MLRO review worksheet: the first review

Harwood & Lane Accountants Ltd
The MLRO's written report on the operation and effectiveness of the firm's AML systems and controls
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About this worksheet

To be introduced: the firm has not yet produced this written report, so this is the worksheet for its first review. To be introduced — action: The MLRO writes a report, at least once a year, on how well the firm's AML systems and controls are working, and gives it to the partners or directors (AMLGAS §3.4.10).

The sector guidance says the MLRO should:

> *"Report to the board (or equivalent managing body) at least annually, providing an assessment of the operations and effectiveness of the business's MLTPF systems and controls."*
> — AMLGAS §3.4.10

> *"This should take the form of a written report."*
> — AMLGAS §3.4.10

The ACCA return asks: "As the MLRO, have you produced a written report on the operation and effectiveness of the firm's AML systems and controls? (Technical factsheet)" (ACCA AML annual return 2026/27)

This worksheet sets out the questions to answer and the evidence to attach. It is a record of a review only once the MLRO has completed it, dated it and signed it.

The rest of the full document

- 1. The review
- 2. Questions and evidence
- 3. Actions the firm's answers already raise
- 4. Conclusions
- 5. Sign-off
- Sources

SAMPLE — fictitious practice, for illustration

Sample pack for Harwood & Lane Accountants Ltd, a fictitious practice. Generated 3 November 2026 from the ratified wording.
Excerpt. The full document is written for your practice.