

23 May 2023



The CIOT and ATT are pleased to provide an update on a number of issues of importance for AML Supervised firms

Have you submitted your 2023/24 AML Renewal form and payment – IF NOT ACT NOW!

The Anti-Money Laundering Supervision Scheme registration is open **until midnight 31 May 2023** for the 2023/24 AML Registration period (1 June 2023 to 31 May 2024).

In order to complete the renewal form and make the payment required please log on to the [Portal](#). Further guidance on the AML Renewal is available [here](#) for CIOT members and [here](#) for ATT members. If you have any queries in relation to AML please contact us by email: aml@tax.org.uk or aml@att.org.uk.

This is an important legislative requirement and members not renewing on time will be referred to the Taxation Disciplinary Board.

Non-compliance with AML Requirements

The most common areas where members indicate non-compliance with the requirements of the Money Laundering Regulations and associated legislation are:

- No written review of the AML/CTF risks to your business
- No written risk based policies and procedures
- Policies and procedures which do not recognise the need to check the financial sanctions lists
- No AML training undertaken

These are requirements placed on **all firms** including sole practitioners and those with very low fee income.

Our supervisors (the Office for Professional Body AML Supervision) expect the CIOT and ATT to take action against firms not complying with the requirements and to ensure that members are subject to “effective, proportionate and dissuasive disciplinary measures”. We will be following up with members who have indicated non compliance

on their 2023/24 renewal form but members should review their submissions and contact us for guidance where they are unclear on any of the requirements.

Proliferation Financing Risk Assessment

Since 1 September 2022 all regulated entities have been required to have a Proliferation Financing Risk Assessment.

For further details of relevant risks refer to

[The Financial Action Task Force guidance](#)

[The UK Proliferation Financing National Risk Assessment](#)

The only UN sanctioned countries at present are Iran and North Korea. The UK has also implemented an autonomous sanctions regime on chemical weapons and individuals and entities from Syria and Russia have been designated under this regime. On this basis we expect there to be limited risk exposure for firms supervised by the CIOT and ATT. Further guidance is expected to be included in the next update to AML Guidance for the Accountancy Sector but in the meantime wording for inclusion in a firm's written Practice Wide risk assessment is available on the CIOT website [here](#) and the ATT website [here](#).

Discrepancy Reporting

Supervised members are reminded of the requirements to report trust discrepancies to HMRC in relation to

- material discrepancies in the information included on the trust register; or
- where it is found that a trust is not registered with HMRC and members think it should be.

Further information is provided by HMRC [here](#).

Since 1 April 2023 there have been some changes in the requirements on reporting discrepancies to Companies House. Firms now have to report:

- a. 'Material' discrepancies in relation to persons of significant control and registrable beneficial owners of overseas entities; and
- b. The reporting requirements now apply throughout the business relationship not just when the client is being taken on.

Please see the [Companies House guidance](#) for further information.

Suspicious Activity Reporting (SAR) Portal

Over the coming months the UK Financial Intelligence Unit will be releasing the new SARs Portal for firms to submit their Suspicious Activity Reports. This will be a phased release, and firms will be invited to create an account in the new system. Once the new system is up and running all SARs should be submitted in the new SARs Portal. For further information in relation to this please see the following links:

- [New SARs portal FAQs](#)
- [New SAR Portal overview](#) (Guide A)
- [New SAR Portal: How to register](#) (Guide B)

For further information on SARs in general please see the following links:

- [Best practice guidance on submitting a SAR](#)
- [How to improve the quality of a SAR](#)
- [How to seek a 'defence' from the NCA](#)
- [SARs Annual Report 2022](#)

AML (and Professional Standards) Webinar

The CIOT and ATT recently provided a webinar covering AML hot topics (as well as other Professional Standards issues). A recording of the webinar is available on the CIOT website [here](#) and the ATT website [here](#).

Supervised members are reminded that they must keep a written log of AML training undertaken and watching webinars including AML material should be recorded on this log.

AMLCC

As a reminder CIOT and ATT have negotiated discounts with AMLCC in relation to their AML products. Further information is available on the CIOT website [here](#) and the ATT website [here](#).

The CIOT and ATT do not endorse particular products and details of other providers are available [here](#) for CIOT and [here](#) for ATT.

Contact us

If you have any queries relating to AML matters please contact the team by emailing aml@tax.org.uk or aml@att.org.uk