



AAT

ORDER BY CONSENT

In the matter of

Virginia Rattigan (7678169)

Misconduct

Virginia Rattigan'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. For an unknown period until on or around 12 November 2019 she failed to have in place adequate Anti-Money Laundering policies, procedures and controls.
2. For an unknown period until on or around 12 November 2019 she failed to carry out and record any, or any adequate, client due diligence in respect of one or more clients.
3. For an unknown period until 12 November 2019 she failed to carry out an adequate risk assessment and ongoing monitoring in respect of one or more clients.
4. For an unknown period until on or around 12 November 2019 she failed to carry out an adequate firm-wide money laundering risk assessment.
5. For an unknown period until on or around 12 November 2019 she failed to carry out any, or any adequate, periodic review of her Anti-Money Laundering policies, procedures and controls.
6. For an unknown period until on or around 12 November 2019, she failed to receive and hold clients' money in accordance with AAT's *Clients' Money* policy.

Finding

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

Order

Virginia Rattigan is hereby:

- i. Reprimanded, with the reprimand to remain live on her record for 48 months.
- ii. Removed from AAT fellow membership (FMAAT) for a period of 48 months.

- iii. Fined £1,133.00
- iv. Warned that she must take adequate measures to ensure she is aware of and compliant with her obligations pursuant to all relevant money laundering legislation.

Consent

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

05 January 2021

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