

Financial Crime Compliance: Best Practice Guide





This report provides an overview of how Financial Institutions are managing their Financial Crime learning programmes. It looks at what is currently considered best practice, and how firms expect their programmes to develop in the next two years. It has been prepared by Simon Truckle, Head of Key Accounts at Skillcast, based on interviews conducted by Scott Morris, Skillcast Advisory Board Member.



Approach

Skillcast conducted informal, off-the-record conversations with senior Compliance and Financial Crime Experts at five financial Institutions. For the purpose of this document, we have classified three as sophisticated organisations with a global reach and upwards of 20,000 staff and two as smaller organisations of around six to ten thousand staff. The research was carried out in August 2025.

Current Practice

All firms:

- Allocate at least 2-4 hours of mandatory training annually on Anti-Financial Crime.
- Provided training on: AML, CTF, Anti-Bribery and Sanctions.

Smaller firms:

- The training was entirely online.
- The average length of the annual mandatory online training was 40 minutes, with a range of 30- 60 minutes.

Sophisticated firms:

- Provide training on Cybersecurity, Tax Evasion, Client Due Diligence, Escalation and Red Flags.
- Provided 5-9 mandatory training hours annually.





Data Driven Approaches

Existing and planned approaches for sophisticated firms focus on an initial information-gathering process.

They use an enterprise-wide risk assessment that is provided to all department heads, risk owners, and those with key responsibilities. The assessment is analysed, and the relevant elements are fed into a Training Needs Assessment plan, which in turn helps to formulate the training programme.

Tailored and Segmented Content



All sophisticated firms currently create tailored content, segmented to business units and with different levels of content dependent on the responsibilities of the learner. The tailoring is generally based on inputs from the risk assessment and HR attributes. Regulatory inspections and visits have led to their focus on this approach.

Again, due to regulatory expectations, the smaller firms all planned to move to a tailored content delivery programme.





Data Issues

All firms felt the quality of HR data within their firms was a challenge to implementing the level of granularity they wanted to achieve with a tailored programme. The lack of detail or consistency in job roles, descriptions and scope meant that they tended to include more colleagues in the higher risk learning than probably needed to err on the side of caution.

The increasing value of data and the emergence of specific roles such as Chief Data Officer have added a layer of complexity, as it is generally no longer compliance or L&D that owns the data.



Future Planning

In terms of best practice for preventing financial crime, all firms expect to increase their focus on Fraud this year and going into 2026 and 2027.

- The sophisticated firms also expect to increase their training focus on Third-Party Risk, both in terms of identifying who presents a risk and implementing training and measures proportionate to the risk.
- The driver for this is a combination of the recent Anti-Bribery and Anti-Fraud legislation that has put more responsibility on firms for the actions of employees and associated people.
- All firms reported that recent regulatory inspections and visits had highlighted the need for more tailored training solutions. All firms were expecting to increase current training by around 30% to allow for more tailored training.

The sophisticated firms were planning more data-driven, tailored and segmented programmes.



About Skillcast

We make navigating compliance simpler, smarter and more effective. Our comprehensive training solutions equip you with the tools to strengthen your team and protect your reputation. Together, we can help overcome your compliance challenges.

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