., for individuals) must be submitted simultaneously with the practice application.

DocuSign will email applicants a unique link from [dse@eumail.docusign.net](mailto:dse@eumail.docusign.net). The link expires after **28 days**. If applications are not submitted within this period, the practice application will be treated as **withdrawn**.

### STEP 5: COMPLETENESS REVIEW

A preliminary completeness review will be conducted on individual applications, followed by the practice application.

At this stage, we aim to identify any BOOMs, Managers, HoLPs, HoFAs, MLROs, or CLC licence applications that cannot be accepted due to ineligibility or material omissions. If no issues are found, we proceed to a preliminary review of the full practice application.

The CLC Licensing Team will share the review findings with the practice application's named contact.

**Please note:** All applicants must respond to information requests within **14 days** to avoid delays.

### STEP 6: DETERMINING APPLICATION ACCEPTANCE

Administration and screening fees will be invoiced upon receipt of a complete application. All fees must be paid within **10 working days** of the invoice date and are **non-refundable**.

We will confirm with the named contact whether the application has been accepted.

**Processing times** begin from the date of acceptance:

- Individual applications: within **42 days**
- Non-complex practice applications: within **90 days**

More information on Licensing Application Fees can be found on the [CLC website](#).

### STEP 7: SCREENING

All applicants undergo a Fit and Proper Person screening by Giant Screening (our third-party screening agent), including:

- DBS check
- ID&V documentation
- Facial recognition verification

Applicants must satisfy the CLC that they are a fit and proper person to practise as a CLC lawyer. See item 8.22 of the Licensed Body (ABS) Licensing Framework for details.

#### **Declaration of Adverse Information:**

All adverse information—including spent or satisfied matters—must be disclosed with supporting documentation. Failure to do so is a **material omission**. Ensure you obtain any necessary third-party documentation prior to submission.

### STEP 8: THE SUBSTANTIVE APPLICATION REVIEW

We will review the following:

1. Ownership, Governance, and Key Personnel
2. Operating Policies and Procedures (desktop review by a CLC Inspector)
3. Financial Viability and Forecasts

Key focus areas:

- Financial documentation
- Practice Application Supporting Synopsis
- Policy and procedure compliance
- Regulatory intelligence and compliance history
- Fit and proper assessments
- Experience, skills and professional status of Managers and Key Personnel

At this stage, we are seeking to identify any applications for roles such as BOOM, Manager, HoLP, HoFA, MLRO, or for a CLC Licence that cannot be accepted due to one or more of the following reasons:

1. Failure to meet the CLC's Fit and Proper Test
2. The presence of adverse information that was not declared and is considered a material omission

Licensed individuals must demonstrate both the ability and willingness to act in a principled manner and to deliver the Outcomes of the CLC Code of Conduct by adhering to its Overriding Principles:

- Act with independence and integrity
- Maintain high standards of work
- Act in the best interests of clients
- Comply with your duty to the court
- Deal with regulators and ombudsmen in an open and co-operative way
- Promote equality of access and service.

**Please note:** Individual applications submitted as part of a practice application (e.g., Recognised Body or ABS) will be processed in line with the full practice application timeline.

Complex applications may incur additional fees (up to 14 hours at £80/hour) if adverse findings are present.

### STEP 9: LICENSING DECISION

Applicants will be informed of one of the following outcomes:

- Approved
- Minded to Approve
- Minded to Refuse
- Refused

If approved, applicants have **three months** to complete post-approval steps, unless a deferred licence date has been agreed.

If refused, the CLC will explain the reasons and offer the opportunity to respond with representations or further documentation within **one month**. Additional requirements may be imposed to ensure compliance.

### STEP 10: ANNUAL FEES

Practice Licences will only be issued once the Annual Regulatory Fee is received.

Following confirmation of the agreed first 12 months gross turnover exclusive of VAT, the full annual practice licence fee will be calculated. At that point, the practice will be given the option to pay by Direct Debit. A Direct Debit Mandate will be provided for this purpose, which the applicant must complete, sign, and return.

Key points:

- Licence fees are calculated from the first day of the month
- Pro-rata fees are **non-refundable** and **non-changeable**
- All fees must be paid by **31 October** of the licensing year
- Individual Licences are issued in the **legal name** (as per passport)

Requests for deferred licence issuance must be submitted with the application.

More information on Annual Regulatory Fees can be found on the [CLC website](#).

### STEP 11: POST-APPROVAL PROCESS

If the application is approved, the following steps must be completed before a CLC licence can be issued:

1. Ask your PII broker to confirm in writing:
  - The turnover figure used to calculate the premium
  - That the premium has been paid or finance arranged
  - Provide the certificate of insurance (expiry date: 30 June)
2. Pay the Annual Regulatory Fee and Compensation Fund contributions.
3. Submit examples of branding and marketing materials, including letterheads and email footers.
4. Sign and return the **Inspection Co-operation Agreement** and final declarations.
5. Install and activate the **CLC Secure Badge** on the practice website.

## Section 4: Additional Information

### 1 STATUTORY RIGHT TO APPEAL

Under Section 29(1)(a) of the Administration of Justice Act 1985, if the CLC refuses an application for a licence, the individual has the right to appeal the decision to the Adjudication Panel within one month of being notified of the refusal. This period begins from the date the applicant receives the licensing refusal letter.

The appeal must be submitted to the CLC within 28 days of notification, via email to [licensing@clc-uk.org](mailto:licensing@clc-uk.org).

The Adjudication Panel, comprising a minimum quorum of three members, will determine whether to impose sanctions, such as:

- Disqualification of the Body or a Manager
- Licence revocation
- Imposition of a penalty

No member of the Adjudication Panel is a member of the CLC Council or an employee of the CLC. Wherever possible, a decision will be provided to the appellant within **42 days** of the CLC receiving the appeal. This may be extended to **90 days** if necessary.

For more details, refer to:

- [Adjudication Panel Procedure Rules 2015](#)
- [Adjudication Panel Rules 2015](#)

**Please Note:** The Adjudication Panel's decision is final. There is no further right of appeal.

### 2 APPOINTING REPRESENTATION

Rule 10(1) and (2) of the [Adjudication Panel Procedure Rules 2013](#) provide:

- (1) A party may appoint a representative (whether legally qualified or not) to represent that party in the proceedings.*
- (2) If a party appoints a representative, that party must send or deliver to the Adjudication Panel and to each other party written notice of the representative's name and address.*

### 3 HOW TO SUBMIT AN APPEAL

Appellants must complete and submit a Notice of Appeal to [licensing@clc-uk.org](mailto:licensing@clc-uk.org). Please ensure that the appellant's name and the type of licence application are clearly stated in the subject line of the email.

Download the [Notice of Appeal](#).



### 4 REVOCATION OF LICENCES ISSUED BY FRAUD OR ERROR

Should the CLC consider that it has issued a Licence that was obtained by Fraud or Error

Under [Administration of Justice Act 1985 S28](#) and by [APR 2015](#), revocation of licences and recognitions obtained through fraud or error

18 (1) Where—

- (a) it is considered that a licence was issued to any person as a result of error or of fraud on his part, and
- (b) the CLC decide that there is any question of the Adjudication Panel exercising their powers under section 28(1) of the 1985 Act, the CLC must refer the matter to the Adjudication Panel.

18 (2) Where—

- (a) it is considered that recognition was granted to any Recognised Body as a result of error or of fraud on its part, and
- (b) the CLC decide that there is any question of the *Adjudication Panel exercising their powers under paragraph 7(1) of Schedule 6 to the 1985 Act*, **the CLC must refer the matter to the Adjudication Panel.**

18 (3) A reference under this rule must—

- (a) be made in writing,
- (b) state that it is made under this rule, and
- (c) set out the allegation and a summary of the facts relied on to support it.

18 (4) A copy of such a reference must be served on the respondent, together with a copy of these Rules.

18 (5) On such a reference, the Adjudication Panel must hold a hearing to determine the allegation.

**Please Note:** In the case of a Panel's decision to revoke a licence on the basis of fraud or error under Section 28, the AJA does not provide for a Right of Appeal to the First-Tier Tribunal.

### 5 OUR PUBLICATION POLICY

Read the [CLC's Publication Policy](#)

### 6 YOUR PERSONAL DATA

Your details will be held by the CLC in accordance with the General Data Protection Regulation (GDPR). For the purposes of GDPR, if you provide any information to us, we will be the Data Controller.

For further information about how your information is used, how we maintain its security, and your rights to access information we hold about you, please see our Privacy Policy, which is kept under regular review.

You can contact our Data Protection Officer via email at [privacy@clc-uk.org](mailto:privacy@clc-uk.org) or in writing at:

**Council for Licensed Conveyancers**

WeWork, 120 Moorgate, London EC2M 6UR

Main Line: 020 3859 0904

[Read our Privacy Policy](#)

7	<b>YOUR RIGHT TO COMPLAIN</b>
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We are committed to maintaining high standards in the processing of your personal information.

If you have any questions or concerns, please contact us at [privacy@clc-uk.org](mailto:privacy@clc-uk.org).

If you remain dissatisfied, you have the right to lodge a complaint with the [Information Commissioner's Office](#) regarding the way we handle your personal data.

### *Annex 1 - Index of Documents*

Below is a list of documents applicants will be asked to provide when completing the New CLC Practice Application Form.

Document Type	Source
Evidence of the Rent or Lease Agreement	
Evidence of the rent or lease agreement	
Policy Quote from a CLC Participating Insurer	
Explanation of any pending or ongoing Regulatory Investigations	<a href="#">AML Risk Assessment Template</a>
Policies and Procedures (Copies of all Client Facing Policies and Procedures)	<a href="#">Template</a>
Practice Application Supporting Synopsis	
Evidence of Set-Up or Investment Funds	
Evidence of Cover Arrangements	
Financial and Transactional Forecast	

## *Annex 2 - Definitions*

### **1.1 Reserved Legal Activities**

‘Reserved legal activities’ are defined in Section 12 and Schedule 2 of the Legal Services Act 2007.

There are currently six reserved legal activities:

- The exercise of a right of audience (advocacy)
- The conduct of litigation
- Reserved instrument activities
- Probate activities
- Notarial activities
- The administration of oaths

The Council for Licensed Conveyancers (CLC) currently licenses and regulates Conveyancing Services, which fall within reserved instrument activities, probate activities, and the administration of oaths.

### **1.2 Approved Regulator**

An ‘Approved Regulator’ is an organisation authorised to regulate providers of legal services.

Approved Regulators include:

- The Law Society
- The Bar Council
- The Chartered Institute of Legal Executives (CILEx)
- The Council for Licensed Conveyancers (CLC)
- The Chartered Institute of Patent Attorneys
- The Institute of Trade Mark Attorneys
- The Association of Law Costs Draftsmen
- The Master of the Faculties
- The Institute of Chartered Accountants in England and Wales (ICAEW)

### **1.3 Authorised Person**

An ‘Authorised Person’ is an individual who has been authorised by an Approved Regulator to carry out reserved legal activities. This includes:

- Licensed Conveyancer
- Licensed Probate Practitioner
- Solicitor
- Fellow of the Chartered Institute of Legal Executives with CILEx Practitioner Rights

### **1.4 Non-Authorised Person**

A ‘Non-Authorised Person’ is an individual who has not been authorised by an Approved Regulator to carry out reserved legal activities.

### **1.5 Beneficial Owner**

A ‘Beneficial Owner’ is an individual or entity who enjoys the benefits of ownership, even if not named or registered as the legal owner.

### **1.6 Material Interest**

A person or legal practice is considered to hold a material interest in a Licensed Body if they (or any of their associates, or collectively with associates):

- Hold 10% or more of the shares in the body or its parent undertaking;
- Are able to exercise significant influence over the management of the body or parent undertaking through voting rights;
- Are entitled to exercise or control 10% or more of the voting powers in the body or parent undertaking;
- Are a partner with at least a 10% interest in the capital or profits of the partnership;
- Are the ultimate beneficial owner of more than 10%.

### 1.7 Registered Manager

A 'Registered Manager' is an individual notified to the CLC by virtue of being:

- A Partner (equity or salaried);
- An appointed Member of an LLP;
- An appointed Director (shareholding or non-shareholding) of a limited company;
- A nominated officer of a corporate investor; or
- An individual investor.

These individuals are listed on the CLC Public Register. Some investors or nominated officers of corporate investors may be treated as Registered Managers and subject to standard due diligence checks (including financial, disciplinary, sanctions, and criminality checks) but may not appear on the Public Register.

### 1.8 Insolvency Event

An insolvency event is defined as:

- A resolution for voluntary winding-up of a body is passed without a solvency declaration (Section 89, Insolvency Act 1986);
- The body enters administration (Schedule B1, Paragraph 1(2)(6), Insolvency Act 1986);
- An administrative receiver is appointed (Section 251, Insolvency Act 1986);
- A creditors' meeting is held which converts a members' voluntary winding-up into a creditors' voluntary winding-up (Section 95, Insolvency Act 1986);
- An order is made to wind up the body.

### 1.9 Individual Voluntary Arrangement (IVA)

An IVA is a formal agreement between a debtor and their creditors that sets out how debts will be repaid. This may involve monthly payments over a specified period (e.g., five or six years) or the sale of an asset to raise a lump sum for distribution to creditors.

### 1.10 Lenders Panel

A lenders panel is a group of legal professionals who have been approved by mortgage lenders to act on their behalf in relation to property purchases and re-mortgages.

### *Annex 3 – Useful Links*

1	CLC Regulation	<a href="https://www.clc-uk.org/regulation/">https://www.clc-uk.org/regulation/</a>
2	Application Stages	<a href="https://www.clc-uk.org/application-stages/">https://www.clc-uk.org/application-stages/</a>
3	Professional Indemnity Insurance	<a href="https://www.clc-uk.org/professional-indemnity-insurance/">https://www.clc-uk.org/professional-indemnity-insurance/</a>
4	Professional Indemnity Insurance Brokers	<a href="https://www.clc-uk.org/regulation/professional-indemnity-insurance-brokers/">https://www.clc-uk.org/regulation/professional-indemnity-insurance-brokers/</a>
5	Annual Regulatory Fees	<a href="https://www.clc-uk.org/annual-regulatory-fees/">https://www.clc-uk.org/annual-regulatory-fees/</a>
6	Licensing Application Fees	<a href="https://www.clc-uk.org/regulation/application-fees/">https://www.clc-uk.org/regulation/application-fees/</a>
7	Anti-Money Laundering Toolkit	<a href="https://www.clc-uk.org/lawyers/anti-money-laundering-toolkit/">https://www.clc-uk.org/lawyers/anti-money-laundering-toolkit/</a>
8	AML Client and Matter Risk Assessments	<a href="https://www.clc-uk.org/practice-application-templates/">https://www.clc-uk.org/practice-application-templates/</a>
9	CLC Risk Agenda	<a href="https://www.clc-uk.org/risk_agenda/">https://www.clc-uk.org/risk_agenda/</a>
10	Practice Application Supporting Synopsis	<a href="https://www.clc-uk.org/practice-application-templates/">https://www.clc-uk.org/practice-application-templates/</a>
11	Essential Background Reading	<a href="https://www.clc-uk.org/essential-background-reading/">https://www.clc-uk.org/essential-background-reading/</a>
END OF DOCUMENT		