Anti-Money Laundering Supervision: your 2025/26 AML renewal

Briefings



24 April 2025

Handy tips and guidance for completing your submission.

Members currently AML supervised by CIOT and ATT will receive an email reminder to renew their supervision at the beginning of May when the 2025/26 renewal application process goes live. Here are our top tips to help you complete this year's renewal:

1. You can access your renewal either through the link in the email, or by logging into your member account at: tinyurl.com/yy7j459v

2. The form works best if accessed through the following browsers:

- Microsoft Edge v86 or higher
- Google Chrome v86 or higher

Members have reported problems when using Firefox and Internet Explorer so these browsers are best avoided.

3. Your AML renewal form and fee payment **must** be completed by midnight on **31 May 2025.** You will be directed to pay online immediately after you have submitted the form. **If your fee payment is outstanding after 31 May, you will have failed t`o renew your AML supervision on time** (see point 4 for consequences).

4. It is a **legal obligation** under The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017, as amended, to be supervised for AML. If you fail to renew on time, you will be fined or referred to the Taxation Disciplinary Board.

5. The cost of annual supervision for 2025/26 is £350. The AML supervision year covered is from 1 June 2025 to 31 May 2026.

6. Please ensure the name of your business is correct, particularly if you intend to register as an Authorised Corporate Service Provider (ACSP) at Companies House. If you need to change the name listed on your AML renewal form, please email us at aml@tax.org.uk. You can still submit your form as we will update the details directly on the register.

7. There is a new question (Q.49) included this year regarding cyber-attacks and data breaches. If your firm has experienced a cyber-attack or data breach in the last 12 months, please provide details of the attack and how it was addressed.

8. From our review of answers in the form, some members appear to be unclear on what Trust or Company Service Provider (TCSP) work constitutes. We recommend that you review the guidance (see links below) on TCSP work **before** you begin completing the form to be able to answer this question correctly.

See the sections on ‘HMRC TCSP register Q&A for businesses’ for CIOT members (tinyurl.com/v46x9tyk) or ATT members (tinyurl.com/3vw8zu58) for further information on these services.

9. At Q.35, you are asked: ‘Do your AML policies and procedures ensure you undertake all sanctions related checks necessary as part of your client due diligence procedures to ensure you are allowed to act for a client?’ This continues to be important given the ongoing Russian sanctions in place following Russia’s invasion

of Ukraine. Further information can be found on the CIOT website (tinyurl.com/bdcyr58y) and the ATT website (tinyurl.com/2nr26dkn)

10. For sole practitioners or sole traders, on questions that relate to ‘all staff and principals’, you should include yourself as a principal in your response (except for Q.39, which relates to communicating policies and procedures to staff where you can put ‘N/A’).

11. When putting the number of beneficial owners, officers and managers (BOOMs) on your form at Q.52, please remember to include yourself. See section 3.2.5 of AML Guidance for the Accountancy Sector (tinyurl.com/25pw6naw) to assess who is included as a BOOM.

12. Relating to Q.53, you do not need to repeat criminality checks for existing BOOMs but you do need to carry out criminality checks for any **new** BOOMs appointed on or after 1 June 2024 (if you have not done this already) and email the results to us separately at aml@tax.org.uk.

13. There is a function at the end for you to review your answers and if necessary, edit any errors before you submit the form. This is particularly helpful when completing the form on a mobile phone, as experience has shown that it is easy to hit the wrong button and give an erroneous non-compliant answer.