

POLICY FOR LATE APPLICATIONS TO REGISTER FOR THE CIOT AND ATT ANTI MONEY LAUNDERING (AML) COMPLIANCE SCHEME

AML registration, monitoring and compliance scheme

The full details of the CIOT and ATT AML registration, monitoring and compliance scheme (the Scheme) can be found on the CIOT and ATT websites.

Registration

Regulation 3.1 of the Scheme rules states that

“Members who are sole proprietors and firms comprising members at least one of whom is an equity partner, member of an LLP or company director listed at Companies House, whose business includes the provision of tax advice to clients should apply for registration under the Scheme, using the form issued by the Institute/Association for this purpose.”

Late Registration

Late registration occurs when a sole practitioner or firm is registered after the date they started to trade or the date their registration with another supervisor ceased.

Members who are required to be supervised for AML need to ensure that all businesses offering tax services are supervised for AML purposes at all times.

Each registration which is 3 months late or more will be subject to a late registration fee which will be equal to the fees applying for all of the years when the member should have been registered for AML supervision but was not (subject to an overall cap of the current year's fee plus fees for the previous six Scheme years). **In addition from 1 June 2022** such a late registration will also be considered for referral to the [Taxation Disciplinary Board](#) (TDB) with automatic referral where the registration is more than a year late.

Late registration fees may be waived where there is a reasonable excuse for late registration, such as illness or bereavement.

The late registration fee will be issued by way of invoice and payment of this is required within 6 weeks of the date of issue.

If the fee has not been paid within 6 weeks of issue the non-payment of the late registration fee will be referred as a separate matter to the Taxation Disciplinary Board (TDB).

For further guidance on this policy refer to the associated guidance note on policy for late applications to register for the CIOT and ATT AML Compliance Scheme.

Last reviewed November 2021