

AAT

ORDER BY CONSENT

In the matter of

John Barber 6245340

Misconduct

John Barber's professional or personal conduct, was found to be in breach of the *Code of Professional Ethics* and to have posed a risk to the public or was likely to undermine public confidence in the Association or its members; namely:

1. He failed to comply with his obligations under the Money Laundering Regulation in force while providing accountancy services to the public, specifically:
 - (i) Between on or around 26 June 2017 and on or around 30 April 2021, he did not maintain an adequate written record of his anti-money laundering policies, controls and procedures; and/or
 - (i) Between on or around 01 October 2014 and on or around 31 March 2021, he failed to apply adequate risk-based due diligence and ongoing monitoring measures in respect of one or more clients; and/or
 - (ii) Between on or around 26 June 2017 and on or around 31 March 2021, he did not carry out and/or record an adequate firm-wide money laundering risk assessment; and/or
 - (iii) Between on or around 01 October 2014 and on or around 30 April 2021, he did not carry out an adequate review of his anti-money laundering policies, controls and procedures
2. For an unknown period up until on or around 30 August 2020 he failed to have in place any or any adequate continuity of practice agreement

Finding

Grounds for disciplinary action existed and the matter was suitable for exercise of the Investigations Team's powers under the *Disciplinary Regulations*.

Order

John Barber is hereby:

1. Reprimanded; the reprimand will expire 24 months from the date of the Order Reprimand
2. A warning over future conduct
3. Fined: with the fine being £2000
4. Divested of his fellow membership (FMAAT) status for a period of two years.

Consent

John Barber has agreed to submit to the decision of the Investigations Team in accordance with Regulation 6 of the *Disciplinary Regulations*.

11 November 2021

AAT's Publication policy requires AAT to publish the Committee's finding and orders as soon as practicable.