

November 2025

DFSA Thematic Review – Continuing Professional Development (CPD) for MLROs

The DFSA has released its 2025 Thematic Review on MLRO Continuing Professional Development (CPD), outlining key findings, gaps and expectations for Firms and MLROs.

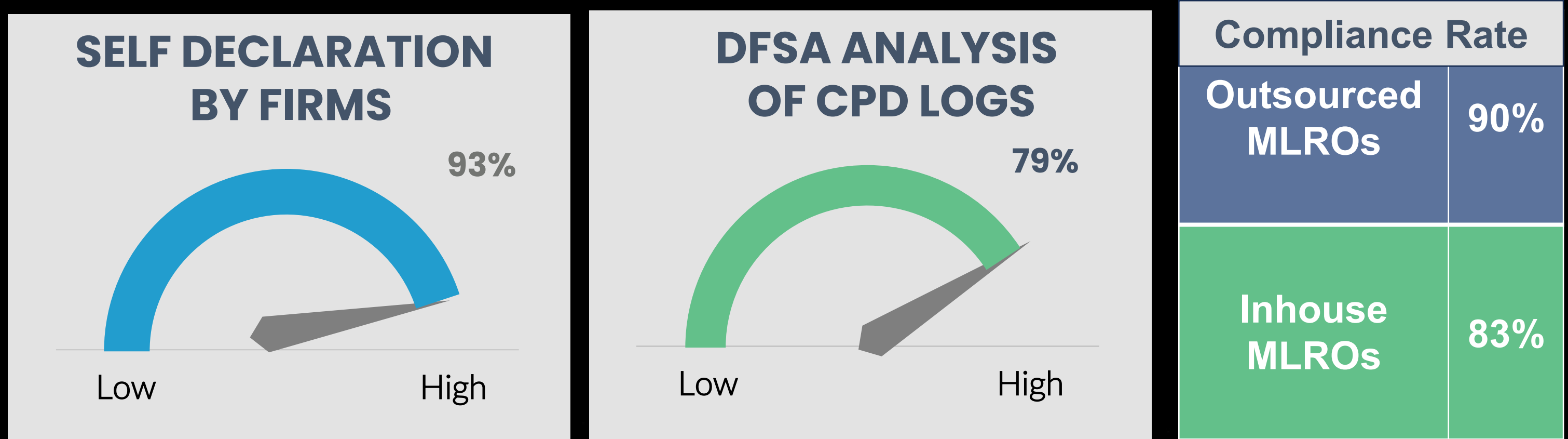
Background & Purpose

- ❑ DFSA introduced mandatory CPD requirements in 2020 requiring SEOs, MLROs and COs to complete a minimum of 15 hours of relevant CPD annually
- ❑ The MLRO role demands high competence and integrity, reinforced by *AML Rule 11.3.1*, which outlines key qualities and expectations
- ❑ This Review assessed how effectively MLROs interpret and comply with the CPD Rule in their ongoing responsibilities
- ❑ It evaluated the extent of support provided by Authorised Firms (Afs) and outsourced service providers to meet CPD obligations

Looking ahead, the DFSA expects the firms to be able to show, in future Risk Assessments, evidence of the steps they have taken to meet their obligations related to CPD and the role of the MLRO under the CPD Rule and the AML Module (AML) of the DFSA Rulebook.

Key CPD Statistics from Thematic Review:

Completion of 15 hours of CPD: The 2023 Annual AML Return included a question requiring a Yes/No answer as to whether the MLRO had completed at least 15 hours of CPD. Self declaration indicated that 93% of firms were compliant, whereas DFSA analysis indicated that the percentage was 79%.



Validity of Hours: The validity of CPD activity was assessed based on GEN 5.3.19A(3). More than 50% of the MLROs completed 20+ hours of valid CPD requirements



Findings & Observations:

1. Content of completed CPD :

- Preference for free external training was common; some MLROs relied entirely on such trainings.
- CPD for pure MLROs focused almost entirely on AML; hybrid MLROs showed limited balance.
- Many MLROs did not attend Targeted Financial Sanctions (TFS) trainings.
- Internal AML training (e-learning or group-level content) was often basic, not UAE/DIFC-specific, and included activities that do not qualify as CPD

Action required:

- The DFSA encourages MLROs to be discerning about the nature of CPD undertaken
- MLROs must avoid content that is pitched at a level that is too basic to be suitable for them.

2. Record-keeping of CPD activities:

Many MLROs fell short of CPD requirements due to a “bare minimum” approach and poor record-keeping, highlighting the need for a standardized CPD log template.

Areas of Improvement:

- Key information was often missing from CPD logs, including the MLRO’s or Firm’s name, CPD provider, and activity details
- Logs frequently omitted relevant CPD activities.
- Internal training programme was not broken down into its components, making it impossible to assess the validity of relevant CPD hours.

Findings & Observations (*continued*):

- Inconsistent approaches were observed in logging hours, including incorrect calculations and use of credits instead of hours.

3. *Employer engagement on CPD obligations*

- Employers' involvement in supporting MLROs' CPD completion was reviewed to assess how firms ensure MLRO competence and compliance with the 15-hour annual requirement. Many Firms provided financial support for MLRO CPD, often through reimbursement
- Non-Financial Support: Larger Firms with HR/L&D teams provided stronger, continuous support for MLRO CPD. Some employers offered little to no support.

Action Required:

- MLROs are personally responsible for their CPD, but best outcomes occur with active employer support.
- Firms to take a more proactive role in CPD.

4. *MLRO engagement on CPD obligations*

- Many MLROs proactively met CPD requirements
- Some MLROs relied on minimal or outdated qualifications, with limited focus on professional growth or learning relevance

Action Required:

- MLROs must remain fit and proper, demonstrating competence, capability and up-to-date AML knowledge
- Senior management is responsible for ensuring the MLRO maintains this standard