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Money Laundering Basics – What “Good” Looks Like (Frontline Quick Reference)

This one-page reference describes the behaviours and practices that support effective money laundering risk management at a basic level. It is intended for frontline, branch, and simple operations roles.

1. Understanding the Basics

- Staff can explain in simple language what money laundering is and why it matters for customers, the institution, and the wider community.
- Staff can describe the three stages of money laundering – placement, layering, and integration – and recognise basic examples of each.
- Staff understand that both small and large transactions can present risk, depending on context and patterns.

2. Asking Good Questions

- Staff feel able to ask polite follow-up questions when information is unclear, incomplete, or inconsistent with the customer’s profile.
- Staff use open questions to clarify source of funds, purpose of accounts, and reasons for unusual transactions.
- Staff document key explanations given by customers in the appropriate system or notes field.

3. Using Controls Properly

- Staff follow onboarding and due diligence procedures, collect required documents, and avoid shortcuts.
- Staff understand how to recognise and respond to system alerts, including when to refer cases for further review.
- Staff use internal tools such as checklists and guidance notes to support their decisions.

4. Escalation and Culture

- Staff know who the MLRO or relevant compliance contact is and how to escalate concerns.
- Staff understand that raising concerns is encouraged and protected, and that honest questions are welcome.

- Supervisors provide regular feedback on escalations and share lessons learned from real cases, where appropriate.

Use this sheet as part of induction or refresher sessions. Ask staff to highlight areas where they feel confident and areas where they would value more training or practical examples.

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