

Anti-Money Laundering / Counter Terrorist Financing (AML/CTF) Site Visits

What is the purpose of the site visit?

AML/CTF compliance site visits are carried out under the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017. The purpose of the Site Visit is for CIMA to gain a wider understanding of its Member in Practice population and ensure Members in Practice remain compliant under the Money Laundering Regulations 2017.

What criteria will CIMA use when selecting Members in Practice for site visits?

CIMA uses a risk-based approach for selecting which practices to visit. This is based on a risk-based approach from the AML/CTF annual returns.

When are the visits conducted?

The site visits are conducted annually. Members in Practice who are selected for a site visit will be notified by the Professional Standards team via email.

What are the benefits of a site visit to my practice?

As a Member in Practice you are required to ensure that you have relevant procedures, policies and controls in place. Regulations 18 and 19 are relevant requirements under Schedule 6 of The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 to ensure you have policies and procedures in place. If you are selected for a site visit, we will advise you on any improvements you should make to reduce the risk to yourself and remain compliant with legislation. We will help you understand your obligations to ensure you do what is necessary under the Regulations. Under Regulation 86 of 'The Money Laundering Regulations 2017', Failure to meet these requirements is a criminal offence, and contravenes [CIMA's Member in Practice Rule 8](#) which may lead to passing your details onto Professional Conduct. If you were unwittingly involved in money laundering, you would be required to prove that you had followed the necessary checks and had adequate internal processes in place.

Are the site visits mandatory or can I opt out from the site visit?

Site visits are a mandatory requirement. As a Member in Practice, under [Member in Practice Rule 8](#), you must comply under with any scheme operated by the Institute, which includes procedures for monitoring compliance with the provisions of these rules.



What can I expect during the site visit?

On the day there will be an initial meeting during which the consultant will request a list of the documents expected to be reviewed onsite (a full list will be provided as part of the pre-visit documentation). During the visit the consultant will need access to relevant documents. It is vital for the consultant to be given space to work and privacy to carry out his work for the visit to be successful. You will be free to deal with your own work whilst the consultant reviews your files and writes his report. There will be ample time for you to speak with the consultant.

What can I expect following the visit?

After the site visit, an AML compliant report will be produced and sent to CIMA and to the Member in Practice with an overview of the visit and any steps of improvements required. Upon receipt of your AML compliance report, and where weaknesses in your AML processes have been found, Members in Practice will be required to provide to CIMA an update on **remedial actions within 28 days**.

Failure to meet this requirement may result in disciplinary action by Professional Conduct (i.e. the removal of your Practising Certificate and the right to operate as a CIMA Member in Practice).

What should I do if my client files are stored electronically?

Any client files that are stored electronically can be reviewed on the day. The consultant will request to have access to these so please ensure they are ready to be reviewed on the day.

Will there be further information provided prior to the visit?

Yes. All Members in Practice who are selected for a site visit will be provided with pre-visit documentation to help them prepare for the site visit.

Who will conduct the Site Visit?

The site visits are conducted by a third-party consultant. Whilst you may continue to carry out your normal duties during the site visit, we ask that you scheduled a whole day in your diary for the visit, unless instructed otherwise. Whilst CIMA will look to accommodate your busy schedule, we ask that co-operate with the Professional Standards team to ensure both you and the consultant agree on a date for the site visit to take place.



Can the Site Visit be cancelled?

Once a Member in Practice has confirmed the site visit date with the CIMA Staff Member, the scheduled visit **cannot** be cancelled.

I am only a small practice with a few clients, is it likely I would receive a visit?

We are aware that CIMA has registered practices of various sizes, many of which with very small client bases, few staff or no staff at all. However, as Members in Practice you fall under the definition of an 'external accountant', under the Money Laundering Regulations 2017, therefore, no matter how small your practice is you must still be compliant with the Regulations. We understand that it can be difficult for smaller practices to juggle complying with numerous regulatory requirements and find time to successfully run their business. That is why we are ensuring that we offer you support during the site visit to ensure you remain compliant.

How does CIMA ensure confidentiality of any personal data or information viewed during the site visit?

Confidentiality is a priority for CIMA and none of your client documents need to be removed from your premises. CIMA has a formal contract in place with the third-party provider to ensure the confidentiality of any information shared about the Members in Practice is done in a secure manner.

Who can I contact if I have any queries?

If you any queries regarding the site visits, please contact aml@aicpa-cima.com