

MLRO Cheat Sheet

Topic/Focus	Reference
The individual referred to in the legislation and CCAB AMLGAS as a 'Nominated Officer' with responsibility for receiving and dealing with reported suspicions	Reg 21 (3), ss330, 331 PoCA 2002, s21A TA 2000, and Para 3.4.5 CCAB AMLGAS
Money Laundering Compliance Officer – referred to in MLR and CCAB AMLGAS	Reg 21 (1)(a), and Para 3.4.4 CCAB AMLGAS
The Compliance Officer will be particularly concerned with obligations on the firm (which is referred to as the 'relevant person' in the MLR)	Regs 18 to 21, 24 and 27 to 41, and Paras 3.4.10 and 3.5.3 CCAB AMLGAS
Money Laundering Reporting Officer – combining the roles of Nominated Officer and Compliance Officer	Para 3.4.7 CCAB AMLGAS
Reviewing compliance periodically	Regs 19(3)(e), 19A(3)(c) and 21(1)(c), and Paras 3.6.23 to 3.6.26 CCAB AMLGAS
Policies, Controls and Procedures document	Regs 19 and 19A, and Paras 3.6.1 to 3.6.26 CCAB AMLGAS (Template: see link below)
Business owners, officers and managers ('BOOMS')	Reg 26, and Paras 3.2.1 to 3.3.1 CCAB AMLGAS
Staff screening	Reg 21 (1)(b), and Para 3.6.22 CCAB AMLGAS
Individual client risk and client due diligence	Regs 27 to 41, and Paras 5.1.1 to 5.6.12 CCAB AMLGAS
Informing your professional supervisory body / HMRC	Regs 26 and 57, and Para 3.4.6 CCAB AMLGAS
Firm-wide risk assessment	Regs 18 and 18A, and Paras 4.1.1 to 4.7.1 CCAB AMLGAS (Template: see link on page 2)
Outsourcing work overseas	Paras 3.6.14 to 3.6.16 CCAB AMLGAS
Review by professional supervisory bodies / HMRC	Regs 46, 59 and 60
Tipping off	ss 333A to 333E PoCA 2002, s21D to 21H TA 2000, and Paras 6.3.1 to 6.3.10 CCAB AMLGAS
PoCA privilege	s330 subsections (6)(b), (10), (11) and (14) PoCA 2002, s21A subsections 5(b), (8), (9) and (15) TA 2000, and Paras 6.5.22 to 6.5.33 CCAB AMLGAS

HELPFUL LINKS

Money Laundering Regulations 2017

<https://www.legislation.gov.uk/ukxi/2017/692/contents>

Proceeds of Crime Act 2002

<https://www.legislation.gov.uk/ukpga/2002/29/part/7>

Terrorism Act 2000

<https://www.legislation.gov.uk/ukpga/2000/11/part/III>

CCAB Anti-Money Laundering Guidance for the Accountancy Sector

<https://www.ccab.org.uk/wp-content/uploads/2023/08/AMLGAS-update-June-2023-APPROVED.pdf>

ACCA AML Policies, Controls and Procedures factsheet and template

<https://www.accaglobal.com/gb/en/technical-activities/technical-resources-search/2020/february/ta-anti-money-laundering-policy-and-procedures.html>

ICAEW AML Firm-wide Risk Assessment guidance and template

<https://www.icaew.com/-/media/corporate/files/technical/legal-and-regulatory/money-laundering/icaew-firm-wide-risk-assessment-methodology.ashx>

David Winch MLRO Support Ltd website

<https://mlrosupport.co.uk/>

References to legislation and guidance were last updated on 1 October 2024.