

Osprey Approach: AML Risk Assessment

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The latest version is always online at
<https://support.ospreyapproach.com/?p=69603>

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This workflow helps you to meet your obligations under The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017. The workflow will prompt the user to analyse both the client and matter risk. The tasks can be integrated into your existing workflows where needed, or run as a standalone workflow on existing work types.

ALLOCATE A CUSTOM QUESTIONNAIRE

CLIENT DETAILS - AML RISK

New or existing client:

Please Select

New
Existing


Date due diligence last updated (if applicable):

Occupation/source of income:

What I.D. documents received, expiry dates, certified and verified by

Enter info here:

Entity type:


 [Submit](#)

ALLOCATE A CUSTOM QUESTIONNAIRE

CLIENT RISK - AML RISK

Is it unusual for this type of client to instruct us?

Yes or no - please select:

Please Select 


Please Select

Yes

No

Do you have any concerns about the client, or third party? e.g. capacity, undue influence, vulnerability

Yes or no - please select:

Please Select 


Please Select

Yes

No

If an third party is instructing, do we have evidence of their authority to act?

Yes or no - please select:

Please select 


Please select

Yes

No

N/A

Concerns about this client, agent or third parties:

Please Select 


Please Select

Yes

No

Not applicable

Is the client a designated person / entity?:

Please Select 


Please Select

Yes

No

Provide details of any concerns identified in this section.

Enter info here:

 [Submit](#)

ALLOCATE A CUSTOM QUESTIONNAIRE

JURISDICTION RISK - AML RISK

Where is the client based e.g. England, Wales:

Do you have concerns about the client's location:

Please Select

Yes

No

Does it make sense for the client to instruct us from this location?

Yes or no - please select:

Please Select

Yes

No

Are there overseas elements? If yes, provide details below e.g. overseas beneficiary, contracts for overseas entities

Yes or no - please select:

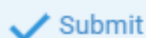
Please Select

Yes

No

Provide details of any concerns identified in this section.

Enter info here:

 Submit

ALLOCATE A CUSTOM QUESTIONNAIRE

DELIVERY CHANNEL RISK - AML RISK

Will we meet the client in person?:

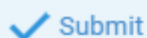
Please Select

Yes

No

If no, how are we satisfied that the client is who they say they are?

Enter info here:

 Submit

ALLOCATE A CUSTOM QUESTIONNAIRE


DUE DILIGENCE REVIEW - AML RISK

What steps have you taken to verify the identity of the client, Giftoor or third party?

Enter info here:

Is there any adverse media about the client or beneficial owners.

Yes or no - please select:

Please select 

Please select

Yes

No

N/A

 Submit

ALLOCATE A CUSTOM QUESTIONNAIRE


FOR ENTITIES - AML RISK

Provide details of beneficial owners, shareholders/controllers including percentages of shareholdings

Enter info here:

Steps taken to identify & verify beneficial owner:

Have you identified any reportable discrepancies?:

Please Select 


Please Select

Yes

No

If applicable, have you checked the register of overseas entities?

Yes or no - please select:


Please select 

Please select

Yes

No

N/A

 Submit

ALLOCATE A CUSTOM QUESTIONNAIRE

MATTER RISK - AML RISK

Description of work:

Do we usually carry out this type of work?:

Please Select 

Please Select

Yes

No

Does the matter involve creating a complex structure?

Yes or no - please select:

Please Select 

Please Select

Yes

No

Does it involve a cash-intensive industry?:

Please Select 

Please Select

Yes

No

Does it involve a high-risk industry?:

Please Select 


Please Select

Yes

No

Are there any other AML or Counter Terrorist Financing risks?

Yes or no - please select:

Please Select 

Please Select

Yes

No

Does the matter involve risk of proliferation financing?

Yes or no - please select:

Please Select 

Please Select

Yes

No

Have you checked and obtained evidence of the source of wealth and source of funds for this transaction and placed evidence on the file?

Yes or no - please select:


Please Select 

Please Select

PRODUCT/SERVICE RISK - AML RISK

Based on the client's profile, does it make sense for the client to instruct us on this transaction?

Yes or no - please select:

No 

Please Select

Yes

No

If no, provide details:


 [Submit](#)

ENHANCED DUE DILIGENCE - AML RISK

If 'Yes' applies to any of the following, contact the nominated person before proceeding.

If the client is not an individual, is the structure complex or unusual?

Yes or no - please select:

Please Select 


Please Select

Yes

No

Does the client own, manage or direct a business or activity that falls within a higher risk sector?

Yes or no - please select:

Please Select 


Please Select

Yes

No

Does the matter involve a client, a beneficial owner or other party linked to the transaction, manage or direct a business or activity that is cash intensive?

Yes or no - please select:

Please Select 


Please Select

Yes

No

Does the matter involve a client, a beneficial owner or any party established in a high-risk third country or high-risk or jurisdiction?

Yes or no - please select:

Please Select 


Please Select

Yes

No

Is the client, a beneficial owner or any party linked to the transaction a politically exposed person (PEP), family member or a close associate of a PEP?

Yes or no - please select:

Please Select 

Please Select

Yes

No

Do you have any concerns that the client, a beneficial owner or any parties linked to the transaction is subject to financial sanctions or has links to a country subject to sanctions?


Yes or no - please select:

Please Select 

RISK LEVEL - AML RISK

This section should be completed at the outset of the matter. Assessment of risk criteria should be considered holistically and not in isolation. This should take both the client and matter risks into consideration.

What level of risk is posed by the client?:

Medium 


Please Select

Low

Medium

High

What level of risk is posed by the matter?:

Medium 

Please Select

Low

Medium

High


I have given these ratings because:

 Submit

FOR HIGH-RISK MATTERS - AML RISK

For high-risk matters (leave blank for low and medium risk levels):

Date escalated and who it has been escalated to.:

Please Select 


Please Select

Yes

No

Are there any circumstances that would lead you to speak to the MLRO about knowledge or a suspicion of ML/TF?

Yes or no - please select:


Please Select 

Please Select

Yes

No

Explain why you are proceeding with the matter:

 Submit

DUE DILIGENCE - AML RISK

What level of customer due diligence will you apply?

Standard or enhanced - please select:


Standard

Please Select

Standard

Enhanced

I have chosen to apply this level of CDD because:

 Submit

INTERIM RISK ASSESSMENT - AML RISK

In addition to those factors and question listed under the initial assessment section above. Have any of these factors or anything else changed or happened which may change the risk profile of the client or the matter?

Yes or no - please select:

Yes

Please Select

Yes

No

Has your due diligence changed your assessment of risk level?

Yes or no - please select:

Yes

Please Select

Yes

No

If yes explain how you have addressed any concerns:

RISK LEVEL:


Medium

Please Select

Low

Medium


High

 Submit

FINAL RISK ASSESSMENT - AML RISK

Revisit the factors and questions listed under the initial and interim assessment sections above. Have any of these factors or anything else changed or happened which may change the risk profile of the client or the matter?

Yes or no - please select:

Yes 


Please Select

Yes

No

If yes explain how you have addressed any concerns:

RISK LEVEL:

Medium 

Please Select

Low

Medium

High

 Submit

FINAL AML Client & Matter

Risk Assessment

FINAL AML Client & Matter Risk Assessment

Client matter number	{ MERGEFIELD client_no }/{ MERGEFIELD matter_no }
Matter type	{ MERGEFIELD MATTER_MATTER_DESCRIPTION }

Client details	
Client name	{ IF {MERGEFIELD LINKNAME_SURNAME_1 } = "{ MERGEFIELD LINKNAME_SURNAME_2 }" "{ MERGEFIELD LINKNAME_TITLE_1 } { MERGEFIELD LINKNAME_INITIALS_1 } & { MERGEFIELD LINKNAME_TITLE_2 } { MERGEFIELD LINKNAME_INITIALS_2 } { MERGEFIELD LINKNAME_SURNAME_1 }" "{ IF { MERGEFIELD LINKNAME_SURNAME_2 } = "" "{ MERGEFIELD LINKNAME_TITLE_1 } { MERGEFIELD LINKNAME_INITIALS_1 } { MERGEFIELD LINKNAME_SURNAME_1 }" "{ MERGEFIELD LINKNAME_TITLE_1 } { MERGEFIELD LINKNAME_INITIALS_1 } { MERGEFIELD LINKNAME_SURNAME_1 } & { MERGEFIELD LINKNAME_TITLE_2 } { MERGEFIELD LINKNAME_INITIALS_2 } { MERGEFIELD LINKNAME_SURNAME_2 }" }
Client address	{ MERGEFIELD CALCULATION_ADDRESS }

6a. Final risk assessment	
Revisit the factors and questions listed under the initial and interim assessment sections above. Have any of these factors or anything else changed or happened which may change the risk profile of the client or the matter?	{ MERGEFIELD INTFINRISK_FACTORSCHANGE2 }

If yes , explain how you have addressed any concerns.
{ MERGEFIELD INTFINRISK_ADDRESSCON2 }

Risk level	{ MERGEFIELD INTFINRISK_MATTERRISK3 }
Signed	Dated

INITIAL AML Client & Matter

Risk Assessment

Client and Matter Risk Assessment

Client reference	{ MERGEFIELD client_no }
Matter reference	{ MERGEFIELD matter_no }

1. Client details	
Client name	{ IF {MERGEFIELD LINKNAME_SURNAME_1 } = "{ MERGEFIELD LINKNAME_SURNAME_2 }" "{ MERGEFIELD LINKNAME_TITLE_1}{ MERGEFIELD LINKNAME_INITIALS_1 } & { MERGEFIELD LINKNAME_TITLE_2 }{ MERGEFIELD LINKNAME_INITIALS_2 }{ MERGEFIELD LINKNAME_SURNAME_1}" "{ IF { MERGEFIELD LINKNAME_SURNAME_2 } = "" "{ MERGEFIELD LINKNAME_TITLE_1}{ MERGEFIELD LINKNAME_INITIALS_1}{ MERGEFIELD LINKNAME_SURNAME_1}" "{ MERGEFIELD LINKNAME_TITLE_1}{ MERGEFIELD LINKNAME_INITIALS_1}{ MERGEFIELD LINKNAME_SURNAME_1}&{ MERGEFIELD LINKNAME_TITLE_2}{ MERGEFIELD LINKNAME_INITIALS_2}{ MERGEFIELD LINKNAME_SURNAME_2}" }
Client address	{ MERGEFIELD CALCULATION_ADDRESS }
Client new or existing	{ MERGEFIELD "AMLCLI_DET1_NEWEXISTCLI" }
Date due diligence last updated <i>if applicable</i>	{ MERGEFIELD "AMLCLI_DET1_DUEDILUPDATE" }
Occupation/source of income	{ MERGEFIELD "AMLCLI_DET1_OCC_INCOME" }
What I.D. documents received, expiry dates, certified and verified by	{ MERGEFIELD "AMLCLI_DET1_IDINFO" }

For entities complete section 2e

Entity type	{ MERGEFIELD "AMLCLI_DET1_ENTITYTYPE" }
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2. Initial risk assessment	
2a. Client risk	
Is it unusual for this type of client to instruct us?	{ MERGEFIELD "AMLCLI_DET1_UNUSUALCLIENT" }
Do you have any concerns about the client? <i>e.g. capacity, undue influence, vulnerability</i>	{ MERGEFIELD "AMLCLI_DET1_CLIENTCONCERNS" }
If an third party is instructing, do we have evidence of their authority to act?	{ MERGEFIELD "AMLCLI_DET1_INTERMEDIARYEV" }
Do you have any concerns about this client, agent or third parties?	{ MERGEFIELD AMLCLI_DET2_AGENT_CONCERN }

Is the client a designated person / entity?	{ MERGEFIELD "AMLCLI_DET1_DESIGNATEDPERS" }
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Provide details of any concerns identified in this section
{ MERGEFIELD "AMLCLI_DET1_CLIRISKCONCERNS" }

2b. Jurisdiction risk	
Where is the client based?	{ MERGEFIELD "AMLCLI_DET1_CLICOUNTRY" }
Do you have any concerns about the client's location?	{ MERGEFIELD "AMLCLI_DET1_LOCATIONCONCERN" }
Does it make sense for the client to instruct us from this location?	{ MERGEFIELD "AMLCLI_DET1_LOCATIONSENSE" }
Are there overseas elements? If yes , provide details below <i>e.g. overseas beneficiary, contracts for overseas entities</i>	{ MERGEFIELD "AMLCLI_DET1_OVERSEASELEM" }

Provide details of any concerns identified in this section.
{ MERGEFIELD "AMLCLI_DET1_JURSDCTONCONCRN" }

2c. Delivery channel risk	
Will we meet the client in person?	{ MERGEFIELD "AMLCLI_DET1_CLIMEETPERSON" }
If no, how are we satisfied that the client is who they say they are?	
{ MERGEFIELD "AMLCLI_DET1_CLIENTISPERSON" }	

2d. Due diligence review	
What steps have you taken to verify the identity of the client, Giftor or intermediary?	
{ MERGEFIELD "AMLCLI_DET1_STEPSVERIFYCLI" }	
Is there any adverse media about the client or beneficial owners.	{ MERGEFIELD "AMLCLI_DET1_ADVERSEMEDIA" }

2e. For entities	
Provide details of beneficial owners, shareholders/controllers including percentages of shareholdings	
{ MERGEFIELD "AMLCLI_DET2_BENEFOWNERS" }	

Provide details of steps taken to identify and verify ultimate beneficial owners
{ MERGEFIELD AMLCLI_DET2_PROVE_BEN_OWN }

Have you identified any reportable discrepancies?	{ MERGEFIELD "AMLCLI_DET2_REPDISCREP" }
If applicable, have you checked the register of overseas entities?	{ MERGEFIELD "AMLCLI_DET2_CHKCOVERSEASREG" }

3. Matter risk	
Description of work	
{ MERGEFIELD "AMLMATRISK1_WORKDESCRIPTION" }	

Do we usually carry out this type of work?	{ MERGEFIELD "AMLMATRISK1_USUALTYPEWORK" }
Does the matter involve creating a complex structure?	{ MERGEFIELD "AMLMATRISK1_COMPLEXSTRUCURE" }
Does it involve a cash-intensive industry?	{ MERGEFIELD "AMLMATRISK1_CASHINTENSIVE" }
Does it involve a high-risk industry?	{ MERGEFIELD "AMLMATRISK1_HIGHRSKINDUSTRY" }
Does the matter involve risk of proliferation financing?	{ MERGEFIELD "AMLMATRISK1_PROLIFERATION" }
Are there any other AML or Counter Terrorist Financing risks?	{ MERGEFIELD "AMLMATRISK1_AMLTERRORRISKS" }
Have you checked and obtained evidence of the source of wealth and source of funds for this transaction?	{ MERGEFIELD "AMLMATRISK1_WEALTHEVIDENCE" }

If yes, provide a description of the sources, if no provide an explanation (***this question must be answered***)

{ MERGEFIELD "AMLMATRISK1_EVIDENCEWEALTH" }

Is the matter transactional?	{ MERGEFIELD "AMLMATRISK1_TRANSMATTER" }
If no , does the transaction arrange for the movement of funds or assets?	{ MERGEFIELD "AMLMATRISK1_MOVEFUNDS" }
Are we receiving funds from overseas?	{ MERGEFIELD "AMLMATRISK1_OVERSEASFUNDS" }
Are we receiving funds from third parties?	{ MERGEFIELD "AMLMATRISK1_INTERMEDFUND" }
Will this matter be funded by digital assets? <i>e.g. Crypto</i>	{ MERGEFIELD "AMLMATRISK1_DIGITAL_ASSETS" }
Is this transaction consistent with your understanding of the client's profile and financial position?	{ MERGEFIELD "AMLMATRISK1_OKTRANSCLI" }

Provide details of any issues identified in this section

{ MERGEFIELD "AMLMATRISK1_MATRISKISSUE" }

3a. Product/service risk

Based on the client's profile, does it make sense for the client to instruct us on this transaction?

{ MERGEFIELD "AMLMATRISK1_CLINORMALINST" }

If no, provide details

{ MERGEFIELD "AMLMATRISK1_NOTNORMALCLIINS" }

3b. Enhanced due diligence

If 'Yes' applies to any of the following, contact the nominated person before proceeding. Provide details of the additional measures you will take to mitigate the risk identified below

If the client is not an individual, is the structure complex or unusual?

{ MERGEFIELD "AMLMATRISK1_COMLEXCOMPSTRUC" }

Does the client own, manage or direct a business or

{ MERGEFIELD

activity that falls within a higher risk sector?	"AMLMATRISK2_HIGHRISKSECTOR" }
Does the matter involve a client, a beneficial owner or other party linked to the transaction, manage or direct a business or activity that is cash intensive?	{ MERGEFIELD "AMLMATRISK2_CASHBUS" }
Does the matter involve a client, a beneficial owner or any party established in a high-risk third country or high-risk or jurisdiction?	{ MERGEFIELD "AMLMATRISK2_HIGHRISKCOUNTRY" }
Is the client, a beneficial owner or any party linked to the transaction a politically exposed person (PEP), family member or a close associate of a PEP?	{ MERGEFIELD "AMLMATRISK2_PEPCLI" }
Do you have any concerns that the client, a beneficial owner or any parties linked to the transaction is subject to financial sanctions or has links to a country subject to sanctions?	{ MERGEFIELD "AMLMATRISK2_FINSANCTIONSC" }
Will this matter involve a country subject to sanctions?	{ MERGEFIELD "AMLMATRISK2_COUNTRYSANCTION" }
Is the transaction unusually complex or large?	{ MERGEFIELD "AMLMATRISK2_ODDTRANSLRG" }
Does this transaction form part of an unusual pattern of transactions?	{ MERGEFIELD "AMLMATRISK2_UNUSUALPATTERN" }
Does the transaction lack an apparent economic or legal purpose?	{ MERGEFIELD "AMLMATRISK2_ODDPURPOSE" }
Are there any other factors that could indicate a higher risk of money laundering or terrorist financing?	{ MERGEFIELD "AMLMATRISK2_OTHERFACTORS" }

If risks identified, date escalated to nominated person	{ MERGEFIELD AMLMATRISK2_ESCALATE_RISK }
---	--

Provide details of any issues identified and measures to be taken
{ MERGEFIELD "AMLMATRISK2_EDDMEASURES" }

3c. Risk level	
What level of risk is posed by the client?	{ MERGEFIELD "AMLMATRISK2_CLIENTRISK1" }

What level of risk is posed by the matter?	{ MERGEFIELD "AMLMATRISK2_MATTERRISK1" }
--	--

I have given these ratings because
{ MERGEFIELD "AMLMATRISK2_MATTERATE1" }

3d. For high-risk matters (leave blank for low and medium risk levels):	
Have you obtained evidence of source of wealth?	{ MERGEFIELD "AMLMATRISK2_MLROTOLD" }
Does the stated source of wealth/funds and the sum of money involved correspond with what you know about the client? <i>e.g. age and occupation</i>	{ MERGEFIELD "AMLMATRISK2_SUSPICIONS" }

Explain why you are proceeding with the matter

{ MERGEFIELD "AMLMATRISK2_EXPLAINPROCEED" }

4. Due diligence

What level of customer due diligence will you apply?

{ MERGEFIELD
"AMLMATRISK2_DUEDILTYPE" }

I have chosen to apply this level of CDD because

{ MERGEFIELD "AMLMATRISK2_CDDEXPLANATION" }

Signed

Dated

INTERIM AML Client & Matter

Risk Assessment

INTERIM AML Client & Matter Risk Assessment

Client reference	{ MERGEFIELD client_no }
Matter reference	{ MERGEFIELD matter_no }

Client details	
Client name	{ IF {MERGEFIELD LINKNAME_SURNAME_1 } = "{ MERGEFIELD LINKNAME_SURNAME_2 }" "{ MERGEFIELD LINKNAME_TITLE_1 } { MERGEFIELD LINKNAME_INITIALS_1 } & { MERGEFIELD LINKNAME_TITLE_2 } { MERGEFIELD LINKNAME_INITIALS_2 } { MERGEFIELD LINKNAME_SURNAME_1 }" "{ IF { MERGEFIELD LINKNAME_SURNAME_2 } = "" "{ MERGEFIELD LINKNAME_TITLE_1 } { MERGEFIELD LINKNAME_INITIALS_1 } { MERGEFIELD LINKNAME_SURNAME_1 }" "{ MERGEFIELD LINKNAME_TITLE_1 } { MERGEFIELD LINKNAME_INITIALS_1 } { MERGEFIELD LINKNAME_SURNAME_1 } & { MERGEFIELD LINKNAME_TITLE_2 } { MERGEFIELD LINKNAME_INITIALS_2 } { MERGEFIELD LINKNAME_SURNAME_2 }" }
Client address	{ MERGEFIELD CALCULATION_ADDRESS }

5. Interim Risk Assessment

In addition to those factors and question listed under the initial assessment section above. Have any of these factors or anything else changed or happened which may change the risk profile of the client or the matter?

Has your due diligence changed your assessment of risk level?	{ MERGEFIELD INTFINRISK_DDCHANGE }
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If **yes**, explain how you have addressed any concerns.

{ MERGEFIELD INTFINRISK_ADDRESSCON }

Risk level	{ MERGEFIELD INTFINRISK_MATTERRISK2 }
Signed	Dated