AML related member disciplinary action, including an update on the AML Supervision Renewal

Briefings



21 August 2025

It is a **legal requirement** for persons providing tax or accountancy services to be supervised for anti-money laundering (AML) and meet the requirements of the Money Laundering Regulations (see tinyurl.com/mtc4btbr). This applies equally for a full-time tax and accountancy services firm as for a member undertaking some minor part-time activity to support family or friends, regardless of the level of fee income.

Approximately 860 CIOT firms and 630 ATT firms are currently registered with CIOT or ATT for supervision and are required to renew their AML Supervision annually during the month of May.

No excuses: key AML renewal reminders

Thank you to the vast majority of members who complied with the requirement to renew by 31 May 2025. A small number did not, resulting in disciplinary action as summarised below.

We recommend that members diarise the AML renewal deadline, as non-receipt of the renewal email and related reminders is not a valid excuse for missing the 31 May renewal date each year. Members are also reminded of the importance of prompt AML registration and renewal; and of the need to ensure they meet the requirements of the Money Laundering Regulations.

We work closely with members to assist them into compliance where breaches of the requirements are identified but will consider disciplinary action for failure to comply. Other points to note include the following:

- Notification is required within 14 days of any changes to a business. Not responding to the renewal emails is **not** a notification of cessation.
- For any new business owners, officers and managers that join a firm during the year, we require a criminality check certificate which must be forwarded to us within 14 days of their appointment. **We often see firms forget to do this.**
- Care must be taken when completing the form to ensure it is accurate.

Disciplinary actions

Members late in completing their 2025/26 renewal either received a fixed fine of between £350 and £500 (dependant on their prior year compliance history) or were referred to the Taxation Disciplinary Board (TDB) for disciplinary action, or both. At the time of writing:

- 12 ATT and 22 CIOT members were fined;
- one ATT member was referred to TDB in respect of their late renewal; and
- two CIOT members were referred to TDB in respect of their late renewal and other non-compliance matters.

The disciplinary action detailed above, along with other actions we take throughout the year, are part of the ‘effective, proportionate and dissuasive disciplinary measures’ that CIOT and ATT undertake to enforce the Money Laundering Regulations requirements.

As a reminder, the TDB have updated their Indicative Sanctions guidance with increased fining powers for AML non-compliance. The increased disciplinary activity

and outcomes applied by the TDB reflect the serious nature of AML breaches. Examples of recent AML enforcement cases are available on the TDB website (see tinyurl.com/mu4z34hr).