

Making the most of the National Risk Assessment

This report summarises key insights from a cross-sector Latimer Network dialogue on maximising the effectiveness of the recently-published [National Risk Assessment \(NRA\)](#). The objectives of the discussion, which was held under the Chatham House Rule, were to:

- Consider how the National Risk Assessment (NRA) can be used to greatest effect;
- Identify insights from the perspective of stakeholders involved in the NRA process to inform future NRAs; and
- Foster constructive dialogue and cross-sector collaboration.

The discussion, held on 28 August 2025, included network members with insight and expertise from within government, regulatory bodies, the private sector, and civil society.

Participants recognised the NRA as a valuable ‘single version of truth’ enabling shared understanding of systemic risks, and agreed that it remains the most appropriate way to meet the Financial Action Task Force (FATF) recommendation to identify, assess and understand money laundering and terrorist financing risk. They also identified a number of limitations and made recommendations to support greater impact in supporting effective risk management across sectors.

Strengths

The NRA is a valuable resource at the ‘tip of the iceberg’ of the UK’s financial crime risk assessment system. As such, nimble and flexible ongoing engagement across the system that sits beneath the NRA is essential: this occurs in the form of regular supervisory assessments and updates, regulatory guidance on emerging risks, and outputs from the system prioritisation project that aid threat assessment and understanding on an ongoing basis. Feedback from law enforcement, supervisors, and the private sector helps government assess when system-level risks have evolved to the degree that an update to the NRA itself is warranted.

Ownership of the NRA by government rather than law enforcement helps to build broad engagement across industry, and supports understanding of risk assessment as a political priority and necessary for both security and prosperity.

Within the document itself, the elements covering cross-cutting and emerging risks are particularly appreciated, alongside the data visualisations which help present complex information in an accessible way.

Limitations

The contribution of the NRA is limited by two key factors:

- **Data availability and analysis.** The inherent difficulty of assessing risk in dynamic, evidence-light areas, led participants to query whether some sectors were assessed as high-risk based on data availability rather than vulnerability to financial crime. Furthermore, sectoral analysis – while facilitating assessment, scoring, and presentation – can obscure the reality that financial crime often exploits vulnerabilities across multiple sectors simultaneously, and suggest that individual sectors are solely responsible for complex, multi-faceted problems.
- **Dissemination and communication.** The challenge of reaching harder-to-access parts of industry is significant. While large organisations in the regulated sector

demonstrate sophisticated understanding and ongoing engagement, smaller organisations and unregulated sectors lack capacity or clear pathways to access, understand, and use the NRA in their operations. The complexity of the document can overwhelm organisations unfamiliar with financial crime risk assessment, yet simplifying guidance would risk tick-box compliance approaches. Gaps in sector-specific guidance compound difficulties in translating high-level findings into practical measures.

Recommendations

- **Government leadership.** Government-led comprehensive dissemination efforts through targeted engagement with industry, training via professional bodies, and direct ministerial communication with key stakeholders (for example Police Commissioners and/or the Post Office) would significantly enhance awareness and action. As the NRA owner, government is uniquely positioned to drive this engagement and signal the political priority of effective risk management.
- **Communications.** Cross-sector messaging on the benefits of risk assessment would help shift the narrative from compliance burden to business enabler. Effective financial crime risk management should be positioned as a business enabler that supports economic growth and business confidence rather than a compliance burden, supported by case studies of discretionary resource use enabled by effective risk assessment. Embedding links to the NRA in existing platforms such as the Companies House website would reach businesses at key touchpoints without requiring them to seek out the information.
- **Industry implementation.** Larger businesses within the regulated sectors are well-placed to support dissemination of NRA insights through their supply chains and partner relationships, helping reach entities that might otherwise remain unaware of relevant risk developments. Their existing relationships and influence provide natural channels for spreading awareness. Supervisory mandates for incorporating NRA findings into firm-level risk assessments would create accountability and ensure the NRA informs operational decision-making.
- **Stakeholder engagement and data.** Regular industry convening to reassess risks and share insights across sectors would address the dynamic nature of financial crime threats. The next NRA would benefit from expanding its approach of drawing on data from industry and wider (non-law enforcement) sources, particularly strengthening risk assessment in areas where evidence is currently limited and avoiding overreliance on data availability as a proxy for risk.

Conclusion

The challenge for future iterations of the NRA lies in maintaining the analytical rigor and comprehensive scope that stakeholders value while improving accessibility, communication, and practical application across diverse sectors.

The upcoming FATF assessment in 2027 provides both an opportunity and a deadline for demonstrating enhanced effectiveness. Success will be measured not just by the quality of the published assessment but by evidence of how it has been used across government, regulated sectors, and unregulated industries to improve financial crime prevention. Success requires recognising and treating the NRA as the pinnacle of a deeper and more agile risk system.