The MLRO Handbook

Oonagh van den Berg | Book introduction

Follows the role from appointment to accountability, including the first 90 days, EWRA/BWRA, customer due diligence, monitoring, suspicious activity reporting, assurance, inspections and crisis response. Helps MLROs test authority, independence and defensible decisions.

Who it is for

New and experienced MLROs, deputies, compliance leaders and those considering the role.

Contents at a glance

• The role and supervisory mindset: accountability, authority, independence, competence and regulatory expectations.

• The first 90 days: understand the business, test risk narratives, then establish control and escalation.

• Risk and controls: EWRA/BWRA, risk appetite, CDD, monitoring and technology governance.

• Investigations and assurance: suspicion decisions, FIU reporting, testing and second-line blind spots.

• Inspections and crisis: readiness, findings, remediation, crisis response and post-incident reviews.

• The future MLRO: training, capability, career longevity and professional survival.

How it helps in practice

Plan an appointment or review an existing role. Test whether you have the authority, information and evidence needed to challenge decisions, manage findings and explain your own judgement.

Practical material

Reality checks, risk maps, judgement exercises, 90-day reviews, inspection stress tests and decision frameworks.

View the book on Amazon

MODERNISING COMPLIANCE SERIES

THE MLRO HANDBOOK

FROM APPOINTMENT TO ACCOUNTABILITY

The practical, real-world guide for Money Laundering Reporting Officers operating in a world of rising risk, regulatory scrutiny and personal accountability.



JUDGEMENT
Make defensible decisions under uncertainty.

ACCOUNTABILITY
Understand your responsibilities and personal exposure.

TRUST
Build credibility, challenge effectively and earn the confidence to influence.

A PRACTICAL PLAYBOOK FOR MLROs WHO MUST MAKE THE RIGHT CALLS AND DEFEND THEM WITH CONFIDENCE.

THE REALITY

Independence will be promised. It will not always be protected.

Authority will be implied. It will not always be matched with control.

Support will be assumed. It will not always appear when it matters most.

When regulators investigate, they rarely ask if there was a policy. They ask what YOU did.

THIS BOOK HELPS YOU:

- Understand your legal responsibilities and personal exposure
- Build effective challenge and maintain your independence
- Escalate concerns with confidence and evidence
- Govern data, technology and third parties effectively
- Supervise controls and validate their effectiveness
- Manage investigations, SARs and regulatory interactions
- Strengthen governance, reporting and Board engagement
- Prepare for inspections and regulatory scrutiny
- Protect yourself, your judgement and your career

INSIDE THIS BOOK YOU WILL MASTER:

THE MLRO ROLE IN PRACTICE
What the role really involves and why so many fail despite doing the right things.

ACCOUNTABILITY & EXPOSURE
Understand your personal liability and the enforcement landscape.

INDEPENDENCE & AUTHORITY
Build and protect your independence and influence where it matters.

RISK & BUSINESS UNDERSTANDING
Understand risk in context and challenge with credibility.

DATA, SYSTEMS & TECHNOLOGY
Ensure data, systems and AI support risk management.

CONTROLS & EFFECTIVENESS
Supervise, test and validate controls that actually work.

INVESTIGATIONS & SARs
Manage cases, make decisions and file defensible SARs.

GOVERNANCE & BOARD REPORTING
Engage the Board, report with clarity and drive action that matters.

WHO THIS BOOK IS FOR

- MLROs & Deputy MLROs
- Chief Risk, Compliance & AML Officers
- Heads of Financial Crime
- Risk & Compliance Professionals
- Internal Audit & Model Risk Teams
- Boards & Non-Executive Directors
- Regulators & Supervisors
- Aspiring MLROs

> THE MLRO ROLE IS NOT ABOUT A JOB TITLE.
> IT IS ABOUT **JUDGEMENT**, **ACCOUNTABILITY** AND HAVING THE **COURAGE** TO DO WHAT IS RIGHT.

OUTCOMES YOU CAN EXPECT

- Stronger, independent decision-making
- Earlier risk detection and escalation
- Greater credibility with regulators and Boards
- Reduced personal and organisational risk
- Better governance and reporting
- Confidence to challenge and influence
- A resilient, future-ready compliance posture

STRONG MLROs PROTECT THEIR INSTITUTION. GREAT MLROs PROTECT THEIR LICENCE TO OPERATE.

DEFENDABLE DECISIONS | REGULATORY CREDIBILITY | EFFECTIVE RISK MANAGEMENT | STRONGER GOVERNANCE | TRUST & CONFIDENCE IN LEADERSHIP | SUSTAINABLE COMPLIANCE

THE RIGHT JUDGEMENT. THE RIGHT EVIDENCE. THE RIGHT OUTCOME.