

**Wenborne Weller & Spooner Limited
(Wenborne Weller & Spooner Limited)
84 Broadway, Leigh on Sea , SS9 1AE
Licenced body
8000354**

[Agreement Date: 10 October 2025](#)

Decision - Agreement

Outcome: Regulatory settlement agreement

Outcome date: 10 October 2025

Published date: 21 October 2025

Firm details

Firm or organisation at date of publication and at time of matters giving rise to outcome

Name: Wenborne Weller & Spooner Limited

Address(es): 84 Broadway, Leigh on Sea, SS9 1AE

Firm ID: 8000354

Outcome details

This outcome was reached by agreement.

Decision details

1. Agreed outcome

1.1 Wenborne Weller & Spooner Limited (the firm), a licensed body, authorised and regulated by the Solicitors Regulation Authority (SRA), agrees to the following outcome to the investigation:

- a. it will pay a financial penalty in the sum of £4,879,
- b. to the publication of this document, and
- c. it will pay the costs of the investigation of £600.

2. Summary of Facts

2.1 We carried out an investigation into the firm following a desk-based review (DBR) by our AML Proactive Supervision team.



2.2 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 [2019] and the SRA Code of Conduct for Firms [2019].

Firm-Wide Risk Assessment (FWRA)

2.3 Between 4 July 2022 and 28 March 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.

2.4 The firm was asked to provide its FWRA as part of the 'DBR pre-questionnaire'. In response to this, the firm sent in its 'firm wide risk' and 'financing RA' which were stated to be its FWRA. The latter, while it refers to proliferation financing, covered elements of client, transaction, geographical, and product and services risks which are more typical of a 'FWRA'.

2.5 Upon review, the document was deemed non-compliant with Regulation 18 of the MLRs 2017. Although all five sections required under Regulation 18(2) were included in the firm's FWRA, all five sections lacked adequate detail for the document to be compliant.

2.6 The firm was put on a compliance plan to draft and produce a compliant FWRA, which was received on 28 March 2025. Upon review of this document, it was clear that the firm had considered the guidance provided, and we are now satisfied that the firm has a compliant FWRA in place.

Policies, Controls and Procedures (PCPs)

2.7 Between 4 July 2022 and 28 March 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.

2.8 The firm was asked to provide its PCPs as part of the 'DBR pre-questionnaire'. On 17 January 2025, the firm sent its PCPs, along with other AML documents.

2.9 The AML Associate reviewed the firm's PCPs and wrote to the firm stating the document was not compliant with Regulation 19 of the MLRs 2017, as the majority of the mandatory points required by Regulation 19 were not contained within the document.



2.10 The firm was put on a compliance plan to draft and produce compliant AML PCPs. We provided guidance to assist the firm in drafting compliant PCPs.

2.11 On 28 March 2025, the firm sent an email attaching the firm's 'AML manual' that contained its revised PCPs. The AML Investigation Officer reviewed this document and was satisfied the firm's PCPs are now compliant with Regulation 19 of the MLRs 2017.

3. Admissions

3.1 The firm admits, and the SRA accepts, that by failing to comply with the MLRs 2017, the firm has breached:

- a. 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.
- b. 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.
- c. 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.

4. Why a fine is an appropriate outcome

4.1 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). This could have been avoided had the firm established adequate AML documentation and controls.

4.2 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.

4.3 The SRA considers that a fine is the appropriate outcome because:

- a. The agreed outcome is proportionate and 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.
- b. There has been no evidence of harm to consumers or third parties and there is now a low risk of repetition.



- c. The firm has assisted the SRA throughout the investigation and has shown remorse for its actions.
- d. The firm did not financially benefit from the misconduct.

4.4 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.

5. Amount of the fine

5.1 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).

5.2 Having regard to the Guidance, we and the firm agree that the nature of the misconduct was more serious (score of three). This is because the firm should have been aware of its obligation to have in place a compliant FWRA and PCPs since it began trading in 2022.

5.3 In addition, a significant majority of the firm's work currently 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.

5.4 The firm has failed to meet the requirements of the regulations since it began trading and while carrying a large proportion of work that falls within scope of the regulations. Although the firm now has compliant documents in place, which are in proper use, the firm was left vulnerable prior to this, and the SRA considers that this amounts to a serious breach.

5.5 The impact of the harm or risk of harm is assessed as being low (score of two). This is because there is no evidence of any harm being caused, as a result of the firm's breaches. Furthermore, the firm has been trading for only a few years and had some form of AML control environment in place, which while not compliant showed the firm was not oblivious to the AML risks it faced. However, the nature of its work, in particular the amount of in-scope work the firm undertakes, suggests the firm had the potential to cause harm as a result of its conduct.

5.6 The 'nature' of the conduct and the 'impact of harm or risk of harm' added together give a score of five. This places the penalty in Band 'B', as directed by the Guidance, which indicates a broad penalty bracket of between 0.4% to 1.2% of the firm's annual domestic turnover.

5.7 We recommend a basic penalty in the middle of the bracket. This is because while there were failings which had the potential to cause



significant loss or have significant impact, no evidence of actual harm was identified. The firm should have been aware of its statutory obligations under the MLRs 2017, and the breaches started from the inception of the firm. However, the firm has now brought itself into compliance and therefore the ongoing risk is now low.

5.8 Based on the evidence the firm has provided of its annual domestic turnover this results in a basic penalty of £5,421.

5.9 We have also considered mitigating factors and consider that the basic penalty should be discounted by ten percent. This is to take account of the following factors as indicated by the Guidance:

- a. Remedy harm – the firm took steps to rectify the non-compliant document and is now fully compliant with the MLRs 2017.
- b. Cooperating with the investigation – the firm has cooperated with the SRA's AML Proactive and AML Investigation teams.

5.10 The adjusted penalty is therefore £4,879.

5.11 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 £4,879.

6. Publication

6.1 Section 87(1) of the Legal Services Act 2007 (LSA 2007) and the Registers of licenced bodies: Section 87(4) rules, require the SRA, as a licencing authority, to maintain and publish a register of licenced bodies, which includes information on enforcement action or sanctions imposed on a licenced body, owner or employee of a licenced body.

6.2 This agreement confirms a decision has been made under Section 95 of the LSA 2007 to fine Wenborne Weller & Spooner Limited, which is a licenced body, which will be published. We do not have any discretion not to publish the decision.

7. Acting in a way which is inconsistent with this agreement

7.1 The firm agrees that it will not act in any way which is inconsistent with this agreement, such as by denying responsibility for the conduct referred to above. This may result in a further disciplinary sanction.

7.2 Acting in a way which is inconsistent with this agreement may also constitute a separate breach of Principles 1, 2 and 5 of the SRA Principles.

8. Costs

8.1 The firm agrees to pay the costs of the SRA's investigation in the sum of £600. Such costs are due within 28 days of a statement of costs due being issued by the SRA.

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