

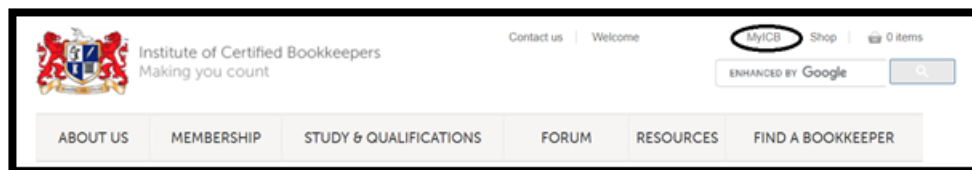
AML Online

All members in practice are required to record their clients on AML Online. AML Online will produce a risk rating for your client that should be used to determine whether Enhanced Due Diligence ought to be performed on that client. It will also help to draw a picture of the whole risk rating of your practice and feed into your whole of practice risk assessment.

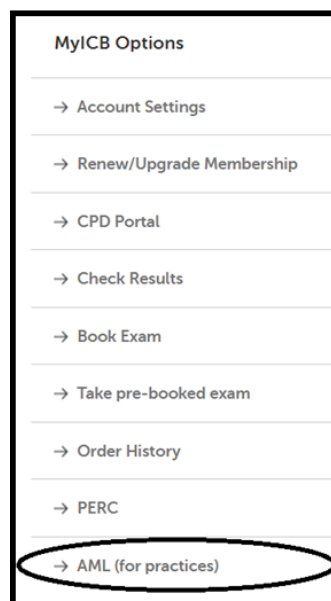
The following guide should be followed to add a new client to AML Online. It is a requirement of the MLRs that clients are reviewed regularly. ICB requires members to risk review their clients at least every 12 months to ensure compliance with the MLRs. However, if you are aware of any changes to your client, a risk review should be performed as soon as is possible but at least within 14 days of becoming aware of the change.

The questions you are asked within AML Online are the same regardless of the type of client or the nature of the work. You may find yourself less able to answer all questions for clients to whom you only deliver Payroll or Self Assessment Tax Returns, or subcontracted clients from another professional. Advice for these cases is included within this guidance.

To access AML Online visit <https://www.bookkeepers.org.uk/Resources/MLR/aml-online> or log in to MyICB:



Once logged in select AML (for practice) from the right hand menu:




You are then taken to your AML Online dashboard. You can see your practice details and once clients have been added these will be listed with their headline details including the date they were last checked (review date).

If you have stopped working with any clients and have ceased their record (instructions below) these can be seen by selecting to show previous clients in the drop down menu.

Click on *Add New Client Due Diligence and Perform Risk Assessment* and an online form is displayed.

AML Online



MLR for **Bookkeeping Practice Ltd**

Practice Details:
Name: **Bookkeeping Practice Ltd**
Type: Private Limited Company
Address: 122-126 Tooley Street
LONDON
Greater London
SE1 2TU

[Add New Client Due Diligence and Perform Risk Assessment](#)

Clients ▼

Name	Business type	Business activity	Date business became client	Risk	Reasoning	Services rendered to client	Last Checked
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Initially fill in the details of the clients. If the client is a corporation complete the Company Registration Number and click *Companies House Import*. Certain details of the business will pull through and populate the form for you.

AML Client Report

ICB AML: Client Record

The Client's Business

Name:

Business type: ▼

Company Registration Number:

Business activity:

Last accounts filed:

Next accounts due:

Next accounts due:

Date business became client:

Date business ceased being client:
(To be completed as soon as applicable)

Registered Address:

Trading Address: Same as registered address

VAT Number:

Select the services you have agreed with the client. It is important to note that any of these answers can be amended at any time when you change the services you provide or you learn more about the client's business.

There is duplication in the list, only one box for each service need be ticked.

Services rendered to client:

- Bookkeeping
- Bookkeeping Software
- Corporation Tax for Micro Businesses
- Corporation Tax for Micro Businesses
- Corporation Tax for Small Businesses
- Costing and Budgeting
- Final Year End Accounts
- Financial Statements for Micro Businesses
- Financial Statements for Micro Businesses
- Financial Statements for Small Businesses
- Financial Statements for Small Businesses
- Independent Examination
- Management Accounting
- Managing profitability and cash flow
- Payroll Management
- Self Assessment Tax
- Self Assessment Tax
- VAT Returns

Within the next sets of questions there are no right or wrong answers. It is imperative you answer truthfully to give a full understanding of the risk of the client. Please do not be tempted to amend any of the answers to engineer a lower risk rating. There is no shame with having high risk clients and it will not prompt an AML inspection









Client introduction	
How was client introduced to the practice	<input type="text" value="Please Select"/> <input type="button" value="v"/>
<hr/>	
Verification / Identity	
Have you met your main point of contact	<input type="text" value="Please Select"/> <input type="button" value="v"/>
Have you visited the principal business location	<input type="text" value="Please Select"/> <input type="button" value="v"/>
Have you verified your client identity and where appropriate proved corporate identity?	<input type="text" value="Please Select"/> <input type="button" value="v"/>
Are you aware of anything detrimental with regards to the reputation of either the business or any other individuals involved with it	<input type="text" value="Please Select"/> <input type="button" value="v"/>
Please list any relevant trade organisation to which the client belongs	<input type="text"/>









The client risk assessment questions are grouped according to the risk category. These risk categories are then mirrored in your whole of practice risk assessment.

Client Risks:

If the only service you offer to a client is Payroll or Self-Assessment Tax Returns, or you have taken on sub-contacting work through another regulated professional, it is unlikely you will know the answers to all of these questions. However, all questions must be answered to the best of your ability and knowledge. In cases where you do not have complete information within this section, please select the *not sure* option and enter a note to provide an explanation. Please make sure that your whole of practice risk assessment clearly indicates any client where this is the case and confirm that only Payroll, Self-Assessment Tax Returns, or sub-contacting work is undertaken for this client.

Client risks	
Details of main source of client funds	Please Select <input type="button" value="v"/>
Are you satisfied that business activity is consistent with this source?	Please Select <input type="button" value="v"/>
Is the client's business sector associated with any specific risks <i>Is the business sector predominantly cash based - for example taxi, market trader or household service provider such as plumber, where clients may be asked to pay in cash and thus income might not be recorded properly?</i>	Please Select <input type="button" value="v"/>
Does the client operate adequate internal controls for business (based on size and sector) <i>e.g: cash business using cash receipt book</i>	Please Select <input type="button" value="v"/>
Is the income strongly 'cash-based'	Please Select <input type="button" value="v"/>
Does the client's business, while not normally cash intensive appear to have substantial amounts of cash?	Please Select <input type="button" value="v"/>
Does the client appear to enter into transactions with limited or no commercial value or logic	Please Select <input type="button" value="v"/>
Is financial performance 'in-line' with expectations of this type of client	Please Select <input type="button" value="v"/>
Is financial performance 'in-line' with the level of activity undertaken	Please Select <input type="button" value="v"/>
Is the client solvent	Please Select <input type="button" value="v"/>
Is the business relationship with your client conducted in unusual circumstances?	Please Select <input type="button" value="v"/>

Does your client avoid face-to-face meetings or are they otherwise evasive or very difficult to reach?	Please Select 
Does your client request transactions be completed in unusually tight or accelerated timeframes without a reasonable explanation making it difficult or impossible for you to perform a proper risk assessment?	Please Select 
Do the owner and key members of the client's personnel appear to be:	
open and candid in dealing with you	Please Select 
aware and appropriately prudent in business dealings (are they business savvy?)	Please Select 
compliant in their approach to regulatory requirements	Please Select 
overtly extravagant in their lifestyles (e.g. cars, offices, entertainment)	Please Select 
To your knowledge, has the owner, any director or other key member of the client's business been convicted of any criminal offence other than minor driving offences?	Please Select 
Does the information obtained from discussions with client/management tally with that available from other sources? (e.g. the client's website or the company's annual return filed at Companies House)	Please Select 

Is the corporate structure of the customer unusual or excessively complex given the nature of the company's business?	Please Select 
Does your client appear to be acting on somebody else's instructions without disclosure?	Please Select 
Is the customer a legal person or legal arrangement that is a vehicle for holding personal assets?	Please Select 
Does your client deal in any type of "Crypto assets"? For more information please see ICB's guidance document here .	Please Select 
Is the client the subject of EU or UK financial sanctions?... To check please visit: Gov.uk consolidated list of financial sanctions For more information please see ICB's guidance document here .	Please Select 
Is the client a High Value Dealer? <i>Someone who makes or receives payment in cash for goods of at least 10,000 euros in total, whether the transaction is executed in a single operation or in several operations which appear to be linked</i>	Please Select 
Are there any other factors which might suggest that there is an increased risk in relation to the likelihood of money laundering/terrorist financing as outlined in the ICB document Recognising money laundering prompt sheet	Please Select 
Is the client a Politically Exposed Person (PEP), or are they a family member or known close associate of a PEP? For more information on PEPs please see ICB's guidance document here Politically Exposed Persons	Please Select 

Geographical risks:

These questions look at whether a client is based locally or has business links with countries that are known to be used by money launderers or terrorist financiers.

As with the client risks, if you are engaged to offer only Payroll, Self assessment tax returns or are taking on sub-contracting work, there may be some questions you are unable to answer. Please follow the same process.

Geographical risks	
Is the client based locally?	<input type="button" value="Please Select"/> <input type="button" value="v"/>
Is the client based, and does it operate, within your practice's usual client catchment area	<input type="button" value="Please Select"/> <input type="button" value="v"/>
Does the client provide services to customers based outside the UK in countries known as not having effective systems to counter money laundering/terrorist financing or identified by credible sources as having significant levels of corruption or other criminal activity?	<input type="button" value="Please Select"/> <input type="button" value="v"/>
Does your client conduct a business relationship with a person established in a High Risk Third Country? For more information please visit https://www.bookkeepers.org.uk/Resources/MLR/High-Risk-Third-Countries	<input type="button" value="Please Select"/> <input type="button" value="v"/>

Service Risks:

This section looks in part at Trust and Company Service Provider (TCSP) services. This is a high-risk area as it can provide anonymity to the owners of a company and the appearance legitimacy. If you are answering yes to these questions you may need to be added to the TCSP register if you are not already on it. Please email professionalstandards@bookkeepers.org.uk to be added or if you want to check your status.

Service risks	
Do you provide company formation services for your client?	<input type="button" value="Please Select"/> <input type="button" value="v"/>
Have you provided company formation services to your client in an overseas jurisdiction?	<input type="button" value="Please Select"/> <input type="button" value="v"/>
Do you act, or arrange for another person to act, as a director or secretary of a company for your client?	<input type="button" value="Please Select"/> <input type="button" value="v"/>
Do you act, or arrange for another person to act, as a partner (or in a similar position) for your client?	<input type="button" value="Please Select"/> <input type="button" value="v"/>
Do you provide a registered office, business address, correspondence address or administrative address for your client?	<input type="button" value="Please Select"/> <input type="button" value="v"/>
Do you act, or arrange for another person to act, as a trustee of an express trust or similar legal arrangement for your client?	<input type="button" value="Please Select"/> <input type="button" value="v"/>
Do you act, or arrange for another person to act, as a nominee shareholder for another person, unless the other person is a company listed on a regulated market which is subject to acceptable disclosure requirements.	<input type="button" value="Please Select"/> <input type="button" value="v"/>
Have you been asked to provide a service that you are not familiar with or is unusual for your practice?	<input type="button" value="Please Select"/> <input type="button" value="v"/>
Does your client offer to pay unusually high levels of fees for services that would not ordinarily warrant such a premium?	<input type="button" value="Please Select"/> <input type="button" value="v"/>
Have you been asked to provide a service that favours anonymity?	<input type="button" value="Please Select"/> <input type="button" value="v"/>

Transaction Risks:

These questions relate to transactions between your client and their customers.

Again, it may not be possible to know the answers to these questions if you are just offering Payroll, Self-Assessment Tax Returns or sub-contracting and the same approach should be taken as for the previous sections.

Transaction risks	
Are all transactions (including, where necessary, the source of funds) consistent with your knowledge of your client, and its business and risk profile;	Please Select <input type="button" value="v"/>
Are non-face-to-face business relationships or transactions made without certain safeguards such as electronic signatures?	Please Select <input type="button" value="v"/>
Are payments received from unknown or un-associated third parties?	Please Select <input type="button" value="v"/>
Are there transactions where you can't easily check where the funds originate from?	Please Select <input type="button" value="v"/>
Are any fees paid in cash?	Please Select <input type="button" value="v"/>

Delivery Channel Risks:

This question relates to how you interact with your client.

Delivery Channel risks	
Are any services/transactions made through intermediaries rather than the client directly?	Please Select <input type="button" value="v"/>

Operational risks	
Are all relevant HMRC registrations (e.g. PAYE, VAT) in place	Please Select <input type="button" value="v"/>
Are you aware of any current or proposed enquiries or investigations by any authorities, including HMRC	Please Select <input type="button" value="v"/>
Does financial activity appear to be 'in-line' with your expectations regarding identity and location	Please Select <input type="button" value="v"/>

Once all the above questions have been answered, a risk rating can be calculated. You are then required to choose your own risk. ICB is aware that you may hold further information regarding your client that is not addressed within the questions asked and you may therefore feel that the risk calculated by AML Online does not accurately reflect the risk posed by your client. In these cases, it is possible to either raise or lower the risk, but you must record your reasonings for the amendment.

Other matters

Are there any factors which might suggest that there is an increased risk in relation to the likelihood of money laundering / terrorist financing Please Select ▼

Your risk assessment

Client overall risk is: CALCULATE RECOMMENDED RISK

Your risk assessment: Calculate Recommended Risk first Please Select ▼

Client Due Diligence

Are you taking due diligence from another party regulated under MLR 2017, **and** do you have a document on their letterhead confirming that they agree that you can rely on their due diligence Please Select ▼

Type of identification checked as part of your own due diligence Certificate of Incorporation
 Companies House search

Please save this report first, then add details on ownership of shares, capital and voting rights as below.

Individuals owning 25% of the shares and / or capital and 25% of any voting rights

ADD NEW

You must then record what due diligence you have carried out and then record the details of the sole trader, partners or, if your client is a corporation, **ALL** the directors and any Persons with Significant Control.

You will need to save the report before you are able to add these details.

If you are taking due diligence from another party (third party CDD) you must get proof of that third party's agreement in writing.

Individual

Name:

Date of Birth:

Have you met this person
(and thus verified Due Diligence)

Is the Due Diligence Verified by other means
(by Bank/Solicitor etc)

Are you taking client due diligence from a third party
regulated under Part 1 Schedule 3 of MLR 2007,
and do you have a document on their letterhead confirming
that they agree that you can rely on their due diligence

Type of Identification Birth Certificate
*Copy must be kept on file. This can be digital but in the case of an
inspection must be printed* Driving Licence Photo
 Government Document
 Other
 Passport
 Utility Bill / Phone Bill / Bank Statement

If you are doing a review of an existing client and have checked all the details, you will be required to recalculate the risk even if no answers have been amended. This is because an element of the risk will naturally lower the longer the client has engaged you as their bookkeeper.

Click to save and close the report and the client will show on your dashboard with today's date showing as last date checked.

This will not count as a review unless you re calculate the risk