ACCOUNTANCY PRACTICE LAUNCH PROGRAMME · GET AML SUPERVISED

AML setup checklist

The steps from picking your supervision route to keeping it live, in order. A signpost, not advice.

01 Find your route

Only one of these applies to you. Confirm which before you do anything else.

- [ ] Regulated route: if you hold a PC or licence, your body (ICAEW, ACCA or AAT) supervises you for AML. Confirm you are registered with them, and do not double-register with HMRC.
- [ ] Unregulated route: register with HMRC for money-laundering supervision before you take on any client.

02 Register and pay (HMRC route)

Every figure here can change. Verify it live on GOV.UK; the fees rose in December 2025.

- [ ] Budget the fees: £300 one-off application, £400 per premises a year, and a £40 approval fee per beneficial owner or officer.
- [ ] Check the small-business reduction if your turnover is below £5,000.
- [ ] Apply on GOV.UK and wait for approval before you trade.

03 Put your controls in place

These apply on either route, and your supervisor can ask to see them.

- [ ] Appoint your MLRO (in a solo practice, you).
- [ ] Write your AML policy, risk assessment and procedures.
- [ ] Diarise the annual declaration and fee so supervision never lapses.

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