

## APPLICATION ON PAPERS

# CONSENT ORDERS CHAIR OF THE ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS

## REASONS FOR DECISION

**In the matter of:** Mr Andrew Rogerson Parry

**Heard on:** Friday, 30 January 2026

**Location:** On the Papers

**Chair:** Mr Steven Chandler

**Legal Adviser:** Miss Juliet Gibbon

**Outcome:** The Chair made orders in the terms of the Consent Order: Draft Agreement that Andrew Rogerson Parry shall be severely reprimanded, shall pay a fine in the sum of £5,000 and shall pay costs to ACCA in the sum of £1,542.50.

## PRELIMINARY

1. This matter has been referred to a Chair of the Disciplinary Committee of ACCA (“the Chair”) pursuant to Regulation 8(8) of The Chartered Certified Accountants’ Complaints and Disciplinary Regulations 2014, as amended (“the Regulations”) for the Chair to determine, on the evidence before him, whether to approve or reject

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the Consent Order: Draft Agreement (“the Consent Order”) agreed between ACCA and Mr Andrew Rogerson Parry.

2. The Chair had before him a bundle of papers, numbered pages 1-319, that included a Referral to Consent Orders Chair and the Consent Order signed by Mr Parry and a representative of ACCA. He also had sight of the following:
  - a. Detailed and Simple Costs Schedules
  - b. ACCA’s ‘Consent Orders Guidance’
  - c. ACCA’s ‘Consent Orders – Frequently Asked Questions’
  - d. ACCA’s ‘Guidance for Disciplinary Sanctions’ (“GDS”), and
  - e. ACCA’s ‘Guidance on Costs Orders’.
3. The Chair considered the Consent Order in the absence of the parties and without a hearing in accordance with Regulation 8(8) of the Regulations.
4. The Chair was satisfied that Mr Parry was aware of the terms of the Consent Order and had signed the order on 11 December 2025. The Chair noted that the Consent Order had also been signed by a representative of ACCA on 15 December 2025.
5. The Chair noted the terms of the Consent Order, as follows:

Mr Parry is the Principal and the Money Laundering Reporting Officer (the “MLRO”) of Firm A. Mr Parry holds a Practising Certificate (“PC”) with ACCA.

“The Association of Chartered Certified Accountants (“ACCA”) and Mr Andrew Rogerson Parry (, the Parties), agree as follows:

1. Mr Andrew Rogerson Parry admits the following:

Mr Andrew Rogerson Parry, an ACCA Fellow:

1. Between 26 July 2017 and July 2025, failed on behalf of Firm A to comply with or demonstrate compliance with the Money Laundering,

Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (“the MLRs 2017”), namely:

- (a) Regulation 18 - Risk assessment by relevant persons: Firm-wide risk assessment
- (b) Regulation 19 – Policies, controls and procedures: AML policy and procedures
- (c) Regulation 24 – Training

2. By reason of his conduct as set out at allegation 1 above, Mr Andrew Rogerson Parry failed to comply with Subsection 115 of ACCA’s Code of Ethics and Conduct (the Fundamental Principle of Professional Behaviour) and Section B2 (Anti-Money Laundering) of ACCA’s Code of Ethics and Conduct (as applicable from 2017 to 2025).
3. By reason of his conduct set out at allegations 1-2 above, Mr Andrew Rogerson Parry is guilty of misconduct pursuant to byelaw 8(a)(i).

2. That Mr Parry shall be severely reprimanded, shall be fined £5,000 and shall pay costs to ACCA in the sum of £1,542.50.

[Signatures of Mr Andrew Rogerson Parry, dated 11 December 2025 and a representative of ACCA, dated 15 December 2025]

If the Consent Orders Chair is satisfied it is appropriate to deal with the complaint by way of a Consent Order and the signed draft Consent Order is approved, it constitutes a formal finding and order. The Consent Orders Chair has the power to recommend amendments to the signed draft Consent Order and to subsequently approve any amended order agreed by the Parties.

## Publicity

All findings and orders of the Consent Orders Chair shall be published naming the relevant person, as soon as practicable, and in such manner as ACCA thinks fit”.

### **BRIEF BACKGROUND**

6. Mr Andrew Rogerson Parry (“Mr Parry”) has been a member of ACCA since 17 April 1997. He is the Principal and the MLRO of Firm A and holds a Practising Certificate (“PC”) with ACCA. As a holder of a PC from ACCA, there is a mandatory requirement for Firm A to be monitored by ACCA to assess compliance with the MLRs 2017. The MLRs 2017 came into force on 26 June 2017. The MLRs 2017 apply to anyone providing accountancy services to other persons by way of business in the United Kingdom.
7. ACCA-supervised firms are required to monitor and manage their own compliance with the MLRs 2017 and make sure they are familiar with the requirements of the MLRs 2017 to ensure continuing compliance. The MLRs 2017 require firms to have in place anti-money laundering systems and controls that meet the requirements of the UK anti-money laundering regime.
8. ACCA also considers Anti-Money Laundering Guidance for the Accountancy Sector (“AMLGAS”). AMLGAS is guidance based on the law and Regulations as of June 2023. It covers the prevention of money laundering and the countering of terrorist financing. It is intended to be read by anyone who provides audit, accountancy, tax advisory, insolvency, or trust and company services in the United Kingdom and has been approved and adopted by the UK accountancy AML supervisory bodies
9. A desk-based monitoring review of Firm A was carried out by ACCA’s AML Team in order to monitor its compliance with the MLRs 2017 and AMGLAS.
10. During the review Mr Parry confirmed within his response to ACCA that no training had been provided to staff at Firm A due to the following:

*“My employees only work on summarizing client paperwork. I work closely with them while they do this and review it after it is completed when I am finishing the accounts. I do not consider it necessary for them to have training as I have a better knowledge of the client and would spot any issues when going through the accounts”.*

11. Mr Parry subsequently confirmed that the Firm-wide Risk Assessment (“FWRA”) that he submitted to ACCA had been written in March 2014 when he bought the AMLCC handbook. This was before the commencement of the MLRs 2017. Mr Parry stated in correspondence to ACCA:

*“It has then been part of my annual review since. A lot of my clients have been with me all that time and the ones I have taken on are of a similar nature”.* Mr Parry also stated that he used to employ an ACCA qualified individual who was in a more senior role and she undertook the courses with him via Quantum, as it was, and then Mercia, which bought out Quantum, but she had left in 2020.

12. During the monitoring review, Firm A displayed poor AML controls. The following non-compliance was identified:

1. *Firm-wide risk assessment*

*It has been a legal requirement since June 2017 for the MLRO to conduct and keep up to date a FWRA.*

*The firm is unable to provide evidence that a FWRA was completed prior to July 2025 and consequently, cannot demonstrate compliance with the MLR 2017 before July 2025.*

*This is also covered in AMLGAS s4.*

2. *AML policy and procedures*

*It has been a legal requirement since June 2017 for a firm to document and regularly review their AML policy and procedures.*

*The firm is unable to provide evidence that the firm had documented AML P&P prior to July 2025, and consequently, cannot demonstrate compliance with the MLR 2017 before July 2025. \*It has also been noted that the July 2025 AML P&P may also be considered non-compliant as it is a third party template that has not been sufficiently tailored to the firm. No material updates have been made and therefore the firm may have been in breach of the MLR 2017 until August 2025.*

3. *AML training*

*It has been a legal requirement since June 2017 for a firm to provide regular AML training to all relevant employees and maintain a record in writing of the training completed.*

*As the firm have not provided training to any current employees, the firm appear to currently be in breach of the MLR 2017 as the firm cannot demonstrate that all relevant employees have received regular AML training.*

13. The evidence revealed that Firm A had not been compliant with Regulations 18, 19 and 24 of the MLRs 2017. As such, Mr Parry had acted contrary to the Fundamental Principle of Professional Behaviour, which requires members to comply with relevant laws and regulations and avoid any conduct that the professional accountant knows or should know may discredit the profession.
14. On 13 August 2025, the AML report was issued to Firm A. Mr Parry responded to ACCA on 24 October 2025. He confirmed that all relevant employees in Firm A had now received the relevant training and he attached certificates to evidence the training.
15. As a result of Mr Parry's non-compliance with Regulations 18, 19 and 24 of the MLRs 2017, the matter was referred to the Regulation and Conduct Department (formerly known as Professional Conduct Department).
16. In a letter to Mr Parry, dated 30 October 2025, ACCA proposed that the matter be disposed of by way of a Consent Order. Mr Parry responded on 12 November 2025

agreeing for the matter to be disposed of by way of a Consent Order. Mr Parry also set out some personal mitigation to explain why he had not fully complied with the MLRs 2017.

17. In signing the Consent Order, Mr Parry has admitted the allegations and has accepted that he should be severely reprimanded, pay a fine of £5,000 and ACCA's costs in the sum of £1,542.50.

### **DECISION AND REASONS**

18. Under Regulation 8(8) of the Regulations the Chair must determine, on the evidence before him, whether it is appropriate to approve or reject the draft Consent Order or whether to recommend any amendments.

19. The powers available to the Chair are:

- a. To approve the draft Consent Order, in which case the findings on the allegations and the orders contained in it become formal findings and orders (Regulations 8(11) and 8(14) of the Regulations).
- b. To reject the draft Consent Order, which they may only do if they are of the view that the admitted breaches would more likely than not result in exclusion from membership (Regulation 8(12) of the Regulations).
- c. To recommend amendments to the draft Consent Order, if they are satisfied it is appropriate to deal with the complaint by way of consent but wish the terms of the draft order to be amended (Regulation 8(13) of the Regulations).

20. The Chair was satisfied that there was a case for Mr Parry to answer and that the Investigating Officer had conducted an appropriate investigation and had followed the correct procedure.

21. The Chair noted that under Regulation 8(12) of the Regulations, he should only reject the signed Consent Order if he is of the view that Mr Parry's admitted

breaches of the MLRs 2017 would, more likely than not, result in his exclusion from membership.

22. The Chair considered the seriousness of the allegations and the public interest, which includes the protection of the public, the maintenance of public confidence in the profession, and the declaring and upholding of proper standards of conduct and performance. He balanced the public interest against Mr Parry's own interests, and he took into account both the aggravating and mitigating features of the case.
23. In considering this matter the Chair accepted the advice of the Legal Adviser and paid due regard to the ACCA guidance documents 'Guidance for Disciplinary Sanctions' ("GDS"), 'Consent Orders Guidance' and 'Consent Orders – Frequently Asked Questions'.
24. The Chair agreed with the following aggravating factors of the case, as identified by ACCA:
  - a. Compliance with the MLRs 2017 is a legal requirement and, therefore, mandatory;
  - b. Mr Parry was the MLRO of Firm A;
  - c. There was a potential risk of harm to the public arising as a result of Firm A's failure to conduct and document an adequate FWRA and AML policies and procedures;
  - d. There was a potential risk of harm to the public arising from Firm A's failure to provide training to relevant employees in Firm A;
  - e. The extent of Firm A's non-compliance with the MLRs 2017, and
  - f. The conduct that led to Mr Parry breaching the MLRs 2017 fell below the standards expected of an ACCA member.

25. The Chair also identified further aggravating factors such as Mr Parry considered that training was not necessary because he had a better knowledge of his clients than his staff did and he was unaware of the need to update policies and procedures. The Chair determined that Mr Parry appeared to demonstrate a lack of regard for the importance of the MLRs 2017, their relevance to Firm A's work and the need for him to take them seriously.
  
26. The Chair agreed with the following mitigating factors of the case, as identified by ACCA:
  - a. Mr Parry has been an ACCA member of continuous good standing since 17 April 1997;
  - b. Mr Parry has regularised his position and there is no continuing risk to the public;
  - c. Mr Parry confirmed that all AML procedures are now in place at Firm A and will be maintained to the standards required;
  - d. There is no evidence of deliberate or dishonest conduct on the part of Mr Parry;
  - e. Mr Parry has fully co-operated with ACCA's investigation and the regulatory process;
  - f. Mr Parry has made admissions to the allegations by agreeing to dispose of the case by consent, and
  - g. There is no evidence of actual enabling of money laundering.
  
27. The Chair also identified the following mitigating factors:
  - a. There was no evidence of personal or financial gain as a result of Mr Parry's breaches of the MLRs 2017 and no loss to the public, and

- b. There is no evidence of any continuing risk to the public.
28. The Chair placed limited weight on the personal mitigation provided by Mr Parry as a reason for his non-compliance with the MLRs 2017 as he had not provided any evidence to support this and, furthermore, the reasons provided did not explain the extent of Firm A's non-compliance with the MLRs 2017.
29. The Chair was satisfied that the allegations admitted by Mr Parry were serious and amounted to misconduct. He was also satisfied that, as a result of the extent and duration of the breaches of the MLRs 2017 and Mr Parry's lackadaisical attitude to the MLRs when accounting for the breaches, that Mr Parry had acted recklessly in failing to comply with the MLRs 2017. The Chair, however, did not consider that the admitted breaches of the MLRs 2017 would more likely than not result in Mr Parry's exclusion from membership of ACCA given the substantial mitigation in this case and Mr Parry's previous good standing since he became a member of ACCA in 1997. The Chair was satisfied, therefore, that there was no basis for him to reject the terms of the Consent Order under Regulation 8(12).
30. The Chair paid due regard to ACCA's GDS, including Section H, Part 2, in relation to the breaches of Regulations 18, 19 and 24 of the MLRs 2017. In relation to the sanction of severe reprimand, the Chair found the following factors to be relevant:
- a. The misconduct was not intentional and is no longer continuing, although the member may have acted recklessly;
  - b. There is no evidence that the breaches of the MLRs 2017 caused any direct or indirect harm;
  - c. Mr Parry had a previous good record from when he became a member of ACCA in 1997;
  - d. There has been no repetition of the conduct since the breaches of the MLRs 2017 were identified by ACCA;

- e. Mr Parry has taken corrective steps to ensure future breaches of the MLRs 2017 do not occur, and
  - f. Mr Parry had fully co-operated with the ACCA investigation.
31. The Chair also considered the guidance at Section C6 of the GDS in relation to fines. The Chair did not have any information before him about Mr Parry's current financial circumstances but noted the guidance that in the absence of such evidence he was '*entitled to assume that the member's means do not justify a reduction in the amount of fine that would be otherwise imposed for an offence of the gravity in question*'. He also noted that Mr Parry had accepted the terms of the Consent Order which included the proposed fine of £5,000.
32. Having considered the GDS and all the documentary evidence before him, the Chair was satisfied that the sanction of a severe reprimand, together with a fine of £5,000, are the appropriate and proportionate sanctions in this case to mark the seriousness of Mr Parry's breaches of the MLRs 2017.
33. The Chair paid due regard to ACCA's Guidance for Costs Orders. He considered that ACCA was entitled to its costs in principle. ACCA has provided two schedules of costs. The Chair did not have a Statement of Financial Position from Mr Parry. [PRIVATE]. The Chair was satisfied, however, that ACCA's application for costs in the sum of £1,542.50, which has been agreed by Mr Parry, was an appropriate and proportionate sum for the costs incurred by ACCA. He noted that Mr Parry had not contested the proposed sum of £1,542.50 and had signed the Consent Order.
34. The Chair, pursuant to his powers under Regulation 8(11) of the Regulations, approved the terms of the Consent Order and made the following Order:

#### **ORDER BY CONSENT**

- i. The Consent Order: Draft Agreement is approved.
- ii. Allegations 1a, 1b, 1c, 2 and 3 are proved by way of Mr Andrew Rogerson Parry's admissions.

- iii. Mr Andrew Rogerson Parry shall be severely reprimanded and fined the sum of £5,000.
- iv. Mr Andrew Rogerson Parry shall pay costs to ACCA in the sum of £1,542.50.

#### **EFFECTIVE DATE OF ORDER**

- 35. Under Regulation 8(17) of the Regulations there is no right of appeal against this Order. The Order shall, therefore, come into effect immediately.

#### **PUBLICITY**

- 36. In accordance with Regulation 8(16) of the Regulations all findings and orders set out in the Consent Order shall be published, naming Mr Parry, as soon as practicable and in such manner as the Association thinks fit.

**Mr Steven Chandler**  
**Chair**  
**30 January 2026**