



# ***Practice Assurance and DPB (remote) reviews guidance***

August 2020

## **What documents will you want to see?**

Please see section 2 of this document for list of what we will need to see. These may not all be relevant to your firm and the reviewer will discuss the list with you during a pre-review call and will confirm what we need to see. If your review includes DPB activities, we will ask you to complete an information questionnaire and submit it to us before the review.

## **How can I transfer documents to you securely?**

Our preferred method is for you to transfer documents via the Sharefile secure portal. We will set up a folder on Sharefile and will email a link to it with instructions on how to access the folder and upload documents. Access to that folder will be limited to the reviewer, the Practice Assurance contact partner and anyone else at your firm that you request access for. Alternatively, if you prefer, you can transfer documents via your own portal or other preferred method eg, a password protected email.

## **What if I only have paper copies of these documents?**

We hope that there will not be too many of these and that you will be able to scan them and send electronically. If this is not going to be possible please inform [QADPre-visitinformation@icaew.com](mailto:QADPre-visitinformation@icaew.com) to check whether your review can go ahead.

## **Even though you are using a secure portal are there any precautions I should take?**

We suggest that you send the documents as PDFs and that you redact sensitive information eg, remove client names and addresses where they appear in enough detail for the client to be identified. Please redact the account number from any bank details except for the last four digits visible.

## **Will you retain these documents and if so how will I know they are secure?**

We will keep a list of documents we have seen and when we have completed our review we will delete all documents in the Sharefile folder. In some cases we may retain a document which is key to our review conclusion, eg, if there is an issue with your PII policy and it will aid the completion of the review if the reviewer has easy access to it.

## **What client files will you want to see and how will you access them?**

The reviewer will discuss this with you during the review. It will depend on how you retain your files. Some firms who hold things electronically are able to give us remote access to their files. Other firms have paper files and will scan and send key documents requested by the reviewer. And there are numerous permutations in between.

### **Who will you want to speak to during the review and how long will it take?**

The reviewer will call you approximately two weeks before the review, the pre-review call, to discuss the information they will want to see and the best way to transfer documents to them. We will ask you to transfer the documents before the agreed review date.

The reviewer will arrange a further call on the agreed review date. This call will cover any initial queries the reviewer has about the documents submitted and other topics. We will want to talk to the Practice Assurance partner and the firm's money-laundering reporting officer (MLRO) (these may be the same person). We will also want to speak to the DPB contact principal if your review includes DPB activities. We can set up a conference call facility for this conversation (using either a video or audio link) or we can use your preferred system. The call will normally take 1 – 1.5 hours but this can vary depending on the size and complexity of the firm. In some cases (especially at larger firms) it may be more convenient to have a separate call with the MLRO and/or with other staff members eg, the person responsible for clients' money. The reviewer will discuss this with you during the pre-review call.

We may need to contact you later in the review, either by telephone or email if we have further queries.

### **How will I know that the review has been completed and how long will it take?**

When we have completed our review we will record our findings in a closing record and will arrange a time to discuss these with you. This will either be on the agreed review date or shortly after that, but that will be dependent on all the information needed being available and how quickly you are able to respond to our queries.

We will ask you to respond in writing to any findings requiring action within 15 business days. You will need to explain what action you plan to take and by what date.

See the [Practice Assurance review visit booklet](#) which explains this process in more detail.

### **I've heard that you need all BOOMs to obtain criminal records checks. Will you want us to send these to you?**

Please do not send any criminal records checks to us electronically. We will ask you to post the original certificates to our head office team later in the year when they return to the office.

## **SECTION 2: INFORMATION REQUEST FOR PRACTICE ASSURANCE AND DPB (REMOTE) REVIEWS**

The following list includes all items we may request from you, however we might cover some elements by discussion. Following discussions and review of the information below, we may ask for further information.

### **FIRM INFORMATION**

- Details of ownership of the firm and any connected entities.
- Details of any trading names used.
- PII policy (including policies for connected entities), most recent renewal/proposal documentation and details of claims history and of any current claims or notifiable events.

- Fee protection insurance/tax investigation service policy, example fee note for one client.
- If you do not use a provider's standard templates/forms please also send an example of documentation sent to clients.
- If you do not use a proprietary manual, your anti-money laundering procedures, including any checklists used. Otherwise please provide the name of the manual provider.
- Firm-wide AML risk assessment.
- Engagement letter template or standard terms and conditions. If you do not send engagement letters please explain how you inform clients of the basis of fees and its complaints procedure and provide copies of these documents.

## **PERSONNEL INFORMATION**

- List of staff and their responsibilities.
- A sample of CPD records for the current and previous year for principals and a sample of qualified (ICAEW/ACCA) staff.

## **ACCOUNTING RECORDS**

- List of practice bank accounts, including the last four digits of each account number (both general office account and any clients' money accounts).
- Bank statements and cashbooks for the general office account for the last six months.
- For any clients' money accounts, the reconciliations for the last six months, trust letter(s) from the bank and details of alternate (if applicable). We may want to see the bank statements and cash books after we have reviewed the reconciliations. We may also ask to see back-up documentation for some clients' money transactions.
- Letters notifying clients of commission received and commission statements, both in the last 12 months.

## **SELF-MONITORING**

- Most recent annual review of compliance with the Clients' Money Regulations (if applicable).
- Most recent review of compliance with the Money Laundering Regulations.
- Most recent review of compliance with DPB (Investment Business) Regulations (if applicable)
- Most recent review of compliance with the Practice Assurance standards (if done).

## **PROBATE RECORDS (if applicable)**

- List of probate and estate administration clients, including fees charged to date, estate value and what stage the work is at (eg, probate applied for/granted/job complete/etc).
- Records of client property, other than already provided re clients' money above.
- Diversity monitoring results and published findings if not on website.
- Most recent annual review of compliance with the Probate Regulations.
- Example probate letter of engagement issued to a client.

## **CLIENT RECORDS**

- Following a review of other documentation, we will be asking for some further records but will discuss this with you.