



# YOUR PRACTICE ASSURANCE TELEPHONE REVIEW

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



## YOUR PRACTICE ASSURANCE TELEPHONE REVIEW

If you have a small practice, we may carry out a Practice Assurance review of your firm by phone. The telephone review will reassure you that your firm is meeting the requirements of the principles-based Practice Assurance standards, other relevant regulations and the ICAEW Code of Ethics.

You will also have the opportunity to discuss any other matters regarding your firm with the experienced reviewer. If you hold a DPB (Investment Business) licence or a probate accreditation, we may carry out your monitoring review for this area during the same telephone review.

If you have any questions at any stage, please respond to any of our emails or contact us at [qadvisits@icaew.com](mailto:qadvisits@icaew.com) or telephone +44 (0)1908 546 335.

### Before the telephone review

We'll ask you to complete a questionnaire and then we'll agree a mutually convenient date for a reviewer to call you. Your answers will give us key up-to-date information about your firm which we'll discuss with you during the telephone review.

It will be useful for you to have the following documents and records available at the time of the telephone review in case you need to refer to them:

- your professional indemnity insurance (PII) policy and proposal form;
- CPD records for the last two years (current and previous year);
- fee protection insurance (if applicable) including:
  - the policy;
  - a copy of your firm's explanatory letter and any promotional material sent to clients; and
  - a copy of the invoice your firm sends to clients;
- client bank account statements, cashbooks and reconciliations for the last 12 months (if applicable);
- anti-money laundering procedures, including any checklists used;
- promotional or marketing material (eg, newsletters, budget circulars, website);
- a copy of your current client engagement letter templates (eg, for corporate work, for taxation work etc); and
- results of your most recent review of compliance with:
  - the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (amended) (MLR17);
  - Practice Assurance standards (if carried out); and
  - the Clients' Money Regulations (if applicable).

Not every document or record listed above will be applicable to your firm.

### The telephone review

Before the telephone review we'll review the information you've given on the questionnaire and any other documentation available, such as:

- your website;
- details from any previous monitoring review that you may have had; and
- a copy of your last annual return.

The telephone review will begin with a discussion to gain a general picture of your firm. If your telephone review also includes a monitoring review for DPB (Investment Business) and/or probate, we'll discuss how your firm is meeting the requirements of the *DPB (Investment Business) Handbook* in the conduct of exempt regulated activities or insurance distribution activities and/or the requirements of the Probate Regulations.

Our approach is open and friendly. We don't form judgements on your professional advice or examine your clients' affairs in depth. We concentrate on finding out how your firm is meeting the requirements of the relevant standards, regulations and the ICAEW Code of Ethics.

The standards can be applied in different ways and we will consider whether your approach is appropriate for the size and nature of the firm and the work undertaken.

### The closing record

We will discuss the findings with you and seek your initial thoughts on any actions you propose to address them. These findings will be recorded in a closing record which we will send to you by email after the telephone review. We will ask you to respond in writing to any matters requiring action within 15 business days. 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 the review documentation which may include a quality 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 an email 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 the report for your comment before it is submitted to the relevant ICAEW committee.

## COMMON PITFALLS

There are a lot of things to consider when running a practice and we've identified and collated the common areas that firms often get wrong in this section.

You can find further Practice Assurance resources at [icaew.com/practiceassuranceresources](https://www.icaew.com/practiceassuranceresources)

If you have questions on any of the issues before your telephone review, please call Advisory Services on +44 (0)1908 248 250.

If you are accredited for probate, you can find more information at [icaew.com/probatecommonpitfalls](https://www.icaew.com/probatecommonpitfalls)

For DPB (Investment Business) licensed firms, you can also refer to our '[Guide to Monitoring Reviews for DPB \(Investment Business\) licensed firms](#)'.

## ANNUAL RETURN

We ask all firms registered with us to complete an annual return. We use the information from these returns to monitor firms between reviews and to highlight any risks which may accelerate a Practice Assurance review. It is therefore important that you complete it accurately and submit it on time.

## CHANGES TO YOUR PRACTICE

Some firms change their structure by converting to a limited company, a limited liability partnership or by setting up new connected entities. You may also make changes to your principals and/or shareholders.

The regulations require you to tell us about any changes to your firm as they happen. Please don't rely on reporting them through your annual return. Firms working in the specialist areas of audit, ATOL reporting, DPB (Investment Business) and probate should complete the [Standing data change form](#). Firms that do not work in these areas should email [firms.admin@icaew.com](mailto:firms.admin@icaew.com) to tell us about changes.

Please also review the [Changes in the composition of a firm helpsheet](#) for details of issues to consider, as well as specific ICAEW requirements. Changes can cause eligibility issues for regulated firms. If you have made any changes that you haven't told us about you should contact us before the review to correct your records.

## ANTI-MONEY LAUNDERING

The MLR17 impose certain obligations on firms that provide accountancy services. Here are some common areas that firms have difficulties with.

### Roles and responsibilities

The MLR17 stipulate that a firm should appoint:

- A board member or member of senior management who must be responsible for the business' compliance with the UK anti-money laundering regime (money laundering compliance officer - MLCO).
- A money laundering nominated officer (MLNO). This individual should be responsible for receiving internal Suspicious Activity Reports (SARs) and making external SARs to the National Crime Agency (NCA).

Depending on the size, complexity and structure of a business, one person may carry out both of these roles (MLNO and MLCO) provided that person has sufficient seniority, authority, governance responsibility, time, capacity and resources to do both roles properly. This guidance primarily describes the situation in which one individual fulfils the combined role, referred to in this guidance as the money laundering reporting officer (MLRO).

### Firm-wide risk assessment

The risk-based approach underpins the MLR17. You should focus your resource on the services and clients that have the highest risk of money laundering. To determine how and where you should focus your resource you must perform a risk assessment at the firm level to understand the risk that your firm may be used to conceal or launder the proceeds of a crime.

A firm is required to perform, and document, an assessment of the money laundering risks faced by the firm as a whole, and not just of its clients. This should take into account factors such as its customer base, the countries and geographies in which the firm operates and its products and services. Please note that this is a mandatory requirement for all firms and is a separate document to a client risk assessment. We provide [guidance](#) on how to conduct a firm-wide risk assessment.

### AML risk assessment and customer due diligence (CDD)

The MLR17 require you to perform CDD when you establish a business relationship with a new client. CDD is the process of identifying who your client is, assessing the risk of that client being involved in money laundering, and then performing verification checks, to ensure the client is who they say they are.

#### New clients

You should have a policy that describes the extent of CDD required when you take on a new client. You will find more guidance in [Anti-money laundering guidance from the CCAB](#).

We find that some firms identify and verify the client using their standard procedures, but they don't perform a money laundering risk assessment. The risk assessment is fundamental to the process as this dictates the level of checks you should perform to assure yourself that you are not facilitating money laundering by accepting that client. The risk assessment will identify when you should perform enhanced due diligence on high risk clients, or where you can perform simplified due diligence on low risk clients.

You must be able to provide evidence to your AML supervisor to show that you have performed appropriate levels of CDD.

When you take on a limited company or LLP you must check that details of the Persons with Significant Control (PSC) have been filed with the registrar (ie, Companies House) and report any discrepancies you identify.

The MLR17 introduced some prescriptive CDD requirements so you should make sure you are familiar with these. You can read further information at [icaew.com/moneylaundering](http://icaew.com/moneylaundering)

#### Existing clients and ongoing due diligence

You must keep your due diligence up to date and think about the risk to existing clients on a regular basis. You need to document your review to be

able to demonstrate to us that what you've done is appropriate, even when there have been no changes since your last review.

Examples of triggers for when you should review the risk of a client are changes in:

- ownership;
- trade;
- related parties; and
- location.

For simplicity, some firms review a client's risk each year as they work on the client's affairs.

You can use [ICAEW's Anti-Money Laundering \(AML\) Service](#) to improve compliance in this area.

#### Training

The MLR17 places an obligation on you to ensure that your MLNO is adequately trained and that you provide your staff with sufficient training to keep them up to date with AML requirements. We find that a number of firms misunderstand the regulations. You need to keep a log of staff training. Getting staff to sign and date the log can help emphasise the importance of following their training at all times.

#### Written AML procedures

Each firm must have documented policies, controls and procedures to mitigate and effectively manage the risk of money laundering and terrorist financing you have identified in the firm's risk assessment. You can use the [ICAEW AML policies and procedures template](#) to help you.

These policies, controls and procedures should include:

- how you comply with the MLR17, including explaining the role of the MLNO and your staff's duty to report suspicions to that person;
- how and when you will conduct your firm-wide risk assessment;
- your procedures for identifying and verifying clients and your CDD measures and monitoring checks;
- your procedures for checking the PSC information and reporting discrepancies where appropriate;
- your training plan for staff so they're aware of their responsibilities;
- the requirement for staff and principals to record their MLR17 training; and
- a summary of the monitoring controls that are in place to make sure your policies and procedures are being carried out.

### Regular review of AML compliance

You should ensure that you carry out (and document) periodic reviews of the adequacy and effectiveness of your firm's AML policies, controls and procedures. Your firm's MLCO will be responsible for this. You should include file review checks to make sure your staff have followed your procedures for new clients and continuing clients. Where you identify any gaps or weaknesses, you should document how you intend to address them. We have an [AML compliance review checklist](#) on our website to help you with this.

### AML suspicious activity reports (SARs)

The NCA has guidance on what constitutes a good quality SAR. MLNOs should refer to the [NCA guidance on what constitutes a good quality SAR](#) before submitting a report. You should include the glossary codes in the 'Reason for suspicion/knowledge' text box whenever relevant. Use of the codes will help you to explain the general nature of your report and enable law enforcement agencies to use the report. You can find further guidance about the codes on the [National Crime Agency website](#).

You should retain copies of all internal SARs that your staff and principals make to the MLNO, including those that result in external reports to the NCA. The records kept should record the MLNO's assessment of the information and their conclusion on the need to make an external report.

### Money laundering supervision

Firms that provide accountancy services, trust and company services, or related services such as tax advice, probate, audit or insolvency, are required by the MLR17 to be supervised for compliance by HMRC or by one of the specified professional bodies (also known as AML supervisory authorities). ICAEW is a recognised AML supervisory body and can supervise member firms. Some firms and/or their connected entities structure themselves so that they do not qualify as a member firm under the Practice Assurance scheme. As a result of this, the firm is not covered by us for money laundering supervision.

If this is the case, you either need to apply for a Practice Assurance contract which will include money laundering supervision or register with another supervisor. Until you have signed a contract you are not covered for AML supervision.

You can find further information on our website at [icaew.com/applyforamlsupervision](https://www.icaew.com/applyforamlsupervision)

## CLIENTS' MONEY REGULATIONS

ICAEW's [Clients' Money Regulations](#) are prescriptive and detailed, with the obvious objective of protecting clients' money. Nevertheless, we find that a significant proportion of firms that hold clients' money do not comply with one or more of the regulations. Tax refunds received on behalf of clients are clients' money and need to be banked in a clients' money account.

If you hold clients' money, here are the areas that firms often have problems with.

### Clients' money bank account

If you hold clients' money, this must be paid into, and held in, a specially set up client bank account. You can find guidance on opening a client bank account in Regulation 9 of the [Clients' Money Regulations](#).

### Bank letter acknowledging trust status

When you set up a client bank account, you need to ask the bank to confirm some things in writing, including that it has no right of combination or set-off. You'll find suitable wording for the letter in Regulation 9(b) of the [Clients' Money Regulations](#). You should ensure that you have a bank letter for all your client accounts before the review.

### Five-weekly reconciliations

If you hold clients' money, you need to reconcile the client bank account at least every five weeks and ensure the reconciled balance agrees with the total balances on each client's ledger.

### Interest

If a client bank account earns interest, you must pass this on to the client. The [Clients' Money Regulations](#) do not include a de minimis limit, but a client bank account need only be interest bearing if material interest is likely to accrue (see Regulation 14 and explanatory note 5 of the [Clients' Money Regulations](#) for guidance on 'material'). The regulations do allow a client to agree in writing to an alternative treatment, for example, accounting for interest only over a certain amount. You could get their agreement to this in your engagement letter.

### Deduction of fees from money held in a client account

Fees can only be withdrawn if:

- the client has agreed to the precise amount of the fee (this should be in writing); or
- the fee is calculated in accordance with an agreed written formula; or
- 30 days has elapsed from the issue of a fee statement that has not been questioned.

### Designated accounts

If you hold or expect to hold for more than 30 days money for any one client in excess of £10,000, the money must be paid into a client bank account designated by the name of the client or by a number or letters allocated to that account.

### Alternate (sole practitioner/sole director of corporate practice)

Sole practitioners/sole directors need to arrange with someone to manage their clients' money account in the event of their death or incapacity. This person does not have to be a chartered accountant. You need to tell us about this arrangement in writing. You can do this by using [the standard form](#).

### Annual compliance review

You need to carry out and document an annual compliance review. [The Clients' Money Regulations compliance review helpsheet](#) contains a checklist you can use.

### Regulation 8a

Clients' Money Regulation 8A aims to ensure that firms only use client bank accounts for lawful and legitimate purposes, and for bona fide transactions. Payments into and out of the firm's client bank account must relate to an accountancy service that is being (or has been or will be) provided by the firm.

You should not use the client account for monies that do not belong to clients eg, staff charity donations.

## CODE OF ETHICS; REFERRAL FEES AND COMMISSIONS

### Consent for firm to retain referral fees or commissions

You need to obtain written informed consent from clients before you can retain any referral fees or commissions. These can come from many sources including referral fees from independent financial advisors (IFAs), commission for providing clients with software and fees from tax specialists.

For unregulated activities, you could obtain advanced informed consent by having an appropriate paragraph in your engagement letter that includes examples of likely commissions and amounts but you will still need to tell your client how much you've received unless this is clear from information in the engagement letter.

See sections 330.12 A1 to 330.14 A1 of the [ICAEW Code of Ethics](#) for more information on commissions and [Practice Helpsheets](#) for sample engagement letter wording.

## DPB (INVESTMENT BUSINESS) BOUNDARY ISSUES

### Unlicensed firm referring clients to IFAs

You need to be careful when referring clients to IFAs if your firm doesn't have a [DPB \(Investment Business\) licence](#). You need to consider the product for which you are making the referral. You need a DPB (Investment Business) licence before you can arrange an introduction for advice on contracts of insurance (including pensions). As an unlicensed firm, you can only arrange introductions for general financial advice or for advice where the product is not a contract of insurance.

If you don't want to obtain a DPB (Investment Business) licence, you can provide your client with the details of the IFA. After the client has established a relationship with the IFA, you can provide information to the IFA (but you cannot comment on the advice given unless you have a DPB (Investment Business) licence).

You can find guidance, including a helpsheet on introductions to financial advisers, at [icaew.com/dpb](https://www.icaew.com/dpb)

### Referrals to financial advisers

It's also important to review the requirements outlined in the ICAEW Code of Ethics, section R331.26 when considering making referrals to financial advisers.

Clients rely on you for objective advice so you should only refer to financial advisers who are able to give sufficiently objective advice. This means you need to know whether your chosen financial adviser is independent or restricted by the FCA. To make a referral to a restricted adviser you need to ensure that your client's needs will be addressed appropriately by making an assessment of whether the restricted adviser places business with product providers who account for a large majority of the relevant market, or offer the sector of the market which is most suitable for your client's needs. If you are not confident that you have the knowledge to make this assessment, you should only refer to IFAs.

If you are not sure if the financial adviser you are referring clients to is independent, you should find out before the start of your review.

## TERMS OF ENGAGEMENT

### Notifying clients in writing of the basis of fees and complaints procedure

Although you don't have to issue engagement letters to clients, we strongly advise that you do. Agreeing an engagement letter with a client helps to avoid misunderstandings over the scope of the work required. It can also provide you with protection if there's a dispute. There are two matters that you must tell all clients about in writing.

- the basis for calculating your fees; and
- your complaints procedure, including their right to complain to ICAEW.

You should provide details of your complaints procedure to new clients before you start working for them. You can find more information about this and a sample 'Confirmation of principal terms of business' template in the [What if you have not issued an engagement letter helpsheet](#).

If you don't want to issue an engagement letter, you can communicate details of the basis for calculating fees and your complaints procedure in any of the following ways.

- a standard terms of business letter;
- a brochure given to the client; or
- a paragraph in the body of initial correspondence.

Suggested wording for the complaints procedure is included in the [Duty on firms to investigate complaints](#) and in the [engagement letter template](#).

If you have told us in the past that you will issue engagement letters to all clients but haven't done so you should make sure you have sent terms of business including the basis of fees and your complaints procedure to all clients before the start of the review.

## ELIGIBILITY

### Use of the term 'chartered accountants'

Due to the way some firms structure themselves, they are not automatically eligible to use the term 'chartered accountants'. If this is the case with your firm, you can find a form to apply for a dispensation to use the term chartered accountants by clicking on the 'Use this form' link at the foot of the [Use of description 'chartered accountants' helpsheet](#).

Until ICAEW has granted a dispensation, the description 'chartered accountants' cannot be used.

## DATA PROTECTION

Every organisation that processes personal information must notify the Information Commissioner's Office (ICO), unless they're exempt. Failure to notify is a criminal offence. The Information Commissioner's view, which we share, is that most firms of accountants need to be registered.

You can find guidance on the Information Commissioner's website [ico.org.uk](http://ico.org.uk). You can also contact the Information Commissioner's helpline on +44 (0)303 123 1113.

### General Data Protection Regulation (GDPR)

Firms that process personal data need to comply with GDPR. You should consider the procedures you have in place to keep data secure and prevent breaches. The [ICO website](#) contains regular updates about GDPR. ICAEW also updates its own [GDPR webpage](#) on a regular basis. You may find clients ask you to include additional clauses in your terms of business that can increase your liability if any breach occurs. If a client does request this, you should seek legal advice and check with your PII provider about the implications of such terms.

### Storing data outside the EEA

If you store data on servers that are located outside of the EEA, you need to comply with the data protection regulations that cover the specific requirements for data security and standard contractual clauses. Further information is available on the Information Commissioner's website to enable you to confirm that your agreements meet these requirements.

## PROFESSIONAL INDEMNITY INSURANCE (PII)

### Level of cover

You need to make sure your firm's PII meets ICAEW's minimum requirements. The cover should be at least two and a half times your gross fee income for the accounting year preceding the start of the policy (subject to a minimum requirement of £100,000 and a maximum of £1.5m). The policy needs to be with a participating insurer who has agreed to meet the requirements of ICAEW's minimum policy wording. You can view a current list of approved insurers at [icaew.com/pii](https://www.icaew.com/pii)

You can include in this figure an excess of up to £30,000 per principal. For example, if a firm only needs the minimum limit of indemnity of £100,000, it can have an insurance policy which has an excess of £30,000 and £70,000 sum insured. This means the insurance would only pay out once the claim(s) exceeds £30,000.

Some firms take out a low-earners policy which is for income less than a certain amount (usually £10,000). One of the requirements of the policy is that the firm notifies the insurer if income exceeds that. We have found that some firms forget to notify their insurers in these circumstances which can potentially render their policy invalid.

### 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)
- **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)
- **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)
- **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](http://www.charteredaccountantsworldwide.com)  
[www.globalaccountingalliance.com](http://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](http://icaew.com/regulation)

## ICAEW

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ICAEW is  
carbon neutral