

CHECKLIST · COMPLIANCE1

AML/CFT Staff Training Outline — Real Estate

A baseline training agenda you can adapt for onboarding and annual refreshers.

Module 1 — Why this matters (20 min)

- What money laundering and terrorism financing look like in property
- Why real estate is attractive to launderers
- Consequences for the agency and individual licensees

Module 2 — Your legal obligations (30 min)

- Overview of the AML/CFT regime
- Role of the supervisor
- The agency's Risk Assessment and Programme (high-level walkthrough)

Module 3 — Customer due diligence in practice (40 min)

- Standard, simplified and enhanced CDD
- Identifying beneficial owners in trusts and companies
- PEP and sanctions screening — how to use the tool
- Common documentation pitfalls

Module 4 — Red flags and reporting (30 min)

- Behavioural and transactional red flags
- The "no tipping off" rule
- How to escalate internally
- What happens after a report is filed

Module 5 — Record-keeping (15 min)

- What to keep, where, and for how long
- The auditor's perspective

Assessment

- 10-question quiz, pass mark 80%
- Attendance and result logged to the training register

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