The AML EWRA Blueprint

Oonagh van den Berg | Book introduction

Works from an independent risk landscape through inherent risk, control assessment, scoring, evidence and data quality. Scenario stress tests, internal challenge, change triggers and governance help make an AML risk assessment a living system rather than a completed form.

Who it is for

MLROs, AML risk assessment owners, risk teams and independent reviewers.

Contents at a glance

- Purpose and accountability: why completed assessments fail and what scrutiny tests.
- The independent risk landscape: customers, geography, sectors, products, behaviour and delivery channels.
- The assessment: scope, appetite, inherent risk, control reality and transparent scoring.
- Evidence and credibility: evidence mapping, data quality, assumptions and alignment.
- Stress-testing: regulatory challenge, scenarios and internal red-teaming.
- A living system under scrutiny: triggers, ownership, review cycles, findings and MLRO protection.

How it helps in practice

Build or challenge an AML EWRA/BWRA from actual exposure. Document assumptions and judgement, test controls against scenarios, and set triggers that keep the assessment current.

Practical material

Risk landscape templates, evidence mapping, control-effectiveness exercises, scenario tests and governance reviews.

View the book on Amazon

MODERNISING COMPLIANCE SERIES

THE AML EWRA BLUEPRINT

Building, Stress-Testing, and Sustaining AML Risk Assessments



JUDGEMENT
Independent challenge, critical thinking and well-founded decisions.

ACCOUNTABILITY
Clear ownership, personal responsibility and regulatory exposure.

TRUST
Defensible assessments, credible evidence and regulatory confidence.

A PRACTICAL, STEP-BY-STEP GUIDE TO BUILDING AN AML EWRA THAT REGULATORS CAN CHALLENGE — AND YOU CAN DEFEND.

THE PROBLEM

Most AML EWRAs look complete.
Very few are truly defensible.

False precision. Weak assumptions.
Comfort instead of clarity.

When risk is misunderstood, mis-scored, or poorly evidenced, the entire AML framework becomes vulnerable.

THE SOLUTION

A proven blueprint to:

- Understand real risk before scoring it
- Avoid false precision and biased judgement
- Build a robust, evidence-based AML EWRA
- Stress-test assumptions and challenge findings
- Keep your AML EWRA alive and decision-driven
- Strengthen governance, oversight and accountability
- Stand up to regulators with confidence

WHAT THIS BOOK COVERS

INDEPENDENT RISK UNDERSTANDING
Understand the true risk landscape before you assess it.

RISK DOMAIN ANALYSIS
Analyse customers, products, services, delivery channels, geographies and transactions independently.

INHERENT RISK ASSESSMENT
Assess inherent risk without mitigation, bias or scoring compression.

CONTROL EFFECTIVENESS TESTING
Test, evidence and validate controls across all risk domains.

RESIDUAL RISK EVALUATION
Combine risk and controls to reach well-evidenced residual outcomes.

STRESS TESTING & CHALLENGE
Challenge assumptions, test vulnerabilities and pressure-test your conclusions.

SUSTAIN & KEEP IT ALIVE
Ensure your AML EWRA remains current, relevant and decision-ready.

HOW THIS BOOK HELPS YOUR INSTITUTION

STRONGER RISK INSIGHT
See your true ML risk landscape with clarity and depth.

REGULATORY CREDIBILITY
Meet expectations and withstand regulatory scrutiny.

BETTER DECISIONS
Prioritise resources where risk is highest.

ACCOUNTABLE GOVERNANCE
Demonstrate ownership, judgement and oversight at all levels.

DEFENSIBLE EVIDENCE
Build a clear audit trail regulators can follow and test.

RESILIENT FRAMEWORK
Keep your AML EWRA relevant in a changing risk world.

REDUCED EXPOSURE
Lower enforcement, reputational and personal risk.

WHO SHOULD READ THIS BOOK?

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

> A DEFENSIBLE AML EWRA IS NOT ABOUT A SCORE. IT'S ABOUT UNDERSTANDING RISK, EVIDENCING JUDGEMENT, AND MAKING BETTER DECISIONS. THAT IS THE FOUNDATION OF A STRONG AML FRAMEWORK.

OUTCOMES YOU CAN EXPECT

- A robust, regulator-ready AML EWRA
- Clear, well-evidenced risk assessments
- Better alignment between risk and controls
- Greater confidence in decisions and reporting
- Stronger governance and oversight
- Improved efficiency and resource focus
- Reduced regulatory and enforcement risk

A STRONG AML EWRA IS NOT A DOCUMENT. IT'S THE FOUNDATION OF YOUR AML FRAMEWORK.

UNDERSTAND REAL RISK | ASSESS INDEPENDENTLY | TEST & VALIDATE CONTROLS | EVIDENCE & DEFEND | DECIDE WITH CONFIDENCE | ADAPT & SUSTAIN

BUILD IT RIGHT. STRESS-TEST IT HARD. DEFEND IT WITH CONFIDENCE.