

OCTOBER 2025



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

Updates to the CIOT and ATT AML Scheme Rules

The CIOT and ATT have recently adopted updated scheme rules. We are therefore notifying all supervised firms that the updated rules will apply from 1 November 2025.

Supervised firms need to be aware that under the updated scheme rules it is a requirement for firms to retain copies of all Suspicious Activity Reports (SARS) submitted to the National Crime Agency and the notes of matters considered for reporting even if no report has been made. These records must be held securely, and we will ask to view them during AML reviews.

The updated rules also clarify:

- a. the requirement to respond promptly to requests to arrange AML supervision reviews; and
- b. details of potential disciplinary action in relation to late registration for AML supervision.

Other amendments relate to minor changes of wording etc to ensure the rules remain fit for purpose. The website pages which include the updated documents are:

[CIOT AML Scheme Rules](#)
[ATT AML Scheme Rules](#)

Identity Verification and Authorised Corporate Service Providers

From 18th November 2025, all company directors and people with significant control (PSCs) will be legally required to verify their identity under the Economic Crime and Corporate Transparency Act.

Individuals can verify their identity directly with Companies House, through the [GOV.UK One Login](#). Alternatively, identity verification can take place through an Authorised Corporate Service Provider (ACSP). Firms and sole traders can apply to become an ACSP [here](#).

ACSPs must be registered for AML supervision and will need to provide their AML reference to Companies House. You can find your AML reference on the CIOT website [here](#) and ATT website [here](#).

When verifying their client's identity, ACSPs must meet the Companies House identification standard, if they do not meet this standard, Companies House can suspend or stop their business from acting as an authorised agent. Members should be aware that this standard is not the same as the risk based approach to Client Due Diligence (CDD) under the [Money Laundering, Terrorist Financing and Transfer of Funds \(Information on the Payer\) Regulations 2017](#) (MLRs), and Companies House have specific requirements to ensure you meet their identity verification standards. Further information on how to meet these standards, and the minimum checks required can be found [here](#).

Further details on ACSPs and how to register can be found on the gov.uk website [here](#).

Non-compliance with AML Requirements

We have identified some common areas of non-compliance during AML visits and from the AML registration and renewal forms. These are:

- A lack of a practice risk assessment or written risk assessment requires improvements
- A lack of written risk-based policies and procedures (P&Ps) or P&Ps require improvements
- A lack of written AML training. Logs should include :
 - the training that was given
 - the dates on which it was given
 - which individuals received the training
 - the results from any assessments
- Lack of evidence of ongoing monitoring of client information and risk assessments

We take this opportunity to remind members that these are mandatory requirements for **all** firms and sole practitioners, regardless of size or fee income.

We provide pro forma practice risk assessment and policies and procedures documents which are available on the CIOT website [here](#) and the ATT website [here](#).

Key AML Renewal Reminders

The majority of members complied with the requirement to renew their AML supervision by 31 May 2025. A small number did not, resulting in disciplinary action as summarised below.

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.
- 1 ATT member was referred to TDB in respect of their late renewal.
- 2 CIOT members were referred to TDB in respect of their late renewal and other non-compliance matters.

We recommend 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 the need to ensure they meet the requirements of the Money Laundering Regulations.

Members are reminded that:

- 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. The notification and provision of the criminality check must be forwarded to us within 14 days of their appointment.

Update to the National Risk Assessment on Money Laundering and Terrorist Financing and the CIOT and ATT Supervisory Risk Assessments

The Home Office and HM Treasury have updated the UK's National Risk Assessments on Money Laundering and Terrorist Financing (NRA). Firms and sole practitioners should review the updated NRA to ensure that the identified risks are considered in their practice wide risk assessment and risk assessments of individual clients.

The 2025 NRA and further information can be found on the [GOV.UK website](#).

The NRA continues to assess the money laundering risk for accountancy service providers (which includes tax advisers) as high. Accountancy services can be used to provide the appearance of legitimacy to transactions that feature criminal funds. Criminals will seek to take advantage of firms with poor AML compliance.

Following the update to the NRA the accountancy sector AML supervisors have updated their AML supervisory risk assessment. The CIOT and ATT were involved in the update to this, and they are now published on the [CIOT website](#) and the [ATT website](#) as our supervisory risk assessment for

members. Please also refer to this when updating your practice wide risk assessment and individual risk assessments.

We will shortly be updating the pro forma documents we provide to members to reflect these updated documents and will notify supervised firms further in due course.

Cybercrime and Resilience Webinar

CIOT and ATT were pleased to present a webinar on cybercrime and resilience. This webinar provided details on how small firms and sole practitioners can stay ahead of threats and covered the following topics:

- Understanding the Landscape
- Real-life Case Studies – Phishing, WhatsApp
- Biggest Threats for Small and Sole Practices – Fraud, Ransomware, Business email compromise, Social Media compromise, Supply chain vulnerabilities
- Building Resilience - Key Steps to Take to Future Proof and Take Away Actions

A recording of the webinar can be found [here](#).

Cyber attacks are a risk factor in relation to AML compliance. Firms should consider how they will protect their client due diligence and risk assessment records to ensure these are not lost in the event of an attack. The webinar provides lots of useful links giving further information on how to protect your firm.

UKFIU SARs Guidance Best Practice Videos

The UKFIU has released a series of SARs best practice videos which can be found on [YouTube](#). Firms and Sole practitioners should view the videos and record this on their AML training log.

SARs In Action Magazine

The National Crime Agency (NCA) has issued their June and August editions of the SARs in Action magazine. These issues include information on organised immigration crime, as well as SAR and DAML case studies. The issues are available on the NCA website through the following links:

[SARs in Action – June 2025](#)

[SARs in Action –August 2025](#)

SARs Reporter Booklets

The latest SARs Reporter Booklets were issued by the UKFIU in May and July. 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:

[May SARs Reporter Booklet](#)

[July SARs Reporter Booklet](#)

UKFIU Podcast

The UK Financial Intelligence Unit (UKFIU) has released their latest podcast episodes. These episodes discuss illicit finance in Organised Immigration Crime (OIC) and the role of international collaboration in combatting money laundering and terrorist financing. The episodes are available on Spotify and can be found through the following link:

[The UKFIU Podcast | Podcast on Spotify](#)

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