

Photiades Solicitors Ltd
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Recognised body
568127

[Agreement Date: 11 September 2025](#)

Decision - Agreement

Outcome: Regulatory settlement agreement

Outcome date: 11 September 2025

Published date: 29 September 2025

Firm details

No detail provided:

Outcome details

This outcome was reached by agreement.

Decision details

1. Agreed outcome

1.1 Photiades Solicitors Ltd (the Firm), a recognised body, authorised and regulated by the Solicitors Regulation Authority (SRA), agrees to the following outcome to the investigation:

- a. Photiades Solicitors Ltd will pay a financial penalty in the sum of £25,000, under Rule 3.1 (b) of the SRA Regulatory and Disciplinary Procedures Rules,
- b. to the publication of this agreement, under Rule 9.2 of the SRA Regulatory and Disciplinary Procedures rules; and
- c. Photiades Solicitors Ltd will pay the costs of the investigation of £600, under Rule 10.1 and Schedule 1 of the SRA Regulatory and Disciplinary Rules.

Reasons/basis

2. Summary of Facts

2.1 Our Anti-Money Laundering (AML) Proactive Supervision team carried out an AML desk-based review at Photiades Solicitors Ltd, to assess its

compliance with the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulation 2017 (MLRs 2017).

2.2 The Proactive Supervision team identified AML control failings in relation to the firm's firm-wide risk assessment (FWRA), client and matter risk assessments (CMRAs), policies, controls and procedures (PCPs) and not always obtaining adequate source of funds (SoF) documentation.

2.3 This resulted in a referral to our AML Investigations Team.

FWRA

2.4 Between 26 June 2017 to 19 February 2025, 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.

CMRAs

2.5 Between 26 June 2017 and 31 March 2025, on six (out of six) files reviewed, the firm failed to carry out an appropriate client and matter risk assessment (CMRA), pursuant to Regulations 28(12) and 28(13) of the MLRs 2017.

PCPs

2.6 Between 26 June 2017 and 19 February 2025, failed to maintain fully compliant PCPs, pursuant to Regulation 19(1)(a) of the MLRs 2017.

SoF

2.7 Between 26 June 2017 and 9 March 2025, on three of six files, failed to carry out adequate source of funds checks, in accordance with Regulation 28(11)(a) of the MLRs 2017.

3. Admissions

3.1 The firm admits, and the SRA accepts, that by failing to comply with the MLRs 2007 and MLRs 2017:

To the extent the conduct took place before 25 November 2019 (when the SRA Handbook 2011 was in force) the firm:

- a. Breached Principle 6 of the SRA Principles 2011 – which states you must behave in a way that maintains the trust the public places in you and in the provision of legal services.
- b. Breached Principle 8 of the SRA Principles 2011 – which states you must run your business or carry out your role in the business



effectively and in accordance with proper governance and sound financial risk management principles.

- c. Failed to achieve Outcome 7.2 of the SRA Code of Conduct 2011 – 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.
- d. Failed to achieve Outcome 7.5 of the SRA Code of Conduct 2011 – which states you comply with legislation applicable to your business, including anti-money laundering and data protection legislation.

And from 25 November 2019 (when the SRA Standards and Regulations came into force), the firm:

- a. Breached 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. Breached 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. Breached 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 SRA's Enforcement Strategy sets out its approach to the use of its enforcement powers where there has been a failure to meet its standards or requirements.

4.2 The issues identified around not having a compliant FWRA, CMRA, PCPs and failing to conduct appropriate source of funds checks on three of six files are serious AML control environment failings, and the conduct had the potential to cause significant harm. The firm carries out just under two thirds of its work in-scope of the regulations, by way of conveyancing, long with other in-scope work such as probate and estate administration. This had the potential to open up the firm to a greater amount of risk of being exploited by criminals.

4.3 It is a regulatory obligation for the firm to meet the requirements set out in the MLRs 2017, which the firm failed to do.

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

- a. The agreed outcome is a proportionate outcome 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 is no evidence of harm to consumers or third parties.
- c. The firm recognises that it failed in its basic duties regarding statutory money laundering regulations and regulatory compliance, as identified during our desk-based review and subsequent investigation.

4.5 The firm has cooperated fully, has admitted the breaches, shown remorse and remedied the breaches, and there is low risk or repetition.

4.6 A fine is appropriate to maintain professional standards and uphold public confidence in the solicitors' profession and in legal services provided by authorised persons. A financial penalty therefore meets the requirements of rule 4.1 of the Regulatory and Disciplinary Procedure Rules.

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, the SRA and the firm agree that the nature of the misconduct was more serious (score of three). This is because the firm failed to have a compliant FWRA between 26 June 2017 and 19 February 2025, did not carry out appropriate CMRAs on all six files checked between 26 June 2017 and 31 March 2025, failed to have compliant PCPs between 26 June 2017 and 19 February 2025 and failed to carry out adequate source of funds checks on three of six files reviewed between 26 June 2017 and 9 March 2025.

5.3 The SRA considers the impact or risk of harm was medium (score of four). The nature of conveyancing is considered high-risk, owing to the risk of abuse of the system by criminals. The firm carries out the majority of its work in conveyancing, which puts it at a greater risk of being used to launder money. There is no evidence of there being any direct loss to clients or actual harm caused as a result of the firm's failure to ensure it had proper documentation in place.

5.4 The nature and impact scores add up to seven, placing the conduct in penalty bracket Band 'C'. The Guidance indicates a broad penalty bracket of between 1.6% and 3.2% of the firm's annual domestic turnover is appropriate.

5.5 The SRA agree a fine in this bracket because the firm should have been aware of its statutory obligations under the MLRs 2017, but there is no evidence of any harm being caused or an unwillingness to improve. Based on the firm's annual domestic turnover, the fine results in a basic penalty of £30,000.

5.6 The SRA considers that the basic penalty should be reduced by fifteen percent, in terms of mitigation discount, to £25,500, then reduced using our discretion for proportionality reasons to £25,000. This reduction follows the following factors in the Guidance that apply to this case:

- a. The firm has taken steps to rectify its failures, by taking into account our guidance and producing compliant AML documentation (FWRA, PCPs, CMRA), documenting CMRAs on all in-scope files and providing SoF training to all in-scope staff.
- b. The firm has cooperated with the SRA's AML Proactive Supervision and Investigations teams.

5.7 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 to remove this and the amount of the fine is £25,000.

6. Publication

6.1 Rule 9.2 of the SRA Regulatory and Disciplinary Procedure Rules states that any decision under Rule 3.1 or 3.2, including a Financial Penalty, shall be published unless the particular circumstances outweigh the public interest in publication.

6.2 The SRA considers it appropriate that this agreement is published in the interests of transparency in the regulatory and disciplinary process. The firm agrees to the publication of this agreement.

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

7.1 The firm agrees that it will not deny the admissions made in this agreement or act in any way which is inconsistent with it.

7.2 If the firm denies the admissions or acts in a way which is inconsistent with this agreement, the conduct which is subject to this agreement may be considered further by the SRA. That may result in a disciplinary outcome or a referral to the Solicitors Disciplinary Tribunal on the original facts and allegations.

7.3 Acting in a way which is inconsistent with this agreement may also constitute a separate breach of principles 2 and 5 of the Principles and paragraph 3.2 of the Code of Conduct for Firms.

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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