



YOUR ANTI-MONEY LAUNDERING TELEPHONE REVIEW

icaew.com/amlsupervision



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ICAEW is the anti-money laundering supervisor for around 11,000 firms. Our strategy is to provide robust anti-money laundering supervision through a risk-based regime, focussing our efforts on firms where the risk that they will be used to enable money laundering is highest.

Why your firm has been selected for a review

We review every ICAEW annual return (completed by every firm supervised by ICAEW on an annual basis) as well as other information we have in relation to each firm. We consider factors such as does the firm handle client money and the risk profile of the firm's client base. These factors help us determine the potential risk of a firm being used to facilitate money laundering. This risk score determines the frequency and intensity of our review of a firm's compliance with the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (amended) (MLR17).

An ICAEW Practice Assurance review still includes a review of AML procedures for all the firms that we supervise, however for some firms we have introduced an AML only review to ensure their procedures are reviewed in line with the level of risk accorded to the firm.

Preparing for the review

We will contact you to arrange a mutually convenient time for a reviewer to call you. Ahead of the review, please undertake the following.

1. Complete the information questionnaire (we will email this to you) and submit all the paperwork requested by the pre-agreed date. This will ensure there aren't any delays to the review process. If you have any questions, please telephone us +44 (0)1908 546 335.
2. **Think about questions you might like answered.** This is an opportunity for you to talk to an ICAEW quality assurance reviewer about the adequacy of your AML procedures, potential risks in your client base and AML legislative requirements. Prepare to ask questions as well as answer them.
3. **Review the closing record and paperwork from your last Practice Assurance review and/or your last AML review.** The reviewer will want to see evidence of improvements if any were required. If there were any matters that required action that relate to your AML procedures, consider:

- Have I done what I said what I would do in my responses?
- Have I fully addressed the issue that the reviewer raised in relation to my anti-money laundering procedures?

Where issues have not been fully addressed prepare to discuss these matters with the reviewer.

4. Review the ICAEW guidance on what we require of our firms and common findings on visits and consider the questions set out below.

- What is it that we find on our visits to other firms?
- Are there any weaknesses in your firm's AML processes?
- Can you start to address them or prepare to discuss them with a reviewer?

Practice Assurance monitoring –

[icaew.com/practiceassurancemonitoring](https://www.icaew.com/practiceassurancemonitoring)

What is required of an ICAEW AML supervised firm –

[icaew.com/AMLsupervisionrequirements](https://www.icaew.com/AMLsupervisionrequirements)

5. Read about a firm's experience of an [AML review](#)

The review

Before the call we review all the information that you have provided in the questionnaire, the documents you have submitted and any other documentation available, such as your website, details from previous monitoring reviews and a copy of your firm's last annual return.

In readiness for the review, please ensure the following.

- Have all the information you submitted as part of the review to hand.
- Make sure you are in a quiet location and have set aside time for the call, advising staff that there are to be no interruptions.
- Think about what you would like to discuss with the reviewer before the call.

The reviewer will talk through your AML policies and procedures with reference to the information you have submitted. They will discuss matters such as:

- A general overview of the firm, structure, staffing, services provided, client base, location.
- Your firm wide risk assessment, what money laundering risks have you identified within it; and are they consistent with the AML risks identified by ICAEW. We discuss mitigation of the risks identified.
- The adequacy of your firm's AML policies and procedures.
- How you monitor compliance with the MLR17 and results of any monitoring performed.
- For higher risk clients, we'll check if you recognise the risks and have performed appropriate due diligence to mitigate the risks.
- Your firm's Customer Due Diligence (CDD) procedures for both new and existing clients, with reference to any examples of CDD you have submitted.
- AML training for staff and MLROs including how well your staff are trained to recognise risks and report them to the MLRO.
- The number of suspicious activity reports (SARs) reported, the nature of SARs reported and your awareness of how to report a good quality SAR.

The closing record

We will record our findings in a closing record which we will discuss with you at the end of the call. The reviewer will discuss with you what changes your firm must make to comply with the MLR17 and areas where you could make improvements to your firm's AML policies and procedures. If you are unsure about anything that is discussed, please make sure you discuss this with the reviewer. Please don't leave the call feeling uncertain about our expectations. You need to be sure that you know what it is your firm needs to do to improve.

The reviewer will then send you a closing record. This summarises the review process, the conclusion on your firm's level of compliance and any areas where you must take action to comply, or where we feel we need further information to conclude on your level of compliance. We will ask you to respond within 15 days, in writing, to any matters requiring action. You will need to explain what action you plan to take and by what date.

After the review

When we receive your response, we complete our visit documentation which may include a quality control review.

If we have any questions or need additional information, we will contact you. We will only be able to close the review once we have received and reviewed your responses.

You will receive a letter from us to confirm that your review has been completed satisfactorily, or to request additional information we need before we can close the review.

In some circumstances, we may need to report matters to an ICAEW committee. If this happens, we'll keep you fully informed and we will send you a copy of our report for your comment before it is submitted to the relevant ICAEW committee.

COMMENTS

If you have any comments about the review, please write to:

Director, Quality Assurance
ICAEW
Metropolitan House
321 Avebury Boulevard
Milton Keynes
MK9 2FZ UK

If your comments are about the Director of Quality Assurance, please write to:

Chief Executive
ICAEW
Chartered Accountants' Hall
Moorgate Place
London
EC2R 6EA UK

HELP AND SUPPORT

There is a broad range of information and guidance available to your firm. Here's a quick guide on where to find some of our useful resources.

- Keep up to date with ICAEW regulatory and conduct news by subscribing to our monthly newsletter, Regulatory and Conduct News, follow us on LinkedIn and visit [icaew.com/regulatorynews](https://www.icaew.com/regulatorynews)
- Anti-money laundering resources – [icaew.com/moneylaundering](https://www.icaew.com/moneylaundering)
- Anti-money laundering supervision – [icaew.com/amlsupervision](https://www.icaew.com/amlsupervision)
- Anti-money laundering supervision report – [icaew.com/amlsupervisionreport](https://www.icaew.com/amlsupervisionreport)
- Practice Assurance standards and regulations – [icaew.com/practiceassurance](https://www.icaew.com/practiceassurance)
- Practice resources including thought leadership and professional guidance – [icaew.com/practiceresources](https://www.icaew.com/practiceresources)
- Technical, ethical and practical helpsheets – [icaew.com/helpsheets](https://www.icaew.com/helpsheets)
- Practice helpsheets – [icaew.com/practicehelpsheets](https://www.icaew.com/practicehelpsheets)
- Technical information – [icaew.com/technical](https://www.icaew.com/technical)
- Helplines and support – [icaew.com/helplines](https://www.icaew.com/helplines)
You can contact us for specialist help on a wide range of topics including ethical, technical and legislative. Our technical advisory team offer advice on all aspects of complying with the MLR17 and can answer questions on both:
 - general issues concerning the regulations and reporting suspected illegal activity; and
 - specific issues, which can be discussed anonymously.
- Courses to help you with your continuing professional development – [icaew.com/cpd](https://www.icaew.com/cpd)
- Communities – [icaew.com/communities](https://www.icaew.com/communities)
- ICAEW library service – [icaew.com/library](https://www.icaew.com/library)
- Annual return guidance – [icaew.com/annualreturn](https://www.icaew.com/annualreturn)
- Raise a money laundering concern – [icaew.com/amlconcerns](https://www.icaew.com/amlconcerns)
- Core accounting and tax service – [icaew.com/bloomsbury](https://www.icaew.com/bloomsbury)
- DPB resources – [icaew.com/dpb](https://www.icaew.com/dpb)

Chartered accountants are talented, ethical and committed professionals. ICAEW represents more than 195,300 members and students around the world.

Founded in 1880, ICAEW has a long history of serving the public interest and we continue to work with governments, regulators and business leaders globally. And, as a world-leading improvement regulator, we supervise and monitor around 12,000 firms, holding them, and all ICAEW members and students, to the highest standards of professional competency and conduct.

We promote inclusivity, diversity and fairness and we give talented professionals the skills and values they need to build resilient businesses, economies and societies, while ensuring our planet's resources are managed sustainably.

ICAEW is the first major professional body to be carbon neutral, demonstrating our commitment to tackle climate change and supporting UN Sustainable Development Goal 13.

ICAEW is a founding member of Chartered Accountants Worldwide (CAW), a global family that connects over 1.8m chartered accountants and students in more than 190 countries. Together, we support, develop and promote the role of chartered accountants as trusted business leaders, difference makers and advisers.

We believe that chartered accountancy can be a force for positive change. By sharing our insight, expertise and understanding we can help to create sustainable economies and a better future for all.

www.charteredaccountantsworldwide.com
www.globalaccountingalliance.com

ICAEW's regulatory and conduct roles

Our role as an improvement regulator is to strengthen trust in ICAEW Chartered Accountants and firms. We do this by enabling, evaluating and enforcing the highest standards in the profession.

ICAEW's regulatory and conduct roles are separated from ICAEW's other activities through internal governance so that we can monitor, support or take steps to ensure change if standards are not met. These roles are carried out by the Professional Standards Department (PSD) and overseen by the ICAEW Regulatory Board (IRB).

We:

- **authorise** ICAEW firms, members and affiliates to undertake work regulated by law: audit, local audit, investment business, insolvency and probate;
- **support** the highest professional standards in general accountancy practice through our Practice Assurance scheme;
- **provide** robust anti-money laundering supervision and monitoring;
- **monitor** ICAEW firms and insolvency practitioners to ensure they operate correctly and to the highest standards;
- **investigate** complaints and hold ICAEW firms and members to account where they fall short of standards;
- **respond** and comment on proposed changes to the law and regulation; and
- **educate** through guidance and advice to help stakeholders comply with laws, regulations and professional standards.

icaew.com/regulation

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