

OPBAS

OFFICE FOR PROFESSIONAL BODY AML SUPERVISION
FINANCIAL CONDUCT AUTHORITY



Progress and themes from OPBAS's 2024/2025 supervisory work: Anti-Money Laundering Supervision by the Legal and Accountancy Professional Body Supervisors

March 2026

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Foreword

Welcome to the 2024/2025 supervisory report of the Office for the Professional Body Anti-Money Laundering Supervision (OPBAS).

Professional Body Supervisors (PBS) play a critical role in the **fight against economic crime**, with many committed and hard-working individuals contributing. The services those they supervise provide support a healthy economy but can be exploited by those who want to clean criminally made cash. This can undermine trust in professional services and fuel crime – damaging the economy and **undermining long-term growth**. So good supervision of these services is vital.

Standards at PBSs have improved, providing a strong foundation on which to build a new regulatory model.

We welcome the fact that, subject to legislation, the FCA will become the single Anti-Money Laundering/Counter Terrorist Financing (AML/CTF) supervisor for selected professional services. This reflects the importance of **strong, consistent and systemwide supervision**. The move draws on the FCA's experience as an AML supervisor for more than 16,000 businesses across the financial services sector.

For now, **baseline compliance is good and effectiveness is improving**, but some poor practice persists. PBSs report recurring common breaches by those they supervise, and some PBS may still be taking an overly member-centric approach hindering robust supervision.

Enforcement is sometimes necessary to address non-compliance and ineffectiveness and maximise the deterrent impact of our work. In 2025, we used our **enforcement power of public censure** for the first time against a PBS that failed to meet the UK's money laundering¹ requirements.

Understanding threats, sharing intelligence and coordinating action have improved through collaborating with domestic and international partners. We take a lead role in key information and intelligence sharing forums including the Intelligence Sharing Expert Working Groups (ISEWGs) and delivered actions under the cross-system Professional Enablers Strategy including our well-received Suspicious Activity Report (SAR) project.

Our evidence and expertise informed the National Risk Assessment 2025 and preparations for the Financial Action Task Force's (FATF) 2027 UK assessment. OPBAS's approach and methodology is intentionally informed by FATF as the global AML standard setter.

We continue to play an active role in **raising global compliance standards**. For example, in 2025 we hosted an international roundtable with representatives from seven countries to exchange ideas, expertise and AML best practice.

1 Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017

Change brings opportunity and risks to be managed and mitigated. As we move into the 2026/27 regulatory cycle, it's even more important for OPBAS to deliver on its objectives.

With the FCA as the supervisor-in-waiting, OPBAS will need to continue to collaborate with PBSs and with system partners to support an **orderly transition** to the new regulatory model.

Mark Francis
Director, Specialist Directorate
FCA

The UK's professional services

The accountancy sector contributed

£81bn to the UK's GDP in 2022¹

The legal sector contributed

£74bn in 2023²

Estimated possible laundering through and within the UK or UK companies annually of more than **£100bn**³.



213 FTE staff are dedicated to AML/CTF supervision, with a combined annual spend of **£15m**⁴.



Our role

We are
A public body



funded by the fees we charge PBSs. We are **housed within the FCA**, and through the FCA, accountable to HM Treasury and Parliament.

We supervise the UK's **22 professional bodies** (plus 3 who have delegated their regulatory functions) responsible for AML compliance in the legal and accountancy sectors, who in turn oversee over

41,400⁴

firms and practitioners worldwide.



Our objective is to

reduce the **harm** of money laundering and terrorist financing by:

- ensuring a robust and consistently **high standard of supervision** by the PBSs
- facilitating **collaboration and information sharing** between PBSs, statutory supervisors and law enforcement agencies

¹ CCAB: Accountancy Report 2024

² The Law Society: The economic contribution of legal services report 2024

³ NCA: National Strategic Assessment 2025

⁴ HMT: Supervision Report 2023-24

The year at a glance

Objective 1: ensuring a robust and consistently high standard of supervision



Assessed 6 PBS against the OPBAS Sourcebook, **OPBAS reviewed circa 5,250+ pages**, and delivered insights from **720+ hours of analysis to drive more effective practice**

Supported the **improvement of SAR quality and consistency** through our successful SAR Project



Facilitated **enhanced public-private collaboration** between PBSs and other system partners including the National Economic Crime Centre (NECC)



Over **90** engagement meetings to **hold PBSs accountable** and support them in delivering **consistent, high-quality supervision**



Issued **1 Public Censure** to address ineffective practice

Effectively monitored PBS remediation through **targeted follow-ups** driving progress on PBS action plans

Objective 2: facilitating collaboration and information sharing

Domestic

Applied our knowledge to directly **inform the National Risk Assessment**



Supported **proactive information and intelligence sharing** with external stakeholders including law enforcement



Supported the **ISEWGs** to drive **smart intelligence sharing**

Facilitated constructive discussions, such as on AML supervisory reform through our engagement programme, including the **OPBAS conference**



Delivered **10** Professional Enablers Strategy presentations and facilitated cross-sector events to **strengthen system-wide collaboration**

International



Delivered **1 International Roundtable** supporting cross-border dialogue, innovation and strategic collaboration

Raised global standards through **proactive** engagements with international stakeholders

Contributed **evidence and expertise** ahead of the Financial Action Task Force's UK assessment



Contributed to the drafting of the Anti-Corruption Strategy

Chapter 1

Themes from our supervisory assessments

Methodology and effectiveness ratings

- 1.1** Between Q4 2024 and Q1 2026, we reviewed 6 PBSs using the updated OPBAS Sourcebook. This included both scheduled assessments and work informed by risk and intelligence. We also held regular engagement meetings to track accountability, actions and progress.
- 1.2** We used a four-point scale to assess PBSs' effectiveness and technical compliance against the Money Laundering and Terrorist Financing Regulations 2017 (MLRs).
- 1.3** **Table 1** shows our ratings across each Sourcebook area for the 6 PBSs. This includes two of our larger PBSs. The samples differ from those we assessed in 2022/23.

Table 1: Effectiveness ratings for 6 PBSs assessed by OPBAS in 2024/25

Effectiveness of PBS by Sourcebook area		PBS1	PBS2	PBS3	PBS4	PBS5	PBS6
Governance		PE	LE	LE	LE	E	LE
Risk Based Approach		LE	PE	LE	LE	LE	LE
Supervision		PE	PE	LE	LE	LE	PE
Intelligence and information sharing		LE	PE	LE	LE	LE	PE
Information and guidance		LE	LE	LE	LE	LE	PE
Staff competence and training		LE	LE	LE	LE	LE	PE
Enforcement		PE	LE	PE	LE	LE	PE
Record keeping		E	PE	LE	E	E	IE
E	Effective	Achieving intended outcomes consistently			Minor improvement needed		
LE	Largely Effective	Achieving intended outcomes frequently			Moderate improvement needed		
PE	Partially Effective	Achieving intended outcomes only occasionally			More major improvement needed		
IE	Ineffective	Little or no demonstration of intended outcomes			Fundamental improvement needed		

- 1.4** We found a combination of broadly maintained or moderate improvements among the 6 PBSs we assessed. We are less assured that they're robust and effective on supervision and enforcement. All PBSs have proportionate action plans to address the

weaknesses we found. However, if they make insufficient progress, we may consider using our supervisory and enforcement powers. We have used directions once in this supervisory cycle.

- 1.5** We also launched projects to better understand sector risks, address PBS vulnerabilities, and support timely action (often using OPBAS convening powers). See Chapter 2 for details.

Governance

Leading by example



"PBSs have relatively mature governance arrangements, but they need to improve their management information. Some PBSs can and should do more to evidence how their MI is used to track and challenge delivery of AML strategy."

- 1.6** Most PBSs were effective or largely effective on governance. A number of larger PBS had clearly invested in their AML capabilities. All the PBSs we assessed had competent and capable specialist staff, specifically, the Single Point of Contact (SPOC) and Money Laundering Reporting Officer (MLRO).
- 1.7** All PBSs clearly separated their supervisory functions from their advocacy and disciplinary functions. Some PBSs would benefit from formalising these distinctions in their policies, controls and procedures to aid staff understanding.
- 1.8** Some PBSs could enhance their conflicts of interest approach, by being clearer to staff on their expectations and ensuring all relevant staff participate in the conflicts of interest declaration process. PBSs should ensure that their conflicts of interest policy is kept under regular formal review.
- 1.9** Although PBSs have relatively mature governance arrangements, they need to improve their management information (MI). Some PBSs can and should do more to evidence how their MI is used to track and challenge delivery of AML strategy. Ideally this would include a positive feedback loop to deliver better outcomes.
- 1.10** Effective MI is essential for boards and other governance functions to effectively oversee AML supervisory activity and delivery. This is set out clearly in our [OPBAS Sourcebook](#) and in previous OPBAS reports. We expect to see improvements here.

Case study: More effective practice in MI

An accountancy sector PBS shares accessible, relevant and regular updates with its senior management and governance committees. This helps them on decision-making and regulatory outcomes. The information includes sectoral money laundering issues and trends, regulatory and wider landscapes updates, and operational matters such as emerging risks and themes from the PBS assessments, staffing, communications and financials.

The PBS continues to improve its MI including clearly linking the management information to the organisation’s AML objectives and success measures. There is documented evidence that the MI is received, appropriately challenged and feedback is acted on.

Risk-based approach

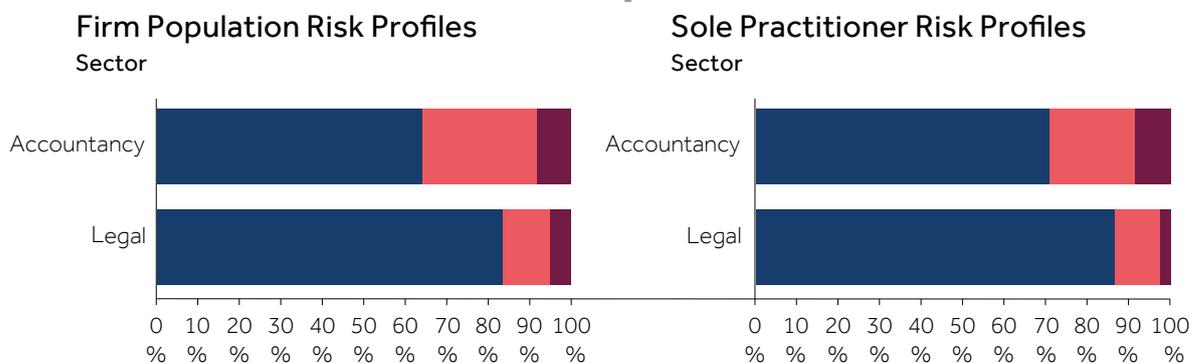
Targets highest threats, enabling effective and proportionate risk-based mitigation



"We support PBSs in their use of technology and artificial intelligence to better understand risk. We encourage all PBSs thinking about AI and exploring its benefits to make sure it's robustly tested and uses relevant and accurate data sources."

1.11 Most PBSs were rated as largely effective. This demonstrated some improvements since their last OPBAS assessment and higher scores on average than those assessed in the 2022/23 cycle.

Graph 1: Firm and sole practitioner risk profiles for all PBSs



Metric	Accountancy	Legal
Firms categorised as low risk	12,253	4,691
Firms categorised as medium risk	5,303	632
Firms categorised as high risk	1,578	281

Metric	Accountancy	Legal
Sole practitioners categorised as low risk	10,387	1,436
Sole practitioners categorised as medium risk	3,022	179
Sole practitioners categorised as high risk	1,267	44

- Firms categorised as high risk
- Sole practitioners categorised as high risk
- Firms categorised as medium risk
- Sole practitioners categorised as medium risk
- Firms categorised as low risk
- Sole practitioners categorised as low risk

- 1.12** **Graph 1** shows the risk profiles that all 22 regulatory PBSs have assigned their supervised population. Risk profiling is important as it informs the PBSs' risk approach, and the tools and methods used to supervise its population. Each supervisor makes its own assessment of risk, and the approach adopted by the largest PBSs in each sector influences the overall picture.
- 1.13** All PBSs demonstrated that they considered a broad range of risk factors when forming risk profiles. Most PBSs were agile in tailoring their approach to current and emerging risks. More effective practice included an accountancy sector PBS that factored information and intelligence held by the PBS in its risk profiling. Some PBSs would benefit from more timely inclusion of key risks such as those relating to proliferation financing.
- 1.14** An annual data collection exercise was a key way in which PBSs understood the risks present within the supervised populations. More effective practice included one accountancy sector PBS periodically reviewing and updating the form of its information collection in a timely manner to capture data on emerging risks, such as cryptocurrency. It also adapted questions on key risk areas to prompt more accurate responses from its supervised population demonstrating its focus on continual improvement.
- 1.15** PBSs are exploring use cases for technology and artificial intelligence (AI) to inform their risk-based approach. This is an evolving area. We support PBSs in their use of technology and artificial intelligence to better understand risk. We encourage all PBSs thinking about AI and exploring its benefits to make sure it's robustly tested and uses relevant and accurate data sources. PBSs should be able to show OPBAS evidence of how they manage the risk associated with their chosen approach, and that the components are understood, documented and auditable.
- 1.16** Most PBSs have clearly documented, structured and risk-informed supervisory review cycles to assess their supervised population across all risk classifications. Some smaller PBSs did not meet their own set review cycle/or had cycles we consider too long.
- 1.17** The approach we advocate includes dip-sampling or other activity across risk classifications, particularly as there's a growing proportion of medium and low risk populations at PBSs. This can also help provide assurance on a PBS's ongoing risk classification.
- 1.18** Although we don't mandate a particular approach to reviewing risk, we expect PBSs to adhere to their policies or explain deviations. Prolonged review cycles risk missing a MLRs breach or identifying a problem. PBSs should build into their approach a regular review of the assessment cycles ensuring appropriate resource allocation and management visibility and scrutiny.

Case study: Less effective practice in addressing the limitations of AI models

One legal sector PBS developed an AI risk model as a tool to enhance its ability to predict and identify money laundering risks among its supervised population.

Although the model used many data points and showed a commitment to improvement, it assigned all new firms a default medium risk rating due to limited early data. The PBS identified that it could take up to two years to have sufficient data on new firms to effectively apply the AI model.

This medium risk rating meant that these new firms were unlikely to be prioritised for review within the first few years, raising concerns about potentially unidentified or unmanaged risks. We encouraged the PBS, alongside continuing to develop its AI tool, to also explore ways to proportionately sample new firms to validate risk ratings and mitigate potential harm.

Supervision

Demonstrates that the risks are managed, standards upheld, and trust is maintained



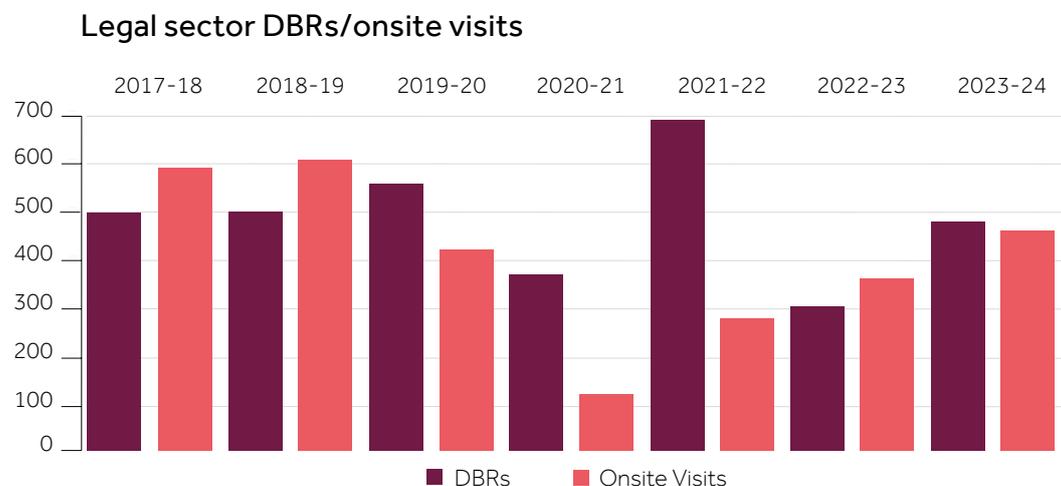
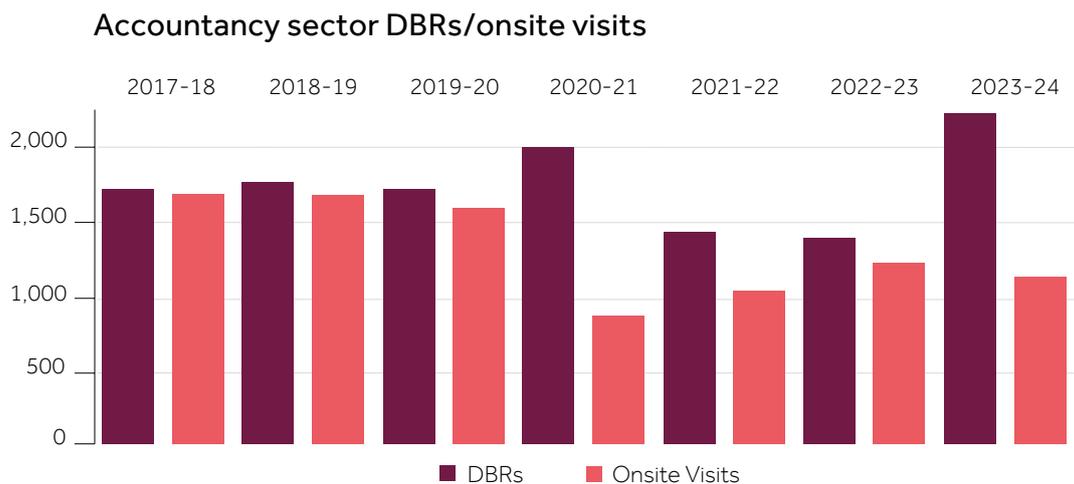
"Some PBSs still take an overly member-centric or assisted compliance view, hindering robust AML supervision."

- 1.19** The HMT AML Supervision Report 2023-2024 shows that PBSs still report common breaches of inadequately documented policies and procedures, customer due diligence, client risk assessment or records and no or inadequate firm-wide risk assessment by their supervised population. These continued failures call into question the consistency and effectiveness of PBS supervision. Our concerns are reflected across other Sourcebook areas including information and guidance and enforcement.
- 1.20** Samples of file reviews show that some PBSs still take an overly member-centric approach or assisted compliance view. This hinders robust AML supervision and might be linked to an 'assisted compliance' culture which we continue to find at some PBSs.
- 1.21** We'd expect PBS to support the firms they supervise to comply with expectations. This should not, however, be disproportionate and come at the cost of holding members to account for material non-compliance. In more extreme examples this could include PBSs providing templated documents for members to use to address a breach and achieve compliance (for example the absence of a risk assessment as required under MLRs Reg 18).
- 1.22** PBS supervisory approaches ranged from partially effective to largely effective. More effective practice included a legal sector PBS who had a clearly defined methodology, clear and well understood selection criteria for their assessments and a formal supervisory cycle that could be flexed to address emerging risks.
- 1.23** Less effective practice included a self-imposed review cycle for high-risk firms that was then not delivered, and an unclear explanation between population shifts in high and medium risk categorisations, which affected the number and type of assessments undertaken. PBSs should show clear evidence of their methodology and how it achieves effective AML supervision including recording any key decisions taken.
- 1.24** With greater resources and supervisory tools larger PBSs tended to be more effective. Some smaller PBSs could, however, have made more effective use of the tools available to them. For example, a smaller accountancy sector PBS could have benefitted from

using a thematic review to better understand the Trust and Company Service Provider (TCSP) risks present in its supervisory population. Many offered TCSP services and in our view, they did not otherwise adequately understand or quantify the risk present. We encourage PBSs to consider which tools best support supervisory outcomes.

1.25 Desk-based reviews (DBRs) and onsite assessments remain key tools used by PBSs to assess their supervised population.

Graph 2: DBRs / Onsites for the Accountancy and Legal Sectors



Metric	DBRs	Onsite Visits	Population	Metric	DBRs	Onsite Visits	Population
2017-18	1,368	1,201	34,309	2017-18	491	583	12,639
2018-19	1,696	851	33,411	2018-19	492	600	9,733
2019-20	1,733	1,660	32,217	2019-20	549	414	8,737
2020-21	1,686	1,654	33,586	2020-21	364	117	8,573
2021-22	1,966	1,566	33,396	2021-22	680	272	8,462
2022-23	1,410	1,015	33,911	2022-23	297	354	7,998
2023-24	2,191	1,104	33,830	2023-24	472	453	7,564

- 1.26** **Graph 2** shows that the total number of onsite visits conducted by all 22 PBSs has not yet returned to pre-pandemic levels. The number in 2023/24 was slightly lower than in 2022/23 for the accountancy sector PBSs. In contrast, the legal sector PBSs have collectively and consistently increased their number of onsite inspections over the same period.
- 1.27** The total number of DBRs reported across the two sectors was 2,663 and onsites were 1,557, equating to 10.2% population coverage. Although what inspections entail varied across the PBSs, the general coverage is encouraging and in our view the volumes achieved compares favourably to other AML supervisors. As part of the 2024/25 assessment cycle, we have seen an investment in resource across the larger PBSs which in turn has led to more DBRs and onsites conducted.
- 1.28** All PBSs we assessed conduct DBRs. Specific DBR methodology varies across individual PBSs, but they remain an important tool for PBSs to assess compliance. For example, as part of their DBR most PBSs assess client file reviews, but some relied on member-selected files rather than choosing ones at random. Another used small samples, limiting conclusions.
- 1.29** Most PBSs would benefit from enhanced guidance for assessors or inspectors on supervision to support consistency in decision-making. Examples of helpful guidance include SAR assessment guidance, the use of supervisory tools and remediation timelines.
- 1.30** For most PBSs we saw from file reviews that the remediation timeline was too long or not appropriately followed up when the deadline was passed. This reinforced our concern that some PBSs may place overreliance on members delivering remediation and self-certification, without associated and risk-sensitive proportionate assurance activity by the PBS.
- 1.31** Consistent with the 2022/23 supervisory cycle, PBSs could strengthen their approach to Disclosure and Barring Service (DBS) checks. This would mean PBSs have the necessary procedures in place to obtain and review renewed DBS certificates at appropriate intervals. We encourage PBSs to review their approach to DBS checks to ensure they can act promptly if there's a change of circumstance.
- 1.32** Some PBSs shared their views on third party provided AML software being used by their supervised population to help apply due diligence measures. OPBAS does not advocate for or endorse any provider of technology. Generally, providers don't fall directly within AML supervisory remit, and so this represents a reliance on third party providers, essentially outsourcing. The MLRs are clear that risk cannot be outsourced.
- 1.33** Different views were expressed on the quality of the third party provided AML software and outcomes achieved. We're unclear on how assurance is obtained by the supervised population or PBSs in these circumstances. Most PBSs showed they were aware of the importance of robustly testing the software used to ensure suitability for their supervised populations' specific needs.

Case study: Less effective practice when non-compliance is identified

An accountancy sector PBS identified that a member had failed to provide proof of customer due diligence for their clients. The PBS asked for, in our view, a disproportionately small sample of client risk assessments (on average around 1%) to review.

The PBS relied on the member's self-declaration without clear evidence of follow-ups to monitor progress or assurance of remediation. We encouraged the PBS to implement proportionate regular supervisory follow-ups or check-ins, and we are monitoring the PBS progress in addressing this finding.

Intelligence and information sharing Supports a faster, joined-up approach to tackling economic crime



"PBSs understand the importance of proactive sharing of information and intelligence; but practical delivery remains challenging for some."

- 1.34** Intelligence and information sharing is key to supporting a system-wide approach to tackling economic crime. We're encouraged by some of the progress, but further improvements are needed. Most PBSs achieved a largely effective score with none rated as effective or ineffective. The PBSs assessed either maintained their previous score or in one case received a slightly lower score.
- 1.35** Most PBSs participate in information and intelligence forums such as the Anti-Money Laundering Supervisors' Forum (AMLSF), the ISEWGs and sector groups. Most PBSs are positively contributing to actions arising from those forums and the Joint Money Laundering Intelligence Taskforce (JMLIT) cells, and from the UK's Professional Enablers Strategy.
- 1.36** PBSs understand the importance of proactive sharing of information and intelligence; but practical delivery remains challenging for some. Varied risk appetites and inconsistent uptake of key tools and processes are making information sharing inconsistent. We want more examples of actionable intelligence sharing which demonstrably leads to interventions and disruptions.
- 1.37** With our system partners, we're reviewing the intelligence sharing framework. This is to make sure it's right for the transitional period and beyond it, and so that intelligence sharing is more robust and proactive. The regional ISEWGs that OPBAS chairs continue to meet regularly and are valuable forums for sharing region-specific intelligence and threats.
- 1.38** OPBAS is working with supervisors through an information sharing work-stream, as part of the Professional Enablers Strategy. This is designed to help with proactive information sharing in PBSs, including amongst senior leaders and data protection officers. It'll be

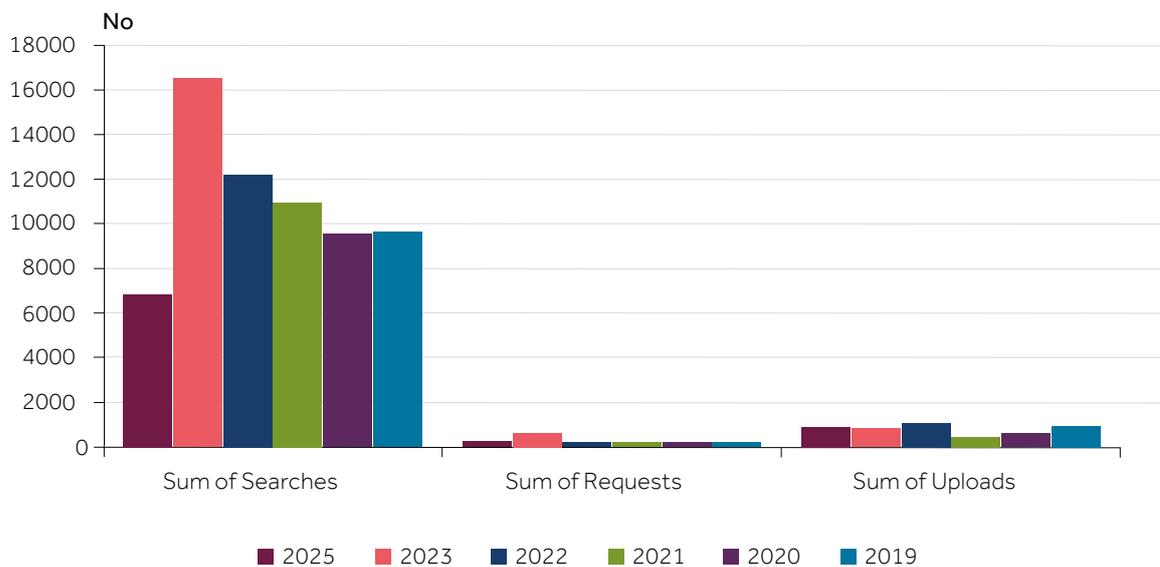
increasingly important as we move towards transition to FCA supervision, where PBSs will be key intelligence sharing partners.

- 1.39** We found that specialist staff, specifically the SPOC and MLRO, appear to have the necessary levels of security clearance and knowledge, experience and understanding to fulfil their duties effectively. However, the scope and remit of these role holders is often broad and can extend beyond AML, which may impact effectiveness.
- 1.40** Some PBSs would benefit from investing further in information and intelligence sharing resource. This would have the twin benefits of reducing the risk of depending on just one person and provide better frameworks for proactive work. In the context of supervisory reform, we'll work with PBSs to understand intelligence and information sharing in future and making sure there's enough resource dedicated to it.
- 1.41** We found more effective practice included a PBS that had dedicated staff working on its approach to intelligence sharing, including intelligence analysts. The PBS provided a demonstrable record of intelligence sharing with law enforcement, other supervisory authorities and government departments. It included many relevant examples in its assessment. Staff engaged in information exchange also received valuable training, which they demonstrated with a detailed understanding of information sharing gateways and when, why and how to use them.

Use of the Shared Intelligence Service (SIS) and Financial Crime Information Network (FIN-NET)

- 1.42** The Shared Intelligence Service (SIS) is owned and operated by the FCA. Membership enables PBSs to participate in information sharing with the FCA, other supervisors and law enforcement on AML/CTF matters. As a member of SIS, PBSs must respond to intelligence sharing enquiries from other SIS members and pro-actively input their own material onto SIS. All PBSs use SIS to some extent, and we've found opportunities for SIS to be better utilised in the PBS supervisory approach.
- 1.43** Information sharing platforms like SIS are most valuable when information held on the platform is timely, accurate and holistic such as at the point of authorisation, or when a conduct or AML issue is identified. We also encourage PBSs to add SIS flags when an individual is declined authorisation to gatekeep the population from bad actors, and to prevent migration from one PBS to another.
- 1.44** We encourage PBSs to ensure that they document the approach to SIS in the training and guidance provided to staff, and that PBSs have a nominated person responsible for SIS, which may make flag uploads and removals more timely and help staff understand when to use it.
- 1.45** In 2025, SIS members raised a total of 274 requests for information on SIS and 925 uploads of intelligence (or flags). The number of flags raised varies considerably from 1 to 255. In some cases this may reflect the comparative membership of the size of some organisations, but there's evidence of material variation between PBSs of a similar size that may reflect a difference in policy or applications.

Graph 3: Annual SIS usage for accountancy and legal PBSs combined



- 1.46** FIN-NET is the Financial Crime Information Network, a longstanding, operationally independent information-sharing mechanism legally housed within the FCA. It connects almost 100 organisations with responsibilities related to regulation, AML supervision, or combatting financial crime affecting the UK’s financial system. It includes UK and overseas financial regulators, all UK police forces and the National Crime Agency (NCA), some professional body supervisors (legal and accountancy), public bodies, and trading and insurance exchanges.
- 1.47** FIN-NET provides a structured, secure system through which members can request case specific information, deconflict investigations, corroborate intelligence, share emerging threats, and where appropriate, initiate multi-agency coordinating groups. FIN-NET is an efficient and effective route for rapid intelligence exchange that often produces high-value responses, with around 85% of referrals receiving a reply. FIN-NET has fewer PBS members than SIS, but those using it report that it is an effective system for increasing intelligence sharing on a case-by-case basis.
- 1.48** The numbers of referrals in 2025 sent by the 8 PBS members of FIN-NET is low at 11, but, increased from 2021 at 5. The lower number may reflect the PBSs’ relative size in comparison to other members of FIN-NET. However, PBSs receive, review and respond to more referrals (593 referrals in 2025), demonstrating their key role as providers of specialist intelligence about their supervised populations. This activity directly supports active law enforcement and regulatory investigations and underlines the importance of maintaining strong engagement between PBSs and the wider financial crime ecosystem.

Suspicious activity reports

- 1.49** Suspicious Activity Reports (SARs) report potential instances of money laundering and terrorist financing, as well as being a vital source of intelligence, not only for tackling economic crime but to help investigate a wide range of criminal activity.
- 1.50** We found that some PBSs could improve in this area such as by maintaining a clear internal SARs policy with tailored training and regularly reviewing a representative sample of their supervised population's SARs. We also found some instances where law enforcement referrals could have been made in addition to SARs reporting, as SAR reporting does not constitute a crime report.
- 1.51** We have conducted a SARs-focused project with further details in Chapter 2.

Disclosures

- 1.52** PBSs can improve their approach to encouraging disclosures of suspected or actual MLR breaches from within their supervised populations. One PBS conflated disclosures with complaints. We encourage all PBSs to have clear, accessible and publicly available policies, procedures and controls in place. They should also have clear, timely staff training and guidance on how to identify, handle and record disclosures received.
- 1.53** We found that staff working within PBSs understood and were confident in using internal disclosure processes, but in some cases were less aware of or didn't fully understand the potential for disclosures to be received from members, or the public.

Case study: More effective practice in adapting approach to assess SARs

OPBAS identified an accountancy sector PBS who was not reviewing member SARs. We provided feedback to the PBS on the importance of SAR reporting and the key role that the PBS can have in supporting high quality SAR submissions from its supervised population. The PBS acted promptly in reviewing its policies, procedures and controls.

The PBS is now implementing a new process to receive SAR submissions through a secure mailbox following appropriate security controls. This enables SAR reviews without the need to go onsite and may save time and resource enabling more SARs to be reviewed for quality purposes.

Information and guidance to supervised population

Clear, relevant and targeted communication supports better tackling of money laundering and terrorist financing risks



"Evidence of a wide range of positive activity, hasn't consistently translated into higher member compliance rates, indicating persistent issues with population engagement and understanding."

- 1.54** Information and guidance provided to the supervised population remains a PBS strength, with most receiving a largely effective score.
- 1.55** PBSs use various outreach methods to help their members understand money laundering risks. This includes the full range of communication methods outlined in paragraph 7.2 of the [OPBAS Sourcebook](#), to make it more likely that a broad proportion of the PBSs' supervised population will be reached.
- 1.56** Most PBSs have a dedicated AML webpage and a members' zone with AML documents and guidance.
- 1.57** Evidence of a wide range of positive activity, hasn't consistently translated into higher member compliance rates (as noted in [HMT AML Supervision Report 2023-2024](#)), indicating persistent issues with population engagement and understanding.
- 1.58** We encourage PBSs to consider how and where they could be more impactful at cutting through to members. For example, some PBSs would benefit from further targeted guidance to their supervised population to address the continuing and unresolved problems with inadequate firm-wide risk assessments. We expect PBSs to demonstrate how they will address this.
- 1.59** Feedback from those they supervise would help most PBSs ensure the guidance material they produce is as helpful as possible.

Case study: More effective practice to support effective information and guidance

One legal sector PBS is collaborating with an external party to evaluate its communication approach and whether it leads to the desired behavioral changes. Testing includes assessing diverse types of content to see what receives the most engagement, such as, click rates and emails opened. The PBS is also engaging with their supervised population to incorporate feedback on the type of content that works best for them. We look forward to seeing the output of this review and are encouraging the PBS to share key findings with other sectors, if applicable.



Staff competence and training

Competent, well-trained staff support more effective delivery

"Evidence of knowledgeable and professional staff, but organisational structures and funding not consistently setting these individuals up for success. There is more to do on general AML training and specialised roles to assist with succession planning."

- 1.60** The PBSs assessed in this cycle were found to be more effective than those we assessed in 2022/23 and most received a largely effective score.
- 1.61** We identified a wide range of regular AML training provided to staff covering topics including disclosures and AML. More effective practice included complementing in-house training with external training opportunities from other sources such as the NCA and The UK Financial Intelligence Unit (UKFIU). We have seen previous examples of PBSs engaging external AML training providers to good effect, including to address formal OPBAS directions.
- 1.62** Training approaches for key members of staff (e.g. the MLRO) varied. We found evidence of knowledgeable and professional staff, but organisational structures and funding not consistently setting these individuals up for success. There is more to do on general AML training and specialised roles to assist with succession planning.
- 1.63** PBSs should ensure they embed relevant specialised training for key staff members and that it's completed and recorded. Some PBSs are exploring working with external providers to design and provide sector specific training. This could be of use and applicable to multiple stakeholders, but this remains at concept stage.
- 1.64** PBS staff showed they had a good understanding of AML supervision and related risks. However, and as per the Supervision and the Enforcement sections, more practical and tailored guidance for specialised staff is needed to support more consistent decisions. Some PBSs may also benefit from capturing and acting on staff feedback on training, to support continuous improvements.
- 1.65** Effective practice included setting aside weekly training time and discussing training needs in line manager meetings and performance reviews. Staff should be encouraged to take formal or tailored AML training if they need it. Most PBSs would also benefit from clearer training logs to better identify and address gaps.

Case study: Less effective practice in the approach to specialised roles

All staff at one legal sector PBS receive mandatory training and annual refresher training which included relevant AML and disclosure modules. OPBAS found an absence of more specialised and tailored training for staff. This would make sure staff are equipped to make confident, consistent and effective risk-based decisions.

OPBAS recommended that a more formal, tailored training plan was created for those staff members which is kept regularly up to date and monitored through their management structure.



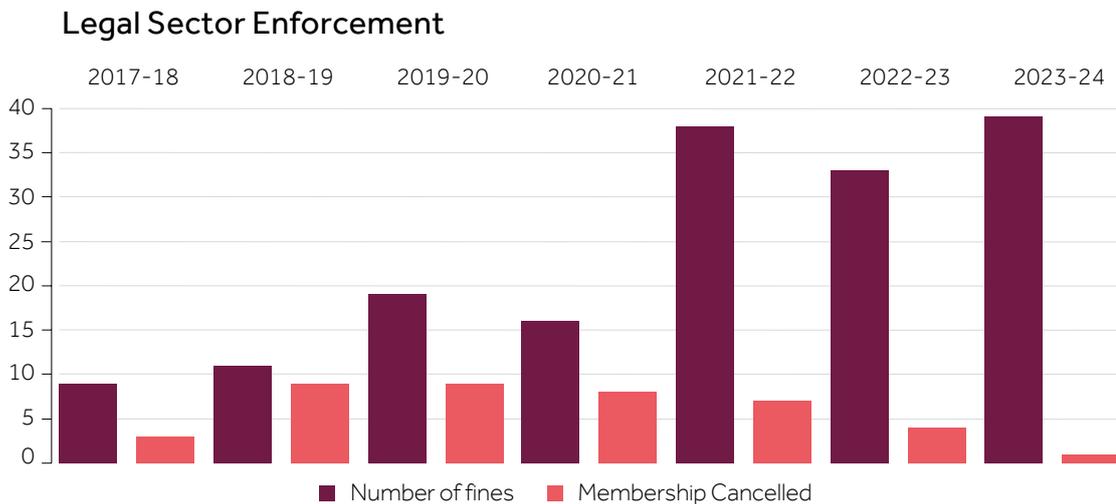
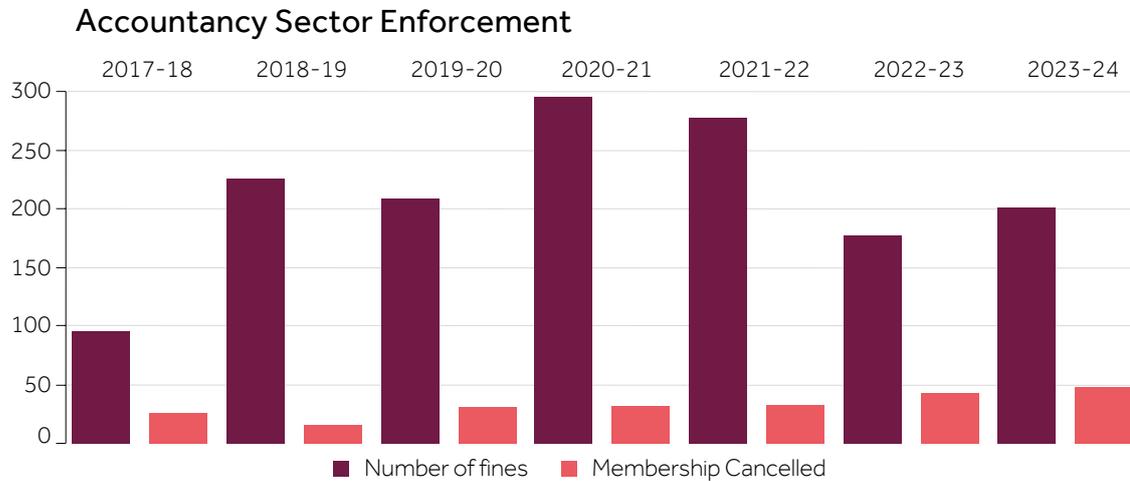
Enforcement

Effective enforcement action can credibly deter non-compliance

"Some PBSs are overly relying on 'assisted compliance' to correct failures through a disproportionate focus on working with firms. This risks undermining the delivery of proportionate, effective and dissuasive disciplinary measures."

- 1.66** PBSs continue to perform poorly in their enforcement approach relative to other Sourcebook areas. We're concerned that some PBSs aren't undertaking consistent, proportionate and sufficiently dissuasive disciplinary measures in circumstances where it would be warranted and justifiable.
- 1.67** We still see some PBSs are overly relying on 'assisted compliance' to correct failures through a disproportionate focus on working with firms. This risks undermining the delivery of proportionate, effective and dissuasive disciplinary measures.
- 1.68** There are limited circumstances where assisted compliance can be appropriate, but it should not be the default preference. More effective practice included one legal sector PBS that balanced the guidance provided to its supervised population with a demonstrable track record of taking enforcement action when appropriate.
- 1.69** Most PBSs assessed could have, at least on occasion, acted more swiftly to address compliance concerns. Less effective practice included one accountancy sector PBS providing a member firm with multiple opportunities to address non-compliance before making an enforcement referral. Another legal sector PBS provided its supervised firm with what was, in our view, too lengthy a period to complete all compliance plan actions and didn't engage with the firm sufficiently to establish how it was progressing.
- 1.70** As we identified in the Supervision section, some PBSs would benefit from more tailored training to staff to ensure there's consistent decision-making on the choice of intervention and proportionate risk-based follow up.
- 1.71** All PBSs publish their enforcement decisions, but they can be hard to find on some of their websites. This weakens the deterrent effect of publishing them.

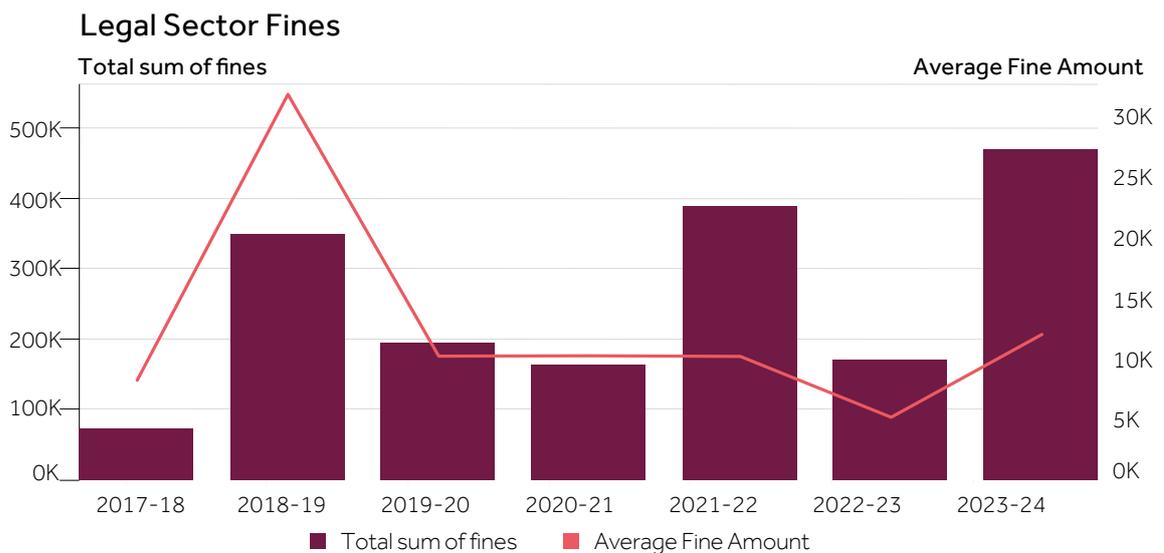
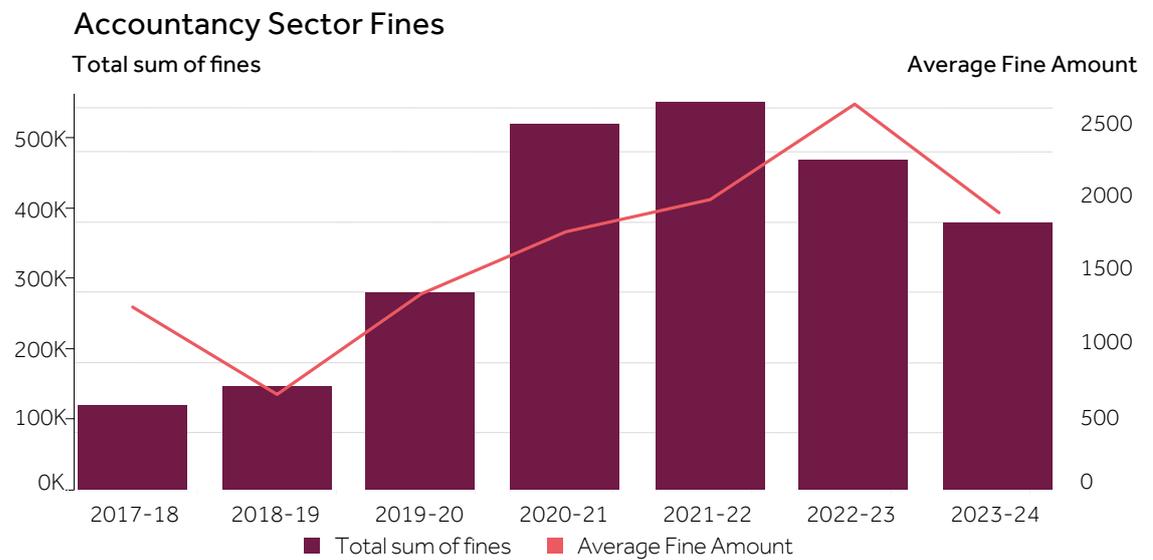
Graph 4: Number of fines and membership cancellation across the legal and accountancy sectors



Metric	Membership Cancelled	Number of fines	Population	Metric	Membership Cancelled	Number of fines	Population
2017-18	26	96	33,411	2017-18	3	9	12,639
2018-19	16	226	32,217	2018-19	9	11	9,733
2019-20	31	209	33,586	2019-20	9	19	8,737
2020-21	32	295	33,396	2020-21	8	16	8,573
2021-22	33	278	33,911	2021-22	7	38	8,462
2022-23	43	178	34,309	2022-23	4	33	7,998
2023-24	48	201	33,830	2023-24	1	39	7,564

1.72 AML specific membership cancellations in the legal sector have fallen since their 2018/19 peak, reaching a low of just 1 in 2023/24. In contrast, cancellations in the accountancy sector have steadily increased over the same period despite no clear evidence of material variation in baseline compliance levels between the sectors.

Graph 5: Total and average fine amounts issued across the legal and accountancy sectors



Years	Total sum of fines	Average Fine Amount	Years	Total sum of fines	Average Fine Amount
2017-18	£119,882.00	£1,248.77	2017-18	£74,500.00	£8,277.78
2018-19	£147,549.00	£652.87	2018-19	£351,502.00	£31,954.73
2019-20	£279,967.00	£1,339.56	2019-20	£195,250.00	£10,276.32
2020-21	£519,946.00	£1,762.53	2020-21	£164,900.00	£10,306.25
2021-22	£551,064.00	£1,982.24	2021-22	£389,663.50	£10,254.30
2022-23	£468,679.00	£2,633.03	2022-23	£172,102.00	£5,215.21
2023-24	£380,299.00	£1,892.03	2023-24	£470,859.00	£12,073.31

1.73 In the legal sector, we identified an unexpected decline in both the total value of fines and the average fine amount during 2022/23, but levels have since rebounded and the total fines collected now stand at a historic high. The total fine amount is influenced by one PBS's activity, which materially impacts the sectoral total.

- 1.74** The total sum of fines issued collectively by the accountancy sector is similar to the legal sector, but the average fine amount is over 6 times lower. This suggests lower average penalties. We are looking at this closely, with the accountancy sector generally receiving lower scores than the legal sector in their enforcement effectiveness scores in this cycle.
- 1.75** During our PBS engagement, we found some PBSs facing challenges with recouping the fines issued, raising concerns that the deterrent is being undermined. We continue to work with them on this.
- 1.76** We expect to see significant improvements in some PBSs' enforcement approach, and we will assess progress. All PBSs should familiarise themselves with the [OPBAS Sourcebook](#) that sets out clear guidance and examples of more and less effective practice to support their approach.

Case study: Less effective practice in taking robust enforcement action

We reviewed a representative sample of files provided by an accountancy sector PBS on its supervised population. Several showed that members were given repeated opportunities, or excessive time, to address non-compliance before referring them for enforcement action.

We found a need for the PBS to reassess its internal guidance on the threshold and criteria for enforcement action. The PBS did not appear to take a risk-sensitive or consistent approach in verifying whether its members had completed the necessary follow-up post enforcement action raising a risk of ongoing harm.

The PBS has since agreed to review its guidance on enforcement action. OPBAS continues to monitor its progress and will intervene further if it doesn't improve.

Record keeping and quality assurance

Strengthened approach to records and QA supports consistent, accountable supervision



"PBSs demonstrated relative strength in record keeping and on quality assurance and internal audit."

- 1.77** PBSs performed well, mostly receiving an effective or largely effective score. PBSs demonstrated relative strength in record keeping and on quality assurance and internal audit.
- 1.78** Most PBSs kept accurate records of how and why decisions were made, and this supported more informed quality assurance testing. For most PBSs, further guidance on the supervisory and enforcement approaches may enhance the consistency of decision-making which has not always been evident in the sample file reviews.

- 1.79** All PBSs demonstrated that they stored records securely with storage and access protection. For key documents, some PBSs could benefit from having a more formalised and consistent approach to version control to ensure these documents remain regularly reviewed and fit for purpose.
- 1.80** All PBSs conduct quality assurance or have internal audit functions. For those that conduct quality assurance, some PBSs would have benefitted from a more formal and rigorous process. More effective PBSs ensured that feedback from the reviews was communicated directly to the reviewee but also presented to seniors in key AML governance forums.

Case study: More effective practice in quality assurance

An accountancy sector PBS ensures staff performance is quality assured. New joiners' cases are all reviewed until the PBS is satisfied that good quality outcomes are consistently achieved. All staff receive periodic 'hot reviews' of their casework by a panel of managers within their department, with regular feedback.

The department conducts annual quality assurance reviews of a representative sample of work, so that it can assure itself that the work complies with the PBS's procedures and responsibilities. Its governance body also conducts an annual independent review of the department's work using a representative sample to assess the overall systems, controls and procedures. The findings from both reviews are shared and discussed by senior management in their governance forum with clear feedback provided to staff.

Regulation 46A Annual Reports

- 1.81** Regulation 46A of the MLRs requires PBSs to submit a standalone annual report on their AML supervisory activities to the Treasury and to publish it. Reports are published and generally publicly available on the professional body's website by 1 November each year. They can be obtained or requested directly from PBSs as needed. The reports have now reached a strong baseline, and we no longer consider it necessary to conduct a mass review. Instead, the reports are assessed as part of OPBAS's risk-based approach.

Chapter 2

OPBAS projects and other work

- 2.1** The risk-based project work we've done this year has helped us understand risks across sectors, address PBS vulnerabilities and support prompt action. The work complements our supervisory assessments and information sharing.

Suspicious Activity Reports: Driving improved SAR quality

- 2.2** Our [OPBAS 2023/24 report](#) encouraged PBSs to review their populations' suspicious activity reports (SARs) and to strive to improve submission rates and quality, noting that PBSs have been enabled to do this under the MLRs for some time. SARs are a vital source of intelligence.
- 2.3** Better-quality information disclosed by the private sector in SARs on suspected professional enablers was part of OPBAS's delivery actions under the [UK Professional Enablers Strategy](#).

Action

- 2.4** We analysed PBS responses to the [HMT AML Supervision Report 2023-2024](#), supported by open-source research and insights from our programme of PBS engagement.
- 2.5** We were generally encouraged by what we found and identified positive practices among PBSs, such as sharing guidance with their supervised population on SAR submissions, and routine sampling of SARs submitted by their supervised population. PBSs who didn't review SARs were asked to explain this to us.
- 2.6** Some PBSs showed they were collaborating well with UKFIU, such as delivering joint training to their supervised population. Full findings and OPBAS recommendations are in our published [April 2025](#) letter.
- 2.7** We also assessed the quality of SARs' submitted by two legal and two accountancy sector PBSs. All PBSs participated willingly. Full findings and recommendations are found in our [September 2025](#) letter.

Graph 6: SARs submitted by the legal and accountancy sector PBSs

SARs disclosures submitted under Part 7 or 8 of POCA



Years	Accountancy	Legal
2019-20	52	29
2020-21	132	48
2021-22	68	40
2022-23	45	45
2023-24	69	36
Number of PBS's	13	9

2.8 We found the sample of SARs submitted by PBSs were of good quality. This has provided us with some confidence in the quality of the reviews that the PBSs themselves undertake on their own supervised population.

2.9 We published opportunities for further improvement and effectiveness in the [September 2025](#) letter. PBSs have responded positively to OPBAS feedback including one PBS who has confirmed that they have integrated OPBAS feedback into how they review their supervised populations' SARs.

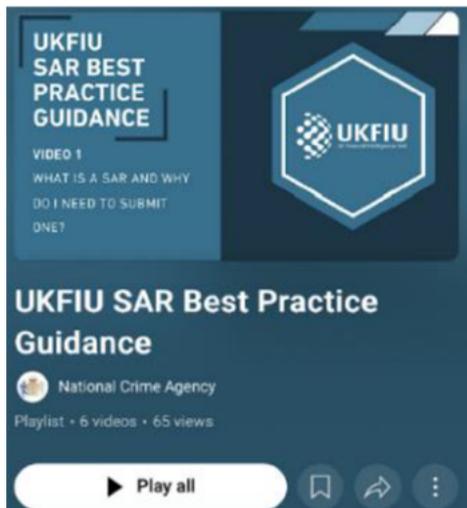
Cross-system engagement

2.10 We have worked with our system partners, including the legal and accountancy sector PBS Affinity Group Chairs, HMRC, the Gambling Commission and UKFIU, on enhancing the SAR approach in the non-financial sector. This has included on SAR record retention and a more consistent approach to reviews.

2.11 We've also supported production of new wording on the SAR portal to encourage appropriate SAR record keeping, addressing a concern that reporting entities weren't retaining SARs and that this action was impeding an effective SAR review.

2.12 Facilitated by OPBAS, UKFIU, held an in-person SAR training event open to financial and non-financial sector stakeholders. It was an opportunity to strengthen awareness and understanding of SAR procedures, legal obligations, and best practices. Key stakeholders such as law enforcement also shared real-life case studies. We received positive feedback and will consider facilitating similar opportunities in future.

2.13 UKFIU has recently produced new guidance as well as AML SAR bitesize training sessions.



The six SARs Best Practice Videos cover the following topics:

- What is a SAR and why do I need to submit one?
- Know your Glossary Codes
- Reason for Suspicion
- Best practice for completing the criminal / terrorist property section
- Best practice for completing the prohibited act section
- What happens after you submit a DAML or DATF?

2.14 We encourage all PBSs (and underlying supervised sectors) to engage with UKFIU's materials and incorporate relevant changes into their approaches. We understand that some PBSs are also undertaking some SAR-focused thematic reviews, and we look forward to seeing their findings.

2.15 Together, this has improved collaboration across the system, and helped PBSs strengthen the quality of SARs, despite remaining challenges on volumes and consistency. It marks a clear step in improving SAR effectiveness.

Next steps

2.16 We'll continue to work with stakeholders and seek representations and evidence of PBS activity.

Trust and Company Service Providers (TCSPs): Tackling key risks

2.17 In March 2023, we published our multi-PBS report on TCSP risk with recommendations for cross-system stakeholders including PBSs to understand more about TCSP risks within their supervised populations.

2.18 Since then, we've worked with HMRC and the PBSs, among others, to help facilitate further action. As part of this, in September 2025 we held an event with all key stakeholders to assess the progress since the report publication.

We found:

a. Improved collaboration

- PBSs had worked collaboratively with stakeholders including HMRC to strengthen collective understanding of risk characteristics and supply chain vulnerabilities.

b. Enhanced guidance

- Enhanced guidance has been issued to the supervised populations to better support an understanding of TCSP risks.

c. Enriched data

- Additional data requested of the PBS supervised populations to inform PBS risk assessments.

2.19 These efforts have contributed to a more evidence-based view of TCSP risk and a more-informed PBS supervisory approach. It may be too early to assess the full impact, but data such as that captured by different supervisory bodies may help identify longer-term trends and future risk-based responses.

2.20 We'll continue to promote and help facilitate cross-sector coordination and collaboration. This is particularly relevant given the supervisory implications for the increase in TF risk for TCSPs in the [National Risk Assessment 2025](#) and the policy changes proposed in the draft Money Laundering and Terrorist Financing (Amendment and Miscellaneous Provision) Regulations 2025. The latter includes the proposal to bring the activity of the sale of 'off-the-shelf firms' within the scope of regulated TCSP activities, requiring compliance with MLRs such as customer due diligence and ongoing monitoring. We'll explore the implications of these changes.

AML supervisory reform

2.21 We have worked with the PBSs to understand priorities and concerns, engaging through multiple channels and fostering dialogue with the FCA.

2.22 PBS feedback has helped inform our transition strategy, and we will maintain this constructive approach so that our supervision remains effective through the transition.

Chapter 3

Information and intelligence sharing

- 3.1** This section describes OPBAS work to encourage information and intelligence sharing domestically among PBSs, and between PBSs, statutory supervisors and law enforcement. It also includes work with our international counterparts as we collectively help drive global compliance.

Domestic

National Risk Assessment

- 3.2** We attended workshops to inform the national scoring and contributed to drafting the National Risk Assessment 2025. This was alongside valuable contributions from the PBSs themselves.
- 3.3** With a clear and comprehensive picture of current and emerging risks, the government, supervisors, law enforcement and businesses can work together to stop money flowing to criminals or those that threaten the UK's security. We expect PBSs to demonstrate how the National Risk Assessment 2025 will inform their ongoing risk assessments.

Professional Enablers Strategy

- 3.4** We continue to lead on actions in the cross-system Professional Enablers Strategy and to support PBSs in delivering their own actions to support a whole-system approach to reducing the risk to the UK from professional enablers.

Achievements include:

a. Supporting system understanding and mitigation

- Completed several reports to support system understanding of key weaknesses and threats, including:
 - A report on the most common AML breaches among supervised populations.
 - Reports on SARs (as noted above).

To maintain momentum, we have moved to the next stage of considering how system weaknesses might be mitigated, working with stakeholders to implement changes and consider where extra guidance might assist supervised populations.

b. Facilitating stakeholder engagement and policy development

- We jointly facilitated a project to understand the barriers to information and intelligence sharing and now chair a working group set-up to develop the policy response to these barriers.

c. Driving and supporting training and guidance

- Facilitated training to PBSs on intelligence handling.
- Delivered training and best-practice guidance on use of SIS.

d. Leading strategic communication

- Delivered 10 presentations, most held jointly with the National Economic Crime Centre (NECC) colleagues, for law enforcement, financial institutions, other supervisory bodies and international partners, explaining the strategy and its aims and objectives, and promoting the UK's approach to this threat.

3.5 We continue to progress ongoing actions and to engage with the NECC on next steps for this work following the end of the cross-system Professional Enablers Strategy's remit in April 2026.

The Intelligence Sharing Expert Working Groups (ISEWGs)

3.6 The ISEWGS are important forums for PBSs to share information and intelligence about current threats with each other and law enforcement. They are also an important opportunity to close the loop on outcomes of intelligence sharing where the supervised population can receive feedback on previous tactical intelligence sharing sessions, for example the regional Northern Ireland and Scotland ISEWGs, and resulting actions.

3.7 In this reporting period:

- The NECC and industry-led accountancy ISEWG has met twice
- The NECC and industry-led legal ISEWG has met once.
- The OPBAS-led Northern Ireland ISEWG has met 3 times
- The OPBAS-led Scotland ISEWG has met 3 times

3.8 We have worked with PBSs and the NECC to ensure that the terms of reference for the sector groups are up to date, with OPBAS leading on revisions. The sector groups have included discussions about emerging threats and typologies, providing PBSs with better information to use in their supervision.

3.9 The regional ISEWGs continue to act as an important forum in which to discuss casework (anonymised when appropriate), and specific geographical themes and trends for Scotland and Northern Ireland. At the October 2025 meetings, we asked for feedback on which aspects of the meetings were most valuable. We discussed the future of the meetings, and agreed that from April 2026, the meetings will be re-focused to include deep dives on given issues of interest to all participants.

3.10 Despite the value of the sector ISEWGs, they dropped in number during this reporting period. We are currently reviewing the overarching intelligence sharing framework, alongside system partners, to ensure that we have the most effective structures in place.

OPBAS conferences

- 3.11** In November 2024, we held our inaugural conference for PBSs. Delegates heard presentations from speakers including OPBAS, the FCA, the NECC, and HMRC. Useful feedback was received from the attendees, which we incorporated into the planning for the second conference.
- 3.12** The second conference took place in November 2025. We discussed the practical delivery of UK AML supervisory reform, the risks and opportunities of AI, cyber security and resilience, and the use and analysis of data in AML. Feedback from the 2024 conference was considered, and breakout sessions were incorporated. This resulted in a more interactive day, and the experience and suggestions from the breakouts will feed into our continuing work.
- 3.13** These conferences are a useful opportunity to share the latest guidance and best practice and hear concerns and questions from PBS. We'll continue to hold such events as we work towards supervisory transition over the coming years.

International

- 3.14** We continue to play our part in strengthening global supervisory effectiveness. We have used forums like FATF and Middle East and North Africa FATF group and the World Bank to share information and best practice. We also meet counterparts from across the world.

In focus: OPBAS-hosted international roundtable

In February 2025 OPBAS held its first in-person international roundtable with representatives from seven countries at the FCA offices. It covered the non-financial sector (so called Designated Non-Financial Businesses and Professions) to encourage dialogue and share ideas.

Engagement continued afterwards on key topics such as tackling TCSP risk and supporting effective risk-based supervision. OPBAS continues to work closely with our international stakeholders to help facilitate and drive co-operation and collaboration.

- 3.15** The UK's Anti-Corruption Strategy, published in November 2025, includes commitments for OPBAS. These include deepening partnerships with other jurisdictions to improve information and intelligence sharing and strengthen supervision standards. As part of this, OPBAS participated in a well received panel event during the December 2025 United Nations Convention against Corruption conference.
- 3.16** Through OPBAS events and engagement with international stakeholders, we'll continue to look for opportunities to bring key stakeholders together to support a cross-border approach to tackling financial crime.

Chapter 4

Our priorities for the year ahead

- 4.1** This year, we'll continue to work closely with stakeholders on an orderly managed transition to the new regulatory model. We'll maintain clear and transparent communication and support the FCA.
- 4.2** We'll strengthen supervision and improve coordination across the broader AML/CFT ecosystem. Our approach will remain risk-based, informed by the data. We expect PBSs to uphold their obligations under the MLRs until formally removed, and we appreciate their cooperation.
- 4.3** Professional enablers will remain a focus, including after the current strategy completes in April. We'll also focus on information sharing, the use of third-party providers to fulfil AML obligations, and helping PBSs to improve AML compliance and effectiveness within their populations.
- 4.4** We will take forward project work focused on terrorist finance risk, including the increased risk highlighted within the NRA to TCSPs.
- 4.5** We will maintain our focus on the ISEWGs and ensure that they deliver positive outcomes and consider their role in the future supervisory landscape. Information and intelligence sharing will remain important both during and after transition, and we'll work with stakeholders and partners to make sure the right structures are in place for this.
- 4.6** We'll examine the changes to the MLRs expected to take effect in the coming year, in particular those requiring TCSPs to do more due diligence in relation to shelf companies. We'll work with partners including the PBSs to ensure that supervised populations receive the right guidance.

Annex 1

List of Professional Body Supervisors

OPBAS oversees 22 PBSs (plus 3 professional bodies which have delegated regulatory functions). They cover a wide range of professions across the accountancy and legal sectors. They are:

- Association of Accounting Technicians
- Association of Chartered Certified Accountants
- Association of International Accountants
- Association of Taxation Technicians
- Chartered Institute of Legal Executives/CILEx Regulation
- Chartered Institute of Management Accountants
- Chartered Institute of Taxation
- Chartered Accountants Ireland
- Council for Licensed Conveyancers
- Faculty of Advocates
- Faculty Office of the Archbishop of Canterbury
- General Council of the Bar/Bar Standards Board
- General Council of the Bar of Northern Ireland
- Insolvency Practitioners Association
- Institute of Certified Bookkeepers
- Institute of Chartered Accountants in England and Wales
- Institute of Chartered Accountants of Scotland
- Institute of Financial Accountants
- Institute of Accountants and Bookkeepers
- Law Society/Solicitors Regulation Authority
- Law Society of Northern Ireland
- Law Society of Scotland

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