NORTH STAR ADVISORY GROUP

The 10-Point AML Programme Gap Checklist

A fast, practical self-assessment for fintechs, payments firms and regulated entities. Score each area honestly — anywhere you can't confidently tick "yes" is a gap worth closing before a regulator finds it.

- [ ] **1. Risk assessment**
  You have a current, documented enterprise-wide and customer risk assessment that actually drives your controls — not a one-off written for a licence application.

- [ ] **2. Risk appetite**
  Your board has set, and signed off, a clear financial-crime risk appetite, and your controls are calibrated to it.

- [ ] **3. Policies & procedures**
  Policies are current, reflect what your team actually does, and map to your specific licence conditions and local regulations.

- [ ] **4. KYC / KYB & onboarding**
  Onboarding, CDD/EDD and UBO checks are risk-tiered, documented and consistently applied — and fast enough not to kill conversion.

- [ ] **5. Transaction monitoring**
  Rules and thresholds are tuned to your typologies and reviewed regularly; you can evidence why each rule exists and how it performs.

- [ ] **6. Sanctions & screening**
  Screening covers customers and payments, with defensible match-handling and a tested process for true matches.

- [ ] **7. SAR / STR process**
  Suspicious activity is detected, escalated and reported within required timeframes — and you can prove the timeline.

- [ ] **8. Governance & MI**
  Leadership gets meaningful management information; issues are escalated, owned and closed, not just logged.

- [ ] **9. Training & capability**
  Staff are trained for their actual role and risk exposure, with records to evidence it.

☐ **10. Independent review**

Your programme has had an independent assessment in the last two years, with findings tracked to closure.

Scored a few gaps?

That's normal — and fixable. North Star Advisory Group helps regulated businesses find and close these gaps before regulators do. Book a free intro call at northstaradvisorygroup.co.uk or email phil@northstaradvisorygroup.co.uk.

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