Return preparation checklist

Harwood & Lane Accountants Ltd
ACCA AML annual return 2026/27
Version: 2026-10-30.1+70701e628d14
Answers worked out as at 3 November 2026

About this checklist

This checklist sets out each question of the ACCA 2026/27 AML annual return that the interview covers, in the interview's order, with the firm's answer and what supports it (ACCA AML annual return 2026/27). Where the pack holds no answer, it says Missing.

The return is filed in ACCA's own portal. This checklist is not the return and does not file it.

The answers on the controls depend on recorded dates, so an answer worked out on 3 November 2026 can change once a date passes 12 or 24 months. Generate the checklist again just before filing.

58 questions: 54 answered, 0 missing, 4 not asked because they do not apply.

1. The questions

#	ACCA question	The firm's answer	Supported by	Status
1	Who is your AML Professional Body Supervisor?	ACCA	Firm-wide risk assessment, section 1 (this pack)	Answered
2	ACCA Firm Registration Number:	DEMO-0147	the firm's ACCA registration	Answered
3	Has the firm been trading for more than 12 months?	Yes	the firm's own records	Answered
4	MLRO Name:	Priya Harwood	Firm-wide risk assessment, section 1 (this pack)	Answered
5	MLRO Email Address:	priya.harwood@harwoodlane.example	the firm's own records	Answered

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#	ACCA question	The firm's answer	Supported by	Status
6	MLRO Phone Number:	07700 900124	the firm's own records	Answered
7	Are you the Money Laundering Reporting Officer (MLRO) of the Firm?	Yes	the firm's own records	Answered
8	Does the firm have any Beneficial Owners, Officers and Managers (BOOMs) that are not ACCA Practising Certificate Holders?	No	AML policies, controls and procedures, section 1 (this pack)	Answered
9	How many additional partners/directors/employees/sub-contractors does your firm have? (Note: this includes both full and part-time.)	1-5	Firm-wide risk assessment, section 1 (this pack)	Answered
10	What was the firm's total revenue for the last financial year? (Please round to the nearest £)	£250,001 - £632,000	Firm-wide risk assessment, section 1 (this pack)	Answered
11	Has the firm held any client's money or managed securities or other assets on behalf of clients in the past two years?	Yes	Firm-wide risk assessment, section 5 (this pack); your own client records by service (not held in this pack)	Answered
12	What was/is the main reason for holding client money, securities or other assets?	HMRC refunds	Firm-wide risk assessment, section 2 (this pack); your own client records by service (not held in this pack)	Answered
13	Approximately how many clients has the firm provided payroll services to in the past two years?	26 - 50	Firm-wide risk assessment, section 2 (this pack); your own client records by service (not held in this pack)	Answered
14	Does the firm provide a registered office address for its clients?	Yes	Firm-wide risk assessment, section 2 (this pack); your own client records by service (not held in this pack)	Answered
15	Approximately how many clients has the firm provided their registered office address to as a service in the past two years?	11 - 25	Firm-wide risk assessment, section 2 (this pack); your own client records by service (not held in this pack)	Answered

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#	ACCA question	The firm's answer	Supported by	Status
16	Does the firm offer trust formation services?	No	Firm-wide risk assessment, section 2 (this pack); your own client records by service (not held in this pack)	Answered
17	Approximately how many clients has the firm provided trust formation services to in the past two years?	—	—	Not asked: it does not apply to the firm
18	Does the firm arrange or act as director/secretary for any of its clients?	No	Firm-wide risk assessment, section 2 (this pack); your own client records by service (not held in this pack)	Answered
19	Approximately how many clients has the firm arranged/acted as director/secretary for in the past two years?	—	—	Not asked: it does not apply to the firm
20	Does the firm act as a trustee for any of its clients?	No	Firm-wide risk assessment, section 2 (this pack); your own client records by service (not held in this pack)	Answered
21	Approximately how many clients has the firm acted as a trustee for in the past two years?	—	—	Not asked: it does not apply to the firm
22	Does the firm offer company formation services?	Yes	Firm-wide risk assessment, section 2 (this pack); your own client records by service (not held in this pack)	Answered
23	Approximately how many clients has the firm provided company formation services to in the past two years?	1 - 10	Firm-wide risk assessment, section 2 (this pack); your own client records by service (not held in this pack)	Answered
24	How many clients has the firm provided services to in the past 12 months?	101 - 250	Firm-wide risk assessment, section 3 (this pack); your own client records (not held in this pack)	Answered
25	Cash-based businesses (e.g., Takeaways, Retail shops, Scrap metal dealers, Car Wash, Nail bars, Massage parlours, etc)	11 - 25	Firm-wide risk assessment, section 3 (this pack); your own client records (not held in this pack)	Answered

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#	ACCA question	The firm's answer	Supported by	Status
26	High-value dealers (e.g., Jewellers, Car dealership, Art, Antiques and Luxury items, etc)	0	Firm-wide risk assessment, section 3 (this pack); your own client records (not held in this pack)	Answered
27	Properties (including estate agents, property developers and private landlords; this should include buying/selling and renting of properties)	1 - 10	Firm-wide risk assessment, section 3 (this pack); your own client records (not held in this pack)	Answered
28	Import and export (including haulage, freights and shipping)	0	Firm-wide risk assessment, section 3 (this pack); your own client records (not held in this pack)	Answered
29	Money Service Businesses (e.g., money remittance, bureau de change, cheque converters, etc)	0	Firm-wide risk assessment, section 3 (this pack); your own client records (not held in this pack)	Answered
30	Cryptocurrency (e.g., clients in which a significant proportion of the assets they hold and transact with are crypto assets)	0	Firm-wide risk assessment, section 3 (this pack); your own client records (not held in this pack)	Answered
31	Visa and immigration services	0	Firm-wide risk assessment, section 3 (this pack); your own client records (not held in this pack)	Answered
32	Investment services	0	Firm-wide risk assessment, section 3 (this pack); your own client records (not held in this pack)	Answered
33	Charities	0	Firm-wide risk assessment, section 3 (this pack); your own client records (not held in this pack)	Answered
34	Precious metals (e.g., gold or diamond trading)	0	Firm-wide risk assessment, section 3 (this pack); your own client records (not held in this pack)	Answered

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#	ACCA question	The firm's answer	Supported by	Status
35	'Wealthy individuals' (HMRC defines individuals as 'wealthy' if they have incomes of £200,000 or more, or assets equal to or above £2 million in any of the last 3 years.)	1 - 10	Firm-wide risk assessment, section 3 (this pack); your own client records (not held in this pack)	Answered
36	Client with annual revenue in excess of £10 million	0	Firm-wide risk assessment, section 3 (this pack); your own client records (not held in this pack)	Answered
37	Politically Exposed Person (including by association)	0	Firm-wide risk assessment, section 3 (this pack); your own client records (not held in this pack)	Answered
38	How many of the firm's clients represent more than 15% of the firm's total revenue?	0	Firm-wide risk assessment, section 3 (this pack); your own client records (not held in this pack)	Answered
39	Does the firm have any existing clients that have been convicted of a financial-related crime or appear in a sanctions list?	No	Firm-wide risk assessment, section 3 (this pack); your own client records (not held in this pack)	Answered
40	If you answered "Yes" to the previous question, please provide details in the textbox below.	—	—	Not asked: it does not apply to the firm
41	How many of your existing clients predominately reside or are based outside of the UK?	1 - 10	Firm-wide risk assessment, section 4 (this pack); CDD records	Answered
42	How many of the firm's existing clients have associations with HM Treasury Advisory Notice: High Risk Third Countries?	0	Firm-wide risk assessment, section 4 (this pack); CDD records	Answered
43	How many Suspicious Activity Reports have you filed to the NCA in the past two years? (This includes Defence Against Money Laundering requests.)	1-5	Internal suspicious-activity report form and register, the register (this pack)	Answered
44	How many internal Suspicious Activity Reports by employees have been formally escalated to the MLRO and documented in the past two years?	1-5	Internal suspicious-activity report form and register, the register (this pack)	Answered

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#	ACCA question	The firm's answer	Supported by	Status
45	A Suspicious Activity Report must be submitted via the NCA online portal. Have you registered with the new updated NCA SAR online system available from 18 September 2023?	Yes	the MLRO's NCA SAR Portal registration	Answered
46	What information, evidence and documentation do you typically obtain and check when onboarding a new client? Select all that apply.	Proof of identification (such as passport or photo driving license); Proof of address; Company Structure; Check PSC Register (i.e., Companies House Records); Use electronic verification	AML policies, controls and procedures, section 4 (this pack); CDD records	Answered
47	How frequently does the firm conduct ongoing monitoring of clients?	6 - 12 Months	Ongoing-monitoring checklist (this pack); the completed checklists	Answered
48	Does the firm categorise clients according to their level of risk? (For example, Low, Medium or High) (Technical Factsheet)	Yes	AML policies, controls and procedures, section 2 (this pack); CDD records	Answered
49	Approximately how many clients do you classify as high-risk?	1% - 5%	AML policies, controls and procedures, section 2 (this pack); CDD records	Answered
50	Approximately how many clients do you classify as low-risk?	51% - 99%	AML policies, controls and procedures, section 2 (this pack); CDD records	Answered
51	As the MLRO, have you conducted and documented a firm-wide risk assessment? (Technical Factsheet)	Yes - and it is updated on a periodic basis	Firm-wide risk assessment (this pack)	Answered
52	Does the firm have documented AML policies and procedures in place? (Technical Factsheet)	Yes - and it is updated on a periodic basis	AML policies, controls and procedures (this pack)	Answered
53	As the MLRO, have you conducted and documented a proliferation financing risk assessment? (Technical Factsheet)	Yes - I have conducted it once	Firm-wide risk assessment, section 7 (this pack)	Answered
54	As the MLRO, have you produced a written report on the operation and effectiveness of the firm's AML systems and controls? (Technical factsheet)	No	MLRO review worksheet (this pack); the MLRO's written report	To be introduced

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#	ACCA question	The firm's answer	Supported by	Status
55	As the MLRO, have you completed formal AML training within the past two years? (Please note, we do not consider reading articles or publications to be formal AML training.) (Technical Factsheet)	Yes	Training register (this pack)	Answered
56	Have you provided AML training to all relevant employees? (Please note: we do not consider employees reviewing the firm's AML policies and procedures or receiving 'on-the-job' training to be sufficient AML training.)	Yes - conducted periodically or regularly	Training register (this pack)	Answered
57	Does the firm have a formal process for employees to report suspicious activity to the MLRO? (For example, employees completing an internal suspicious activity report form.)	Yes	Internal suspicious-activity report form and register (this pack)	Answered
58	Does the firm conduct and document an independent assessment of its AML controls? (Please note: independent does not necessarily mean external. For example, a partner, director, or senior individual who is not the MLRO may conduct the assessment.)	No	MLRO review worksheet, question 7 (this pack); the independent assessment report	Marked not applicable in the interview

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2. The two uploads

The form ends with two uploads, each of up to five files (ACCA AML annual return 2026/27):

> *"Please upload the firm's current firm-wide risk assessment."*
> — ACCA AML annual return 2026/27, final page

Firm-wide risk assessment: recorded as in place, last reviewed or completed 3 November 2026. Upload: the firm-wide risk assessment from this pack, once the firm has adopted it.

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> *“Please upload the firm's current AML policy and procedures document.”*
> — ACCA AML annual return 2026/27, final page

AML policies, controls and procedures: recorded as in place, last reviewed or completed 3 November 2026. Upload: the AML policies, controls and procedures from this pack, once the firm has adopted it.

Read each document, check it describes the firm, and adopt it before uploading.

3. Filing

File the return in ACCA’s own portal. After filing, record the date and the reference ACCA shows on the return sheet.

Sources

- ACCA, AML annual return 2026/27 (UK). Cited: ACCA AML annual return 2026/27.

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