

AUSTRAC INTERNAL AUDIT
ANNUAL INTERNAL AUDIT PLAN
2013-2014

Prepared by Robert Brenmand, Director Internal Audit

Version 2
16 October 2013

EDRMS Ref: 755382

Version 1

TABLE OF AMENDMENTS

Date	Page No.	Area	Amendment
16-Oct-2013	Pages 2-6	Timing/Cost	Timing/Cost now reflects estimated person-hours to complete, not elapsed time.
16 Oct 2013	Page 2	Quarter One Internal Audit Reviews	Internal Audit Self-Assessment replaced with Governance Review Follow-Up. This work for this project will extend into Quarter 2 2013/14. Audit Committee being provided with draft Internal Audit Assessment Checklist for discussion at the 16 October 2013 meeting.
16-Oct 2013	Page 2	Quarter One Internal Audit Reviews	Compliance Branch – Consistency in Assessment Processes and Reporting. Preliminary work has begun in Quarter 1 with the substantial work conducted in Quarter 2 2013-14 - due to Internal Audit staff resourcing and a key Compliance staff member being on leave.
16-Oct-2013	Page 3	Workplace Health and Safety Management Review	Review will now be conducted by AUSTRAC's co-sourced external service provider – Ernst and Young.
16-Oct-2013	Page 7	Ongoing Internal Audit Activities	Added - Advice on design and implementation of information management system upgrade. Added – Ongoing review work on Long Service Leave provisions and calculation spreadsheet. Included monitoring of data centre project as part of ongoing monitoring of business continuity planning.
16-Oct-2013	Page 9	Areas Considered But Not Specifically Included in 2013-14 Internal Audit Plan	Additional section added at the request of the Audit Committee.

INTERNAL AUDIT PLAN 2013-2014

QUARTER ONE (INTO QUARTER TWO)

Assurance Activity	Description	Resource	Timing/Cost
Compliance Branch – Consistency in assessment processes and reporting protocols	<p>The Compliance Branch at AUSTRAC comprises two geographically based regional teams, along with a Remitters unit, a Major Reporting unit and an Enforcement unit.</p> <p>The overall objectives of this review will be to:</p> <ul style="list-style-type: none"> Assess the consistency in approaches to assessment activity across the regions and units. Particular focus will be in regards to identification, assessment and reporting of requirements in compliance assessment reports that are issues to reporting entities. <p>AUSTRAC has a national presence with many reporting entities belonging to national industry associations. Inconsistencies in compliance assessment processes and reporting have the potential to damage AUSTRAC's reputation with the industries it regulates. This is especially important given the cost recovery initiative where entities pay a levy for the benefits of regulation.</p>	Internal	320 person- hours.
Governance Review Follow-Up	<p>Ernst and Young conducted a review of AUSTRAC's governance arrangements in June / July 2013. Following the release of the draft report, Internal Audit is working with management and Ernst and Young to assess the outcomes and recommendations and present a final report to executive management.</p>	Internal	80 person hours

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QUARTER TWO

Assurance Activity	Description	Resource	Timing/Cost
Workplace Health and Safety - Management For Prevention of Risks And Management of Claims	<p>A significant and potentially costly risk for AUSTRAC can arise where workplace accidents occur or other incidents impacting on the health of employees.</p> <p>The overall objectives of this review will be to:</p> <ul style="list-style-type: none"> Assess AUSTRAC's initiatives and processes to identify and prevent potential incidents that may lead to WHS claims. The procedures in existence to address claims when they are made. 	External (Ernst and Young)	80 hours \$20,000
Finance Branch – Post implementation of FFI Follow up	<p>In 2009 AUSTRAC Internal Audit conducted a Budgeting and Management Reporting Audit. A Post Implementation Review of Finance 1 was also conducted in 2010.</p> <p>The Financial Framework Improvement project was established to address some of the recommendations highlighted in both of the above noted reviews.</p> <p>The purpose of this review is to assess the effectiveness of outcomes from the Financial Framework Improvement Project, with a focus on the changes to business practices as a result of audit recommendations. This review will include an examination of:</p> <ul style="list-style-type: none"> Business uptake and understanding of relevant business processes Development of SOPs and other supporting material for the business Development compliance with processes and procedures. 	Internal	100 person-hours

INTERNAL AUDIT PLAN 2013-2014

QUARTER THREE

Assurance Activity	Description	Resource	Timing/Cost
Travel System Review	<p>In 2011 the Finance Branch introduced a new travel system and associated processes for the booking and management of travel arrangements across AUSTRAC.</p> <p>The purpose of this review is to assess whether the travel system is meeting its objectives for efficiently and effectively managing the travel arrangements for AUSTRAC staff.</p>	Internal	80 person-hours
Effective and Efficient Use of Contractor Panels And Selection of Suppliers for Procurement	<p>The purpose of this audit is to review practices across a range of procurement transactions and assess the process used for the selection of supplier.</p> <p>The main objective is to provide assurance that AUSTRAC is following due process to achieve "value for money" in the selection and appointment of consultants and suppliers through panel arrangements.</p> <p>The initiative for this review has come from discussions with the AUSTRAC's Procurement and Contracts Unit over AUSTRAC's use of the same panel suppliers over several projects.</p>	Internal	160 person-hours

INTERNAL AUDIT PLAN 2013-2014

QUARTER FOUR

Assurance Activity	Description	Resource	Timing/Cost
EAC Project – IT Security And User Access Controls	<p>The Enhanced Analytical Capability (EAC) Project involves the development of new analytical technologies for the Financial Intelligence Unit (FIU), giving AUSTRAC and its stakeholders' greater capacity for close-to-real-time tracking of illicit money trails.</p> <p>The new technology will also allow better integration of AUSTRAC and external data assist in the earlier identification of sophisticated criminal networks and terrorism financiers and provide timely intelligence to support other agencies' operational needs.</p> <p>The systems will also enable AUSTRAC to better analyse financial transaction reports in order to better identify non-compliance with the AML/CTF Act.</p> <p>The project is expected to be delivered to AUSTRAC (not including partner agencies) in March 2014.</p> <p>Additionally, AUSTRAC Internal Audit conducted a high level IT Security Review in March 2012.</p> <p>The review highlighted that AUSTRAC has a deliberate decentralised approach to oversight of IT controls such as user administration and software management, i.e. control oversight rests with business units rather than centrally with IT.</p> <p>Given the implementation of EAC technology and processes for the FIU, it is considered timely to review IT security and user access controls, especially given the decentralised approach to control oversight.</p> <p>This review will coordinate with any security testing being planned by AUSTRAC IT.</p>	External / Internal	240 person-hours \$60,000

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QUARTER FOUR Continued

Assurance Activity	Description	Resource	Timing/Cost
Privacy Controls Review	<p>AUSTRAC has until 12 March 2014 to implement changes to its privacy policies and procedures as a result of reforms to the Privacy Act 1988.</p> <p>The purpose of this review is to assess whether AUSTRAC has addressed the reforms comprehensively to reduce the risks of being in breach of the new amendments to the privacy legislation.</p>	Internal	90 person-hours
Monitoring of Telephone Billing	<p>The purpose of this review is to assess the monitoring processes AUSTRAC undertakes to ensure that telephone accounts from providers are accurate and reflect contractual conditions. The initiative for this review has come from the external experience of other organisations where over-billing has occurred without adequate controls in place to detect and rectify it.</p>	Internal	80 person-hours.

INTERNAL AUDIT PLAN 2013-2014

ONGOING INTERNAL AUDIT ACTIVITIES (ALL QUARTERS)

Assurance Activity	Description	Resource	Timing/Cost
Quarterly Finance Checks	Regular quarterly checks of credit cards, drawing rights, banking, accounts receivable, accounts payable, employee entitlements and Cabcharge transactions.	Internal	40 person-hours per quarter
ACLEI	Monitoring of issues and actions arising from AUSTRAC coming under ACLEI jurisdiction from 1 July 2012.	Internal	Ongoing
Partner Agencies Data Security	Compliance with MOA Audit Log requirements for information dissemination to other agencies. Reason for access from review -- ongoing throughout the year.	Internal	Ongoing
Data Centre Project Monitoring / Business Continuity and Disaster Recovery Planning	Monitoring of progress with the data centre project. Ongoing monitoring of AUSTRAC business continuity and disaster recovery planning,	Internal	Ongoing
Advice on design and implementation of information management system upgrade.	Involvement in the testing and analysing of proposed options to upgrade AUSTRAC's information management system.	Internal	Ongoing

INTERNAL AUDIT PLAN 2013-2014

ONGOING INTERNAL AUDIT ACTIVITIES (ALL QUARTERS) - Continued

Assurance Activity	Description	Resource	Timing/Cost
Ongoing review work on Long Service Leave provisions and calculation spreadsheet.	Follows previous Internal Audit analysis work and testing by the external auditors (ANAO). Working with management to further assess and improve the spreadsheet used for calculating long service leave provisions.	Internal	Ongoing
Internal Audit Recommendation Follow-up	Follow-up and verification of outstanding audit recommendations.	Internal	40 person-hours per quarter
Audit Committee Administration	Preparation and distribution of Audit Committee packs.	Internal	25 person-hours per quarter
Other Control Assurance	Bases on review of AUSTRAC risk assessments and discussions with management identify business risk areas where reliance is being placed on business controls, rather than on Internal Audit reviews (eg disposal of secure IT assets and information management controls). Without undertaking formal reviews, assess whether these areas may require audit attention in the future.	Internal	Ongoing

AREAS CONSIDERED BUT NOT SPECIFICALLY INCLUDED IN 2013-14 INTERNAL AUDIT PLAN

Area	Comment
Security Risk and Integrity	No specific reviews planned for this area during 2013-14. Liaising with the Agency Security Advisor on any relevant issues which may require Internal Audit involvement.
Risk Management Framework	No specific reviews of the framework and supporting policies and procedures planned for 2013-14. The Fraud Control and Governance Reviews conducted by Ernst and Young in Q4 2012-13 touched on this area. Liaising with the Agency Risk Advisor on any relevant issues which may require Internal Audit involvement.
Employment Conditions and Services (ECS) and Workforce Capability and Performance(WCP) sections	ECS: Internal Audit has a focus on employee entitlements, specifically the calculation and payment of long service leave provisions and payments. Other payroll and employee condition activities are not areas of focus for 2013-14. WCP: A review is planned for Workplace Health and Safety management processes. Other activities (eg education and training) not a focus for 2013-14.
Operations Support Division	Division encompasses Reporting Entity Operations, Strategic Analysis, Planning Co-ordination and Relief, Data Quality and Statistics and International Technical Assistance. No specific reviews planned for this Division with other areas of audit focus assessed as a higher priority.
Financial Intelligence Unit	Internal Audit will be conducting a review of the Enhanced Analytical Capability Project from an IT security perspective. The Performance Audit conducted by the ANAO over 2012-13 focussed on the Financial Intelligence Unit and consequently it is not an area of focus for Internal Audit in 2013-14.
Enforcement	A review of Compliance: Record Maintenance For Enforcement Activity was conducted on 2012-13. No further work (other than recommendation follow-up) is planned for 2013-14.
Program Management	Internal Audit is liaising with Program Management over Integrated Planning and the Data Centre project. Program Management will also be consulted as part of the EAC IT Security Review. No further work in this area planned for 2013-14.

AUSTRAC INTERNAL AUDIT
ANNUAL INTERNAL AUDIT PLAN
2012-2013

Prepared by Robert Brennand, Director Internal Audit

Version 4
25 March 2013

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Table of Updates to Version 4		
Review	Update and Comments	Date Updated
Data Security In Designated Agencies Follow-Up	Moved from Quarter 3 to Quarter 4. Review updated to reflect actions being taken by the FIU to check audit logs being maintained by selected partner agencies and for ongoing monitoring of partner agency access to AUSTRAC information.	25 March 2013
Privacy Controls Review	Removed from Internal Audit Plan for 2012-2013. Legal branch to provide updates to the Audit Committee on progress in addressing changes in legislation (due by March 2014). Internal Audit to consider conducting a review of Privacy Controls after the changes have been addressed in March 2014.	25 March 2013
Long Service Leave Review	Replaces Privacy Controls Review	25 March 2013
ANAO review of confidentiality in government contracts	Additional review being conducted by the ANAO. Internal Audit to provide assistance as necessary.	25 March 2013

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INTERNAL AUDIT PLAN 2012-2013

QUARTER ONE

Risk Area (From AUSTRAC Risk Management Plan)	Assurance Activity	Description	Resource	Timing/Cost
Project Risks / Financial Risks	Cost Recovery Pre- Implementation Reviews	<ul style="list-style-type: none"> ▪ Levy Determination In progress from 2011-2012 and reviewing: <ul style="list-style-type: none"> - Whether the calculation model supports the costs to be recovered as determined by the budgeting cost model. - Whether the levy for different industry sectors has been determined on a clear, concise and sound basis that reflects their structure, earnings and transaction reporting characteristics. - Whether the levy determination for industry sectors reflects the legislation and Rules establishing its design and implementation. ▪ Invoicing In progress from 2011-2012 and reviewing: <ul style="list-style-type: none"> - Whether the processes and controls for invoicing will result in: <ul style="list-style-type: none"> ○ the accurate levy being invoiced to a reporting entity ○ the correct invoice being sent to the right entity ○ all entities required to be invoiced being invoiced. 	Internal Audit	8 weeks

INTERNAL AUDIT PLAN 2012-2013

QUARTER TWO

Risk Area (From AUSTRAC Risk Management Plan)	Assurance Activity	Description	Resource	Timing/Cost
Strategic Risks Operational Risks Legal Risks	Compliance Support For Enforcement	<ul style="list-style-type: none"> Review the effectiveness of compliance assessment processes and documentation for supporting any potential enforcement actions undertaken by AUSTRAC. This includes examining whether the processes and documentation are adequate, complete and comprehensive enough to meet legal requirements for enforcement actions under the AML/CTF Act and Rules. 	Internal Audit	8 weeks
Project Risks Financial Risks	Cost Recovery – Collections	<ul style="list-style-type: none"> Final component of the Cost Recovery “pre-implementation” reviews. Review processes for collecting, recording and banking funds received as part of the cost recovery initiative. Review impact of collection processes on quarterly finance checks. 	Internal Audit	4 weeks
Financial Risks	Certificate Of Compliance Follow-Up Review	<ul style="list-style-type: none"> Review of effectiveness of Certificate of Compliance (CoC) process just completed for the 2011/12 financial year. Involves follow-up with a sample of business of representatives as to their opinion and understanding of the CoC process. 	Internal Audit	1 week

INTERNAL AUDIT PLAN 2012-2013

QUARTER THREE

Risk Area (From AUSTRAC Risk Management Plan)	Assurance Activity	Description	Resource	Timing/Cost
Strategic Risks Operational Risks	Compliance KPIs	<ul style="list-style-type: none"> ▪ Review how AUSTRAC develops and measures key performance indicators for its compliance function. <p>Areas to be considered as part of the review include:</p> <ul style="list-style-type: none"> - The existence of KPIs and how they relate to strategic priorities. - The effectiveness and relevance of existing KPIs in meeting internal and external reporting requirements (eg as part of annual report statistics). - The accuracy and reliability of processes to measure KPIs. - The timeliness of measuring KPIs in meeting internal and external reporting requirements. 	Internal Audit	10 weeks

INTERNAL AUDIT PLAN 2012-2013

QUARTER FOUR

Risk Area (From AUSTRAC Risk Management Plan)	Assurance Activity	Description	Resource	Timing/Cost
Operational Risks Legal Risks	Legislative Delegations	<ul style="list-style-type: none"> Review how AUSTRAC monitors and updates its delegations under AML/CTF, finance and human resource legislation to ensure that those exercising delegations are legally entitled to do so. 	Internal Audit (Internal work experience resource)	4 weeks
Strategic Risks Operational Risks Financial Risks	Fraud Control Review	<ul style="list-style-type: none"> Review the implementation of AUSTRAC's Fraud Control Plan, including an assessment of the adequacy of internal controls in place to detect and investigate fraud and potential corruption. 	Ernst and Young	\$40,000 12 weeks
Security Risks Legal Risks	Data Security In Designated Agencies Follow-Up	<ul style="list-style-type: none"> Assisting the FIU in contacting selected partner agencies to review audit logs of information disseminated to other agencies. Designing further audit tests using the "Reason For Access" form and IT security logs of information accessed by partner agencies. 	Internal Audit	4 weeks
Financial Risks	Long Service Leave Review	<ul style="list-style-type: none"> Assessing the accuracy, completeness and reliability of AUSTRAC's Long Service Leave calculations to assist with the external audit requirements. 	Internal Audit	2 weeks

INTERNAL AUDIT PLAN 2012-2013

ONGOING INTERNAL AUDIT ACTIVITIES (ALL QUARTERS)

Risk Area (From AUSTRAC Risk Management Plan)	Assurance Activity	Description	Resource	Timing/Cost
Financial Risks Fraud Risks	Quarterly Finance Checks	<ul style="list-style-type: none"> Regular quarterly checks of credit cards, drawing rights, banking, accounts receivable, accounts payable, employee entitlements and Cabcharge transactions. 	Internal Audit	4 weeks per quarter
Administration	Internal Audit Recommendation Follow-up	<ul style="list-style-type: none"> Follow-up and verification of outstanding audit recommendations. 	Internal Audit	3 days per quarter
Administration	Audit Committee Administration	<ul style="list-style-type: none"> Preparation and distribution of Audit Committee packs. 	Internal Audit	1 week per quarter

POTENTIAL OTHER INTERNAL AUDIT ACTIVITY

- Enhanced Analytical Capability Project
- Assistance with internal reviews of financial statements
- Post implementation / benefits realisation reviews (in conjunction with the Project Management Office)

OTHER AUSTRAC ASSURANCE ACTIVITIES

Internal Audit will be monitoring and contributing to the following assurance activities conducted by other AUSTRAC sections.

KEY RISK AREA	ASSURANCE ACTIVITY	RESPONSIBILITY
Information Technology Risks Security Risks	Information Management – Retention and Destruction of Files	Information Management
Information Technology Risks	Security of AUSTRAC IT systems and access to information	IT Security Advisor
Strategic Risks	Enterprise Risk Management Framework	Agency Risk Advisor
Financial Risks	Certificate of Compliance	Finance + Project Management Office
Project Risks	Post-Implementation Reviews Of Projects	Project Management Office

OTHER POTENTIAL EXTERNAL ASSURANCE ACTIVITY REQUIRING INTERNAL AUDIT INVOLVEMENT

- ANAO Performance Audit
Quarters 1 to 3.
- ANAO audit of AUSTRAC financial statements.
- ANAO audit of confidentiality in government contracts.

AREAS CONSIDERED BUT NOT INCLUDED IN THE 2012-2013 INTERNAL AUDIT PLAN

Enterprise Risk Management Framework	AUSTRAC's Enterprise Risk Management Framework still under development. Internal Audit is liaising with the Agency Risk Advisor. No formal review of the framework is planned for 2012-13.
Occupational Health and Safety Risks	No review is planned in this area. It is noted that each office has appointed Occupational Health and Safety Representatives. It is also noted that OH&S is highlighted as a risk area in the Risk Management Plan for ongoing monitoring.
Business Continuity and Disaster Recovery Planning	Internal Audit notes the work that has been done in this area by the Agency Risk Advisor and the business. No specific review is planned in this area other than monitoring any issues that potentially arise.
Physical Security Risks (eg access to building to equipment)	No audit work planned in this area. It is noted that AUSTRAC has an Agency Security Advisor who monitors this area.
Payroll / Entitlements	Staff entitlements are subject to quarterly audit sample checks. LSL entitlements were also reviewed by Internal Audit to support the ANAO year-end financial audit. No further work planned in this area.
Agreements / MOU's with partner agencies	Internal Audit are conducting a follow-up review on Data Security in Designated Agencies. No audit work is planned on reviewing the other terms and conditions in agreements.
International	An audit of the Africa Program was completed in 2011. No further audit activity is planned for the International unit in 2012-13.
People Strategies and Solutions	Performance Management Review completed in 2011. Follow-up being conducted on this audit. No further audit work of PSS planned for 2012-2013.
Education and Training	No reviews currently planned around the efficiency and effectiveness of training courses and seminars delivered to staff.
FFI Post Implementation Review	Originally scheduled for Quarter 3 in 2012/2013. To be postponed to 2013/2014 financial year due to budgetary constraints. Not a critical review given recent year-end financial audit by ANAO.

AUSTRAC INTERNAL AUDIT
ANNUAL INTERNAL AUDIT PLAN
2011-12

Prepared by Robert Brennand, Director Internal Audit
Version 3
22 March 2012

Version 3
For Management and Audit Committee review and comment

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KEY RISK DESCRIPTIONS

See Appendix 1 for Risk Rating Matrix

See Appendix 2 for areas considered but not included in 2011-12 plan.

		Likelihood	Consequence	Rating
Information Security And Management Risks	<ul style="list-style-type: none"> - Inappropriate access and use of AUSTRAC data and information. - Breaches of information management and security policies - Lack of tested and effective business continuity and disaster recovery capabilities. 	Possible	Major	High
Process Risks	<ul style="list-style-type: none"> - Internal processes / polices / procedures / actual work practices do not support required operational activities and business outcomes. 	Possible	Moderate	Medium
Financial Management	<ul style="list-style-type: none"> - Poor financial practices / lack of effective oversight of financial performance 	Possible	Moderate	Medium
People Risks	<ul style="list-style-type: none"> - Staff numbers and skills not suitable to achieving business outcome - Attracting and retaining staff. 	Possible	Minor	Low
Project Risks	<ul style="list-style-type: none"> - Funded projects do not deliver expected benefits and outcomes / lack of timeliness. - Cost blowouts in delivery of project outcomes. 	Possible	Major	High
Governance/ Compliance Risks	<ul style="list-style-type: none"> - Failure to comply with relevant legislation and regulations. - AUSTRAC not fulfilling legislative functions and obligations. 	Unlikely	Major	Medium
Reputation Risks	<ul style="list-style-type: none"> - AUSTRAC not seen as relevant by government and key stakeholders. - Breaches / unexpected negative issues publically exposed. 	Unlikely	Major	Medium
Risks to Ongoing Funding	<ul style="list-style-type: none"> - Planned funding initiatives do not deliver required outcomes. - AUSTRAC "brand" not viewed as valuable by relevant stakeholders. 	Possible	Major	High

Draft

For Management and Audit Committee review and comment

Page 2

AUSTRAC – KEY STRATEGIES AND KEY RISK AREAS

KEY RISK AREA AUSTRAC STRATEGY	Information Security And Management Risks	Process Risks	Financial Management	People Risks	Project Risks	Governance/ Compliance Risks	Reputation Risks	Risks to Ongoing Funding
AUSTRAC is considered relevant and effective with key stakeholders	■	■			■	■	■	■
AUSTRAC influences its operating environment by contributing to a whole-of government-agenda.	■				■	■	■	■
AUSTRAC secures additional sources of funding.	■		■		■			■
AUSTRAC has a workforce appropriate to its strategic priorities and operational activities.		■		■				
AUSTRAC has the necessary business capacity to deliver on stakeholder expectations (partners, industry and RE's	■	■	■	■	■		■	■

Draft

For Management and Audit Committee review and comment

Page 3

INTERNAL AUDIT PLAN 2011-12

Key Risk Area	Assurance Activity	Description	Resource	Timing/Cost (Scoping to final report)	Planned	Audit Priority
Project Risks / Risks To Ongoing Funding	Cost Recovery Pre- Implementation Reviews	<ul style="list-style-type: none"> - Focus on risks and controls for IT and Finance processes supporting the project - Audit will comprise progressive reviews in line with project implementation stages, ie. <ol style="list-style-type: none"> 1. Project management 2. Enrolment and registration processes 3. Budgeting, levy determination and invoicing 	Internal Audit	12 weeks over the project cycle	Quarters 1-4	High

Draft

For Management and Audit Committee review and comment

Key Risk Area	Assurance Activity	Description	Resource	Timing/Cost (Scoping to final report)	Planned	Audit Priority
Information Security and Management Risks		s 22	Ernst & Young Internal Audit support.	\$35,000 10 weeks (5 weeks E&Y time)	Quarter 2-3	High
Information Security and Management risks			Internal Audit	5 days.	Quarter 3	High

Key Risk Area	Assurance Activity	Description	Resource	Timing/Cost (Scoping to final report)	Planned	Audit Priority
Information Security and Management Risks	s 22		Internal Audit	4 weeks	Quarter 3-4	High
Financial Management and Process Risks	Cost Recovery - Finance Collection Processes and Implications on Quarterly Checks	<ul style="list-style-type: none"> - Review of procedures for collecting and recording revenue received from cost recovery. - Developing new or revised quarterly check procedures as determined. 	Internal Audit	2 weeks	Quarter 4	Medium
Financial Management/Process Risks	IT Procurement and Contracting Review	<ul style="list-style-type: none"> - Review of processes and controls over IT procurement and contracting. - Focus on compliance with legislative obligations and AUSTRAC CEI's. 	Internal Audit	6 weeks	Quarter 4 – Quarter 1 2012-13	Medium

Key Risk Area	Assurance Activity	Description	Resource	Timing/Cost (Scoping to final report)	Planned	Audit Priority
Project Risks	Project Costing Models and Management	<ul style="list-style-type: none"> - Evaluation of the appropriateness of the life-cycle costing model used to select successful tender and product. - Also incorporates reviewing current processes for project management and decision making. (Lead on from Procurement of CRM review completed by Ernst and Young. 	Ernst & Young Internal Audit support	\$30,000 5 weeks	Quarter 4 – Quarter 1 2012-13	High
Project Risks /	ARMS Benefits Realisation	<ul style="list-style-type: none"> - Post-implementation review on whether expected outputs and business benefits defined for the project have been delivered. - To be conducted in conjunction with the Project Management Office. 	Internal Audit	4 weeks	Quarter 4 – Quarter 1 2012-13	High

Key Risk Area	Assurance Activity	Description	Resource	Timing/Cost (Scoping to final report)	Planned	Audit Priority
Project Risks / Risks to Ongoing Funding	Post Implementation Review of Cost recovery	<ul style="list-style-type: none"> - Follow-up to Pre-implementation review. Review of project outcomes and lessons learnt. - To be conducted in conjunction with the Project Management Office. 	Internal Audit	4 weeks	Quarter 4 – Quarter 1 2012-13	High
2011-12 Regular Audit Work						
Financial Management / Governance and Compliance Risks	Quarterly Finance Checks	<ul style="list-style-type: none"> - Regular quarterly checks of credit cards, drawing rights, banking, accounts receivable, accounts payable, employee entitlements and Cabcharge transactions. 	Internal Audit	4 weeks per quarter	Quarters 1-4	Medium
Governance and Compliance Risks	Internal Audit Recommendation Follow-up Compliance Committee	<ul style="list-style-type: none"> - Follow-up and verification of outstanding audit recommendations. 	Internal Audit	7 days in Quarter 1 to review existing outstanding recommendations 2 days per quarters for reviews conducted 2011-12	Quarters 1-4	N/A

Key Risk Area	Assurance Activity	Description	Resource	Timing/Cost (Scoping to final report)	Planned	Audit Priority
Governance and Compliance Risks	Risk / Issues Update	- "State of the nation" report on emerging issues and risks potentially impacting on Internal Audit activity.	Internal Audit	2 days per quarter	Quarters 1-4	N/A
Governance and Compliance Risks	Audit Committee Administration	- Preparation and distribution of Audit Committee packs.	Internal Audit	1 week per quarter	Quarters 1-4	N/A

ADJUSTMENTS TO ANNUAL INTERNAL AUDIT PLAN 2011-12

Privacy Controls Review

- Originally planned for Quarter 3, 2011-12.
- Not progressing due to key staff member being absent for two months. Also not highlighted as a High Risk area.
- Replaced with Data Security in Designated Agencies Part 2.

Recruitment Process Review

- Originally planned for Quarter 4, 2011-12.
- No progressing – not highlighted as a High Risk area.
- Replaced with Cost Recovery - Finance Collection Processes and Implications on Quarterly Checks, which is considered more immediately relevant to AUSTRAC.

Enhanced Analytical Capability Project

- Potential controls review to key business project. Currently not scheduled in plan, but may need to be incorporated depending on priorities.

OTHER AUSTRAC ASSURANCE ACTIVITIES

Internal Audit will be monitoring and contributing to the following assurance activities conducted by other AUSTRAC sections.

KEY RISK AREA	ASSURANCE ACTIVITY	RESPONSIBILITY
Information Security and Information Management	Information Management – Retention and Destruction of Files	Information Management
Information Security and Information Management	IT Security Advisor (to be appointed to assess and address IT security risks)	IT
Financial Management / Process Risks	Finance Framework Improvement Project	Finance + Project Management Office
Governance / Compliance	Enterprise Risk Management Framework	Agency Risk Advisor
Governance / Compliance	Certificate of Compliance	Finance + Project Management Office
Projects	Post-Implementation Reviews	Project Management Office
Information Security and Information Management / Process Risks	Business Continuity and Disaster Recovery Planning	Agency Risk Advisor + Consultants

Appendix 1
Risk Rating Matrix

	Consequence				
Likelihood	Insignificant	Minor	Moderate	Major	Catastrophic
Almost Certain	Medium	Medium			
Likely			Medium		
Possible			Medium		
Unlikely				Medium	
Rare				Medium	Medium

<u>LIKELIHOOD</u>	
Almost Certain	Is expected to occur in most circumstances.
Likely	May occur at least once.
Possible	Could occur at some time.
Unlikely	Low chance of occurring.
Rare	Could occur only in exceptional circumstances.
<u>CONSEQUENCE</u>	
Catastrophic	Organisational survival is at risk.
Major	Operations severely damaged requiring executive management focus.
Moderate	Significant management time and resources required to rectify.
Minor	Some disruption to business possible requiring local management attention.
Insignificant	Minor problem easily handled by existing day to day operations.

Appendix 2
Areas considered but not included in 2011-12 Internal Audit Plan

Enterprise risk management framework	Enterprise Risk Management Framework still under development. Internal Audit is liaising with the Agency Risk Advisor. No formal review of the framework is planned for 2011-12.
Occupational Health and Safety Risks	No review is planned in this area. It is noted that each office has appointed Occupational Health and Safety Representatives.
Physical Security Risks (eg access to building to equipment)	Physical security controls around IT assets will be considered as part of Information Security and Management review. No other audit work planned in this area.
Finance: <ul style="list-style-type: none"> - Budget processes - Delegation and approval processes - Contracting / procurement - Accounts payable / Accounts receivable - Management reporting 	As requested by the previous Audit Committee, there are no specific detailed audit reviews planned for Finance while the Financial Framework Improvement Project is undertaken. Internal Audit is being regularly consulted on the Financial Framework Improvement Project and still conducts its quarterly financial audit checks.
Payroll / Entitlements	Staff entitlements are subject to quarterly audit sample checks. No further work planned in this area.
Agreements / MOU's with partner agencies	Internal Audit are conducting a follow-up review on Data Security in Designated Agencies. No audit work is planned on reviewing the other terms and conditions in agreements.
International	Audit of the Africa Program completed this year. No further audit activity planned for 2011-12.
Education and Training	No reviews currently planned around the efficiency and effectiveness of training courses and seminars delivered to staff, nor on the process for study assistance approvals.



Australian Government

**Australian Transaction Reports
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Internal Audit Annual Work Plan

2010-11

Last Updated: 20 September 2010

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Introduction

Overview

Internal Audit prepared an annual audit work plan for the 2010-11 financial year in accordance with AUSTRAC's Internal Audit Charter and the Internal Audit Strategic Audit Plan 2010 – 2013. The objective of the plan is to ensure timely and comprehensive audit coverage through the effective and efficient deployment of available resources within the Internal Audit business unit.

The work plan is a guide for the utilisation of the Internal Audit's resources during the financial year to cover the financial, operational and compliance risks to AUSTRAC, with a focus on those issues or risk that represent a high risk to the agency based on risk assessments.

The audit work plan is a dynamic document that may change during the financial year as circumstances dictate. Continuous reassessment of risks to the agency and business unit(s), requests from management, and changes in AUSTRAC's operations may result in changes to this work plan. Projects outlined in this work plan are only described in general terms. The specific audit 'objective' will be determined at the time the project is initiated.

Internal Audit resources at AUSTRAC currently consist of two internal resources with additional assistance from an external service provider. This work plan has been developed on the assumption that these resources will be sustained for the entire financial year. The work plan makes a distinction on those audits and reviews that will be carried out in-house and those that will be outsourced.

Planning Methodology

Risk Assessment

The annual audit work plan strives to provide assurance over areas identified as representing the greatest current risks to AUSTRAC and all AUSTRAC's business units over time to ensure that identified controls are working efficiently and effectively. AUSTRAC's risks at both agency and business unit level have been considered in the risk assessment of the audit universe.

Internal Audit also sought input from the Executive General Managers, General Managers, Directors and the ANAO's management letters and audit reports to identify auditable areas.

2010 - 11 Audit Coverage

The plan described below demonstrates a reasonable distribution of resources and appropriate coverage of the elements of the audit universe in relation to their relative risk. Some audits will be conducted by specific business units (e.g. Information Management and IT Security) to determine the adequacy and effectiveness of

processes and controls in place to manage agency wide risks. Internal Audit will satisfy itself of the quality of work done by these business units to determine if reliance can be placed on these audits.

	AUDITOR	Q1	Q2	Q3	Q4
FINANCIAL AUDITS					
No financial audits planned (1)	External			✓ (1)	
OPERATIONAL AUDITS/REVIEWS					
Information security in AUSTRAC	External			✓ (2)	
Review of AUSTRAC's performance management framework	In-house		✓ (3)		
Procurement of FIDM and CRM	External				✓ (4)
Compliance with professional standards	In-house				✓ (5)
Certificate of Compliance	In-house	✓			
Information Management – Annual review of file register by Business Unit Ad hoc reviews of closed/destroyed files by individual or Business Unit <i>These reviews are organised by IM business unit.</i>	In-house			✓ (6)	
FOLLOW UP AUDITS/REVIEWS					
TA&T – Governance and oversight of the Africa Program, including delivery of program and accounting for receipt and expenditure of funds received for this program	In-house		✓		
Software Asset Management (7)	In-house				
INFORMATION TECHNOLOGY AUDITS					
AUSTRAC Gateway Audit (organised by IT Security)	In-house				✓ (8)
Penetration and vulnerability audit (internet facing systems) (organised by IT Security)	In-house				✓ (8)
OTHER PROJECTS					
Annual Business Plan	In-house				✓
Quarterly Reporting	In-house	✓	✓	✓	✓
Development of agency and business unit risk plans	In-house	✓ (9)	✓ (9)	✓ (9)	✓ (9)

	AUDITOR	Q1	Q2	Q3	Q4
Development of CSAs	In-House	✓ (9)	✓ (9)	✓ (9)	✓ (9)
Control & Risk Self Assessments (CSA) - administration	In-House	✓	✓	✓	✓
Audit Committee Administration	In-House	✓	✓	✓	✓
Review of Internal Audit Strategic Plan	In-House		✓		✓
Regulatory Change	In-House	✓	✓	✓	✓
Risk Assessment & Annual Plan Preparation	In-House				✓
Special Requests	In-House	As Required			

- (1) Both the **Payments to contractors** audit (planned Q3, 2010/11) and the **Intangibles** audit (planned Q4, 2010/11) will be moved to 2011/12 based on the recommendation of the strategic review that Internal Audit shift its focus from Financial Services to allow Financial Services to put in place business improvements.
- (2) The **Data security in AUSTRAC** review was initially scheduled for Q2, 2009/10 and was to be conducted in-house. However, due to competing priorities it was moved to Q1, 2010/11 and will be conducted by the co-sourced internal audit provider. It will now be moved to Q3, 2010/11 once the selection of the service provider has been finalised and to allow for security clearances to be completed.
- (3) The **Review of AUSTRAC's performance management framework** will replace the **Travel** audit which will be moved to 2011/12 based on the recommendation of the strategic review that Internal Audit shift its focus from Financial Services to allow Financial Services to put in place business improvements.
- (4) A hot audit of the procurement of the CRM solution was conducted in Q2 and Q3 of 2009/10. This audit focused on probity issues. The scope of the audit planned for Q4, 2010/11 will also consider the benefits realisation of both the FIDM and CRM solutions in addition to the procurement of these software solutions.
- (5) The **Compliance with professional standards** review was initially scheduled for Q3, 2010/11. It has now been moved to Q4, 2010/11 due to resource constraints given the number of audits to be completed inhouse.
- (6) Internal Audit will partner the Information Management business unit to conduct a joint audit of a business unit's compliance with the Information Management Policy.
- (7) The **Software Asset Management** audit which was initially Q2, 2010/11 was moved to Q4, 2010/11 due to competing priorities for the IT business unit. IA has decided to move this audit to the following year due to resource constraints given the number of audits to be completed inhouse.

- (8) These reviews are arranged by IT Security annually and are to be conducted externally in the second half of the year.
- (9) Risk plans will be developed for both the agency and each business unit. CSAs will then be developed for each business unit and will include responsibility of ensuring compliance with FMA obligations and risk management (including fraud and management of BCP/DRP). The fraud plan will be integrated into the development of business unit and agency risk plans and will be reviewed as part of the ongoing monitoring of operational risks.

The Finance risk plan and CSA were finalised in Q1 2009/10.

Internal Audit has reviewed and revised the timeframe for the development of risk plans and CSAs as set out in the table below:

AUDITS (FINANCIAL, OPERATION, INFORMATION TECHNOLOGY)					
Title of Audit	Area Responsible	Auditor	Description	Potential Benefit/ Rationale	Estimated Start Date
FINANCIAL AUDITS					
No financial audits to be undertaken for the rest of 2010/11 given the recommendation of the strategic review that Internal Audit shift its focus from Financial Services to allow Financial Services to put in place business improvements.					
OPERATIONAL AUDITS					
Certificate of Compliance	Agency Wide	In-House	To assess AUSTRAC's compliance with the Australian Government's Financial Management Framework.	Preparation of the Certificate of Compliance for sign-off by the Chief Executive.	Q1
International Technical Assistance and Training – Governance and oversight of the Africa Program, including delivery of program and accounting for receipt and expenditure of funds received for this program	TA&T	In-house	A review of the mechanisms in place to account for the delivery of training programs and the use of funds received for the Africa program. This review will also focus on the acquittal of funds to ensure this is in accordance with the terms of any agreement in place.	Assurance that there is effective oversight and governance over the administration of the Africa program and the acquittal of funds received.	Q2

AUDITS (FINANCIAL, OPERATION, INFORMATION TECHNOLOGY)					
Title of Audit	Area Responsible	Auditor	Description	Potential Benefit/ Rationale	Estimated Start Date
Review of AUSTRAC's performance management framework	PSS	Internal	Review of existing performance management framework.	The results of this review will inform the changes made to the performance management system with negotiations for the Collective Agreement. Negotiations of the new CA will commence in February 2011.	Q2
Information Security in AUSTRAC	Agency wide	External	To review and assess the data security controls in place, including data access controls, in the agency.	Assurance that controls are effective in preventing the unauthorised access and use of data in the agency.	Q3
Information Management – ad hoc audit of closed/destroyed files by individual or business unit	Information Management	In-house	To partner the Information Management team in the audit of a business unit's compliance with the Information Management Policy.	To assist the Information Management team in building audit skills and in conducting quality audits.	Q3
Procurement of FIDM and CRM	PMO	External	To assess compliance with CPGs, CEIs and procurement policies in the procurement of the FIDM and CRM solutions, including a review of benefits analysis of such procurement activities.	Assurance that there is adequate control and oversight of the procurement of services and that these procurements represent value for money.	Q4
Compliance with professional standards	Agency wide	In-house	To assess the level of compliance with professional standards across the agency.	To minimise the negative impact on staff morale and code of conduct breaches as a result of failure by staff to adhere to professional standards.	Q4

AUDITS (FINANCIAL, OPERATION, INFORMATION TECHNOLOGY)					
Title of Audit	Area Responsible	Auditor	Description	Potential Benefit/ Rationale	Estimated Start Date
INFORMATION TECHNOLOGY AUDITS					
AUSTRAC Gateway Audit (organised by IT Security)	IT Security	External	S 22	Assess compliance with the Gateway Certification Guide (http://www.dsd.gov.au/library/info/sec/gateway.html).	Q3 – Q4
Penetration and vulnerability audit (organised by IT Security)	IT Security	External	Organised by IT Security – audit to be conducted by Deloitte	Assurance that internet facing systems are not susceptible to unauthorised external access.	Q2

OTHER PROJECTS					
Title of Project	Area Responsible	Auditor	Description	Potential Benefit/ Rationale	Estimated Start Date
Development of agency and business unit risk plans	Agency Wide	In-House	To assist ExCom and senior managers in identifying and managing operational and strategic risks on an on-going basis.	Consistency in the identification and management of risks within and across business units and the agency.	Quarterly
Development of Control Self Assessments	Agency Wide	In-House	To provide assistance to senior managers in assessing the effectiveness of controls for which senior managers are responsible.	Proactive assessment of each business unit's control environment.	Quarterly
CSA Administration	Internal Audit	In-House	To ensure that CSAs completed, responses reviewed and exceptions reported to the Audit Committee.	Ensures that risks are managed as a result of effective controls and that any breakdowns in controls are rectified on a timely basis.	Quarterly

OTHER PROJECTS					
Title of Project	Area Responsible	Auditor	Description	Potential Benefit/ Rationale	Estimated Start Date
Audit Committee Administration	Internal Audit	In-House	To provide a report of Internal Audit activities during the quarter for consideration and review by AUSTRAC's Audit Committee.	Requirement as per Internal Audit Charter.	Quarterly
Review of Internal Audit Annual and Strategic Plans	Internal Audit	In-House	To review and update (where necessary) the current Internal Audit Annual and Strategic Plans.	Ensures that the Annual and Strategic Plans continue to be valid and relevant to any changes to AUSTRAC's operating environment.	Q2 & Q4
Preparation of Annual Plan and Strategic Plan	Internal Audit	In-House	To establish the Annual and Strategic Internal Audit Work Program	Areas of high risk identified for inclusion in the forthcoming year's audit plan.	Q4
Special Requests	Executive Committee or Audit Committee	In-House / Outsourced service provider	Time set aside for special requests and other consulting engagements requested from the Executive Committee or Audit Committee.	Mitigate any new risks that are identified during the year impacting AUSTRAC's operating environment.	As Required

Internal Audit History – By Business Unit

Business Unit	Audit	Year
Agency wide		
	Information security in AUSTRAC	2010-11
	Compliance with professional standards	2010-11
Policy Branch		
Corporate Communications	Financial Management & Reporting	2007-08
Government Relations		
Strategic Policy		
International Relations		
Legal Branch		
Legal		
Rules		
Corporate Branch		
Finance & Corporate	Contract Management	2007-08
	Domestic & International Travel	2007-08
	Property, Plant & Equipment	2008-09
	Contracts Performance Management	2008-09
	Budget Development & Management	2008-09
	Infringement Notice Scheme	2008-09
	Property, plant and equipment	2009-10
	Post Implementation Review – Finance 1	2009-10
	Employee entitlements	2009-10
	Contract Management	2009-10
	Procurement – hot audit of CRM	2009-10
	Payments to contractors	2011/12
	Intangibles	2011/12
	Travel audit	2011/12
People, Strategies and Solutions	Payroll Processing	2006-07
	Payroll Control Environment	2008-09
	Review of performance management framework	2010-11
Education and Training	Education Strategy Review	2007-08
	Effectiveness of training strategy and framework	2011-12
Corporate Services		
Information Management	PIR of EDRMS	2007-08
	Audit of closed/destroyed files	2009-10
Information Technology		
IT Operations/Systems	Software Asset Management	2007-08
	Software Asset Management	2010-11
	General Computer Controls	2006-07
IT Security	IT Business Continuity Management	2007-08
	Application Penetration Review	2008-09
	IT Security Review	2008-09
	Application Penetration Review	2009-10
	IT Security Review	2009-10
Supervision		
Supervisory Development & Coordination		
Technical Development and	Administration of Exemption Applications	2008-09

Business Unit	Audit	Year
Advice	Administration of No Action Letters	2008-09
Front line Supervision	Supervision assessments	2009-10
Data Research and Statistics	Data Quality Control Environment	2006-07
Referrals		
Planning and Strategic initiatives		
RE Operations	Help Desk Control Environment	2007-08
Enforcement		
Intelligence		
International Technical Assistance & Training	Compliance with requirements in agreements	2008-09
	Africa Program	2010-11
Intelligence Strategy and Support	Data Security Controls in PAs	2008-09
Analytics and Taskforces		
Tactical Analysis & Support	Data Security Controls in PAs	2008-09
	Partner Agency Relationship Survey	2006-07
	Data Security Controls in PAs	2008-09
Program Management		
Program Management	Procurement of FIDM and CRM	2010-11
Governance and Oversight Committees		
Supervision Oversight Committee		
Intelligence Oversight Committee		
Enforcement Committee		
Program Management Governance Committee		
Finance Committee		

Internal Audit History – Audits Mapped against Key Strategic Risks

Business Unit	Audit	Strategic Risks	Year
Agency wide			
	Data security in AUSTRAC	Failure to protect our data Failure to protect AUSTRAC's position	2010-11
	Compliance with professional standards	Failure to manage key external relationships Failure to build sustainability	2010-11
Policy Branch			
Corporate Communications	Financial Management & Reporting	Failure to build sustainability	2007-08
Government Relations			
Strategic Policy			
International Relations			
Legal Branch			
Legal			
Rules			
Corporate Branch			
Finance & Corporate	Contract Management	Failure to build sustainability	2007-08
	Domestic & International Travel	Failure to build sustainability	2007-08
	Property, Plant & Equipment	Failure to build sustainability	2008-09
	Contracts Performance Management	Failure to build sustainability	2008-09
	Budget Development & Management	Failure to build sustainability	2008-09
	Infringement Notice Scheme	Failure to build sustainability	2008-09
	Property, plant and equipment	Failure to build sustainability	2009-10
	Post Implementation Review – Finance 1	Failure to build sustainability	2009-10
	Employee entitlements	Failure to build sustainability	2009-10
	Contract Management	Failure to build sustainability	2009-10
	Procurement – hot audit of CRM	Failure to build sustainability	2009-10

Business Unit	Audit	Strategic Risks	Year
People, Strategies and Solutions	Payment to contractors	Failure to build sustainability	2011-12
	Intangibles	Failure to build sustainability	2011-12
	Travel audit	Failure to build sustainability	2011-12
	Payroll Processing	Failure to build sustainability	2006-07
	Payroll Control Environment	Failure to build sustainability	2008-09
	Review of performance management framework	Failure to build sustainability	2010-11
Education and Training	Education Strategy Review	Failure to successfully implement the AML/CTF Reform Project	2007-08
	Effectiveness of training strategy and framework	Failure to successfully implement the AML/CTF Reform Project	2011-12
Corporate Services			
Information Management	PIR of EDRMS	Failure to build sustainability Failure to protect our data	2007-08
	Review of closed/destroyed files	Failure to protect our data	2009-10
Information Technology			
IT Operations	Software Asset Management	Failure to build sustainability	2007-08
	Software Asset Management	Failure to build sustainability	2010-11
	General Computer Controls	Failure to protect our data Failure to protect AUSTRAC's position	2006-07
IT Security	IT Business Continuity Management	Failure to protect our data Failure to protect AUSTRAC's position	2007-08
	Application Penetration Review	Failure to protect our data Failure to protect AUSTRAC's position	2008-09
	IT Security Review	Failure to protect our data Failure to protect AUSTRAC's position	2008-09
	Application Penetration Review	Failure to protect our data Failure to protect AUSTRAC's position	2009-10
	IT Security Review	Failure to protect our data Failure to protect AUSTRAC's position	2009-10
	Application Penetration Review	Failure to protect our data	2010-11

Business Unit	Audit	Strategic Risks	Year
	IT Security Review	Failure to protect AUSTRAC's position Failure to protect our data Failure to protect AUSTRAC's position	2010-11
Supervision			
Technical Development and Advice	Administration of Exemption Applications	Failure to successfully implement the AML/CTF Reform Project Failure to manage key external relationships	2008-09
	Administration of No Action Letters	Failure to successfully implement the AML/CTF Reform Project Failure to manage key external relationships	2008-09
Front line Supervision	Supervision assessments	Failure to successfully implement the AML/CTF Reform Project Failure to manage key external relationships	2009-10
Data Research and Statistics	Data Quality Control Environment		2006-07
Supervisory Development & Coordination			
Referrals			
Planning and strategic initiatives			
RE Operations	Help Desk Control Environment	Failure to successfully implement the AML/CTF Reform Project Failure to manage key external relationships Failure to protect our data	2007-08
Enforcement			
Enforcement			
Intelligence			
International Technical Assistance & Training	Compliance with requirements in agreements	Failure to build sustainability Failure to manage key external relationships	2008-09
	Governance and oversight of the Africa Program, including delivery of program and accounting for receipt and expenditure of funds received for this	Failure to build sustainability Failure to manage key external relationships	20010-11

Business Unit	Audit	Strategic Risks	Year
	program Governance and oversight of the Africa Program, including delivery of program and accounting for receipt and expenditure of funds received for this program		
Intelligence Strategy and Support	Data Security Controls in PAs	Failure to protect our data	2008-09
Analytics and Taskforces			
Tactical Analysis & Support	Data Security Controls in PAs	Failure to protect our data	2008-09
	Partner Agency Relationship Survey		2006-07
	Data Security Controls in PAs	Failure to protect our data	2008-09
Program Management			
Program Management	Procurement of FIDM and CRM	Failure to build sustainability	2010-11
Governance Committees			
Supervision Oversight Committee			
Intelligence Oversight Committee			
Enforcement Committee			
Program Management Governance Committee			
Finance Committee			

Key strategic risks 2009-11:

1. Failure to successfully implement the AML/CTF Reform Project.

The risk that we will not adequately implement the AML/CTF reform project. This means we would fail to meet international standards and domestic expectations. We must continue to comprehensively plan at all stages of the reform project, and take appropriate responses to the various compliance risks .

2. Failure to manage key external relationships.

Failure to build the trust and respect of industry, government and the community. This risk ties in with the implementation of the AML/CTF Act. With new compliance capabilities we must continue to build strong, trusting relationships with all external stakeholders.

3. Failure to demonstrate the effectiveness of the AML/CTF system

Ongoing research and measurement is needed to demonstrate the progress made in combating crime and money laundering and the wider benefits to the Australian community of the AML/CTF regime.

4. Failure to protect AUSTRAC's position

Partner agencies remain concerned for the timeliness, quality and relevance of AUSTRAC data, disseminations and regulatory responses. This risk can be exemplified through partner agencies seeking direct access to financial intelligence sources, inappropriate requests for bulk AUSTRAC data or demands by other regulators for interventions that should remain matters for AUSTRAC. We need to focus on meeting partner agency expectations while maintaining our unique position as Australia's financial intelligence unit and AML/CTF regulator. Through close cooperation and consultation, we must ensure that partner agency needs are understood; that coordinated regulatory and intelligence responses are taken; and that improper demands for our support are distinguished and dealt with appropriately.

5. Failure to build sustainability.

With many demands for government funding, AUSTRAC must ensure appropriate stewardship of its resources and provide clear value for money. In a rapidly changing environment with many new staff, our organisational culture is also adapting. We must ensure our organisational values clearly align with business strategies and support our organisational context.

6. Failure to protect our data.

Inappropriate use of our data by staff and partner agencies would jeopardise AUSTRAC's reputation as a global leader in financial intelligence. Our data is our major asset affecting core operations of the agency, and we must ensure that tight controls safeguard its existence and integrity.



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Internal Audit Annual Work Plan

2009-10

Last Updated: 25 June 2009

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Introduction

Overview

Internal Audit has prepared an annual audit work plan for the 2009-10 financial year in accordance with AUSTRAC's Internal Audit Charter and the Internal Audit Strategic Audit Plan 2009 – 2012. The objective of the plan is to ensure timely and comprehensive audit coverage through the effective and efficient deployment of available resources within the Internal Audit business unit.

The work plan is a guide for the utilisation of the Internal Audit's resources during the financial year to cover the financial, operational and compliance risks to AUSTRAC, with a focus on those issues or risk that represent a high risk to the agency based on risk assessments.

The audit work plan is a dynamic document that may change during the financial year as circumstances dictate. Continuous reassessment of risks to the agency and business unit(s), requests from management, and changes in AUSTRAC's operations may result in changes to this work plan. Projects outlined in this work plan are only described in general terms. The specific audit 'objective' will be determined at the time the project is initiated.

Internal Audit resources at AUSTRAC currently consist of two internal resources and additional assistance from an external service provider (currently Deloitte Touche Tohmatsu). This work plan has been developed on the assumption that these resources will be sustained for the entire financial year. The work plan makes a distinction on those audits and reviews that will be carried out in-house and those that will be outsourced.

Planning Methodology

Risk Assessment

The annual audit work plan strives to achieve the dual objectives of providing assurance over areas identified as representing the greatest current risks to AUSTRAC and all AUSTRAC's business units over time to ensure that identified controls are working efficiently and effectively. AUSTRAC's risks at both agency and business unit level have been considered in the risk assessment of the audit universe.

Internal Audit also sought input from General Managers, Senior Managers and external auditors to identify auditable areas.

2009 - 10 Audit Coverage

Internal Audit believes the plan described below demonstrates a reasonable distribution of resources and appropriate coverage of the elements of the audit universe in relation to their relative risk. Some audits will be conducted by specific business units (e.g. Information Management and IT Security) for agency wide risks. Internal Audit will satisfy itself on the quality of the work done before reliance can be placed on these audits.

	AUDITOR	Q1	Q2	Q3	Q4
FINANCIAL AUDITS					
Property, plant and equipment	In-house	✓			
Finance 1 – post implementation review	In-house			✓	
Employee entitlements (correctly calculated and reflected in financial statements)	External				✓
OPERATIONAL AUDITS/REVIEWS					
Procurement and contract management	In-house			✓	
Data security in AUSTRAC	In-house		✓		
Certificate of Compliance	In-house	✓			
Enforcement – chain of evidence	In-house				✓
Compliance supervision assessment	In-house	✓			
Travel	In-house		✓		
Information Management – Annual audit of file register by Business Unit Ad hoc audits of closed/destroyed files by individual or Business Unit <i>These audits are organised by IM business unit.</i>	In-house	✓ (1)	✓ (1)	✓ (1) *	✓ (1)
FOLLOW UP AUDITS/REVIEWS					
• Budget management	In-house			✓	
• Infringement scheme	In-house		✓		
• No-action	In-house	✓			
• Exemption	In-house		✓		
• Payroll controls	In-house	✓			
INFORMATION TECHNOLOGY AUDITS					

	AUDITOR	Q1	Q2	Q3	Q4
Maintenance of key AUSTRAC systems (AO, TES, TRAQ)	External		✓		
AUSTRAC Gateway Audit (organised by IT Security)	In-house				✓ (2)
Penetration and vulnerability audit (internet facing systems) (organised by IT Security)	In-house				✓ (2)
OTHER PROJECTS					
Annual Business Plan	In-house				✓
Quarterly Reporting	In-house	✓	✓	✓	✓
Review of fraud plan	In-house	(4)			
Review of Business Continuity Plan/Disaster Recovery Plan/Pandemic Plan	In-house		✓ (3)	✓ (3)	
Testing of BCP	In-house				✓ (3)
Testing of DRP	In-house				✓ (3)
Testing of Pandemic Plan	In-house		✓ (3)		
Development of agency and business unit risk plans	In-house	✓ (4)	✓ (4)	✓ (4)	✓ (4)
Development of CSAs	In-House	✓ (4)	✓ (4)	✓ (4)	✓ (4)
Control & Risk Self Assessments (CSA) - administration	In-House	✓	✓	✓	✓
Audit Committee Administration	In-House	✓	✓	✓	✓
Review of Internal Audit Strategic Plan	In-House		✓		✓
Regulatory Change	In-House	✓	✓	✓	✓
Risk Assessment & Annual Plan Preparation	In-House				✓
Special Requests	In-House	As Required			

(1) The audits will be conducted by the Information Management Business Unit. At the time of the development of the annual audit work plan, specific timings for these audits have not been firmed up.

* Internal Audit will partner with the Information Management business unit to conduct a joint audit of a business unit's compliance with the Information Management Policy.

(2) These audits have been scheduled for the second half of 2009/10.

(3) Review and testing of Business Continuity Plan/Disaster Recovery Plan/Pandemic Plan to be done at least annually or when there is a change in systems/business structure (which ever is the earliest).

(4) Risk plans will be developed for both the agency and each business unit. CSAs will then be developed for each business unit. The CSAs will ensure that FMA obligations, risk management responsibilities

(including fraud and management of BCP/DRP) are considered. The fraud plan will be integrated into the development of business unit and agency risk plans and will be reviewed as part of the ongoing monitoring of operational risks.

Risk plans and CSA s will be developed for the following business units in the following quarters:

Q1 2009/10 – Finance, Govt Relations, Corporate (including PSS, Education and Training, Building Facilities Management and Protective Services)

Q2 2009/10 – Regulatory Policy (Strategic Policy and TDA), Supervision

Q3 2009/10 - Corp Comms, Legal, RE Ops, IT,

Q4 2009/10 - TA&T, International Relations, Enforcement and Agency Risk plan.

IA will schedule a review of the new Risk Management Framework in 2010/11 to be conducted by the external service provider of the internal audit function. This review will assess the effectiveness of the framework for BUs and the agency to adequately manage operational and strategic risks.

AUDITS (FINANCIAL, OPERATION, INFORMATION TECHNOLOGY)					
Title of Audit	Area Responsible	Auditor	Description	Potential Benefit/ Rationale	Estimated Start Date
FINANCIAL AUDITS					
Property, plant and equipment	Finance	In-house	To assess compliance with purchase, disposal and depreciation guidelines.	Assurance that there is adequate control over the purchase and disposal of fixed assets and in the accounting treatment of fixed assets.	Q1
Finance 1 – post implementation review	Finance	In-house	To assess the effective implementation and integration of the new FMIS system and ensure there is a robust framework (e.g. communication, training, monitoring) in place underpinning the FMIS system .	Assurance that financial information produced by the new FMIS software is true and fair.	Q3
Employee entitlements	Finance	External	To determine the accuracy of employee entitlements.	Assurance that employee entitlements have been correctly calculated and reflected in the financial statements.	Q4
OPERATIONAL AUDITS					
Certificate of Compliance	Agency Wide	In-House	To assess AUSTRAC's compliance with the Australian Government's Financial Management Framework.	Preparation of the Certificate of Compliance for sign-off by the Chief Executive.	Q1
Compliance supervision assessment	Supervision	In-house	Review compliance with SOPs in assessments conducted to date.	Provide assurance that there is a consistent approach to assessments conducted by the various sector teams in Supervision.	Q1

AUDITS (FINANCIAL, OPERATION, INFORMATION TECHNOLOGY)					
Title of Audit	Area Responsible	Auditor	Description	Potential Benefit/ Rationale	Estimated Start Date
Information Management – ad hoc audit of closed/destroyed files by individual or business unit	Information Management	In-house	To partner the Information Management team in the audit of a business unit's compliance with the Information Management Policy.	To assist the Information Management team in building audit skills and in conducting quality audits.	Q3
Procurements and contracts management	Agency	Internal	To assess compliance with CPGs, CEIs and procurement policies in the procurement and on-going management of contracts.	Assurance that there is adequate control and oversight of the procurement of services and the on-going management of contracts.	Q3
Travel	Finance	In-house	To assess compliance with CEIs, travel policies and procedures.	Assurance that the framework supporting the management of domestic and international travel is effective.	Q2
Enforcement – chain of evidence	Enforcement	In-house	Review the effectiveness of the management of the chain of evidence.	Provide assurance that evidence is managed appropriately to enable appropriate enforcement action to be taken.	Q4
INFORMATION TECHNOLOGY AUDITS					
Data Security in AUSTRAC	Agency wide (including Information Management, IT).	In-house	To review and assess the data security controls in place, including data access controls, in the agency.	Assurance that controls are effective in preventing the unauthorised access and use of data in the agency.	Q2

AUDITS (FINANCIAL, OPERATION, INFORMATION TECHNOLOGY)					
Title of Audit	Area Responsible	Auditor	Description	Potential Benefit/ Rationale	Estimated Start Date
AUSTRAC Gateway Audit (organised by IT Security)	IT Security	External	S 22	Assess compliance with the Gateway Certification Guide (http://www.dsd.gov.au/library/info/sec/gateway.html). S 22	2nd half of 2009/10
Penetration and vulnerability audit (organised by IT Security)	IT Security	External	Organised by IT Security – audit to be conducted by Deloitte	Assurance that internet facing systems are not susceptible to unauthorised external access. S 22	Q2, 2009/10

FOLLOW UP REVIEWS						
Title of Audit	Area Responsible	Month audit report issued	Auditor	Description	Potential Benefit/ Rationale	Estimated Start Date
No-action	TDA	Feb 09	In-house	Follow up status of action items and limited testing done to verify effectiveness of completed actions. Update tracker for incomplete actions and due dates.	Assurance that all recommendations have been effectively implemented	Q1
Payroll controls	PSS	Dec 08	In-house	Follow up status of action items and limited testing done to verify effectiveness of completed actions. Update tracker for incomplete actions and due dates.	Assurance that all recommendations have been effectively implemented	Q1
Infringement scheme	RE Ops	March 09	In-house	Follow up status of action items and limited testing done to verify effectiveness of completed actions. Update tracker for incomplete actions and due dates.	Assurance that all recommendations have been effectively implemented	Q2
Exemption	TDA	May 09	In-house	Follow up status of action items and limited testing done to verify effectiveness of completed actions. Update tracker for incomplete actions and due dates.	Assurance that all recommendations have been effectively implemented	Q2

FOLLOW UP REVIEWS						
Title of Audit	Area Responsible	Month audit report issued	Auditor	Description	Potential Benefit/ Rationale	Estimated Start Date
Budget Management	Finance	June 09	In-house	Follow up status of action items and limited testing done to verify effectiveness of completed actions. Update tracker for incomplete actions and due dates.	Assurance that all recommendations have been effectively implemented	Q3

OTHER PROJECTS					
Title of Project	Area Responsible	Auditor	Description	Potential Benefit/ Rationale	Estimated Start Date
Review of Business Continuity Plan/Pandemic Plan	Agency Wide	In-House	Assist in the review of these plans to ensure that the agency has up to date plans in place.	Current plan in place, updated for changes in roles, functions and systems.	Q2 & 3
Testing of BCP (including DRP) and Pandemic Plan	Agency Wide	In-House	BCP and Pandemic Plan to be tested.	Ensure that the plan will work when required.	Q4
Development of agency and business unit risk plans	Agency Wide	In-House	To assist ExCom and senior managers in identifying and managing operational and strategic risks on an on-going basis.	Consistency in the identification and management of risks within and across business units and the agency.	Quarterly
Development of Control Self Assessments	Agency Wide	In-House	To provide assistance to senior managers in assessing the effectiveness of controls for which senior managers are responsible.	Proactive assessment of each business unit's control environment.	Quarterly
CSA Administration	Internal Audit	In-House	To ensure that CSAs completed, responses reviewed and exceptions reported to the Audit Committee.	Ensures that risks are managed as a result of effective controls and that any breakdowns in controls are rectified on a timely basis.	Quarterly

OTHER PROJECTS					
Title of Project	Area Responsible	Auditor	Description	Potential Benefit/ Rationale	Estimated Start Date
Audit Committee Administration	Internal Audit	In-House	To provide a report of Internal Audit activities during the quarter for consideration and review by AUSTRAC's Audit Committee.	Requirement as per Internal Audit Charter.	Quarterly
Review of Internal Audit Strategic Plan	Internal Audit	In-House	To review and update (where necessary) the current Internal Audit Strategic Plan.	Ensures that the Strategic Plan continues to be valid and relevant to any changes to AUSTRAC's operating environment.	Q2 & Q4
Annual Plan Preparation	Internal Audit	In-House	To establish the Internal Audit Work Program for 2010/11.	Areas of high risk identified for inclusion in the forthcoming year's audit plan.	Q4
Special Requests	Executive Committee or Audit Committee	In-House / Outsourced service provider	Time set aside for special requests and other consulting engagements requested from the Executive Committee or Audit Committee.	Mitigate any new risks that are identified during the year impacting AUSTRAC's operating environment.	As Required

Internal Audit History – By Business Unit

Business Unit	Audit	Year
Executive Branch		
Corporate Communications	Financial Management & Reporting	2007-08
Government Relations		
Legal Branch		
Legal		
Corporate Branch		
Finance & Corporate	Contract Management	2007-08
	Domestic & International Travel	2007-08
	Property, Plant & Equipment	2008-09
	Contracts Performance Management	2008-09
	Budget Development & Management	2008-09
	Infringement Notice Scheme	2008-09
	Risk Management Framework	2009-10
	Property, plant and equipment	2009-10
	Post Implementation Review – Finance 1	2009-10
	Employee entitlements	2009-10
	Travel audit	2009-10
People, Solutions & Services	Payroll Processing	2006-07
	Payroll Control Environment	2008-09
Education and Training	Education Strategy Review	2007-08
Protective Security		
Information Management	PIR of EDRMS	2007-08
Information Technology		
IT Operations	Software Asset Management	2007-08
	General Computer Controls	2006-07
IT Security	IT Business Continuity Management	2007-08
	Application Penetration Review	2008-09
	IT Security Review	2008-09
	Data security in AUSTRAC	2009-10
Supervision Group		
Regulatory Policy		
Strategic Policy		
AML/CTF Rules & Guidance		
Technical Development and Advice	Administration of Exemption Applications	2008-09
	Administration of No Action Letters	2008-09
Banking & Finance		
Front line Supervision (Major Banks, Other ADIs and NBFS)	Supervision assessments	2009-10
Data Integrity	Data Quality Control Environment	2006-07
Gambling, Money Services and International		
Front line Supervision (Money Services and Gambling)	Supervision assessments	2009-10
International Technical Assistance & Training	Compliance with requirements in agreements	2008-09
International Operations		

Business Unit		Audit	Year
RE Operations		Help Desk Control Environment	2007-08
Enforcement		Enforcement General Controls	2009-10
Intelligence			
Operational Intelligence			
Research & Analysis			
Partner Agencies		Partner Agency Relationship Survey	2006-07
		Data Security Controls in PAs	2008-09
Program Management Office			
Program Management Office			
Governance and Oversight Committees			
Supervision Oversight Committee			
Intelligence Oversight Committee			
Enforcement Committee			



Australian Government

**Australian Transaction Reports
and Analysis Centre**

Internal Audit Annual Work Plan

2008-09

Last Updated: 2nd February 2009

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Introduction

Overview

In accordance with AUSTRAC's Internal Audit Charter and the Internal Audit Strategic Audit Plan 2008 – 2011, an annual audit work plan has been prepared for the 2008-09 financial year. The objective of the plan is to provide the most timely and comprehensive scope of audit coverage to AUSTRAC, deploying resources available within the Internal Audit business unit in an effective and efficient manner.

The work plan is a guide for the utilisation of the business unit's resources during the financial year in order to cover the financial, operational and compliance risks to AUSTRAC. Audits and other projects included in this audit work plan are those areas that represent a high risk to AUSTRAC based on various risk assessments.

The audit work plan is a dynamic document that changes during the financial year as circumstances dictate. Continuous reassessment of the risks, requests from management, and changes in AUSTRAC's operations may result in changes to this work plan. Projects outlined in this work plan are only described in general terms. The specific audit 'objective' will be determined at the time the project is initiated based on more detailed assessment of the relative risks.

Internal Audit resources at AUSTRAC currently consist of an Internal Audit Senior Manager, an Internal Audit subordinate and additional assistance from an external service provider (currently Deloitte Touche Tohmatsu). This work plan has been developed on the assumption that these resources will be sustained for the entire financial year. The work plan makes a distinction on those audits and reviews that will be carried out in-house and those that will be outsourced.

Planning Methodology

Risk Assessment

The annual audit work plan strives to achieve the dual objectives of assuring audit coverage of the areas identified as representing the greatest current risks to AUSTRAC, while at the same time assuring a broad audit coverage of all AUSTRAC's business units over time.

The audit work plan focuses on high risk activities to ensure that identified controls are working efficiently and in the most effective manner. AUSTRAC's key strategic risks, as well as the risks identified at a business unit level have been used in a risk assessment of the audit universe.

In addition to the risk assessment, Internal Audit has used experience and judgment, along with input from General Managers, Senior Managers and external auditors to identify auditable areas.

2008-09 Audit Coverage

Internal Audit believes the plan described below demonstrates reasonable distribution of resources and appropriate coverage of the elements of the audit universe in relation to their relative risk.

	AUDITOR	Q1	Q2	Q3	Q4
FINANCIAL AUDITS					
Budget Development & Management	Deloitte			✓	
Infringement Notice Scheme	In-House		✓		
Contract Performance Management	In-House				✓
OPERATIONAL AUDITS					
Exemption Applications	Deloitte			✓	
Certificate of Compliance	In-House	✓			
Technical Assistance & Training Control Environment	In-House				✓
Data Security in Partner Agencies	In-House			✓	
Payroll Control Environment	Deloitte		✓		
No Action Letters Administration	Deloitte	✓			
INFORMATION TECHNOLOGY AUDITS					
IT Security Review	Deloitte			✓	
OTHER PROJECTS					
Control & Risk Self Assessments	In-House	✓	✓	✓	✓
Post Audit Recommendation Follow-ups	In-House	✓	✓	✓	✓
Audit Committee Administration	In-House	✓	✓	✓	✓
Review of Internal Audit Strategic Plan	In-House		✓		✓
Policy Environment Review	In-House			✓	
Risk Assessment & Annual Plan Preparation	In-House				✓
Special Requests	In-House	As Required			

Audit Title	Area Responsible	Auditor	Audit Description	Potential Benefit/ Rationale	Estimated Start Date
FINANCIAL AUDITS					
Budget Development & Management	Finance & Corporate	Deloitte	To assess AUSTRAC's internal budget and management reporting processes.	Assurance that there is adequate control over AUSTRAC's budgeting and management reporting processes.	Q3
Infringement Notice Scheme	Finance & Corporate	In-House	To evaluate the effectiveness of controls surrounding the Infringement Notice Scheme.	Assurance that key control procedures for processing Infringement Notices are operating effectively.	Q2
Contract Performance Management	Finance & Corporate	In-House	To review the ongoing management of contract performance from the commencement to termination date.	Assurance that AUSTRAC is obtaining value for money from engaged contractors and consultants.	Q4
OPERATIONAL AUDITS					
Exemption Application Administration	Technical Advisory Group	Deloitte	To examine the efficiency of the administration of Exemption applications.	An opportunity to assess the procedures involved in evaluating Exemption applications.	Q3
Data Security in Partner Agencies	Partner Agencies	In-House	To review the controls and security safeguards in place surrounding the access of AUSTRAC information by employees of designated Partner Agencies with a current MOU in place with AUSTRAC.	Assurance that controls are in place to prevent unauthorised access to AUSTRAC data by Partner Agencies.	Q3

Payroll Control Environment	People, Strategies & Solutions	Deloitte	To assess the adequacy and effectiveness of the payroll control environment.	Assurance that key control procedures for processing and monitoring payroll transactions are operating effectively.	Q2
No Action Letters Administration	Technical Advisory Group	Deloitte	To examine the efficiency of the administration of No Action letters.	An opportunity to evaluate the procedures involved with assessing No Action letters.	Q1
Certificate of Compliance	Agency Wide	In-House	To assess AUSTRAC's compliance with the Australian Government's Financial Management Framework.	Preparation of the Certificate of Compliance for sign-off by the Chief Executive.	Q1
Technical Assistance & Training Control Environment	International	In-House	To assess the effectiveness of the International training programs, identifying the key risks that may prevent the achievement of project objectives and reviewing the controls in place to mitigate those risks.	Assurance that key control procedures are operating effectively within the International Training environment.	Q4
INFORMATION TECHNOLOGY AUDITS					
IT Security Review	IT Security	Deloitte	To review the IT security environment including governance, architecture intrusion detection and network encryption.	Assurance that key IT security controls are operating effectively.	Q3
OTHER PROJECTS					
Control & Risk Self Assessments	Agency Wide	In-House	To provide assistance to senior managers in assessing the control of systems, functions and activities for which they are responsible and determining the level of compliance with those controls.	Proactive assessment of each business unit's control environment.	Quarterly

Post Audit Recommendation Follow-ups	Agency Wide	In-House	Undertake follow-ups on the implementation of recommendations from previous audits	Ensure high risks or control weaknesses are adequately addressed by management and to identify any issues which are still outstanding.	Quarterly
Audit Committee Administration	Internal Audit	In-House	To provide a report of Internal Audit activities during the quarter for consideration and review by AUSTRAC's Audit Committee.	Requirement as per the Internal Audit Charter.	Quarterly
Review of Internal Audit Strategic Plan	Internal Audit	In-House	To review and update (if necessary) the current Internal Audit Strategic Plan.	Ensures the Strategic Plan continues to be valid and relevant to any changes to AUSTRAC's operating environment.	Q2 & Q4
Policy Environment Review	Agency Wide	In-House	To perform a stocktake of all Business Unit policies, procedures and guidelines to determine which are overdue for review and/or maybe redundant.	Assurance that AUSTRAC's policy environment is considered up to date and easily assessable by relevant staff.	Q3
Annual Plan Preparation	Internal Audit	In-House	To establish the 2009/10 Internal Audit Work Program.	Internal Audit uses a combination of risk assessments and professional judgement to identify those auditable areas to include in the forthcoming years audit plan.	Q4
Special Requests	Executive Committee or Audit Committee	In-House / Deloitte	Time set aside for special requests and other consulting engagements requested from the Executive Committee or Audit Committee.	Mitigate any new risks that are identified during the year impacting AUSTRAC's operating environment.	As Required

Internal Audit History

	2006-07	2007-08	Proposed 2008-09
Financial Audits			
Payroll Processing	✓		
Contract Management		✓	
Domestic & International Travel		✓	
Budget Development & Management			✓
Infringement Notice Scheme			✓
Contract Performance Management			✓
Operational Audits			
Data Quality Control Environment	✓		
Partner Agency Relationship Survey	✓		
Education Strategy Review		✓	
Help Desk Control Environment		✓	
Corporate Communications Financial Management & Reporting		✓	
Data Security Controls in Partner Agencies			✓
Administration of Exemption Applications			✓
Administration of No Action Letters			✓
International Technical Assistance & Training Control Environment			✓
Payroll Control Environment			✓
Compliance Audits			
Certificate of Compliance		✓	✓
Information Technology Audits			
General Computer Controls	✓		
IT Business Continuity Management		✓	
Software Asset Management		✓	
PIR of EDRMS		✓	
IT Security Review			✓

Internal Audit History – By Business Unit

Business Unit	Audit	Year
Executive		
Corporate Communications	Financial Management & Reporting	2007-08
Government Relations		
Legal Branch		
Legal		
Corporate		
Finance & Corporate	Contract Management	2007-08
	Domestic & International Travel	2007-08
	Property, Plant & Equipment	2008-09
	Contracts Performance Management	2008-09
	Budget Development & Management	2008-09
	Infringement Notice Scheme	2008-09
People, Solutions & Services	Payroll Processing	2006-07
	Payroll Control Environment	2008-09
Information Technology		
IT Systems		
IT Operations	Software Asset Management	2007-08
	General Computer Controls	2006-07
IT Management	PIR of EDRMS	2007-08
IT Security	IT Business Continuity Management	2007-08
	IT Security Review	2008-09
Domestic & International Relations		
International		
International TA & T	TA & T Control Environment	2008-09
DR – Partner Agencies	Partner Agency Relationship Survey	2006-07
	Data Security Controls in PAs	2008-09
DR – Regulated Entities	Help Desk Control Environment	2007-08
Education & Training	Education Strategy Review	2007-08
Data Quality	Data Quality Control Environment	2006-07
Intelligence		
Operational Intelligence		
Research & Analysis		
Compliance & Enforcement		
Compliance		
Enforcement		
Regulatory Policy		
Policy Team		
AML/CTF Rules & Guidance		
Technical Advice & Guidance	Administration of Exemption Applications	2008-09
	Administration of No Action Letters	2008-09
Reform Program		
Reform Project Office		