Jonathon Bray

Role-based AML Training & Competence Matrix (One-Page Summary)

Role	Key Learning Outcomes	Measurement of Success	Frequency / Format	Informal Reinforcement
File-handlers (fee earners)	- Understand and apply CDD & EDD requirements - Identify red flags & report suspicions - Maintain compliant file notes	- File review quality - Audit outcomes - Quiz completion - Supervisory feedback	- Onboarding + annual refresher - Targeted updates for high-risk areas	- Peer discussion of tricky cases - 'AML moment' in team meetings
Partners	- Lead by example; promote AML culture - Approve high-risk clients/matters - Monitor team compliance	- Supervision notes - Escalation logs - Partner CPD record	- Annual leadership AML briefing - Quarterly regulatory updates	- Case debriefs; mentoring sessions
Cashiers / accounts team	- Recognise suspicious transactions - Check source of funds/wealth evidence - Apply 'no client account as banking facility' rule	- Error/near-miss tracking - Audit results - Quiz	- Onboarding - Annual update	- Joint reviews with MLRO after issues - 'What went wrong?' discussion
Onboarding / client intake team	- Complete CDD accurately - Use screening tools properly - Know escalation process	- Error rates - Review of onboarding checklists - Quiz	- Onboarding - 6-month review - Annual refresher	- Share red flag examples; huddles with MLCO/MLRO
Reception / front-of-house	- Recognise suspicious behaviour or visitors - Know who to contact if concerned	- Observation / supervisor notes - Spot-check quiz	- Onboarding - Refresher every 2 years	- Short briefings; posters & reminders
MLRO	- Lead by example – promote 'open door' AML culture - Awareness of all roles within firm - Undertake specialist training	Supervision notes - Escalation logs - MLRO CPD record	- Annual MLRO training or certification - Quarterly regulatory updates	- Continual monitoring and assessment of cases

