

Anti-Money Laundering Training checklist



Under regulation 24(1) of the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (MLR), firms must make sure fee earners who undertake work within scope of the MLR:

- Are made aware of the law relating to money laundering, terrorist financing and the requirements of data protection which are relevant to the MLR
- Are regularly provided with training in how to recognise and deal with transactions and other activities which may be related to money laundering or terrorist financing; and
- Can identify and report suspicions of money laundering or terrorist financing.

Under regulation 24(1)(b), firms must keep a comprehensive written record of all training undertaken including:

- training documentation (presentations, notes, hand-outs, copies of online content etc)
- attendance records
- dates of training, and
- the results of any assessments carried out

This information must be made available to us, upon request.

We have developed a checklist for firms to use when developing an AML training programme. It should help firms subject to the MLRs fulfil their requirement to carry out anti-money laundering (AML) training, as required under regulation 24 of the MLR.

The checklist provides an overview of the areas we consider contribute to an effective training programme, as well as other useful tips and things firms may consider to help them comply with regulation 24 MLR.

The checklist is based on the 'ROLE' model which is discussed in greater detail in the findings from our training thematic. This recommends training should be:

- **Relatable**
- **Ongoing**
- **Leadership support**
- **Engaging**

It should be noted that this checklist is non-exhaustive. If you chose to use our training checklist you should adapt this to make sure any training you provide is relevant to your firm.

This may include covering potential risk areas that do not feature on our checklist.

1. Have you created a training plan? Yes No

This should consider the goals/objectives of training, the curriculum of the course and the frequency of training

2. Will you be producing your own training material or using a training provider?

Producing Own Materials

Using Training Provider

There is no obligation to use external consultancies in providing training, although you may find this to be your preferred method. You may decide to produce your own training materials, so long as they cover off the appropriate topics with enough detail. There are many open-source resources available online to help you develop a training package.

You may also consider alternating delivering training internally and externally.

3. If using a provider, have you discussed what you would like to achieve with your training package? Yes No N/A

4. Is your training tailored to your firm? Yes No

AML training should be tailored to the risks your firm faces. If the training you provide does not mirror the risks in your firm wide AML risk assessment, you should consider how useful this will be to your fee earners.

5. Does the training cover:

The risks identified in the firm wide AML risk assessment

Your AML policies, controls and procedures

Gaps in knowledge or identified training needs from file reviews

None of the above

6. Is the training material up to date?

Training material should be current and should consider emerging risks.

When was the training material last updated?

Is it up to date? Yes No

7. Will you provide training to: All staff Relevant staff (Check relevant option below)

Fee earners working in scope of the MLR

Accounts staff

Compliance team

New business intake teams

Support staff (e.g. administrative or secretarial staff with file opening responsibilities)

The regulations require that all relevant employees and any agents' firms use are trained including agents and employees who are capable of contributing to the identification, mitigation, prevention or detection of money laundering.

This would include support staff who handle money or assist with compliance.

[Guidance on the scope of the MLRs can be found here.](#)

8. Does your training cover the following areas (this list is non-exhaustive, but details some of the areas we would expect to see covered in your training package)?

Client Due Diligence (CDD)

Enhanced Due Diligence (EDD)

Ongoing-Monitoring

Suspicious Activity Reporting

Tipping Off

Record Keeping

An Overview of Relevant Legislation (POCA /MLR /TF)

Red Flags (Firm-specific Risks)

Source of Funds/Source of Wealth

Internal Policies, Controls and Procedures

Proliferation Financing

9. Is the training relevant to the fee earner's role: Yes No

10. Are there any higher risk roles at your firm which require additional in depth training requirements? Yes No

This could include staff that work in higher risk work areas, such as conveyancing, or include compliance staff who are responsible for carrying out AML checks.

11. Has the money laundering compliance officer (MLCO) or money laundering reporting officer (MLRO) undertaken any additional training. Yes No

To be effective in the role of MLCO/MLRO there is an expectation they are familiar with some of the wider AML literature produced for the legal sector by law enforcement agencies, national government and other bodies.

Things to consider:

- dedicated AML qualifications
- attending webinars
- online training
- attending specialist conferences
- attending specialist round-table discussions and workshops with peers
- reading specialist articles and publications.

12. When do new staff receive AML training?

Where new or existing relevant staff take on a role, you should ensure AML training is provided as soon as possible after they join, ideally as part of their induction process and before undertaking any regulated work.

New starters

During induction

Within first 3 months

Within first 6 months

Longer than 6 months

13. Existing Staff

[The Legal Sector Affinity Group \(LSAG\) AML guidance](#) sets out that some form of high-level basic AML awareness/refresher training should be taken annually across all relevant employees.

Our expectation is that employees should receive training at regular and appropriate intervals. This should provide updates on any new developments and to refresh existing knowledge. How often this is provided will be determined on a risk-based approach.

When was AML training last provided?

Within the last year

Within the last two years

More than two years ago

Never

14. When will the next AML training be provided?

15. Within the last 12 months, have you:

Attended team meetings to discuss AML

Shared AML update emails

Shared AML case studies and articles

Asked fee earners to attend AML webinars

Delivered face to face AML training

These ad-hoc updates are an effective way of keeping money laundering at the forefront of fee earners minds.

Leadership

16. Have senior management fed into training content: Yes No

17. Have senior management cited/approved training content: Yes No

18. Have you maintained a copies of:

Under regulation 24(1)(b), firms must keep a comprehensive written record of all training undertaken.

- Training records Yes No
- Training content Yes No
- AML updates which have been shared Yes No
- Attendance records Yes No
- The results of any assessments carried out Yes No
- Results following file reviews Yes No

19. Are senior management monitoring AML training records? Yes No

20. Have you rolled out follow up training for those who were not in attendance? Yes No

Engaging

21. Does the training content feature:

Case studies

SRA updates

Immersive scenarios

Live examples

Interactive content

22. Does the training make use of mixed media sources? Yes No

This could include bitesize content, such as articles, podcasts, games etc.

23. Have you sought feedback from fee earners around how they find the training? Yes No

24. How will you check to see if training has been taken on board by fee earners:

Assessment

AML file reviews

Follow up discussions at team meetings

Fee earner interviews

Independent audit

Appraisals

Additional comments: