COMPLIANCE WORKING RECORD

AML document clause-coverage report

Fixture Accountancy Ltd. UK rule pack 2026-07-31.1. 11 found, 0 not found, 4 needing review and 1 using earlier wording.

Document control

Field	Value
Organisation	Fixture Accountancy Ltd
Document type	AML clause-coverage report
Document reference	AML-POLICY-2026-001
Jurisdiction	United Kingdom
Version	2026-07-31.1
Status	Working review
Classification	Internal
Prepared by	Money Laundering Reporting Officer
Prepared on	2 August 2026
Rule pack	2026-07-31.1
Sources reviewed	31 July 2026
Generated	7 August 2026

Run record

Field	Value
Organisation	Fixture Accountancy Ltd
Reference	AML-POLICY-2026-001
Assessed at	2 August 2026 at 01:00
Rule pack	2026-07-31.1
Sources reviewed	31 July 2026
Risk-assessment text SHA-256	fixture-risk-sha256

Field	Value
Policy text SHA-256	fixture-policy-sha256
Manual reviews recorded	0 of 16
Reviewer	Money Laundering Reporting Officer
Review date	2 August 2026
Status	Working review

Assessment boundary

The result is a deterministic English phrase-coverage check against the cited rule topics.

- Found means the configured phrase groups appeared together. It is not a conclusion that wording, implementation or evidence is adequate.

- Not found means this check did not locate the configured wording. Definitions, cross-references, appendices and unusual drafting may require manual review.

- The tool does not determine whether the business is in scope, who supervises it, whether controls are proportionate or whether a transaction is suspicious.

- Each document must contain 160 to 2,000,000 extractable characters of readable text. Image-only scans are not assessed.

- The rule pack uses 10 official sources reviewed on 31 July 2026.

Rule-by-rule result

Subject	Reference	Status	Requirement
Unusual transaction review wording	MLR 2017 regulation 19(4)(a)(i)(aa), amended by SI 2026/621 regulation 11	Earlier wording found	The policy covers unusually complex or unusually large transactions, in each case given the nature of the transaction.
Risk-linked policies and senior approval	MLR 2017 regulation 19(1) and (2)	Needs review	Policies, controls and procedures are proportionate to identified risks and are approved by senior management.
Customer due diligence	MLR 2017 regulations 27 to 32; HMRC AMLG11300	Needs review	The policy addresses customer identity, beneficial ownership, purpose and intended nature, and ongoing monitoring.

Subject	Reference	Status	Requirement
Enhanced due diligence	MLR 2017 regulations 33 and 35; HMRC AMLG11600	Needs review	The policy identifies enhanced due-diligence triggers and records additional measures for higher-risk cases.
Records and retention	MLR 2017 regulation 40; HMRC AMLG11700	Needs review	The policy states what AML records are retained, the responsible owner and the applicable retention trigger or period.
Written, business-specific risk assessment	MLR 2017 regulation 18; HMRC AMLG1800	Found	The assessment is written and describes the business, its activities and the risks that are specific to it.
Customer risk factors	MLR 2017 regulation 18(2)(a)	Found	The assessment considers risks associated with customers and beneficial owners.
Country and geographic risk factors	MLR 2017 regulation 18(2)(b)	Found	The assessment considers countries and geographic areas in which the business operates or to which it is exposed.
Services and transaction risk factors	MLR 2017 regulation 18(2)(c) and (d)	Found	The assessment considers products, services and transactions offered or encountered by the business.
Delivery-channel risk factors	MLR 2017 regulation 18(2)(e)	Found	The assessment considers how services are delivered, including non-face-to-face or intermediary channels where relevant.

Subject	Reference	Status	Requirement
Proliferation-financing risk	MLR 2017 regulation 18A	Found	The business identifies and assesses proliferation-financing risk, either separately or within the wider assessment.
Sources, versions and review record	MLR 2017 regulation 18(4); HMRC AMLG1800	Found	The assessment records the information used, its version or date, and when the assessment was approved or reviewed.
Review cycle	HMRC AMLG1800 section 2.6	Found	The documents state a review cycle. HMRC says it expects a business risk assessment to be reviewed at least annually and when material changes occur.
AML governance and nominated officer	MLR 2017 regulations 21 and 46	Found	The policy assigns AML responsibilities and an internal route to a nominated officer where the role is required.
Suspicion and internal reporting	Proceeds of Crime Act 2002; HMRC AMLG11100	Found	The policy gives staff a confidential internal reporting route and records the nominated officer decision.
Staff screening and training	MLR 2017 regulation 21; HMRC AMLG11030	Found	The policy covers relevant-employee screening, role-appropriate training and a record of completion.

Subject	Explanation	Document	Location
Unusual transaction review wording	Earlier or conflicting wording was found. Review the quoted text against the cited 2026 provision.	AML policy	Paragraph 1

Subject	Explanation	Document	Location
Risk-linked policies and senior approval	2 of 3 configured phrase groups were found together. Human review is needed.	AML policy	Paragraph 1
Customer due diligence	3 of 5 configured phrase groups were found together. Human review is needed.	AML policy	Paragraph 1
Enhanced due diligence	2 of 3 configured phrase groups were found together. Human review is needed.	AML policy	Paragraph 1
Records and retention	2 of 3 configured phrase groups were found together. Human review is needed.	AML policy	Paragraph 1
Written, business-specific risk assessment	Every configured phrase group was found together. This records observable coverage, not legal adequacy.	Business-wide risk assessment	Paragraph 1
Customer risk factors	Every configured phrase group was found together. This records observable coverage, not legal adequacy.	Business-wide risk assessment	Paragraph 1
Country and geographic risk factors	Every configured phrase group was found together. This records observable coverage, not legal adequacy.	Business-wide risk assessment	Paragraph 1
Services and transaction risk factors	Every configured phrase group was found together. This records observable coverage, not legal adequacy.	Business-wide risk assessment	Paragraph 1
Delivery-channel risk factors	Every configured phrase group was found together. This records observable coverage, not legal adequacy.	Business-wide risk assessment	Paragraph 1
Proliferation-financing risk	Every configured phrase group was found together. This records observable coverage, not legal adequacy.	Business-wide risk assessment	Paragraph 1
Sources, versions and review record	Every configured phrase group was found together. This records observable coverage, not legal adequacy.	Business-wide risk assessment	Paragraph 1
Review cycle	Every configured phrase group was found together. This records observable coverage, not legal adequacy.	Business-wide risk assessment	Paragraph 1

Subject	Explanation	Document	Location
AML governance and nominated officer	Every configured phrase group was found together. This records observable coverage, not legal adequacy.	AML policy	Paragraph 1
Suspicion and internal reporting	Every configured phrase group was found together. This records observable coverage, not legal adequacy.	AML policy	Paragraph 1
Staff screening and training	Every configured phrase group was found together. This records observable coverage, not legal adequacy.	AML policy	Paragraph 1

Subject	Quotation	Manual review	Review note
Unusual transaction review wording	...lies to higher-risk or PEP cases with source of funds and senior management approval. Staff examine complex or unusually large transactions and record background, purpose and written findings. Suspicious activity reports are routed to the MLRO with a decision log. Records are retained for five years by the responsible owner. Employees are screened and receiv...	Not reviewed	Not supplied
Risk-linked policies and senior approval	Policies, controls and procedures are proportionate to identified risks and receive senior management approval. The nominated officer is responsible for internal reporting and escalation. Customer due diligence identifies and verifies the customer, beneficial owner, purpose and intended nature and ongoing monitoring. Enhanced due diligence applies to higher-...	Not reviewed	Not supplied
Customer due diligence	...for internal reporting and escalation. Customer due diligence identifies and verifies the customer, beneficial owner, purpose and intended nature and ongoing monitoring. Enhanced due diligence applies to higher-risk or PEP cases with source of funds and senior management approval. Staff examine complex or unusually large transactions and record background, p...	Not reviewed	Not supplied
Enhanced due diligence	Policies, controls and procedures are proportionate to identified risks and receive senior management approval. The nominated officer is responsible for internal reporting and escalation. Customer due diligence identifies and verifies the customer, beneficial owner, purpose and intended nature and ongoing monitoring. Enhanced due diligence applies to higher-...	Not reviewed	Not supplied

Subject	Quotation	Manual review	Review note
Records and retention	...proportionate to identified risks and receive senior management approval. The nominated officer is responsible for internal reporting and escalation. Customer due diligence identifies and verifies the customer, beneficial owner, purpose and intended nature and ongoing monitoring. Enhanced due diligence applies to higher-risk or PEP cases with source of fund...	Not reviewed	Not supplied
Written, business-specific risk assessment	Business-wide AML risk assessment for this business. We provide regulated services and assess the nature, size, scale and complexity of our firm. Customer risk and beneficial owner ownership and control are considered. Country and geographic risk exposure is assessed. Products, services and transactions, payments and risk typologies are reviewed. Delivery ch...	Not reviewed	Not supplied
Customer risk factors	...iness. We provide regulated services and assess the nature, size, scale and complexity of our firm. Customer risk and beneficial owner ownership and control are considered. Country and geographic risk exposure is assessed. Products, services and transactions, payments and risk typologies are reviewed. Delivery channels, remote online agents, verification con...	Not reviewed	Not supplied
Country and geographic risk factors	Business-wide AML risk assessment for this business. We provide regulated services and assess the nature, size, scale and complexity of our firm. Customer risk and beneficial owner ownership and control are considered. Country and geographic risk exposure is assessed. Products, services and transactions, payments and risk typologies are reviewed. Delivery ch...	Not reviewed	Not supplied
Services and transaction risk factors	Business-wide AML risk assessment for this business. We provide regulated services and assess the nature, size, scale and complexity of our firm. Customer risk and beneficial owner ownership and control are considered. Country and geographic risk exposure is assessed. Products, services and transactions, payments and risk typologies are reviewed. Delivery ch...	Not reviewed	Not supplied
Delivery-channel risk factors	Business-wide AML risk assessment for this business. We provide regulated services and assess the nature, size, scale and complexity of our firm. Customer risk and beneficial owner ownership and control are considered. Country and geographic risk exposure is assessed. Products, services and transactions, payments and risk typologies are reviewed. Delivery ch...	Not reviewed	Not supplied

Subject	Quotation	Manual review	Review note
Proliferation-financing risk	Business-wide AML risk assessment for this business. We provide regulated services and assess the nature, size, scale and complexity of our firm. Customer risk and beneficial owner ownership and control are considered. Country and geographic risk exposure is assessed. Products, services and transactions, payments and risk typologies are reviewed. Delivery ch...	Not reviewed	Not supplied
Sources, versions and review record	...ic risk exposure is assessed. Products, services and transactions, payments and risk typologies are reviewed. Delivery channels, remote online agents, verification controls and mitigation are recorded. Proliferation financing risk assessment and mitigation are included. Sources include the national risk assessment and dated guidance, with version, approval a...	Not reviewed	Not supplied
Review cycle	...risk typologies are reviewed. Delivery channels, remote online agents, verification controls and mitigation are recorded. Proliferation financing risk assessment and mitigation are included. Sources include the national risk assessment and dated guidance, with version, approval and review date. We review annually and after a material change in the business.	Not reviewed	Not supplied
AML governance and nominated officer	...ls and procedures are proportionate to identified risks and receive senior management approval. The nominated officer is responsible for internal reporting and escalation. Customer due diligence identifies and verifies the customer, beneficial owner, purpose and intended nature and ongoing monitoring. Enhanced due diligence applies to higher-risk or PEP case...	Not reviewed	Not supplied
Suspicion and internal reporting	...ls and procedures are proportionate to identified risks and receive senior management approval. The nominated officer is responsible for internal reporting and escalation. Customer due diligence identifies and verifies the customer, beneficial owner, purpose and intended nature and ongoing monitoring. Enhanced due diligence applies to higher-risk or PEP case...	Not reviewed	Not supplied
Staff screening and training	...diligence applies to higher-risk or PEP cases with source of funds and senior management approval. Staff examine complex or unusually large transactions and record background, purpose and written findings. Suspicious activity reports are routed to the MLRO with a decision log. Records are retained for five years by the responsible owner. Employees are scree...	Not reviewed	Not supplied

Assumptions

- Fixture documents were treated as English working records.

Limitations

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Official sources

Source	Provision	Date	Link
UK Legislation: Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017	Regulations 18, 18A, 19, 21, 27 to 40 and 46	31 July 2026	https://www.legislation.gov.uk/uksi/2017/692/contents
UK Legislation: Money Laundering and Terrorist Financing (Amendment) Regulations 2026	SI 2026/621	31 July 2026	https://www.legislation.gov.uk/uksi/2026/621/contents/made
HM Revenue & Customs: Guidance for all sectors: Introduction		31 July 2026	https://www.gov.uk/hmrc-internal-manuals/anti-money-laundering-guidance-for-supervised-businesses/amlg1100
HM Revenue & Customs: Business risk assessment	Regulations 18 and 18A	31 July 2026	https://www.gov.uk/hmrc-internal-manuals/anti-money-laundering-guidance-for-supervised-businesses/amlg1800
HM Revenue & Customs: Policies, controls and procedures	Regulation 19	31 July 2026	https://www.gov.uk/hmrc-internal-manuals/anti-money-laundering-guidance-for-supervised-businesses/amlg1900
HM Revenue & Customs: Customer due diligence	Regulations 27 to 32	31 July 2026	https://www.gov.uk/hmrc-internal-manuals/anti-money-laundering-guidance-for-supervised-businesses/amlg11300
HM Revenue & Customs: Enhanced due diligence	Regulations 33 and 35	31 July 2026	https://www.gov.uk/hmrc-internal-manuals/anti-money-laundering-guidance-for-supervised-businesses/amlg11600

Source	Provision	Date	Link
HM Revenue & Customs: Suspicious activity reports		31 July 2026	https://www.gov.uk/hmrc-internal-manuals/anti-money-laundering-guidance-for-supervised-businesses/amlg11100
HM Revenue & Customs: Record keeping	Regulation 40	31 July 2026	https://www.gov.uk/hmrc-internal-manuals/anti-money-laundering-guidance-for-supervised-businesses/amlg11700
HM Revenue & Customs: Training	Regulation 21	31 July 2026	https://www.gov.uk/hmrc-internal-manuals/anti-money-laundering-guidance-for-supervised-businesses/amlg11030