



Regulating  
Property  
And  
Probate  
Lawyers

## **GUIDANCE FOR CLC NEW PRACTICE APPLICANTS**

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## Section 1: Guidance Notes

### A BACKGROUND & CONTEXT

The CLC is the regulator of choice for businesses intending to offer conveyancing and probate activities. CLC practices may only deliver those legal services which the CLC has expressly licensed them to provide.

The Council for Licensed Conveyancers (CLC) regulates specialist Conveyancing and Probate Lawyers in England and Wales. The CLC was established by the Administration of Justice Act 1985 (the 1985 Act) which enabled the regulation of what is known as a Recognised Body (RB): a practice that must be wholly owned by the regulated lawyers (Authorised Person/s as they are now defined in the Legal Services Act 2007) who will operate and manage the business and deliver the regulated services direct to the public.

The CLC is also subject to the Legal Services Act 2007 which opened up the ownership of practices to non-lawyers (subject to certain checks and tests) and led to the creation of Alternative Business Structures (ABS). The CLC's regulated community is made up of RBs and ABSs and covers a broad range of practice sizes from sole practitioners (SPs) up to large practices with multi-million-pound turnovers.

The CLC's authority as a Professional Body AML Supervisor (PBS) has been ratified by His Majesty's Treasury in Schedule 1 of the Money Laundering Regulations (MLRs) which are the primary pieces of legislation in the United Kingdom in respect of AML.

CLC Practices operate within a range of business models (such as sole principals, partnerships, LLPs and limited companies). Some practices provide specialist services within a wider group structure, providing for example, a combination of legal, financial and/or professional services.

Our approach to regulation is designed to meet the needs of a diverse commercial market. This is why we encourage prospective practice applicants to start discussions about their current or intended business arrangements with us at an early stage. Our focus is on the ability of the owners and managers to provide compliant legal services and manage the risks associated to the legal services they provide.

Each CLC practice is assigned a Regulatory Supervision Manager (RSM) or Regulatory Supervision Officer (RSO). The RSO/RSM is the main point of contact for the practice whether that is to address questions around the code of conduct or to self-report issues. This point of contact encourages an open relationship between the CLC and the practices we regulate. Practices are encouraged to seek guidance and discuss compliance issues at an early stage, which prevents more serious problems

from manifesting at a later stage and provides an early insight into potential weaknesses in a practice's controls.

Our approach involves significant close monitoring of practices, and the CLC uses a number of supervisory and enforcement tools, both proactive and reactive. The CLC's approach commences from when a business first applies to the CLC for regulation, when a desk top inspection of the policies and procedures is conducted; and continues throughout the period of regulation, and beyond into de-regulation at the point of closure/wind-up. New practices will undergo a period of enhanced monitoring on being onboarded, that involves review of financial documentations and an initial meeting with the practice with the RSM/RSO.

The CLC also routinely publishes a range of guidance and resources on breach reporting and making suspicious activity reports (SARs) in its AML Toolkit. The CLC also reviews the quality of SARs during inspections and will be undertaking a thematic review

## B WHO CAN APPLY?

CLC practices operate within a range of legal structures, such as sole proprietors, partnerships, LLPs and Limited Companies.

Businesses must structure themselves to meet the structural licensing requirements of either:

- (i) A Recognised Body, or
- (ii) A Licensable Body (Alternative Business Structure 'ABS').

The CLC practice should be housed in a standalone legal entity and operate its own banking systems but be part of a group accounting function.

It should have its own Professional Indemnity Insurance, obtained under CLC minimum terms and conditions (MTCs).

Businesses with a group can utilise shared business service arrangements and outsourced backroom functions, such as cashing services; however, these are explained fully in the application and copies of any contractual agreements supplied.

### Regulatory Structures

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

[CLC Recognised Body Recognition Framework](#) sets out that a Recognised Body must be:-

a Company that must:

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

A Limited Liability Partnership (LLP) that must:

- a) be registered in England and Wales under the Limited Liability Partnerships Act 2000;
- b) have its registered office in England and Wales and at its place, or one of its places of business;
- c) have at least two LLP Members.

At least one manager must be a CLC lawyer. [Manager Definition](#)

2. **Licensable Bodies** are more commonly known as **Alternative Business Structures (ABS)**, and are business owned and managed by a combination of Authorised Persons, under the Legal Services Act 2007, and non-legally qualified individuals, or containing a material interest (beneficial owner) by another Company. [Beneficial Owner Definition](#)

[CLC ABS Licensing Framework](#) sets out what is meant by a Licensed Body (also called an Alternative Business Structure);

The licensable body (*Company or LLP*) 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.
- A Head of Finance and Administration (HoFA).

[Details of the threshold level of experience for HoLP/HoFA/MLRO appointees](#)

### 3. Post Qualifying Experience

Qualified lawyers considering opening a CLC practice should at a minimum be evidence to demonstrate:

- a. four years' or more post qualifying experience (first licence or entering the solicitors role) of holding substantive middle management, but ideally, senior management positions;
- b. in a business regulated by an approved regulator in England and Wales, to provide conveyancing and or probate services to the public;
- c. with professional accountability in areas such as, client care, compliance, complaints handling, and policy and procedure implementation; and
- d. direct supervisory experience for overseeing the legal work of others

To help you think about whether becoming CLC regulated is right for you and whether the business is sufficiently developed to apply, we have explained some of our key compliance principles under the xx simple headings below:

## C ABOUT THE BUSINESS

1. A CLC regulated business must:
  - a. have a registered office in England and Wales;
  - b. conveyancing and/or probate services provided within England and Wales;
  - c. have in place professional indemnity insurance (PII) to indemnify it for any civil liability incurred arising out of regulated services provided. Business must obtain Professional Indemnity Insurance from an Insurer that has signed up to the CLC's Participating Insurers Agreement and be valid each year from 01 July to 30 June. [Details of Insurers](#) and background documents can be found here.
  
2. A CLC regulated business must:
  - a. Employ an appropriately qualified and skilled individual, such as a CLC Licensed Conveyancer/Licensed Probate Practitioner, a Solicitor, or [CILEX Lawyer](#) (i.e. a Fellow with Authorised Practitioner Rights in Conveyancing or Probate), who is Authorised under the Legal Services Act 2007 to supervise the breath of the legal work as the principle lawyer in a Recognised Body, or to be appointed as the HoLP in an Licensable Body (ABS).
  - b. Licensable Bodies (ABS) are also required to employ an appropriately qualified and skilled individual to supervise the office and client account and be appointed as the HoFA.
  - c. Since January 2024, all CLC practices are also required to have CLC approved MLRO.

## D BOOMS/MANAGERS/KEY PERSONNEL

### 1. Beneficial Owners, Officers and Managers (BOOMs)

BOOMs are defined as individual or Body holding a direct or indirect material (financial, controlling or beneficial) interest in a CLC regulated business, its parent company, or the ultimate person with significant control (PCS). This may be an individual, a group holding company, or an investment body or fund. The CLC will refer to Companies House structures, in the UK and elsewhere to identify BOOMs and the ultimate PSC.

It is very important that the business can meet its regulatory responsibilities. Having an accurate picture of those who control the business is an important part of the CLC recognising any risks to this. Therefore, all Persons and businesses intending to hold a material interest must be declared to us as they are subject to our approval.

The CLC needs to be satisfied that the proposed owner arrangements do not demonstrate there is a significant risk of undue or improper influence risk. Insufficient information in relation to the above is a material omission and the CLC will treat the practice application as incomplete.

### 2. 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.*

### 3. Material interest of less than 10%

The CLC requires any BOOM

- with 5% or more material interest to be identified and to be subject to identity, AML and sanctions screening and for that information to be held on its records; and
- with 1% or more material interest to be identified and to be subject identification verification checks and for that information to be held on its records.
- Where a BOOM is a corporate body the suitability test will broadly reflect the approach taken in respect of Licensed Body applications.

## 4. No Overall Control

Where the shareholding of an entity indicates that no one owns or controls over 25% the CLC will consider whether it is appropriate that a senior manager (e.g., CEO, board member, controlling mind of the company, or fund manager) be considered as the 'nominated' beneficial owner.

## 5. Incorporated Limited Partnership (ILP)

At least one general partner must be identified as a nominated beneficial owner.

## 6. Managers

A 'Manager' is defined as an individual who has been appointed at a CLC regulated practice as one the below:

- a. when the body is a limited company, a shareholding or non-shareholding director, registered at Companies House; or
- b. when the body is a Limited Liability Partnership, an LLP member registered at Companies House; or
- 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
- d. Sole Proprietor, who is by default a Sole Practitioner under CLC rules; or
- e. Beneficial Owners/Investors, Private or Corporate Investors with a material interest.

## 7. Key Personnel

Key Personnel are defined as

- a. Managers as above)
- b. Head of Legal Practice (HoLP) is the person at a firm who has the oversight of all activity relating the provision and supervision of legal services, and must be an Authorised Person, under the Legal Services Act 2007.
- c. Head of Finance and Administration (HoFA) is the person at a firm who has the oversight of all activity relating the office and clients account, and CLC Accounts Code.
- d. The money laundering reporting officer (MLRO) is the person at a firm who has the oversight of all activity relating to anti-money laundering.

## 8. BOOMs, Managers and Key Personnel

BOOMs, managers key personnel are required to:

- a. Apply to be authorised by the CLC.
- b. Be subject to fit and proper suitability screening, including identity and PEP verification, financial, sanctions, FCA, regulatory checks.
- c. Complete Standard DBS criminality checks.
- d. Comply with the CLC's AML processes for establishing Source of Funds and Source of Wealth.
- e. Be published on the CLC's Public Register (Managers and Key Personnel)



E	FIT AND PROPER TESTS
<p>The CLC <a href="#">ABS Framework</a> requires the CLC to be satisfied that owners are fit to own. The CLC needs to be satisfied that the proposed owner arrangements do not demonstrate there is a significant risk of undue or improper influence risk.</p> <p>The CLC must be satisfied that each manager (Individual and/or the body with a restricted interest) is suitable (<a href="#">S72 and S90, Legal Services Act</a>) and the provisions of <a href="#">LSA Schedule 13, s6(1)</a> set out what the CLC must approve. In summary the CLC is seeking to satisfy itself of the following:</p> <ol style="list-style-type: none"> <li>a. the person's (or body) holding of that interest does not compromise the regulatory objectives,</li> <li>b. the person's (or body) holding of that interest does not compromise compliance with the duties imposed by section 176 by the licensed body or persons to whom sub-paragraph (2) applies, and</li> <li>c. the person (or body) is otherwise a fit and proper person to hold that interest.</li> </ol> <p>In making its determination the CLC will have particular regard to—</p> <ol style="list-style-type: none"> <li>a. the person's (or body) probity and financial position,</li> <li>b. whether the person (or body) is disqualified as mentioned in Section 100(1), or included in the list kept by the Board under paragraph 51,</li> <li>c. the person's (or body) associates, and) any other matter which may be specified in licensing rules.</li> </ol> <p>The CLC will raise an objection to any one of the individuals and/or bodies not unsuitable. <i>The CLC's object will set out its reasons in a warning notice</i> (applies to new applicants and notifications concerning existing incoming parties into CLC licensed bodies).</p> <p>In reference to the <a href="#">CLC's ABS Framework</a>, Warning notices can be served in the scenarios outlined at 8.17 (objecting to the material interest or issuing subject to conditions) or 13.2 (enforcement for non-compliance with regulatory arrangements).</p>	
F	SUITABILITY TESTS
<p><b>Persons and Bodies intending to hold a Material Interest</b></p> <p>The CLC must be satisfied that each manager (Individual and/or the body with a restricted interest) is suitable (<a href="#">S72 and S90, Legal Services Act</a>) and the provisions of <a href="#">LSA Schedule 13, s6(1)</a> set out what the CLC must approve. In summary the CLC is seeking to satisfy itself of the following:</p>	

- a. the person's (or body) holding of that interest does not compromise the regulatory objectives,
- b. the person's (or body) holding of that interest does not compromise compliance with the duties imposed by section 176 by the licensed body or persons to whom sub-paragraph (2) applies, and
- c. the person (or body) is otherwise a fit and proper person to hold that interest.

In making its determination the CLC will have particular regard to: -

- a. the person's (or body) probity and financial position,
- b. whether the person (or body) is disqualified as mentioned in section 100(1), or included in the list kept by the Board under paragraph 51,
- c. the person's (or body) associates, and) any other matter which may be specified in licensing rules.

The CLC will raise an objection to any one of the individuals and/or bodies not unsuitable. *The CLC's object will set out its reasons in a warning notice* (applies to new applicants and notifications concerning existing incoming parties into CLC licensed bodies).

In reference to the CLC [ABS Framework](#), Warning notices can be served in the scenarios outlined at 8.17 (objecting to the material interest or issuing subject to conditions) or 13.2 (enforcement for non-compliance with regulatory arrangements).

### G SOURCE OF FUNDS AND SOURCE OF WEALTH (SoF/SoW)

Beneficial owners must identify whether funds derived from a direct or indirect party, such as but not limited to:-

- a. A private individual's personal wealth (after tax funds).
- b. Cash reserves from another business.
- c. Credit (loan facilities) provided by another private individual or business.

Any funds provided by a direct or indirect party will bring that party in scope for identity and adverse information screening, sanctions checks, and SoF/SoW evidence). The party must define the terms and conditions of the funds being provided.

#### 1. Source of Funds

Source of Funds (SoF) refers to the origin of funds that an individual or business uses in a specific transaction or investment. The CLC is required to collect this information from BOOMs to ensure that the transactions aren't made for money laundering purposes, and that no Sanctions are

contravened. BOOMs must provide 6 months financial statements to evidence where the funds have been held.

## 2. Source of Wealth

Source of Wealth relates to the economic, business and/or commercial activities that generated, or significantly contributed to, the overall net worth/entire body of wealth to how the BOOM came to accumulate/ generate the funds in question – via pension withdrawal, sales of a house/shares/art/motor vehicles/inheritance.

Savings and Investment statements, loan and credit agreements should also be provided.

**Screenshots/Photos of bank account statements from a mobile or similar device, and modified documents are not acceptable. Copies of original documents must be provided.**

## 3. Private Equity

Fund managers (when not a shareholders of the Fund Holding Company) should be identified and will be asked to explain how they satisfy themselves that in the jurisdiction in which they are investing, that they have met their legal AML, SoF, Economic Crime, PEP, and sanctions obligations, and that no one investor is:

- a. subject to sanctions in the UK, Europe, the US or any other geographies, and
- b. no individual (or fund manager/GP or LP) has the power solely to manage the Fund.

Private Equity manager must also provide evidence of the terms of investment, and terms of no-performance.

## 4. Gifts

When the funds have been gifted, the 'Giftor' must be identified and will be required to satisfy the SoF/SoW evidence requirements. Depending on the circumstances, we may ask for more information, such evidence of salary or earnings. The Giftor must provide a Gifted Deposit Letter confirming that the funds are not repayable at any time and are a gift.

## 5. Sanctions

BOOMs, must be fully cognisant of the current scope and application of the relevant AML, Economic Crime and Sanctions regimes and understand their obligations to remain within compliance with those regimes throughout their investment and return cycles, mindful of the fact that scope and reach may change at any time; and

They should have systems, policies, and procedures in place, which are regularly reviewed and supported by a capable and well-resourced compliance team, able to deal with the escalation of target matches and breaches of sanctions, and AML obligations, in a timely fashion should they arise; and must provide routine training on AML, Economic Crime, and Sanctions to all staff.

BOOMs will be asked to demonstrate how they comply with the CLC's sanctions expectations in the application processes.

## H ABOUT THE LEGAL SERVICES

### 1. Defining the scope of the licence

Businesses must clearly define the legal services they intend for the CLC to regulate. This is quite straight forward for practices seeking to offer conveyancing services. Most often when considering granting a Probate licence the CLC considers the standard limit of the licence permission to include the below after death services (including all reserved and non-reserved work).

- a. Obtaining the Grant of Probate or a grant of letters of administration
- b. The administration of the Estate

Businesses have the option to expand the Probate licence permission to include bundles of non-reserved work that are often form part of the before death legal services, such as

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

### 2. Supervision Requirements

Reserved Legal Activities must be directly provided by Authorised Persons (with the appropriate practising rights) licensed by an Approved Regulator, such as the CLC or Solicitors Regulation Authority, or under by an exempt person under their supervision.

Any non-reserved legal activities must be provided or supervised by appropriately experienced and/or qualified persons.

In addition to the structural requirements of the Recognised Body Recognition and Licensable Bodies (ABS) Frameworks the CLC expects the ownership and governance structures of the

businesses it regulates to have sufficient Authorised Persons to supervise the full breath of legal service listed on the CLC Licence.

For example, a Recognised Body consisting of two partners/directors that intends to provide conveyancing and probate services, must be able to demonstrate a partner/director is appropriately skilled and qualified in each of the legal services permissions, i.e. conveyancing and probate.

This principle applies to Licensable Bodies (ABS) where the HoLP must demonstrate supervision credentials for the breath of legal services applied for.

## Section 2: Preparing to Apply and Collating Evidence

### A CLC PRACTICE APPLICATION SUPPORTING SYNOPSIS

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

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

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

#### Section 1: Business Viability and Sustainability

In this Section, the business will be required to provide a response to the following Licensing Outcomes:

##### 1. Financing and Ownership

Licensing Outcome: *The CLC can regulate this Business*

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

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

Licensing Outcome: *The plan for the business indicates that it will provide legal services which protect the interest of clients*

Licensing Outcome: *The business has clear lines of accountability (for managers)*

Licensing Outcome: *The business has suitable (trustworthy, qualified, skilled and experienced) managers*

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

Licensing Outcome: *The plan for the business indicates that it will provide legal services which protect the interest of clients*

Licensing Outcome: *The business has clear lines of accountability (for managers)*

## 5. The Trading Profile

Licensing Outcome: *The plan for the business indicates that it will provide legal services which protect the interest of clients*

## 6. Sources of Work and Referral Strategy

Licensing Outcome: *The plan for the business indicates that it will provide legal services which protect the interest of clients*

## 7. Client Profile

Licensing Outcome: *The business has in place compliant governance arrangements to protect the interest of the business AND the interest of clients*

## 8. Service Quality and Complaints Handling

Licensing Outcome: *The business has in place compliant governance arrangements to protect the interest of the business AND the interest of clients*

## 9. Claims and Claims Management

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

Licensing Outcome: *The business has in place compliant governance arrangements to protect the interest of the business AND the interest of clients*

Licensing Outcome: *The business has clear lines of accountability (for managers)*

Licensing Outcome: *The business has suitable (trustworthy, qualified, skilled and experienced) managers*

## 11. Staff Training and Ongoing Competence Strategy

Licensing Outcome: *The business has in place compliant governance arrangements to protect the interest of the business AND the interest of clients*

Licensing Outcome: *The business has suitable (trustworthy, qualified, skilled and experienced) managers*

*The business must establish and provided supplementary forms of evidence (if necessary) to show that its BOOMs, Managers and Key Personnel are fit to own and fit to manage.*

*ABS Framework 8.22 (a) (i) Unless there are exceptional circumstances the CLC will not be satisfied that the individual is a fit and proper person and will refuse the candidate if they have:*

- convictions for offences, or disqualifications involving dishonesty; or*
- deceived or sought to deceive others, e.g. academic authorities, employers or members of the public.*

## 12. Adverse Information

*Un-declared adverse information that later comes to light in the course of the CLC's screening process will be considered a material omission.*

### Section 2: Owners and Managers Overview

Reporting Beneficial Owners, Officers and Managers (BOOMs), CLC Managers, and Key Personnel (HoLP, HoFA and MLRO)

A reporting template is provided at Section 2: ANNEX 1 - A template must be completed for EACH BOOM, CLC Manager and Key Personnel.

## B POLICIES AND PROCEDURES

Businesses must provide copies of:

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

Part of the assessment is that businesses understand which types of policies are required.

For ease the CLC provides a template for AML Risk Assessments. Businesses can of course use their own preferred templates.

### Anti-Money Laundering (AML)

The CLC has developed an AML Policy Checklist which can be located in our AML Toolkit and is available for practices to use. This checklist is used when reviewing AML Policies as part of CLC inspections or dedicated AML reviews.

The AML Policy Checklist was published in February 2024 and can be found [here](#) under the Resources Section.

The CLC also published AML, CTF and Sanctions Policy and Procedure Guidance on 20 May 2024 which contains the latest AML Developments and a Policy/Procedure Template for practices to use. This can be found [here](#). The businesses AML Policy must detail the ID&V (KYC) and appropriate enhanced processes.

Due regard must be given to the CLC's [Code of Conduct](#), [Licensed Body Code](#) and [Recognised Body Code](#), and [Regulation and Enforcement Policy](#).

### Risk Agenda

The CLC provides a range of supportive material, such as our Annual Risk Agenda. Areas covered in the Risk Agenda for 2023 and 2024 included Anti-Money Laundering, Conflicts of Interest, Sanctions, the Accounts Code, Complaints Handling, and Breaches of Undertaking.

[2024 Risk Agenda](#)

## Useful Information

<https://www.clc-uk.org/lawyers/informed-choice/>

<https://www.clc-uk.org/lawyers/anti-money-laundering-toolkit/>

<https://www.clc-uk.org/cybercrime-fraud-toolkit/>

<https://www.clc-uk.org/the-customer-charter/>

<https://www.clc-uk.org/clc-customer-charter/>

## Business Continuity Planning (BCP)

CLC Regulated Businesses must have an up-to-date and functional Business Continuity Plan (BCP). A BCP should be explicit about the arrangements necessary to manage all aspects of any transaction in any event that triggers the following:

- 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 and foreclosure)
- e. Orderly Managed Closure (triggered by retirement, company wind up, planned closure)

Eventualities should include:

- a. Incapacity, dealing with family emergencies, bereavements, death of key personnel or owners.
- b. External events that could trigger a rapid wind-up which means the proper conclusion of legal services is not possible, for example failure to secure PII cover

The BCP must also provide details for:

- a. Cover arrangements, contact details, external notification requirements
- b. Banking mandates
- c. IT systems and website, administration contact details and legacy access
- d. Premises access and management
- e. Legacy file storage management
- f. PII details

Businesses should also plan for safe storage and access to system passwords, and system accesses, banking accesses, PII/Stakeholder contact details to cover the event of incapacity.



C	FINANCIAL AND TRANSACTIONAL FORECAST
<p><b>Forecasts</b></p> <p>Businesses must provide a financial and transactional forecast for the first 12 months of trading. This must be submitted in excel format using the specified tabs below.</p> <p>Each tab must include an explanation of any assumptions used for to make any average calculations and cover the below format.</p> <p><b>Tab 1:</b> Fee Structure (gross and broken down into transaction types)  <b>Tab 2:</b> 12 months Transaction Volumes by type, including referral and conversion rates  <b>Tab 2:</b> 12 months Income (Gross, including income lines)  <b>Tab 4:</b> The first 12-months Profit and Loss Forecast, including salaries (Gross and Net)</p>	

Section 3: The Application Process	
CLC NEW PRACTICE APPLICATION PROCESS	
<p>Most Applications will follow the steps below. The CLC will discuss these steps with businesses in our meeting prior to the application stage.</p>	
STEP 1	AN EXPRESSION OF INTEREST
<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 cover if there is a predecessor or parent business, or any third-party investors/beneficial owners.</p>	
STEP 2	MEET WITH THE CLC LICENSING TEAM
<p>Applicants are invited to attend a virtual Microsoft Teams Meeting with the CLC Licensing Team. It is important that BOOMs, Managers and Key Personnel attend this meeting because we will also use it to identify the appropriate authorisations and licences required for any key personnel.</p> <p>We will discuss the financial and regulatory viability and sustainability of the proposed business. In addition, we will explain the following documents and their importance in the application process together with what we expect from you.</p>	

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

Corporate or Personal. Including details of the repayment terms or any conditions that would apply because of financial non-performance. You must also explain any relationship the proposed CLC business may have with other existing businesses through common ownership or financing. We will be seeking to establish the appropriate AML checks and whether any due diligence is required on any related business or its owners/officers.

We may request to see copies of the following types of legal agreements:

- Corporate investment, loan, intercompany financing agreements
- Share Purchase/Share Holders agreements
- Exit/retirement packages
- Agree Payment Plans, such as those relating to HMRC arrangements.
- The contracts of employment for the key personnel
- Current employment contracts including restrictive covenants relating to key personnel, in particular the HoLP/HoFA.

*Please Note: This is an entirely confidential discussion but for the meeting to be useful you must come prepared to share information.*

### B. Practice Application Supporting Synopsis (Outlined in Section 4A):

Your replies should explain how the Practice's organisational structure and operating procedures will effectively identify and manage risk associated to the legal services provided, with reference to properly maintaining consumer protection and regulatory compliance. Typically, we would expect the HoLP/HoFA/MLRO and Registered Managers to contribute to the drafting this document.

### C. An Organisational Chart:

You will be asked to upload an organisational chart which should include, non-operational individuals with a material interest and specify individual roles, such as HoLP, HoFA, GDPO, MLRO, together with other key responsibilities such as, complaints handling or specific areas of practice. You must also specify which individuals are licensed or regulated professionals, including the name of the regulator and the individuals regulatory ID, for example SRA: 1234, ICAEW: 1234 and the date that their first licence was granted.

### D. Transaction and Financial Forecast (Outlined in Section 4C)

### E. Policies and Procedures (Outlined in Section 4B):

The CLC is only seeking to verify that your client facing policies and procedures are compliant. We do not need you to submit any employer related documentation. The application form will

ask for specific policies such as a Business Continuity Plan, AML policy and a separate completed practice wide AML risk assessment.

Applicants that are not able to provide sufficient detail in the above documents, when explaining 'how to implement appropriate systems, controls and management processes to ensure the business can operate in a complaint way' risk being rejected on the basis that there is insufficient evidence.

### STEP 3 | PROFESSIONAL INDEMNITY INSURANCE

Before requesting for a new CLC Practice Application Form the business must obtain a quotation for Professional Indemnity Insurance (PII) Cover from an Insurer which is a signatory to the CLC Participating Insurance Agreement. The CLC encourages firms to seek quotes from more than one insurer.

All practices regulated by the CLC must, as a condition of being licensed, have in place professional indemnity insurance (PII) to indemnify them for any civil liability incurred arising out of regulated services provided. The CLC runs a Participating Insurers Agreement and CLC regulated practices can seek cover from any insurer that is part of this scheme. This arrangement was put in place in June 2016. Among other things, it sets out a minimum level of cover of £2 million for each and every claim. It also ensures six years run-off cover at no additional cost when a practice closes with cover of £2 million in aggregate.

The minimum terms and conditions were revised in 2022 following extensive consultation. The current minimum Terms and Conditions, Participating Insurers Agreement, CLC Framework, Code and Guidance are linked below.

#### Background Documents

Below you can read and download the relevant policies and documents. These were amended in June 2022 following extended consultation.

- a. [CLC Professional Indemnity Insurance Minimum Terms and Conditions](#)
- b. [Participating Insurers Agreement](#)
- c. [CLC Professional Indemnity Insurance Framework](#)
- d. [CLC Professional Indemnity Insurance Code and Guidance](#)

## Contact Details of Brokers and Insurers

Below is a list of brokers and approved insurers. Further details about each scheme can be found by clicking on the links below.

- a. [Howden CLC Scheme](#)
- b. [Marsh JLT CLC Scheme](#)
- c. [Miller CLC Scheme](#)
- d. [HERA CLC Scheme](#)

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

<b>STEP 4</b>	<b>COMPLETE AND SUBMIT ALL APPLICATION FORMS</b>
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All Applications are made through the online platform, DocuSign.

All related applications must be submitted simultaneously, attaching all relevant supporting information.

DocuSign will email applicants from [dse@eumail.docusign.net](mailto:dse@eumail.docusign.net) with a unique link to access the digital application form and instructions on how to complete this.

After 28 days of the application form being sent should this not be submitted the link will expire. If the CLC has not received all associated applications within 28 days, it will treat the substantive practice application as withdrawn.

*Please Note: Non-responsive applicants delay, and ultimately derail the practice application process. Please ensure all associated applicants are on notice to make their applications within 28 days of receiving the unique link from DocuSign.*

<b>STEP 5</b>	<b>COMPLETENESS REVIEW</b>
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A preliminary completeness review is carried out on all individual applications prior to the preliminary completeness review on the practice application.

At this stage in the process, we are looking to identify BOOMs, Managers, HoLP, HoFA, MLRO or CLC Licence Applications that cannot be accepted due to not meeting the standard eligibility criteria, or for having a material omission.

If none are found, the practice preliminary completeness review will be carried out.

The CLC Licensing Team will provide the findings of the review to the practice application contact.

***Please Note: Non-responsive applicants delay, and ultimately derail the practice application process. Please ensure all associated applicants are on notice to respond to emails and request for information within 14 days of receipt of any correspondence.***

<b>STEP 6</b>	<b>SCREENING</b>
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All licence applications are subject to Fit and Property Screening. This incurs a non-refundable screening fee. All associated fees will be charged in a single invoice addressed to the business, i.e. the practice applicant. For more information regarding fees please visit our website [here](#).

Giant Screening is the Third-Party Screening Agent used to carry out all our screening checks. Giant will contact applicants directly for DBS consent and ID&V documentation. Applicants are required to complete a facial recognition as part of the ID&V process.

***Please Note: Non-responsive applicants delay, and ultimately derail the practice application process. Please ensure all associated applicants are on notice to respond to Giant emails and information requests.***

<b>STEP 7</b>	<b>DETERMINING APPLICATION ACCEPTANCE</b>
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At this stage we are looking to identify any BOOM, Manager, HoLP, HoFA, MLRO or CLC Licence Applications that cannot be accepted due to the following reasons:

1. Not meeting the standard eligibility criteria
2. Not meeting the CLC Fit and Proper test
3. Adverse information which was not declared and was deemed a material omission

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 an overview of the type of factors considered when applying the fit and proper test). Licensed Individuals must be able and willing to act in a principled manner and deliver the CLC Code of Conduct's Outcomes by complying with 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; and

- Promote equality of access and service.

We will write to each applicant to advise them whether their application has been accepted.

When an application is accepted a non-refundable administration fee will be charged. All associated fees will be charged in a single invoice addressed to the business, i.e. the practice applicant.

Fees should be paid within 10 working days.

Invoices are payable by debit or credit card held in ANY name. For more information regarding fees please visit our website [here](#).

### STEP 8 | THE SUBSTANTIVE APPLICATION REVIEW

Practice Applications will be subjected to the following reviews:

1. Ownership, Governance and Key Personnel
2. Operating Policies and Procedures  
A desktop review by a CLC Inspector will be carried out.  
The Practice Application Contact will be provided with feedback from the review.
3. Financial Viability, Sustainability and Forecasts

The Application Assessment will focus on the below areas:

- a. Financial Information
- b. The Practice Application Supporting Synopsis
- c. Compliance of Policies and Procedures.
- d. Compliance and Regulatory Intelligence
- e. Fit and Proper Assessments
- f. Professional Status, Experience and Skills of Managers and Key Personnel

The CLC endeavours to process most individual applications within 42-days and non-complex Practice applications within 90-days. **Individual applications submitted as part of a practice application (to be licensed as a CLC Recognised Body or as an ABS) will be considered and processed within the practice application timescale.**

The CLC reserves the right to charge additional fees, up to 14 hours' charges at £80.00 per hour on applications containing adverse findings.

## STEP 9

## LICENSING DECISION

The CLC Licensing Team will advise the applicants of our decision by email.

Decision Outcomes include:

- (i) refusal to grant
- (ii) minded to refuse
- (iii) minded to approve
- (iv) approved, i.e. granted

For more information view the [CLC Lawyer Licensing Framework](#).

When approved we will set out the post approval steps necessary to realise the practical and legal arrangements necessary to issue the practice licence. This must be completed within three months of receiving our decision.

*Please Note: This is unless it has been agreed at the outset that a deferred licence issue is required. This may be the case to accommodate restrictive covenants.*

### Refusing an Application

When minded to refuse the granting of a licence, the CLC will notify the Applicant of the grounds of its concerns and invite the applicant to make representations to address the concerns or to resubmit improved documentation within one month of the date of the notification.

*Applicants may be required to take specific steps the CLC deems conducive to safeguarding the interests of consumers or other regulatory objectives. This may include completing specific educational requirements, or arranging for independent verification of their work, such as an external audit and file reviews. Requirement must be met at the applicant's own time and cost. Refusal to undertake any specified activity will lead to the CLC's refusal to grant the licence.*

When refusing to grant a licence, the CLC will notify the Applicant of the grounds on which the rejection was made and the Applicants right for the determination to be reviewed.

## STEP 10

## ANNUAL FEES

When a CLC licence is approved, i.e. granted, it will not be issued to the licensee until the Finance Team confirm to the Licensing Team receipt of payment for the appropriate Annual Regulatory Fees.

[Annual Regulatory Fees Table](#)

If you are applying to become a CLC Lawyer (Licensed Conveyancer, Licensed Probate Practitioner) or making any changes to an existing CLC licence, the new licence will be issued in your legal name as it appears in your Passport. This applies to any newly issued licences.

- a. Any request to defer the issue of an approved (new and reapplying) licence must be made when the licence application is submitted, as this will change the way we calculate the cost of the annual licence fee.
- b. The CLC calculates the annual licence fee from the 1st day of the calendar month in which an application is approved. This fee will be the pro-rata annual licence fee payment and will be automatically invoiced. Once invoiced, this fee is not changeable and is non-refundable.
- c. The annual licence fee must be paid by 31 October in the current licensing year.
- d. The licence will incept from the date that the licence is generated and issued.

<b>STEP 11</b>	<b>POST APPROVAL PROCESS</b>
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If approved, applicants will be required to complete the final steps before the licence can be generated and issued:

1. Ask the PII broker to confirm to the CLC in writing:
  - a. the annual turnover figure provided for the purpose of calculating the annual premium;
  - b. that the premium has been paid or that a third-party financier agreement is in place for the payment of the premium; and
  - c. obtain the certificate of insurance from the PII broker (expiry date of 30 June)

**Please Note: The PII must incept before the practice licence can be issued**
2. Pay the upfront portion of the Annual Regulatory Fee and contribution to the Compensation Fund together with any fees associated to individual licences.
3. Complete and return the Direct Debit Mandate for the remaining amount owed for the Annual Regulatory Fee.
4. Provide copies of all branding and marketing materials, including letter heads and email footers.
5. Complete and sign a **Cooperation Inspection Agreement** and any final declarations associated to the key personnel.
6. Sign up to and have approved the CLC's Secure Badge on the practice website. This must appear in a prominent place on the Practice's website. The CLC Licensing Team will upon request email instructions on the installation of the Secure Badge once a website has been created.



## Section 4: Additional Information

### A STATUTORY RIGHT TO APPEAL

Under Section 29(1)(a) of the Adjudication Act 1985 when the CLC refuses an application for a licence an individual may appeal that decision to the Adjudication Panel within one month of being notified of that refusal. That time runs from the date of receiving the CLC licensing refusal letter. The **respondent** must submit an appeal to the CLC within 28 days of being notified of the determination by email.

The **Adjudication Panel** (with a quorum of 3) will determine when it is appropriate to impose sanctions – such as disqualification of the Body or a **Manager**, licence revocation or 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 the **applicant** making the appeal will be provided with the decision of the **Adjudication Panel** within 42 days of receipt of the request for the appeal. The CLC reserves the right to extend this to 90 days where needed.

View the [Adjudication Panel Procedure Rules 2015](#) and the [Adjudication Panel Rules 2015](#). The Adjudication Panel decision is final. There is no further stage of appeal open to applicants.

### B 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.*

### C HOW TO SUBMIT AN APPEAL

Appellants should complete and submit a Notice of Appeal to [licensing@clc-uk.org](mailto:licensing@clc-uk.org). Please ensure that the Appellants Name and Licence Application Type is clearly stated in the subject heading of the email.

Download the [Notice of Appeal](#).

<b>D</b>	<b>REVOCATION OF LICENCES ISSUED BY FRAUD OR ERROR</b>
<p>Should the CLC consider that it has issued a Licence that was obtained by Fraud or Error Under <a href="#">Administration of Justice Act 1985 S28</a> and by <a href="#">APR 2015</a>, revocation of licences and recognitions obtained through fraud or error</p> <p>18.—(1) Where—</p> <ul style="list-style-type: none"> <li>(a) it is considered that a licence was issued to any person as a result of error or of fraud on his part, and</li> <li>(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.</li> </ul> <p>18 (2) Where—</p> <ul style="list-style-type: none"> <li>(a) it is considered that recognition was granted to any Recognised Body as a result of error or of fraud on its part, and</li> <li>(b) the CLC decide that there is any question of the <i>Adjudication Panel exercising their powers under paragraph 7(1) of Schedule 6 to the 1985 Act</i>, <b>the CLC must refer the matter to the Adjudication Panel.</b></li> </ul> <p>18 (3) A reference under this rule must—</p> <ul style="list-style-type: none"> <li>(a) be made in writing,</li> <li>(b) state that it is made under this rule, and</li> <li>(c) set out the allegation and a summary of the facts relied on to support it.</li> </ul> <p>18 (4) A copy of such a reference must be served on the respondent, together with a copy of these Rules.</p> <p>18 (5) On such a reference, the Adjudication Panel must hold a hearing to determine the allegation.</p> <p><i>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.</i></p>	
<b>E</b>	<b>OUR PUBLICATION POLICY</b>
<p>Read the <a href="#">CLC's Publication Policy</a></p>	
<b>F</b>	<b>YOUR PERSONAL DATA</b>
<p>Your details will be held by the CLC in accordance with the General Data Protection Regulations (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 the</p>	

security of your information, 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**

**We Work, 120 Moorgate, London EC2M 6UR, Main Line: 020 3859 0904**

[READ OUR PRIVACY POLICY](#)

### G YOUR RIGHT TO COMPLAIN

We work to high standards when it comes to processing your personal information.

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

If you remain dissatisfied, you can make a complaint about the way we process your personal information to the [Information Commissioner's Office](#).

## Annex 1 - Index of Documents

Documents you will be asked to provide when completing the New CLC Practice Application Form.

Section ID	Document Type	Source
1A1	Evidence of the Rent or Lease Agreement	
1C1	Policy Quote from a CLC Participating Insurer	
1C4	Explanation of any pending or ongoing Regulatory Investigations	
3A1-A9	Policies and Procedures (Copies of all Client Facing Policies and Procedures)	<a href="#">AML Risk Assessment Template</a>
4A1	Practice Application Supporting Synopsis	<a href="#">Template</a>
4B1	Evidence of Set-Up or Investment Funds	
4C1	Evidence of Cover Arrangements	
5A1	Financial and Transactional Forecast	
5A2	Source of Work	

## Annex 2 - Definitions

**1.1 'Reserved legal activities'** are as defined in s.12 and Schedule 2 of the Legal Services 2007 Act. Currently, there are six reserved legal activities: the exercise of a right of audience (advocacy), the conduct of litigation, reserved instrument activities, probate activities, notarial activities, and the administration of oaths. The CLC currently licenses and regulates Conveyancing Services which are included reserved instrument activities and probate activities and in the administration of oaths.

**1.2 An 'Approved Regulator'** is a body which is authorised to regulate providers of legal services and includes the Law Society, Bar Council, The Chartered Institute of Legal Executives, The Council for Licensed Conveyancers, The Chartered Institute of Patent Attorneys, The Institute of Trademark Attorneys, The Association of Law Costs Draftsman, The Master of Faculties, The Institute of Chartered Accountants in England and Wales.

**1.3 An 'authorised person'** is a person who has been authorised by an approved regulator to carry out reserved legal activities, for example: -

- a. Licensed Conveyancer
- b. Licensed Probate Practitioner
- c. Solicitor
- d. A Fellow of the Chartered Institute of Legal Executives with CILEx Practitioner rights

**1.4 A 'non-authorised person'** is a person who has not been authorised by an approved regulator to carry out reserved legal activities

**1.5 A 'beneficial owner'** is an individual or company which has all the benefits and entitlements of a legal owner, even if not named or registered as the legal owner.

**1.6 Person or Legal Practice holds a 'material interest'** in a Licensed Body if the person, legal Practice (or any of the person's associates or the person and any of the person's associates together):

- a. holds at least 10% or more shares in the body (or in a parent undertaking);
- b. is someone able to exercise significant influence over the management of the body (or a parent undertaking) due to their entitlement to exercise, or control the exercise of voting rights;
- c. is entitled to exercise, or control the exercise of, voting powers in the body (or a parent undertaking), which, if it consists of voting rights, constitutes at least 10% or more of the voting rights;
- d. is a partner having at least 10% interest in the capital or profits of the partnership; and includes any ultimate beneficial owner of more than 10%.

**1.7 Registered Manager**, is an individual notified to the CLC because they are

- (i) held out as a Partner (equity or salaried),
- (ii) an appointed Member, LLP
- (iii) an appointed Director (shareholding and non-shareholding), LTD, or
- (iv) nominated officer of a corporate investor; or
- (v) individual investor.

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

**1.8 An 'insolvency event'** is defined as:-

- a. resolution for a voluntary winding up of the body is passed without a solvency declaration (under s.89 of the Insolvency Act 1986);
- b. the body enters administration under the meaning of Schedule B1, para 1(2)(6) of that
- c. Act;
- d. an administrative receiver within s.251 of that Act is appointed;
- e. a meeting of creditors – which has the effect of converting a members' voluntary winding up into a creditor's voluntary winding up – is held in relation to the body under s.95 of that Act;
- f. an order winding up the body is made.

**1.9 An 'individual voluntary arrangement' (IVA)** is an agreement between a debtor and their creditors. The agreement sets out how creditors will be repaid and normally entails setting up monthly payments over a certain period of time, such as five or six years. Alternatively, if an asset such as property can be sold, the agreement may specify that a lump sum is raised and distributed to creditors of the debtor.

**1.10 'Lenders panel'** comprises of lawyers who have been approved by lenders to carry out legal work on their behalf in relation to property purchases and re-mortgages.

## Annex 3 – Useful Links

1. CLC Regulation  
<https://www.clc-uk.org/regulation/>
2. How to Apply  
<https://www.clc-uk.org/how-to-apply/>
3. Application Stages  
<https://www.clc-uk.org/application-stages/>
4. Forms and Guidance  
<https://www.clc-uk.org/regulation/forms-and-guidance/>
5. Professional Indemnity Insurance  
<https://www.clc-uk.org/regulation/professional-indemnity-insurance-1/>
6. Professional Indemnity Insurance Brokers  
<https://www.clc-uk.org/regulation/professional-indemnity-insurance-brokers/>
7. Annual Regulatory Fees  
<https://www.clc-uk.org/annual-regulatory-fees/>
8. Licensing Application Fees  
<https://www.clc-uk.org/regulation/application-fees/>
9. Anti-Money Laundering Toolkit  
<https://www.clc-uk.org/lawyers/anti-money-laundering-toolkit/>
10. AML Client and Matter Risk Assessments Template  
<https://www.clc-uk.org/aml-client-and-matter-risk-assessments/>
11. CLC Risk Agenda  
[https://www.clc-uk.org/risk\\_agenda/](https://www.clc-uk.org/risk_agenda/)
12. Practice Application Supporting Synopsis  
<https://www.clc-uk.org/practice-application-supporting-synopsis/>

END OF DOCUMENT