

Obligations as a Retired Member of the CIOT

You have told us that you are eligible for the retired rate subscription. We know that some of you continue to provide tax advice and services, sometimes on a pro bono basis and sometimes on a chargeable basis (within the constraints of the reduced rate subscription). To avoid any confusion we thought it would be useful to set out your key obligations as a retired member.

Compulsory Professional Development (CPD)

If you continue to provide and charge for tax advice or tax services or continue to use your designatory letters you will need to consider and undertake the CPD required in relation to your role.

If you are working in a voluntary capacity your work may still bring you within the CPD regulations as the voluntary work must be carried out with due regard to the technical and professional standards expected of a CIOT member. The [CPD regulations and guidance](#)¹ notes provide helpful further details.

Professional Indemnity Insurance (PII)

If you are working as a sole practitioner or as a principal in a firm (ie partner, director or member in an LLP) and are charging for your services you must have PII.

If you are providing your services in a personal capacity on a pro bono basis or receive an honorarium of not more than £1000 in total per year you are not required to have PII cover. Please note that you can still be sued even if you do not charge for your advice and we recommend that you consider carefully whether you should take out cover or not.

Please note that under the [CIOT PII rules](#)² you need to retain PII “run-off cover” for at least 6 years after you cease to be in practice. For more information please also note the PII Run Off Cover FAQ [here](#)³.

Anti-Money Laundering (AML)

If you are working as a sole practitioner or a principal in a firm (see PII above) and you charge for your services, you are required by law to be supervised for AML purposes. There is no de minimis limit.

If you do not charge for your services, you are not considered to be in business and therefore you are not within the regulated sector for AML purposes. As a result, you do not need to be supervised.

As long as you remain a member, the CIOT can continue to be your AML supervisor but if you cease to be a member completely and still continue to work you will need to register for AML supervision with HMRC (unless you are a member of another AML supervisory body).

For further guidance on AML supervision refer to the CIOT guidance [here](#)⁴.

¹ <https://assets-eu-01.kc-usercontent.com/220a4c02-94bf-019b-9bac-51cdc7bf0d99/790b8d10-71d1-4e54-a1f1-e9b511588066/171212%20CPD.pdf>

² <https://ciotmktgprodeun.azureedge.net/professional-indemnity-insurance-regulations>

³ [https://assets-eu-01.kc-usercontent.com/220a4c02-94bf-019b-9bac-51cdc7bf0d99/8a8bafec-c04c-472d-99c6-bbd9463adf62/PII%20Run%20Off%20Cover%20FAQ%20\(1\).pdf](https://assets-eu-01.kc-usercontent.com/220a4c02-94bf-019b-9bac-51cdc7bf0d99/8a8bafec-c04c-472d-99c6-bbd9463adf62/PII%20Run%20Off%20Cover%20FAQ%20(1).pdf)

⁴ <https://ciotmktgprodeun.azureedge.net/aml-guidance>