



## AAT

### PROFESSIONAL STANDARDS

#### ORDER OF AAT

#### In the matter of

Paul Barry (7948069)

#### Misconduct

Paul Barry'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 15 December 2007 and on or around 12 October 2020, he did not have appropriate and risk-sensitive anti-money laundering policies, controls and procedures in place; and/or
  - (ii) between on or around 15 December 2007 and on or around 12 October 2020, he did not apply and/or record adequate client due diligence measures in respect of one or more clients; and/or
  - (iii) between on or around 15 December 2007 and on or around 12 October 2020, he did not have adequate anti-money laundering training in place for his relevant employees; and/or
  - (iv) between on or around 15 December 2007 and on or around 02 July 2020, he did not carry out an adequate review of his anti-money laundering policies, controls and procedures; and/or
  - (v) between on or around 26 June 2017 and on or around 02 July 2020, he did not maintain an adequate written record of his anti-money laundering policies, controls and procedures; and/or
  - (vi) between on or around 26 June 2017 and on or around 29 June 2020, he did not carry out and/or record an adequate firm-wide money laundering risk assessment.

2. For an unknown period up to on or around 30 September 2020, he provided services outside the scope of his AAT licence; namely:
  - (i) company secretarial services; and/or
  - (ii) payroll.
3. For an unknown period up to on or around 30 September 2020, he provided trust or company services without being registered by HMRC to be legally able to do so.

**Finding**

Grounds for disciplinary action existed and the matter was suitable for exercise of the Investigations Team's powers under paragraphs 6 and 31 of the *Disciplinary Regulations*.

**Order**

Paul Barry is hereby:

- i. Reprimanded, with the reprimand remaining live on his record for a period of two years.
- ii. Warned over his future conduct.

**Consent**

Paul Barry agreed to submit to the decision of the Investigations Team, in accordance with Regulation 6 of the *Disciplinary Regulations*.

13 January 2021