AML policies, controls and procedures

Harwood & Lane Accountants Ltd
Money Laundering Regulations 2017, regulations 19 to 24 and 27 to 41
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About these policies

These are Harwood & Lane Accountants Ltd's policies, controls and procedures for managing the risks of money laundering, terrorist financing and proliferation financing identified in its firm-wide risk assessment (reg 19(1); reg 19A).

They must be proportionate to the size and nature of the firm and approved by its senior management (reg 19(2)). They take effect when approved at the end of this document.

They are based on the HM Treasury-approved guidance for the accountancy sector, AMLGAS (AMLGAS §1.3).

They are built from the firm's own answers. Where the firm said a control is not yet in place, these policies say so and list it under Actions. Sections that do not apply to the firm's services are left out.

The firm told us it already has documented AML policies and procedures. Once approved at the end of this document, these policies, controls and procedures replace those earlier ones.

The rest of the full document

- 1. Governance
- 2. The risk-based approach
- 3. Procedures for the firm's services
- 4. Customer due diligence and ongoing monitoring
- 5. Enhanced due diligence
- 6. Reliance on others
- 7. Record keeping
- 8. Internal reporting, suspicious activity reports and defence requests
- 9. Tipping off
- 10. Training
- 11. Financial sanctions
- 12. Reporting discrepancies in registers of beneficial ownership
- 13. Data protection
- 14. Proliferation financing
- 15. Actions
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- Sources

SAMPLE
fictitious practice, for illustration

Sample pack for Harwood & Lane Accountants Ltd, a fictitious practice. Generated 3 November 2026 from the ratified wording.
Excerpt. The full document is written for your practice.