

GATEKEEPERS · LEGAL SECTOR

AML Readiness Assessment for Law Firms

Fifteen items to test whether anti-money laundering compliance is embedded in your firm's culture, or only in its paperwork. Built on the JFourth PULSE framework.

HOW TO SCORE

Score each item from **1** (not in place) to **5** (fully embedded and evidenced). Involve partners (or equivalent senior leaders), the compliance officer and operations staff, and score what you *can prove*, not what you intend.

P PURPOSE: The gatekeeper duty

STRATEGIC ITEMS

#	Assessment item	1	2	3	4	5
P1	AML is treated as a professional duty, not just a compliance cost.	☐	☐	☐	☐	☐
P2	Partners can articulate the social harms their vigilance prevents.	☐	☐	☐	☐	☐

OPERATIONAL ITEMS

#	Assessment item	1	2	3	4	5
P3	Staff can distinguish between legal professional privilege and financial facilitation.	☐	☐	☐	☐	☐

U UNIFIED STANDARDS: Consistency

STRATEGIC ITEMS

#	Assessment item	1	2	3	4	5
U1	Standards apply equally across all practice areas (for example, property transactions and litigation).	☐	☐	☐	☐	☐
U2	Senior partners are subject to the same client due diligence rigour as new clients.	☐	☐	☐	☐	☐

OPERATIONAL ITEMS

#	Assessment item	1	2	3	4	5
U3	Templates and risk-rating criteria are standardised firm-wide.	☐	☐	☐	☐	☐

L LEADERSHIP: Tone from the top

STRATEGIC ITEMS

#	Assessment item	1	2	3	4	5
L1	Managing partners visibly support declining or exiting high-risk instructions, even when the fees are significant.	☐	☐	☐	☐	☐
L2	The compliance officer (MLRO) has authority to block or escalate a matter, with direct access to firm leadership.	☐	☐	☐	☐	☐

OPERATIONAL ITEMS

#	Assessment item	1	2	3	4	5
L3	AML training is mandatory for every fee-earner and staff member, is tracked, and leadership takes part.	☐	☐	☐	☐	☐

S SCREENING: Robust verification

STRATEGIC ITEMS

#	Assessment item	1	2	3	4	5
S1	We use automated tools for real-time sanctions, PEP and proliferation-financing screening.	☐	☐	☐	☐	☐
S2	Source of wealth is corroborated by independent third-party documents.	☐	☐	☐	☐	☐

OPERATIONAL ITEMS

#	Assessment item	1	2	3	4	5
S3	Ongoing monitoring of high-risk clients occurs at least annually.	☐	☐	☐	☐	☐

E EVIDENCE: The audit trail

STRATEGIC ITEMS

#	Assessment item	1	2	3	4	5
E1	If audited tomorrow, we could prove why we accepted a high-risk client.	☐	☐	☐	☐	☐
E2	Decisions on suspicious transaction reports (both to file and not to file) are documented with rationale.	☐	☐	☐	☐	☐

OPERATIONAL ITEMS

#	Assessment item	1	2	3	4	5
E3	Client due diligence files are complete, searchable and restorable within 48 hours.	☐	☐	☐	☐	☐

Your readiness profile

Dimension	Max score	Your score	Priority level
P Purpose	15		H / M / L
U Unified standards	15		H / M / L
L Leadership	15		H / M / L
S Screening	15		H / M / L
E Evidence	15		H / M / L
Total	75		Rating: _____

INTERPRETING YOUR PROFILE

60–75 • Strong: culture-led compliance. Focus next on proliferation financing and AI-related risks.

45–59 • Developing: gaps in consistency. Priority: unified standards.

Below 45 • At risk: vulnerable to exploitation. Immediate external review recommended.

90-DAY PRIORITY ACTION PLAN

List every item you scored below 3. Assign each a partner lead and define the evidence that will show improvement.

Item	Partner lead	Target evidence of improvement	Due

Managing partner (or equivalent)
 Date

Compliance officer (MLRO)
 Date

ACTION OVER ASSUMPTION. Repeat this assessment annually and after any significant matter, staffing change or regulatory development.