

## Module 5

# Implementing and monitoring your AML/CTF program

## Questions with answers

### Question 1

#### Managing the implementation project

Implementing an AML/CTF program is a process that may be divided into four stages. These are:

- a. specify the AML/CTF program implementation
- b. communicate the AML/CTF program implementation plan to your organisation
- c. agree on and delegate AML/CTF program implementation actions
- d. plan the AML/CTF program implementation.

The correct sequence of these stages is:

- a. c, d, b, a
- b. a, b, d, c
- c. a, d, b, c
- d. b, d, c, a

**Answer: c. a, d, b, c**

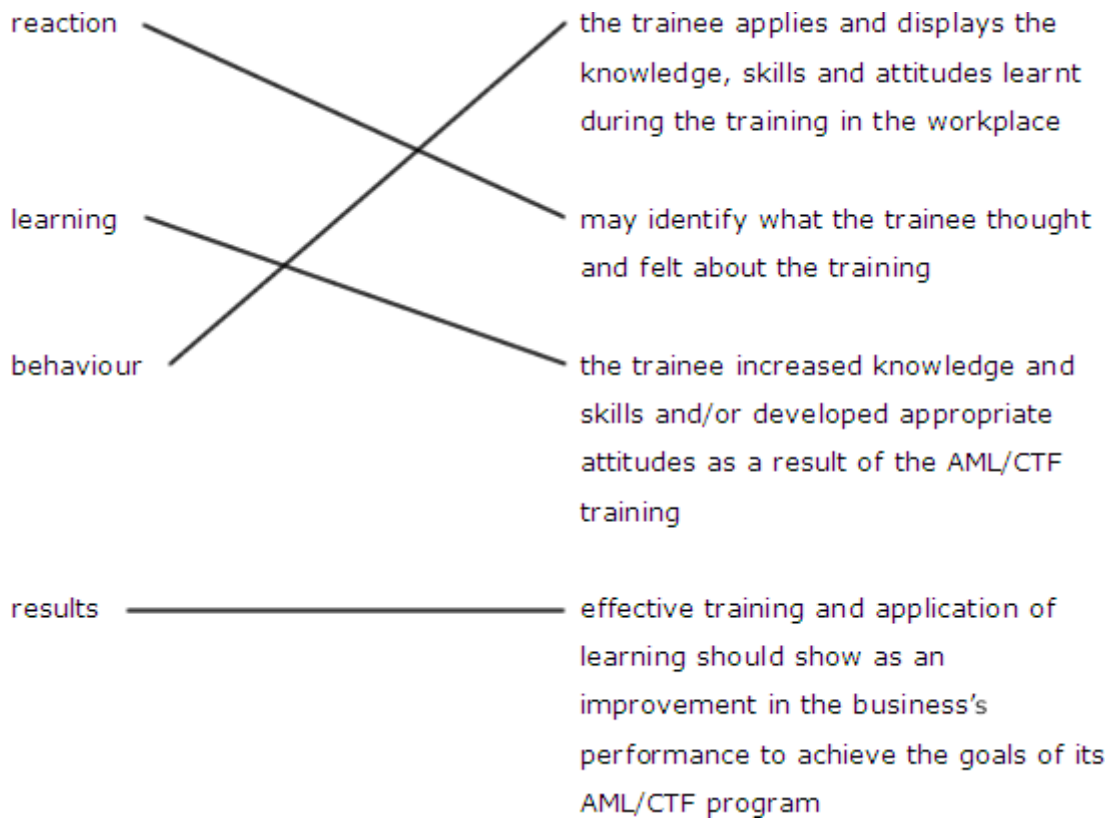
## Question 2

### Kirkpatrick's evaluation model

Many businesses routinely conduct training for their staff and evaluate that training.

A widely accepted method of training evaluation, Kirkpatrick's training evaluation model, evaluates training at four levels.

**Answer:**



### Question 3

#### AML/CTF program monitoring regime

The purpose of monitoring is to ensure your risk treatment process, which identifies, manages and reduces the ML/TF risks in the provision of designated services, is effective.

A monitoring regime is a structure of different monitoring methods that offers different levels of breadth and frequency of monitoring.

- a. true
- b. false

**Answer: a. true**

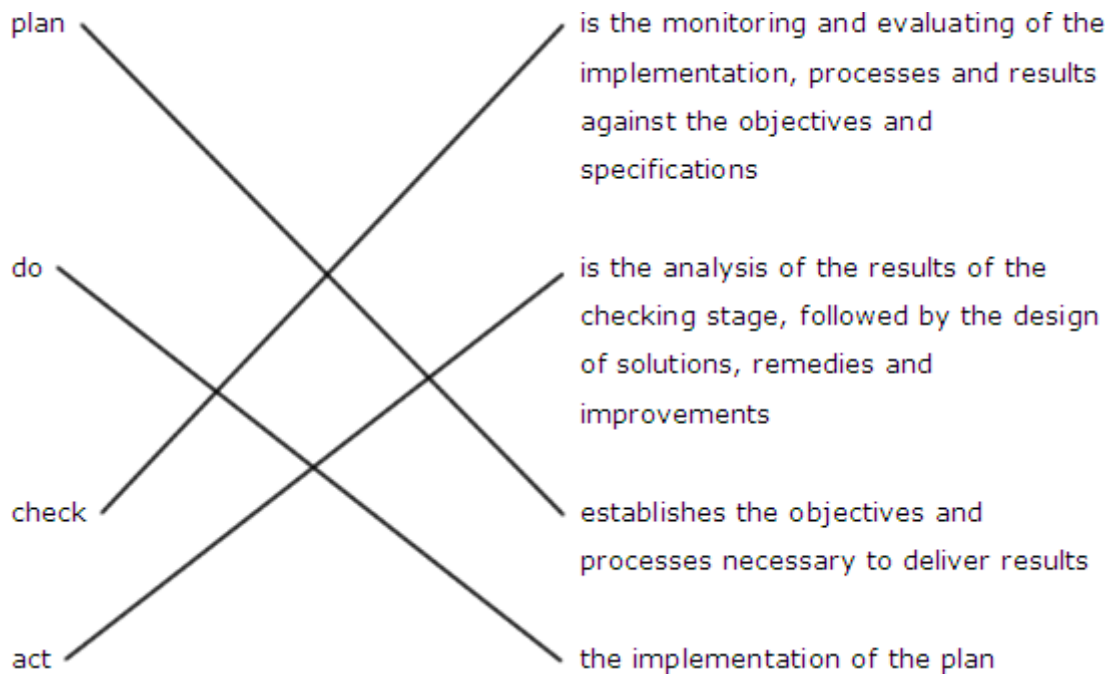
## Question 4

### Continuous improvement

The long term effectiveness of your AML/CTF program will depend on its continuous improvement and ability to reflect the evolving risk management environment.

Continuous improvement is often described as a four-step process.

**Answer:**



## Question 5

### Record keeping

There are a range of legislative obligations that specify record-keeping requirements for your business. These requirements include:

- a. keeping a record of an AML/CTF program for 7 years after the adoption ceases to be in force
- b. keeping a record of any documents a customer provides a reporting entity related to the provision of a designated service for 7 years after the relationship between your business and the customer ceases
- c. keeping a record of designated services for 7 years after the service was carried out
- d. 'b' and 'c' only
- e. All of the above

**Answer: e. all of the above**

## Question 6

### Incident management

An incident management process may help your business plan for and deal with attempts to use a designated service for \_\_\_\_\_ purposes.

- a. criminal
- b. business
- c. legal
- d. various

**Answer: criminal**

## Question 7

### Performance

A special tool may be used to help identify and understand the difference between a current level of performance and a desired level of performance. This tool is known as \_\_\_\_\_ .

**Answer: gap analysis**

## Question 8

### AML/CTF program performance measurement framework

When deciding whether your AML/CTF program reduces the risk of your business being targeted for ML/TF activities, are you assessing the effectiveness, the efficiency or the productivity of your AML/CTF program?

- a. the effectiveness of your AML/CTF program
- b. the efficiency of your AML/CTF program
- c. the productivity of your AML/CTF program

**Answer: a. the effectiveness of your AML/CTF program**

## Question 9

### AML/CTF program stakeholders

This person usually oversees the program, and may be directly and personally accountable for the effectiveness and outputs of the program. This person may drive any program improvement initiatives and activities. This person is known as:

- a. the CEO and/or AML/CTF board member
- b. the designated AML/CTF Compliance Officer
- c. the front line staff
- d. all of the above

**Answer: b. the designated AML/CTF Compliance Officer**

## Question 10

### Managing the implementation project

A force field analysis may provide you with an understanding of possible resources and facilitators to assist with the implementation of your AML/CTF program, as well as identifying possible detractors or hindrances to your AML/CTF program.

- 1. expertise and resources
- 2. where a reporting entity is already managing
- 3. risks in business, it has the opportunity to build on its existing
- 4. to develop its own AML/CTF program

The correct sequence to form a complete sentence from the sentence fragments above is:

- a. 2, 3, 1, 4
- b. 2, 4, 3, 1
- c. 4, 3, 1, 2
- d. 3, 1, 2, 4

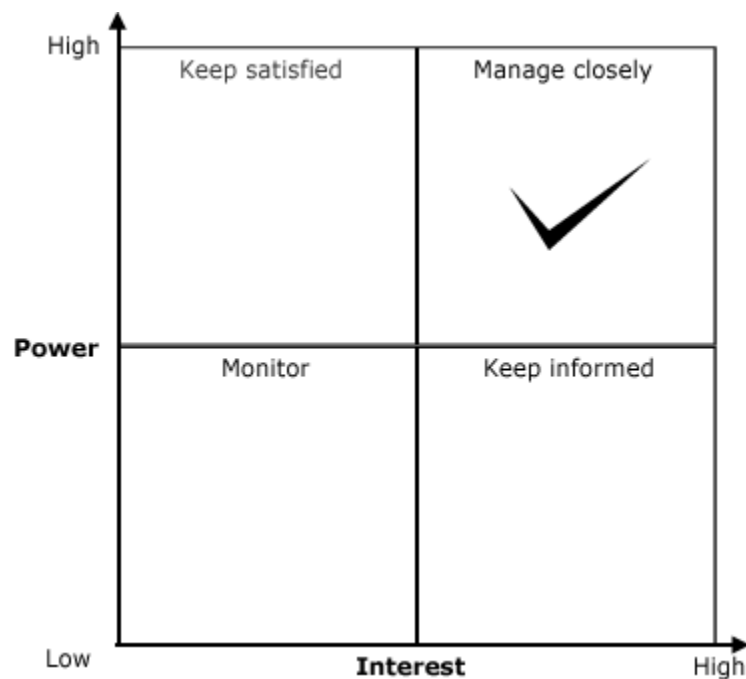
**Answer: a. 2, 3, 1, 4**

## Question 11

### Stakeholder management

Select the correct option from the list below.

Identify the correct quadrant on the stakeholder management diagram where you would list stakeholders you may need to make an effort to fully engage with and to seek opinions from (since they have the power to provide high levels of support).



- a. keep satisfied
- b. manage closely
- c. monitor
- d. keep informed

**Answer: b. manage closely**