



## Technical factsheet

# ACCA anti-money laundering (AML) training: Frequently asked questions

### **Why is AML training so important?**

Staff training and awareness raising have long been recognised as key AML/CTF (counter-terrorist financing) controls. The reason is simple: employees are a firm's best defence against money launderers and terrorist financiers who may seek to abuse its services for illegal purposes.

By failing to provide AML training, a firm makes it easier for organised criminals to launder the proceeds of crime through the financial system. In doing so, it risks undermining the UK economy and becoming an unwitting accomplice to serious offences such as drug trafficking and human trafficking.

### **Who needs to be trained and how often?**

The money laundering regulations require the firm's money laundering reporting officer (MLRO) to *'take appropriate measures to ensure that its relevant employees are –*

- (a) made aware of the law relating to money laundering and terrorist financing, and to the requirements of data protection, which are relevant to the implementation of these Regulations; and*
- (b) regularly given training in how to recognise and deal with transactions and other activities or situations which may be related to money laundering or terrorist financing'*

A relevant employee is an employee (including partner) whose work is relevant to compliance with the Money Laundering Regulations or is otherwise capable of contributing to the identification and mitigation of the money laundering risks. ACCA has interpreted the regulations' call for regular training to mean as often as necessary, with an expectation of providing training to relevant employees on an annual basis and whenever there is an important update to the regulations.

Training must also be provided to all new starters at the firm as soon as is reasonably convenient to do so.

### **What is the purpose of AML training?**

AML training must equip employees with sufficient knowledge to effectively recognise red flags and suspicious activity. Employees must be aware of their legal obligations to recognise and report suspicious activity to the firm's MLRO. If employees can do this, then it will be a step towards making the UK a more hostile environment for criminals to successfully launder their proceeds.

### **What does my firm need to do?**

ACCA expects that firms adopt a training programme that is, firstly, relevant to the accounting sector, and, secondly, addresses the risks the firm is exposed to by the type of clients it engages with and the services it offers. At a minimum, it is expected that training covers the following areas:

- money laundering 'red flags'
- explaining the law and regulations, and placing them in the context of the firm's business activities
- conducting customer due diligence (CDD) and ongoing monitoring
- suspicious activity reporting (SAR) and how to deal with suspicious transactions
- tipping off
- record keeping and the relevant data protection requirements.

Copies of training materials, including presentation slides, booklets and leaflets, should be retained so that the firm can evidence that satisfactory training has been provided to its employees, should the need arise.

It is also advised that firms adopt a training programme that has a post-course assessment (eg a test), in order to ensure that employees who have participated in any training have understood its objectives and met the required standard of comprehension. Again, this will be valuable to firms in demonstrating that they have been employees that are adequately trained, and they fully understand the training materials. Firms should also take care to ensure that the ongoing training provided to employees covers all relevant updates.

Records must be kept of the training given to employees that show who has received training, the training received, when training took place and results of any assessments included as part of the training.

Please note that simply requiring employees to certify that they've read and understood the firm's AML policies and procedures, or read a training handout, does not qualify as AML training – neither does 'on-the-job training', such as informal instruction from the MLRO on an ad hoc basis, satisfy the requirement of AML training.

However, it is considered best practice to supplement AML training with actions such as those listed above.

## **I am an MLRO. Is there anything else I need to do?**

The responsibilities incumbent upon an MLRO demand that they undergo a more rigorous and comprehensive programme of training than a regular employee. To be effective in the role of MLRO, there is an expectation that they be familiar with some of the wider AML literature produced for the accounting sector by law-enforcement agencies, national government and other bodies. ACCA believes it prudent that MLROs familiarise themselves with the following materials:

- [The Money Laundering, Terrorist Financing and Transfer of Funds \(Information on the Payer\) Regulations 2017 \(MLR 2017\)](#)
- [CCAB's AML Guidance for the Accountancy Sector](#) (June 2023)
- [HM Treasury National risk assessment of money laundering and terrorist financing 2025](#) (July 2025)
- [FATF Guidance for a Risk-Based Approach: Accounting Profession](#) (2019)
- [National Crime Agency \(NCA\) website and relevant materials](#)

The above guidance is particularly relevant to sole practitioners, who are responsible for all elements of their practice's compliance with the money laundering regulations.

## **Can I produce my own training material?**

ACCA does not oblige its members to procure the services of external consultancies in providing training; while many members find this more convenient to do so, it is not mandatory. If an MLRO decides to use the services of an external provider, it is the responsibility of the MLRO to ensure that the training covers the key topics and is sufficient enough to enable employees to perform in their roles.

MLROs can produce their own training materials, so long as they cover off the above-mentioned topics with the appropriate detail. A simple PowerPoint presentation could be sufficient. (Please refer to the [ACCA anti-money laundering training: PowerPoint example](#) document for further information.)

There are many open-source resources available online for MLROs to use as well. Relevant extracts from sources listed above, such as the CCAB's Anti-Money Laundering Guidance For The Accountancy Sector and the NCA website, can help shape your training programme. Relevant cases reported in the media can be used as case studies to help employees understand the real threat of money laundering within the accountancy sector. MLROs can also use resources such as [Microsoft Forms](#) to produce an assessment for employees to sit after completing the training to assess understanding.

## **We're a small practice and know all our clients personally. Do we still have to do this?**

This is a requirement for all members who are in practice, no matter the size of their practice or the nature of their clients. Money laundering is a widespread phenomenon and

may occur at any time. Criminals seeking to launder the proceeds of crime or commit tax evasion are constantly looking for new methods to do this successfully. This is why it is important that all accountants are trained to be vigilant and monitor their clients for any suspicious activity, regardless of who they are. It is important to note that a small practice can still be targeted by criminals. They may assume, rightly or wrongly, that their AML controls will not be as effective as those of a large firm with more resources at their disposal.

**We have never reported a SAR to the NCA or had an internal SAR escalated to the MLRO**

If your firm has never had cause to report a SAR, both internally to the MLRO and externally to NCA, then it is especially important that you undertake AML training. It may be the case that previous suspicious activity was missed and not highlighted as a result of a lack of knowledge and understanding. Do your staff have awareness of red flags, trends and risks? Are staff aware of what suspicious activity looks like? Do they know what industries and services would be considered higher-than-normal risk (eg import and export services, high-value dealers and cash-intensive businesses)? These are the types of questions the MLRO must ask themselves if they have never received an internal SAR or submitted an external one to the NCA.

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