



**AAT**

**PROFESSIONAL STANDARDS**

**ORDER BY CONSENT**

**In the matter of**

Steven Bowers (10076404)

**Misconduct**

Steven Bowers'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. Between on or around 16 March 2018 and on or around 26 February 2020 he failed to receive and/or hold clients' money in accordance with AAT's *Clients' Money* policy.
2. For an unknown period until on or around 17 July 2020 he failed to carry out an adequate risk assessment and ongoing monitoring in respect of one or more clients.
3. For an unknown period until on or around 17 July 2020 he failed to carry out an adequate firm-wide money laundering risk assessment.
4. For an unknown period until on or around 17 July 2020 he failed to carry out any or any adequate periodic review of his Anti-Money Laundering policies, procedures and controls.

**Finding**

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

**Order**

Steven Bowers is hereby:

- i. Reprimanded. The reprimand is to remain live on his record for a period of 36 months from the date of this order.
- ii. Warned that he must ensure he is aware of – and compliant with – all relevant AAT policies, regulations and byelaws which govern his membership and licence, as well as all relevant Anti Money Laundering legislation.

**Consent**

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

23 March 2021