

APRIL 2026



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

#### **2026-27 AML Supervision Renewal – Opens 1 May 2026**

The 2026/27 AML supervision annual renewal will be open for members to submit their forms and pay fees from 1 May to 31 May 2026 as usual. The renewal invitation will be sent out via email to all current AML supervised firms with a link to the renewal section of the Portal account. Members can also directly login to their Portal account to renew from the 1st of May <https://pilot-portal.tax.org.uk/Secure-area/Members-Area/Compliance>.

We recommend that members make a diary note to remind themselves to renew before 31 May as non-receipt of a renewal reminder email is not a valid excuse for missing the deadline.

If you are late in renewing (which includes both submitting the form and paying the AML fee) this means you and your business are not meeting your legal obligations under The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (as amended) (MLRs) because you will not be AML supervised after 31 May unless you have renewed and paid.

If your AML supervised business has ceased to trade and you no longer require AML supervision, then email us at [aml@tax.org.uk](mailto:aml@tax.org.uk) by **25 April at the latest** so we can close your AML account. Otherwise, you will be included in the renewal process.

Further guidance on AML Renewal is available at <https://www.tax.org.uk/anti-money-laundering-supervision-renewal-guidance-for-members> for CIOT members, and at <https://www.att.org.uk/anti-money-laundering-supervision-renewal-guidance-members> for ATT members.

If you have any queries in relation to AML supervision or your renewal, please do not hesitate to contact us by email at [aml@tax.org.uk](mailto:aml@tax.org.uk).

**This is an important legislative requirement and members not submitting their renewal form and making payment on time will be subject to a fine, a potential referral to the [Taxation Disciplinary Board](#), and will still be required to complete their renewal.**

#### **AML Supervision Moving to The Financial Conduct Authority (FCA)**

Following the [consultation on reforming anti-money laundering and counter-terrorism financing supervision](#) in 2023, [HM Treasury responded](#) in October 2025 with the decision to move AML supervision from professional bodies and HMRC to the Financial Conduct Authority (FCA). The transition is likely to take a number of years and CIOT and ATT will continue to provide AML

supervision in the meantime.

We have a dedicated webpage on the changes which is updated regularly and can be found on the [CIOT website/ ATT website](#).

### **Improving the effectiveness of the Money Laundering Regulations**

In July 2025, HM Treasury [published their response to the consultation on Improving the effectiveness of the Money Laundering Regulations](#). The Treasury laid the Money Laundering Regulations [Statutory Instrument \(SI\)](#) in Parliament on 25 March 2026. The SI makes targeted changes to improve the effectiveness, proportionality and clarity of the UK's AML and CTF regime. Objectives of the instrument include:

- Supporting a more risk based and proportionate approach, in particular to Customer Due Diligence (CDD) and Enhanced Due Diligence (EDD), including by narrowing mandatory EDD for high-risk jurisdictions to the Financial Action Task Force (FATF) "Call for Action" list and clarifying the treatment of "unusually complex" transactions
- Closing specific regulatory gaps, including in relation to the sale of off-the-shelf firms by TCSPs and the registration of certain non-UK trusts holding UK land
- Reducing unnecessary burdens on low-risk trusts, with reforms to the Trust Registration Service (TRS) requirements to close identified gaps, including a de minimis exemption, while preserving transparency in higher risk cases
- Updating currency thresholds from euros to sterling

The SI requires approval in Parliament. We expect this to occur in Summer 2026.

### **Updates to the High Risk Third Country List**

The latest update to the FATF lists were published in February 2026. These include the addition of Papua New Guinea and Kuwait. The full lists can be found on the [FATF website](#).

### **National Crime Agency (NCA) Suspicious Activity Reporting SAR guidance**

Firms should be aware of their legal obligation to submit a Suspicious Activity Report where there is knowledge or suspicion of Money Laundering or Terrorist Financing. The NCA have published the following SARs Best Practice Guidance and SAR Guidance Videos:

#### **SARs Best Practice Guidance**

[Chapter 1: Using the SAR Portal](#)

[Chapter 2: Submitting a SAR](#)

[Chapter 3: Understanding DAMLs and DATFs](#)

#### **SAR Guidance Videos**

[What is a SAR and why do I need to submit one?](#)

[Know your glossary codes](#)

[Reason for suspicion](#)

[Best practice for completing the criminal or terrorist property section](#)

[Best practice for completing the prohibited act section](#)

[What happens after you submit a DAML or DATF?](#)

We recommend supervised members review the guidance documents and videos and ensure this is documented in their AML training log.

### **SARs In Action magazine**

The National Crime Agency (NCA) have issued their December 2025 and March 2026 editions of the SARs in Action magazine. These issues include information on crypto investment fraud, and SAR case studies. The issues are available on the NCA website through the following links:

[SARs in Action – December 2025](#)

[SARs in Action – March 2026](#)

## **SARs Reporter Booklet**

The latest SARs Reporter Booklets were issued by the UKFIU in November 2025 and March 2026. These issues include case studies of law enforcement agencies utilising SAR intelligence in investigations relating to fraud and money laundering. The issues are available on the NCA website through the following links:

[SARs Reporter Booklet November 2025](#)

[SARs Reporter Booklet March 2026](#)

## **SARs Annual Report**

The NCA have also issued their 2024-25 SARs Annual Report. The report provides insight into the work completed by the regulated sector and the UKFIU between April 2024 - March 2025 and can be found below:

[SARs Annual Report 2025](#)

## **Phishing email**

We have been made aware of phishing emails purporting to be from HMRC. The emails are being sent to supervised businesses asking them to update their Anti-Money Laundering supervision registration details.

We remind members to remain vigilant of phishing emails and to access HMRC online services by going directly to GOV.UK, rather than using links in emails or texts

You can report any suspected fraudulent emails claiming to be from HMRC to <https://www.gov.uk/government/organisations/hm-revenue-customs/contact/reporting-fraudulent-emails>

## **Contact Us**

If you have any queries relating to AML matters, please contact the team by emailing [aml@tax.org.uk](mailto:aml@tax.org.uk) or [aml@att.org.uk](mailto:aml@att.org.uk)

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