



Australian Government

AUSTRAC

# 2020- 24

AUSTRAC  
CORPORATE PLAN

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# CEO FOREWORD

Financial intelligence is a critical piece of the national security architecture, preserving the integrity of Australia's financial system. It has become increasingly vital in securing law enforcement outcomes in the face of new and emerging threats, particularly following a significant change to Australia's economic and security stability.

The challenges of a global pandemic have led AUSTRAC to operate further beyond the conventional scope of its mandate. AUSTRAC is Australia's regulator of the anti-money laundering and counter-terrorism financing (AML/CTF) regime, and financial intelligence unit (FIU). Despite the ever-changing geopolitical, economic and social environment, we remain committed to adapting our operations to continue protecting Australian businesses, and their customers, from being misused to facilitate criminal activity, which ultimately protects the safety and security of the Australian community.

Over the past two years, the increasing use of technology and changing nature of global financial systems have changed the world in which we operate. We continue to foster domestic and international relationships across government and industry. This builds a global capability that uses effective public-private partnerships to disrupt transnational and serious organised crime and terrorism financing. Today, with our partners, we maintain AUSTRAC's position as a world-leading FIU.

As the accountable authority for AUSTRAC, I present this 2020-24 AUSTRAC corporate plan as required under paragraph 35(1)(b) of the *Public Governance, Performance and Accountability Act 2013*.

Over the next four years, AUSTRAC will focus on enhancing the understanding of, and commitment to, AML/CTF across the economy. Through enhanced and strong regulation, and targeted education and enforcement activities, we will encourage entities to harden themselves against financial crime risks and report high-quality data by complying with their legal obligations. Uplifting this capability will provide AUSTRAC with the information we need to better inform and evolve our intelligence capability to provide more targeted and actionable intelligence.

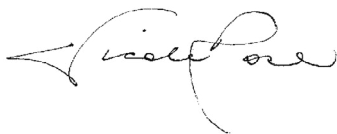
We will continue to build our international engagement to enhance global FIU and regulatory frameworks, particularly with our Five Eyes and Asia-Pacific partners. This will build capability and harden the financial environment in our region. AUSTRAC will also work closely with our Home Affairs Portfolio partners to advocate for legislative reforms that will streamline requirements for our reporting entities, increasing compliance with and effectiveness of AML/CTF Rules.

This corporate plan describes how we plan to leverage our capabilities across our regulatory and intelligence arms, to ensure optimised efficiencies and performance. It articulates how we work alongside our key partners to address challenges and leverage opportunities presented by our unique profile, to optimise our operations.

This corporate plan was prepared immediately following natural disasters and amid a global pandemic. These circumstances demonstrate the impact of environmental change on the economy, as well as the dedication of the public servants who strive to preserve its integrity. Amid this evolving threat environment, AUSTRAC staff have demonstrated great resilience and commitment to protecting the financial sector from criminal abuse. I am confident that our expertise and proven agility will serve us well as we navigate uncertainty, achieve our purpose and optimise our effectiveness, no matter the challenges that lie ahead.

**Nicole Rose PSM**

Chief Executive Officer  
AUSTRAC

A handwritten signature in black ink, appearing to read 'Nicole Rose', with a stylized flourish at the end.

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ABOUT  
US



## OUR VISION

A financial system free from criminal abuse.

## OUR PURPOSE

Our purpose is to build resilience in the financial system and use financial intelligence and regulation to disrupt money laundering, terrorism financing and other serious crime.

## OUR KEY ACTIVITIES

The Australian Transaction Reports and Analysis Centre (AUSTRAC) is the Australian Government agency responsible for detecting, deterring and disrupting criminal abuse of the financial system to protect the community from serious and organised crime.

Through strong regulation and enhanced intelligence capabilities, AUSTRAC collects and analyses financial reports and information to generate financial intelligence. This vital information about potential criminals and criminal activity contributes to Commonwealth, State and Territory law enforcement and national security investigations.

The number of businesses we regulate continues to grow. In 2020 we now regulate over 15,600 entities. AUSTRAC's work ensures regulated businesses have robust anti-money laundering and counter-terrorism financing

(AML/CTF) processes and systems in place to protect themselves and the broader financial system from criminal abuse. We generate financial intelligence based on transaction and suspicious matter reports that our reporting entities provide us every day, as well as other important sources of information. These reports allow our intelligence analysts to identify risks and develop intelligence products to influence operational outcomes and guide law enforcement and national security operations.

Our intelligence function supports our regulatory role by providing information that reveals high-risk areas and threats. We use this information to educate industry and collaborate with them in strengthening Australia's financial system against criminal abuse.

## OUR VALUE

We collaborate with national security, law enforcement and regulatory partners and the financial services industry to detect, disrupt and deter criminal abuse of the financial system to protect the community from serious and organised crime.

To deliver our value we aim to: **discover, understand, strengthen, disrupt** and **optimise**.

## OUR VISION

### A financial system free from criminal abuse.



## OUR PURPOSE

Our purpose is to build resilience in the financial system and use financial intelligence and regulation to disrupt money laundering, terrorism financing and other serious crime.

### UNDERSTAND our environment

*Develop and share a comprehensive understanding of vulnerabilities to criminal exploitation within our financial system.*



#### Leverage our global reach

Leverage our domestic, regional and international relationships to build our understanding of vulnerabilities and threats.



#### Unlock our information's potential

Employ advanced analytics and complex analysis to develop deep insights into financial threats and regulatory risks.



#### Build an integrated view

Integrate our insights, knowledge and diverse experiences to construct an integrated view of our financial system, its vulnerabilities, how criminals seek to exploit these, and the impacts this may have.



#### Share insights

Ensure we share insights on threats to, and vulnerabilities in, our financial system so they can be managed more effectively.

### STRENGTHEN our financial system

*Ensure risks within our financial system are mitigated with effective prevention and monitoring controls.*



#### Improve our regulatory framework

Co-design a more efficient, effective, and collaborative regulatory framework, making it easier to participate and manage risk.



#### Build our industry capability

Support the regulated community to improve their AML/CTF capabilities.



#### Improve risk management

Use targeted interventions and our full range of powers to enhance incentives for voluntary compliance and to foster a culture of risk management. This includes maintaining a strong and credible deterrent for non-compliance.



#### Strengthen the global effort

Participate in international efforts to strengthen the global financial system by assisting international partners to build their AML/CTF capabilities.

### DISCOVER new and emerging risks

*Identify new and emerging risks posed by criminals who seek to exploit our financial system.*



#### Enrich our data

Help develop new insights by improving the quality and value of our data, including new datasets and sources.



#### Learn from the global context

Leverage international experiences and trends to inform where new threats may emerge.



#### Explore beyond the known

Pursue and research anomalies in our environment and our data, and experiment with diverse and dynamic variants of known risks and trends, to discover new and emerging threats.

### DISRUPT criminal abuse of our financial system

*Collaborate with our partners to disrupt criminal abuse of the financial system.*



#### Embrace new opportunities

Pursue opportunities to collaborate with and support our partners to disrupt criminal exploitation of our financial system.



#### Develop tailored interventions

Adopt new regulatory and financial intelligence approaches to address identified exploitation of our financial system.



#### Strengthen the Fintel Alliance

Pursue opportunities to disrupt criminal activity presented through the close partnerships within the Fintel Alliance.



#### Focus on regional operations

Counter regional threats by partnering with our neighbours.

### OPTIMISE our business

*Continuously evolve and adapt our business operations to improve our efficiency, effectiveness and sustainability in a dynamic operating environment.*



#### Transform our business

Design and implement improved and adaptable models for effective, efficient and sustainable business operations.



#### Develop our expertise

Invest in developing the expertise and capabilities of our workforce.



#### Equip our teams

Provide the tools our workforce and partners require to combat financial crime.



## OUR PEOPLE

AUSTRAC's people are our greatest strength and key to delivering on the agency's commitments to the Australian public. We will build on our strong values and culture with a focus on development, diversity and inclusion, increased mobility and robust workforce planning.

We aspire to be an employer of choice. AUSTRAC will continue over 2020-24 to invest in measures to build the strength of our culture, the capability of our people, our safety and wellbeing and ability to scale and flex to respond to the changing environment and deliver on our priorities.

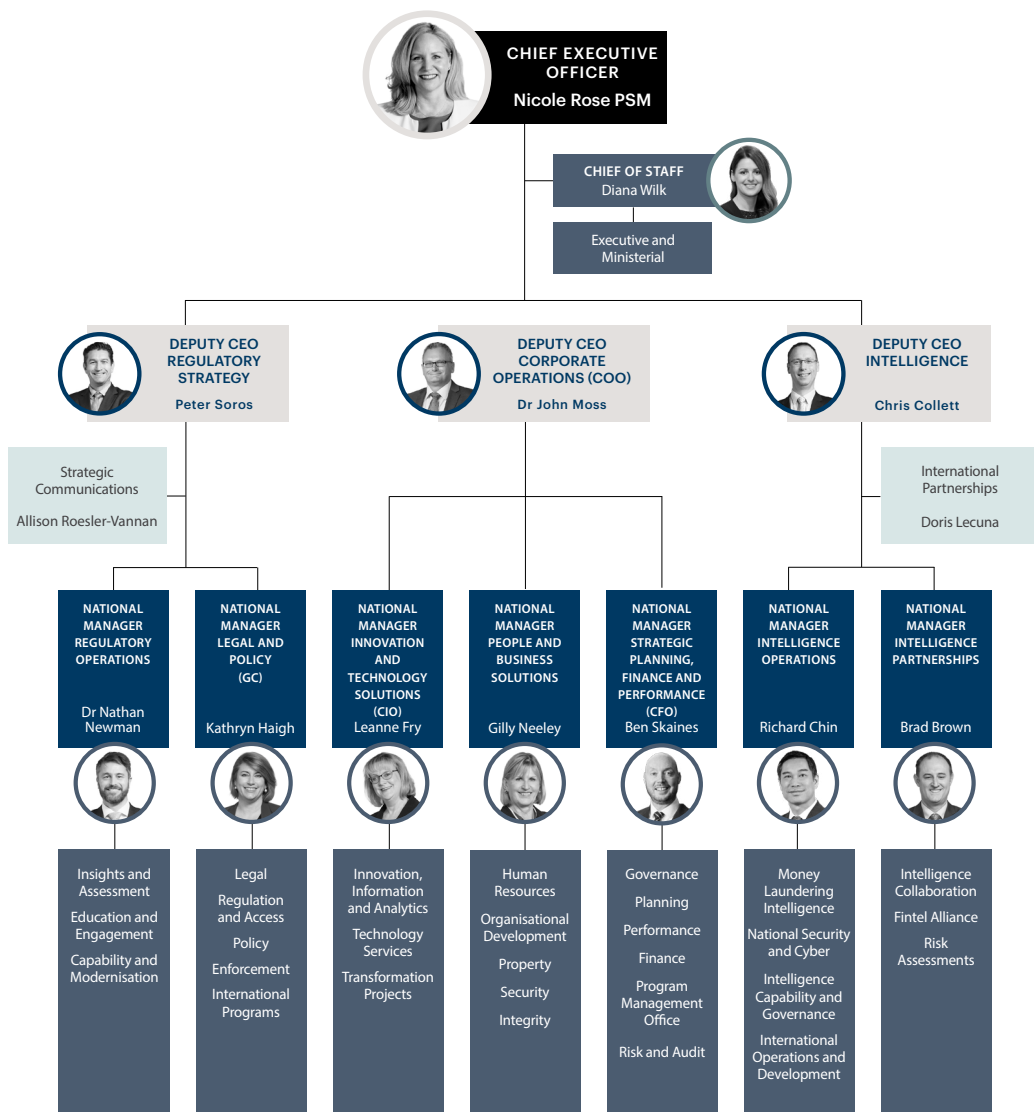
Our soon to be released People Strategy supports our aspirations to be an employer of choice. It supports the decision making principles for managing our people resources, as outlined in the Agency Resource Strategy and takes a holistic approach to building and managing our people and our workforce to ensure we are skilful, adept and able to respond quickly to change.

At AUSTRAC, we derive strength from our people's range of experience and capabilities. We will continue to develop our leaders and managers through a variety of targeted programs and will continue to build technical expertise and tradecraft to support our operational functions.

We have developed best practice flexible work capabilities and are broadening our approach to ensure our staff are able to better balance their work and personal commitments.

One of our strengths is our inclusive culture and ability to attract and retain high-performing and dedicated professionals from a diverse range of backgrounds and perspectives. The environment in which we work is ever-changing so it is essential for AUSTRAC to continually adapt and innovate. Embracing diversity in our agency is one way we do this. AUSTRAC's Diversity and Inclusion Program sets out our objectives and goals where all voices are heard, respected, and valued.

We are committed to fostering a positive safety and wellbeing culture, and ensuring the health and safety of all. AUSTRAC minimises work-related injuries and illnesses, through workstation assessments, provision of ergonomic equipment, early intervention rehabilitation for injury and illnesses irrespective of them being work or non-work related, and a comprehensive wellbeing program for all staff. The significant safety and wellbeing support provided to staff has been especially beneficial during the onset of the COVID-19 pandemic where our workforce is now predominantly working from home.



## OUR CULTURE

AUSTRAC's 'One AUSTRAC' philosophy, as encapsulated in the image below, recognises that employees are stronger together than as individuals. As an organisation, this is reflected in AUSTRAC's role and the interconnected nature of our regulatory and financial intelligence functions, as well as agency-wide corporate support.

The 'One AUSTRAC' concept was created by employees, who came together from all parts of the agency to articulate cultural traits that are unique to AUSTRAC and necessary to deliver AUSTRAC's vision.

The culture statement 'One AUSTRAC' captures AUSTRAC's values and behavioural expectations. AUSTRAC is united by working as one and collaborating with partners. It is accountable for employees' safety and wellbeing. It empowers employees through recognition and job security. It has an inclusive culture and leadership team. It encourages employees to be courageous and continue to learn and grow.

| ONE AUSTRAC<br>TRUSTED • COURAGEOUS • FOCUSSED   |  |  |  |   |
|--|--|--|--|---|
| UNITED   | ACCOUNTABLE  | EMPOWERED  | COURAGEOUS   | INCLUSIVE   |
|   |   |   |   |    |
| We work together as one AUSTRAC and have high expectations of ourselves and others. We embrace change and collaborate internally and with our partners to serve the community. | We are transparent and accountable for our actions. We are honest and consistent, which builds trust and earns us credibility. | We empower our people to share new ideas without fear. This empowerment upholds our high performing reputation across the community and with our partners. | We are innovative, flexible and embrace new ideas. We are bold enough to take risks and test new ideas to solve problems, but we are never reckless. | We recognise and celebrate our differences. We embrace diversity and are respected for it. People are our strength, we care for and support each other. |

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OUR  
ENVIRONMENT

AUSTRAC sits at the intersection of Australia's financial system and the Australian Government's law enforcement, intelligence and national security agencies. As such, our operating environment is increasingly influenced by various, changeable domestic and international factors. To achieve our purpose we are alert to the ever-evolving threats and opportunities that may impact the security and stability of Australia's financial system. This includes criminal and national security threats; the adoption of new technologies and financial products by industry; and the evolution of operating models by business. This means we must be agile to adapt our response by continuing to leverage our intelligence capabilities, investing in and maturing our regulatory capabilities, growing our partnerships, harnessing new technologies and contributing to legislative and policy reform. This will ensure we remain proactive in discovering and disrupting criminal abuse and strengthening the financial system, and ultimately making Australia safe and prosperous.

## THREATS AND CHALLENGES

### Serious and Organised Crime

Transnational, serious and organised crime threatens the safety and security of our citizens, the prosperity of our economy and the integrity of our institutions. The threats and challenges we face continually evolve and with that evolution criminals remain determined in their efforts to exploit vulnerabilities in the financial system to launder the proceeds of their crimes.

Money and profits are at the heart of organised crime. The movement of this money provides a constant picture into how transnational, serious and organised crime is operating and pivoting in response to global changes. AUSTRAC's financial intelligence capability translates this global movement of money into insights and targeted intelligence that provide direction and insights to our law enforcement, national security and other partners in combatting the threat of transnational, serious and organised crime.

## National security

Foreign interference has emerged as a serious threat to Australian sovereignty and interests. In February 2020, the Director-General of Security characterised the current level of threat posed by foreign interference as ‘unprecedented’. As part of the National Intelligence Community, AUSTRAC works alongside intelligence and national security agencies to disrupt and deter anyone attempting to undermine our national interests and to protect the Australian community, economy and its citizens from these threats.

Terrorist and extremist organisations remain significant and enduring threats to the safety and wellbeing of Australians. Terrorist and other extremist organisations rely on funding to sustain their activities. In addition to more conventional methods of banking, remittances and money laundering, new technologies like cryptocurrencies present even greater channels through which these organisations can be financed. Disrupting and preventing financial flows to these organisations is one of the most effective ways to fight terrorism.

International cooperation and mechanisms are key to combatting the borderless threats posed to our national security. AUSTRAC draws upon multilateral networks and continues to work across our region and the globe to discover and disrupt terrorism financing.

## Regulatory environment

In recent years, the financial regulatory environment has been heavily influenced by the outcomes of the Royal Commission into Misconduct in the Banking, Superannuation and Financial Services Industry and AUSTRAC’s civil penalty proceedings. The increased scrutiny has compelled industry to re-assess their approach to regulation to meet community expectations. This expectation has filtered through to industry and has been the impetus for internal reviews of AML compliance, investment in AML/CTF compliance and the self-identification and reporting of compliance failures.

Digitisation of the financial sector has accelerated as individuals and businesses alike have taken up digital payments in unprecedented numbers. Consumer demand and industry innovation has seen the emergence of new financial products in recent years, such as buy-now, pay-later products, while competition has encouraged new operators to enter the market, such as neobanks. Regulatory and consumer-driven changes in the financial system has encouraged third parties, such as financial technology (FinTech) and regulatory technology (RegTech) providers to emerge. Traditional products and services, however, continue to remain in demand, such as cash-based remittance services.

The breadth, complexity and diversity of the global financial system continues to challenge AUSTRAC's regulatory capabilities, and requires a coordinated effort by AML/CTF and other financial regulators to detect and address critical vulnerabilities. Sharing knowledge, raising awareness of criminal methodologies and influencing compliance behaviours strengthens AML/CTF measures across the global financial system.

## Impacts of COVID-19 Pandemic

The emergence of COVID-19 has presented new challenges for the financial sector and in turn for AUSTRAC and other financial regulators. This includes the rapid adoption of new approaches to identifying customers; changes to the operation of compliance functions operating overseas and the ability of regulators to assess the compliance of financial institutions. The COVID-19 pandemic and the associated restrictions on populations have accelerated digitisation of the financial sector.

In addition, the widespread upheavals caused by COVID-19 have presented new opportunities for criminals to exploit pre-existing money laundering and terrorism financing vulnerabilities and new schemes established by Government in response to the pandemic. AUSTRAC has been able to leverage our systems and intelligence capabilities to rapidly deploy our resources to target these areas. The pandemic has also provided opportunities for AUSTRAC to work with the Serious Financial Crimes Taskforce and other partners to prevent and detect fraud against the Government's economic stimulus measures. We have worked with our close partners including the Australian Federal Police, Australian Criminal Intelligence Commission and Australian Border Force to investigate stockpiling and profiteering of essential goods such as personal protective equipment.

AUSTRAC has rapidly adjusted its engagement and communication with industry to provide the necessary guidance, advice and typologies to ensure reporting entities have the appropriate controls in place to adequately respond to these fast-paced changes, while also encouraging industry to report emerging crime threats and suspicious behaviour.

# OPPORTUNITIES

## Technology

AUSTRAC's effectiveness increasingly relies upon keeping pace with the rapid advancements of financial sector technologies and the increasingly digital nature of financial transactions. Reporting entities of all sizes are adopting cost effective technological solutions and exploring open data, digital identity and artificial intelligence. AUSTRAC continues to support the development of technology-based solutions and opportunities driven by the agility and pace of change in the FinTech and RegTech sectors.

The value of these technological developments is underpinned by the willingness of industry partners to support collaborative efforts to drive innovation and change how we protect against, detect and deter financial crime across the financial system. Technology-based regulatory solutions developed in collaboration with both industry and policy-makers are critical in harnessing the expertise that exists across the private and public sectors to optimise approaches for regulatory best practice.

## Data and analytics

Various environmental factors have contributed to the increased volumes of data AUSTRAC is receiving every day. While processing more and more data challenges our capabilities and resources, it also incredibly valuable to AUSTRAC and our partners in detecting and dismantling criminal networks. AUSTRAC ensures data is effectively protected, managed, interrogated and analysed to support timely decision-making and abides by strict privacy, information sharing and de-identification requirements.

Across 2020-24, potential opportunities for AUSTRAC include the ability to provide near real time information from industry-supplied reports, increased data capacity and expanding datasets available to us to ensure our intelligence products are actionable and client focused. Building upon data analytics capabilities will maximise the value of the data provided to AUSTRAC and the quality of the intelligence products and advice we can subsequently provide to our partners.



## Legislative reform

It is critical that our legislative frameworks remain contemporary and fit for purpose. Industry operating models, products and services, and the broader national security environment have evolved considerably since the implementation of the *Anti-Money Laundering and Counter-Terrorism Financing Act* in 2006.

AUSTRAC remains committed to streamlining and simplifying the AML/CTF regime. In 2019, amendments to the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* were tabled in Parliament. AUSTRAC will support the Department of Home Affairs to further implement the reforms recommended by the statutory review of the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* to strengthen our AML/CTF legislative framework. We continue to work with colleagues at the Department of Home Affairs to pursue legislative and regulatory reforms that reduce regulatory costs and make it easier for industry to comply with their AML/CTF obligations.

## Corporate services

The establishment of the Home Affairs Portfolio has brought together a broad range of corporate services developed over time to meet the specific mandates and needs of each agency. The common administrative services program provides portfolio agencies with the opportunity to integrate and consolidate common capabilities over time to improve efficiency through standardisation, economies of scale and the elimination of duplication. AUSTRAC is committed to opportunities for potential shared services through its engagement in the early stages of the program and exploration for further synergies through shared IT solutions. It is expected the program will advance over 2020-24 and result in changes to the way AUSTRAC operates and interacts with other portfolio agencies for the provision of key enabling services.

# PARTNERSHIPS

AUSTRAC's partnerships across government, industry and the community are crucial to achieving our vision of a financial system free from criminal abuse.

People committing crimes interact with the businesses we regulate to move money and hide the proceeds of their crimes.

Businesses detect and submit suspicious matters and report financial transactions to AUSTRAC.

AUSTRAC provides guidance and education to help businesses protect themselves from being exploited by criminals.

## BUSINESSES WE REGULATE

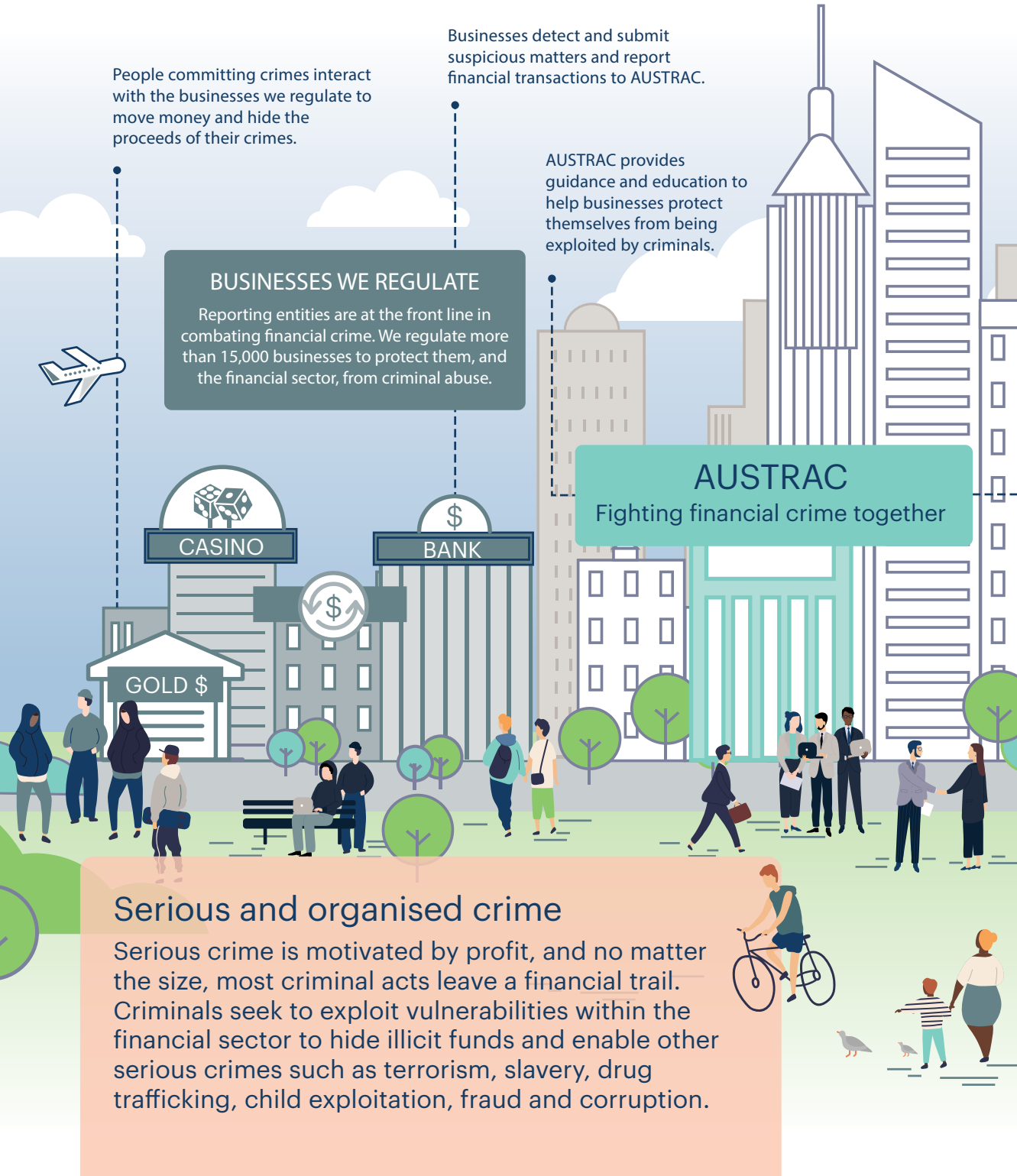
Reporting entities are at the front line in combating financial crime. We regulate more than 15,000 businesses to protect them, and the financial sector, from criminal abuse.

## AUSTRAC

Fighting financial crime together

## Serious and organised crime

Serious crime is motivated by profit, and no matter the size, most criminal acts leave a financial trail. Criminals seek to exploit vulnerabilities within the financial sector to hide illicit funds and enable other serious crimes such as terrorism, slavery, drug trafficking, child exploitation, fraud and corruption.



Our financial intelligence specialists collaborate with law enforcement and national security partners to identify national security threats, and detect and disrupt criminal networks and the proceeds of their crimes.



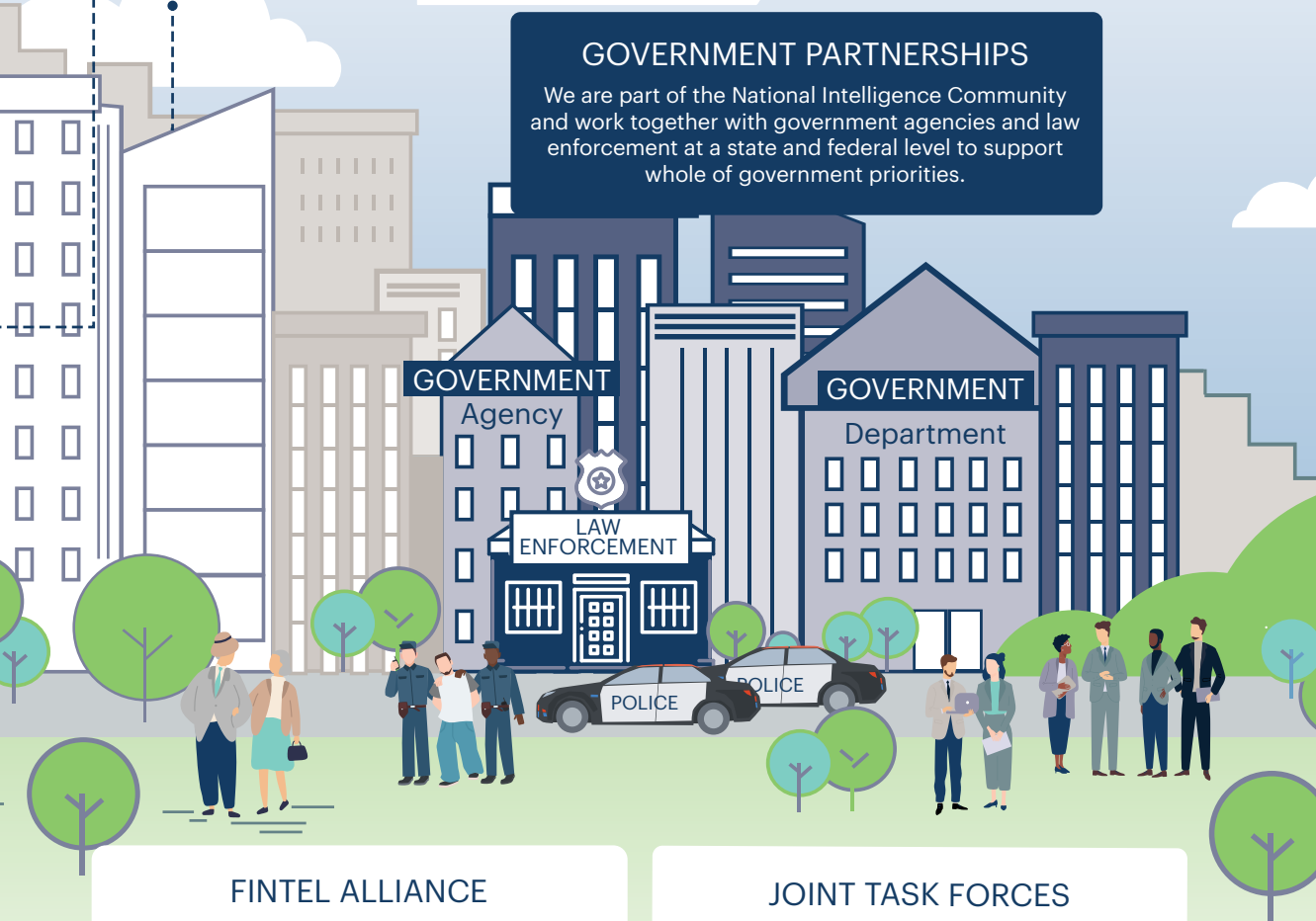
All transactions and suspicious matters reported to AUSTRAC are directly available to more than 5,000 designated users within federal, state and territory partner agencies to support national security and law enforcement investigations.

### INTERNATIONAL PARTNERSHIPS

To combat money laundering and terrorism financing across borders, we share intelligence with other financial intelligence units and regulators around the world.

### GOVERNMENT PARTNERSHIPS

We are part of the National Intelligence Community and work together with government agencies and law enforcement at a state and federal level to support whole of government priorities.



### FINTEL ALLIANCE

An AUSTRAC initiative that brings together government and private sector organisations who work together to increase the resilience of the financial sector and contribute to law enforcement investigations.

### JOINT TASK FORCES

AUSTRAC is a member of national task forces, providing specialist financial intelligence to national security and transnational serious and organised crime efforts.

## Australian Government

AUSTRAC is an independent statutory agency within the Home Affairs portfolio and a member of the National Intelligence Community.

AUSTRAC plays a unique role—we fuse information reported to us by our reporting population with other sources of information into financial intelligence and insights, to inform our law enforcement, intelligence and national security partners. An increasing number of partner agency staff can lawfully access AUSTRAC information for operational reasons. Strong co-operation and sharing of actionable intelligence with our partners on joint operations and national and state task forces ensures AUSTRAC contributes to cross-government outcomes in the fight against serious and organised crime.

In addition, our collaboration across the Home Affairs portfolio builds upon our well established relationships with federal, state and territory law enforcement, revenue and regulatory partners to deliver an efficient and effective AML/CTF regime.

Our relationships with other regulators continues to mature, with sharing of insights contributing to the identification of non-financial risks across the financial sector. Supervisory collaboration is enabling a coordinated approach to current and emerging risks and industry non-compliance, while contributing to unified expectations of industry.

## Industry

AUSTRAC has a unique relationship with industry that extends beyond the traditional transactions of regulatory oversight by virtue of our dual regulatory / intelligence role. We recognise that our regulated population serve as the first line of defence in our AML/CTF regime against criminal exploitation of the financial system. As such AUSTRAC remains committed to educating and equipping regulated entities to support their AML/CTF compliance and their ability to identify and mitigate against vulnerabilities to financial crime.

Public Private Partnerships are increasingly utilised globally to disrupt global illicit finance flows. AUSTRAC's Public Private Partnership (known as the Fintel Alliance) brings together financial institutions, state and Commonwealth law enforcement and intelligence agencies. By harnessing the resources of industry, government and international partners, our collective ability to detect crime and share information with the financial sector has increased and been leveraged to combat a range of threats, including tax avoidance, drug trafficking and cybercrime

## International Partners

Threats, such as serious and organised crime and terrorism are borderless, and as such, demand an international response. AUSTRAC supports efforts to strengthen the international environment against money laundering and terrorism financing through our collaborative, longstanding relationships with international partners.

Through AUSTRAC's strategic international engagement, we influence and promote existing AML/CTF regulations and standards within the Financial Action Task Force and the Asia/Pacific Group on Money Laundering. Through the Egmont Group of Financial Intelligence Units (FIU) and with counterpart FIUs and AML/CTF regulators we exchange operational information and collaborate in strengthening operational best practice globally. These undertakings are a focus in our region through information sharing, education and capability building through our technical assistance and training programs. We work with our ASEAN, Pacific and New Zealand FIU and regulatory counterparts to increase cross jurisdiction collaboration, partnerships and relationship building to progress key strategic and operational outcomes to strengthen regional efforts to counter terrorist activity and transnational crimes.

We continue to improve and increase intelligence sharing, build capacity and create new and innovative methods to collaborate to disrupt and prevent terrorism financing and other serious financial crimes through our international network. Our network consists of internationally deployed officers, joint operations through the regional Financial Intelligence Consultative Group and its related collaborative activities and the Counter Terrorism Financing Summit.

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OUR  
PERFORMANCE

## MEASURING PERFORMANCE

AUSTRAC's performance framework assesses our ability to deliver on our purpose. The framework links and aligns our purpose, key activities and performance measures through the pillars of our strategic direction—discover, understand, strengthen, disrupt and optimise.

AUSTRAC performance framework

| Purpose   |   |  |   |   |
|---|---|--|---|---|
| To build resilience in the financial system and use financial intelligence and regulation to disrupt money laundering, terrorism financing and other serious crime  |   |  |   |   |
| PBS performance criterion   |   |  |   |   |
| AUSTRAC contributes to building resilience and mitigating risk in the financial system by using its regulatory capability, and generating and sharing intelligence and insights, to support the mission of our public and private partners. |   |  |   |   |
| 1.<br>Discover  | 2.<br>Understand  | 3.<br>Strengthen   | 4.<br>Disrupt   | 5.<br>Optimise  |
| AUSTRAC identifies new and emerging risks posed by criminal actors seeking to abuse the financial system.   | AUSTRAC develops and shares a comprehensive understanding of vulnerabilities to exploit criminal exploitation within our financial system | AUSTRAC ensures risks within the financial system are identified, mitigated and managed effectively. | AUSTRAC collaborates with partners to disrupt criminal abuse of the financial system. | AUSTRAC continuously evolves and adapts business operations to improve efficiency, effectiveness and sustainability in a dynamic operating environment. |

| 1.<br><b>Discover</b>  | 2.<br><b>Understand</b>   | 3.<br><b>Strengthen</b>  | 4.<br><b>Disrupt</b>  | 5.<br><b>Optimise</b>  |
|--|---|--|---|--|
| <b>1.1</b> Improved detection of new and emerging risks through enriching and linking AUSTRAC data | <b>2.1</b> Improved collective understanding of risks through the use of AUSTRAC data and intelligence products by partner agencies | <b>3.1</b> Drive positive behavioural change by reporting entities | <b>4.1</b> Contribute to the disruption of financial and other serious crime in line with Government priorities | <b>5.1</b> Provide innovative, co-designed technological solutions to drive business productivity and address operational challenges |
| <b>1.2</b> Increased information sharing   | <b>2.2</b> Build understanding between AUSTRAC and partner agencies through task forces and interagency forums                      | <b>3.2</b> Improved regulatory efficiency of reporting entities    | <b>4.2</b> Enhanced Fintel Alliance effectiveness   | <b>5.2</b> Deliver improvements that generate long-term efficiencies and uplift capability   |



## AUSTRAC performance measures

| Performance measure   | Target   | Methodology   | Reporting period   |
|---|--|---|--------------------|
| <b>1.1</b> Improved detection of new and emerging risks through enriching and linking AUSTRAC data                                  | AUSTRAC increases the number of monitoring profiles in use and its response to alerts to improve its detection of risks. | <p><b>1.1.1 Quantitative assessment:</b> Number of monitoring profiles implemented.</p> <p><b>1.1.2 Quantitative assessment:</b> Ratio of monitoring alerts actioned of those generated.</p>  | 2020-21 to 2023-24 |
| <b>1.2</b> Increased information sharing  | AUSTRAC increasingly provides financial intelligence to international partners.  | <b>1.2.1 Quantitative assessment:</b> Number of exchanges of financial intelligence, both incoming and outgoing, with AUSTRAC's counterpart international financial intelligence units.   | 2020-21 to 2023-24 |
| <b>2.1</b> Improved collective understanding of risks through the use of AUSTRAC data and intelligence products by partner agencies | Improve the access and value of AUSTRAC's data and financial intelligence to partner agencies                            | <p><b>2.1.1 Quantitative assessment:</b> Average time for transaction data reported to AUSTRAC to be made available to domestic partners</p> <p><b>2.1.2 Quantitative assessment:</b> Number of partner agencies searches of AUSTRAC data</p> <p><b>2.1.3 Quantitative assessment:</b> Number of intelligence products disseminated to partner agencies (industry and government)</p> | 2020-21 to 2023-24 |

| Performance measure   | Target   | Methodology  | Reporting period   |
|---|--|--|--------------------|
| 2.2 Build understanding between AUSTRAC and partner agencies through task forces and interagency forums | AUSTRAC intelligence and expertise is valued and used to support Government and international priorities to better harden the global financial system against the ML/TF and other serious crimes | <p><b>2.2.1 Quantitative assessment:</b> Number of intelligence products generated in contribution to law enforcement and national security task forces by crime type.</p> <p><b>2.2.2 Qualitative assessment:</b> Case studies reflecting AUSTRAC's contribution to international multilateral and bilateral forums and international outcomes.</p>   | 2020-21 to 2023-24 |
| 3.1 Drive positive behavioural change by reporting entities   | AUSTRAC compliance, enforcement and education activities improve AML/CTF compliance and capability   | <p><b>3.1.1: Quantitative assessment:</b> Number of findings issued by AUSTRAC as a result of compliance assessment.</p> <p><b>3.1.2 Quantitative and qualitative assessment:</b> Assessment of the quality and number of suspicious matter reports submitted to AUSTRAC in the 12 months following the publication of a Risk Assessment or AUSTRAC campaign.</p> <p><b>3.1.3 Qualitative assessment:</b> Case studies of outcomes of regulatory and enforcement actions of non-compliance that demonstrate specific and general deterrence</p> <p><b>3.1.4 Quantitative assessment:</b> Number of reviewable decisions taken on regulatory registration of Reporting Entities (including refusal, suspension and cancellation of registration).</p> | 2020-21 to 2023-24 |

| Performance measure                                      | Target   | Methodology  | Reporting period   |
|--|--|--|--------------------|
| 3.2 Improved regulatory efficiency of reporting entities | AUSTRAC takes continual actions to reduce regulatory costs of reporting entities | <p><b>3.2.1 Qualitative assessment:</b> Reports of contributions to legislative reform</p> <p><b>3.2.2 Quantitative assessment:</b> Number of exemptions granted by AUSTRAC under section 248 of the <i>Anti-Money Laundering and Counter-Terrorism Financing Act 2006</i>.</p> <p><b>3.2.3 Qualitative assessment:</b> Feedback provided from reporting entities, AML/CTF consultants and RegTech providers on the clarity and effectiveness of AUSTRAC communications.</p> | 2020-21 to 2023-24 |

| Performance measure   | Target  | Methodology  | Reporting period   |
|---|---|--|--------------------|
| <b>4.1</b> Contribute to the disruption of financial and other serious crime in line with Government priorities | AUSTRAC's contribution to law enforcement and national security operations generates positive disruption outcomes                   | <p><b>4.1.1 Qualitative assessment:</b> Case studies of operational outcomes from AUSTRAC contributions to law enforcement and national security task forces.</p> <p><b>4.1.2 Quantitative assessment:</b> Demonstrated value to government revenue protection including against welfare fraud, tax evasion and related serious financial crime.</p>                 | 2020-21 to 2023-24 |
| <b>4.2</b> Enhanced Fintel Alliance effectiveness   | The collaboration of Fintel Alliance partners supports the increased detection, prevention and/or disruption of criminal activities | <p><b>4.2.1 Qualitative assessment:</b> Examples of enhanced collaboration by the Fintel Alliance with new and existing partners, including through preventative action and disruptions.</p> <p><b>4.2.2 Qualitative assessment:</b> Changes in reporting behaviour of Fintel Alliance industry partners in response to Fintel Alliance projects and operations.</p> | 2020-21 to 2023-24 |

| Performance measure  | Target  | Methodology  | Reporting period   |
|--|---|--|--------------------|
| <b>5.1</b> Provide innovative, co-designed technological solutions to drive business productivity and address operational challenges | Completed ICT projects deliver proposed benefits      | <b>5.1.1 Qualitative assessment:</b> Evaluations of delivery and implementation of technology projects funded to deliver system enhancements.  | 2020-21 to 2023-24 |
| <b>5.2</b> Deliver improvements that generate long-term efficiencies and uplift capability   | AUSTRAC optimises the effectiveness of its operations | <b>5.2.1 Qualitative assessment:</b> Examples of initiatives delivered that reduce internal red tape and generate savings to the agency.<br><br><b>5.2.2 Quantitative assessment:</b> Change in proportion of AUSTRAC staff reporting their workgroup has the appropriate skills, capabilities and knowledge to perform well (as reported through the annual APSC Census). | 2020-21 to 2023-24 |

AUSTRAC is committed to enhancing and refining our performance framework and measures to mature how we monitor and report on agency performance as our internal performance reporting mechanisms improve. This year, we have refined our performance measures to mature our approach to performance reporting in line with Commonwealth enhanced performance framework. The revised set of measures will enable greater visibility of the how our performance will be measured, consistency in the measures used over time and the ability to more easily compare results over time.

For each year of this Corporate Plan, we will report and publish our performance against the following measures in our Annual Performance Statements within our Annual Reports.

AUSTRAC's performance is also assessed annually against the six key performance indicators of the Australian Governments' Regulator Performance Framework. The performance of our regulatory functions is reported through an annual self-assessment, which is validated by our industry stakeholders and published on our website each year.



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CAPABILITY



AUSTRAC needs to continue to be agile and adapt to its changing environment in order to lead the charge in fighting financial crime. Our strategy is focused on three key elements:

**1. optimising specialist capabilities to deliver operational outcomes, including data and analytics capabilities**

**2. enhancing our regulatory capability, and**

**3. evolving our intelligence capability.**

## PEOPLE AND CORPORATE OPTIMISATION

The attributes of our people are key to our ability to maintain and uplift AUSTRAC's capabilities. Our workforce capabilities need to constantly evolve to ensure we can deliver what is needed in a timely manner. To remain effective, we rely on the skills and capabilities of our people—our skills in data analytics, our ability to understand the changing nature of intelligence, having strategic thinking skills and understanding emerging financial sectors—all of which means we must continue to attract and retain top talent.

The challenges we have faced in 2020—from bushfires to COVID-19—have shown the resilience and flexibility of AUSTRAC staff. It has illustrated to us the benefits of new and different approaches to communicating and operating as an organisation. We will look to take the lessons we have learned from this challenging period to ensure we continue to be leaders in flexible, inclusive work practices and considered an employer of choice.

Ongoing collaboration with the Home Affairs Portfolio will continue to provide opportunities to optimise our corporate functions into the future. In some cases, this will result in the integration and delivery of functions at the portfolio level via common administrative services, freeing up AUSTRAC to focus more intently on ensuring the efficiency and effectiveness of our capability support and development. In 2020-21, this will see a renewed focus on governance and assurance mechanisms that enhance oversight and strategic alignment of AUSTRAC's capability development into the future.



## Key initiatives - People and corporate optimisation

### SHORT TERM 2020–21

- Delivery of People Strategy
- Continue to implement the Agency Resource Strategy
- Identify opportunities to enhance corporate systems through pre-existing portfolio solutions

### MEDIUM TERM 2021–24

- Harness corporate initiatives in collaboration with the Department of Home Affairs and National Intelligence Community
- Continue to professionalise intelligence practitioners through the FIAC program and analyst exchange programs, domestically and regionally
- Identify opportunities to enhance AUSTRAC's property footprint to respond to the post COVID workplace
- Continue to maximise the use of flexible work practices to attract and retain top talent



## DATA AND ANALYTICS

AUSTRAC's financial information and intelligence holdings are a unique and critical national asset. They offer immense and valuable insights that enable AUSTRAC, and our partners, to protect the Australian financial system.

AUSTRAC's data holdings currently include over 1 billion transaction reports, which is projected to significantly increase over future years. By 2030, AUSTRAC is anticipating its total number of transaction reports to exceed 2 billion. We will transform our data collection and analytical systems and methods to sustainably manage these increasing volumes of data as well as meet the evolving challenges faced in a digital world.

Through the Analyst Workbench (AWB), AUSTRAC and our partners are now provided a more sophisticated suite of tools to explore, discover and visualise the growing volume of transaction data we collect. The roll-out of AWB to around 40 partner agencies has continued in spite of the challenges presented by COVID-19 and will continue into 2020-21. Along with our scalable data-matching algorithm and greater automation and connectivity, AUSTRAC will continue to deliver high volumes of quality data, more quickly to support the operations of our partners.

As the volume of data AUSTRAC receives continues to rise, so too does the need for Artificial Intelligence (AI) solutions. In-house research and development and collaboration across the portfolio and the National Intelligence Community, other agencies and research organisations will enable us to continue to develop our AI capability and increase the efficiency of analysts within AUSTRAC and partner agencies. Machine learning and AI solutions such as this will further improve our ability to surface risk across the large and heterogeneous datasets collected by AUSTRAC.



## Key initiatives - Data and Analytics

### SHORT TERM 2020–21

- Continue to refine our data collection and analyst workbench capabilities.
- Expand capacity of AUSTRAC's key reporting system to enable greater ingestion of data

### MEDIUM TERM 2021–24

- Integrated enterprise data analytics environment on a consolidated platform.
- Advance our efforts in data science, encryption, and information sharing and collaboration platforms for better integration between public and private systems without the need for centralising data.
- Delivery of a new reporting system with refined transaction reporting technology to enable easier report submission and improve quality of data reported
- Incorporating external data sets to enrich our analysis and understanding of complex, high level national security and organised crime financing structures, in addition to the identification and assessment of non-compliance.

## REGULATION

Delivering a more active, forward leaning regulatory posture to support portfolio efforts to counter money laundering and terrorism financing, including through tougher regulatory action.

### Supervision and enforcement posture

In 2020-24 we will continue our risk-based approach to regulating reporting entities, consistent with our [Approach to Regulation](#). This will include using increasingly sophisticated and targeted supervision and enforcement strategies to assess compliance, while using our enforcement powers to serve as a strong deterrent to non-compliance and ensure that our regulated population are investing in their AML/CTF compliance.

We will also increasingly work with law enforcement to deploy our regulatory powers to support investigations and operations, disrupt the operations of organised crime and identifying reporting entities, financial products and channels being exploited by criminals.

### Regulatory reform and streamlining compliance

As threats evolve and criminals seek out opportunities to exploit vulnerabilities and circumvent existing controls, legal and policy settings must too evolve to remain effective in preventing criminal abuse. The pace of change in our operating environment highlights the importance of ensuring our policy and

legislative frameworks remain contemporary and technology-agnostic. Effective, fit for purpose legislation is essential for AUSTRAC and its partners to mitigate emerging money laundering and terrorism financing risks.

Throughout 2020-24, AUSTRAC will continue its joint-efforts with the Department of Home Affairs to streamline and simplify AML/CTF legislation in line with the Government's commitment to make it easier for regulated entities to comply and reduce regulatory costs. Implementation of such measures will commence in 2020-21 following the passage of legislative amendments through the Parliament to strengthen Australia's AML/CTF regime and reduce the cost of customer verification for businesses.

### Outreach and education

We focus on enhancing our industry engagement capability with targeted and effective communications and engagement with industry. Education and communication increases industry knowledge of their obligations and the money laundering and terrorism financing risks they face. In 2020-21 and beyond, we will uplift our industry communications, education and outreach capability to support AML/CTF compliance across our regulated sectors and increase the quality of reports submitted to AUSTRAC. To support this, we will look to harness technologies to make it easier for reporting entities to submit reports in line with industry standard formats.

## Collaboration with regulatory partners

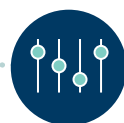
Our collaboration with regulatory partners – domestic and international – will continue. Increasingly we are seeing relationships between compliance risks identified by regulators, which necessitates increased and closer collaboration with regulatory partners. Pooling knowledge and expertise, and sharing information on regulated entities will contribute to consistent and united expectations of industry by Australian regulators. Our relationships with AML regulators around the globe will increase, with a future desire to deliver coordinated regulatory engagement and assessment of entities that operate or are closely connected to Australia.

## Strategic communications

To maintain and build upon AUSTRAC's reputation as a world leading financial regulator and intelligence unit with expert analytical capability, it is vital AUSTRAC continues to proactively engage with reporting entities to educate them about their obligations and raise awareness of the threats criminals pose to their business, Australia's financial system and the community.

As part of AUSTRAC's proactive communication strategy, new, easy-to-understand evidence based and sector focussed materials have been developed to articulate how AUSTRAC works with industry and partners.

AUSTRAC will also continue to work collaboratively with partner agencies and industry partners on joint communications opportunities, in order to better inform AUSTRAC's regulated sectors about its contribution to law enforcement and national security priorities.



## Key initiatives - Regulation

### SHORT TERM 2020–21

- Deploy a diverse range of targeted supervision and enforcement activities to better deter non-compliance of reporting entities
- Make it easier for businesses to comply with AML/CTF obligations, including through the creation of new forms
- Implementation of AML/CTF reforms.
- Build on existing relationships with domestic and international regulatory partners.

### MEDIUM TERM 2021–24

- Deliver upgraded regulatory systems, including an updated user interface for engaging with reporting entities and refined transaction reporting technology to improve quality of reports received
- Work closely with Home Affairs to drive regulatory and legislative reform

## INTELLIGENCE

AUSTRAC remains committed to providing our partner agencies with targeted, actionable and client-focused intelligence. We are working closely with partners to better understand and map complex and dynamic illicit financing structures, provide opportunities for disruption and develop capability to better present insights and targeted intelligence to our partners.

Over 2020-24 we will continue to be agile and adapt intelligence priorities to target efforts against transnational, serious and organised crime and national security priorities. To be effective, we will maintain our strong collaboration and engagement with coordination mechanisms, including taskforces and interagency forums dealing with serious crime and national security efforts and Government priorities combatting crime types as diverse and wide ranging as fraud, the exploitation of children, foreign interference and cybercrime.

In addition to sharing our intelligence in pursuit of priority law enforcement and national security outcomes, insights from AUSTRAC's financial intelligence are also used to keep industry apprised of contemporary money laundering and terrorism financing risks.

In 2020-21 our Risk Assessment Program will continue its focus on complex sectors of Australia's economy exposed to criminal abuse including banking, gambling and remittance services sectors. Over the life of this Corporate Plan, we will also work with the Australian Institute of Criminology to enhance our understanding and better enable the measurement of the impacts of money laundering and terrorism financing harm on the community and the value of our disruption efforts.



## Fintel Alliance

By harnessing the resources of industry and government and international partners through the Fintel Alliance, our collective ability to detect crime and share information with the financial sector has increased. With our partners, AUSTRAC will continue to enhance and mature the Fintel Alliance to share actionable intelligence between industry and government across a broad spectrum of threats, including terrorism financing, tax avoidance, drug trafficking and cybercrime.

The Fintel Alliance continues to respond to complex crime challenges and will produce and provide relevant risk information to a wider range of private sector entities exposed to their services being exploited for money laundering, terrorism financing and serious crime.

Over 2020-21, the Fintel Alliance will continue to build public awareness of its work through promoting various financial crime indicator reports, risk assessments and operational results to industry, the media and other key stakeholders.

## International cooperation

AUSTRAC will increasingly leverage our international networks to share intelligence, enhancing the quality and value of our information exchanges with our international counterparts and strengthening AML/CTF regimes globally. By embedding AUSTRAC officers with key international partners we are able to build on existing partnerships to expand the sharing of knowledge and information and achieve mutually beneficial outcomes.

In our region, the engagement framework with our ASEAN partners is focussed on achieving operational outcomes against joint terrorism financing and criminal priorities. Over the last decade, AUSTRAC has built strong operational relationships with key partners in ASEAN—in particular Indonesia, Malaysia and the Philippines. We will continue to work with our operational partners through the Financial Intelligence Consultative Group and the Counter Terrorism Financing Summit to counter regional financial related threats and crimes. Over the life of this plan, we will enhance operational collaboration with Pacific FIUs through the increased exchange of financial intelligence and through technical assistance and training initiatives. AUSTRAC has recently established a dedicated Pacific function to support Australian whole of government security and law enforcement objectives in the region.

Beyond our region we continue to strengthen our strategic cooperation and collaboration with the Egmont Group of FIUs and our







Five Eyes partners, including through our participation in international multilateral fora and through the establishment of Memoranda of Understanding with other FIUs. Over 2020-24, we will leverage engagement opportunities with Five Eyes and Asia-Pacific partners to increase strategic and operational dividends and improve regional AML/CTF capability through our Technical Assistance and Training and analyst exchange programs. In delivering the Financial Intelligence Analyst Course to

regional partners we will continue our efforts to build the high standard and consistency of financial intelligence practitioners in the application of analytical tools, methodologies and tradecraft. Our international engagement is strengthened further through our international postings to enable AUSTRAC to influence and achieve mutually beneficial outcomes with foreign partners that benefit Australia's national interests and AUSTRAC's objectives.

## Key initiatives - Intelligence

### SHORT TERM 2020-21

- Continue to extend efforts of the Fintel Alliance to address other priorities and crime types, including National Security and Complex Tax Abuse.
- Finalise a series of Risk Assessments on banking, gambling and remittance sectors.
- Extend bilateral and multilateral intelligence engagement and information sharing to support transnational disruption outcomes.
- Continue to extend efforts of the Financial Intelligence Consultative Group to address priorities of terrorism financing and high risk financial crimes including money laundering.

### MEDIUM TERM 2021-24

- Develop Secure information sharing platforms to support Fintel Alliance and Financial Intelligence Consultative Group operations, including international access
- Explore opportunities to measure money laundering/terrorism financing harm and understand the impact of our disruption efforts.
- Increase awareness and promote positive reporting entity behaviours to highlight the value of AUSTRAC data and specialist financial intelligence to partner agencies in investigations.

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RISK OVERSIGHT  
AND MANAGEMENT

# RISK MANAGEMENT

The complex, evolving environment in which AUSTRAC operates necessitates our regular, ongoing engagement with risk. AUSTRAC embeds risk management in, and takes a risk-based approach to, all of the agency's functions. We continue to build upon a strong, positive risk culture where staff are empowered to pursue opportunities, and where risks to the agency's objectives are managed effectively. This is supported by tailored, online risk training developed for AUSTRAC staff and employee surveys that monitor the agency's risk culture.

Our systems of risk oversight, management and internal controls are in accordance with section 16 of the *Public Governance, Performance and Accountability Act 2013* and the [Commonwealth Risk Management Policy](#).

In 2020, risk management has been integrated with our business planning process. This ensures alignment between our purpose and risk management and embeds treatments into branch business plans.

AUSTRAC applies an iterative approach to managing risk in that it continuously reviews and builds on previous actions to manage risk. Our inclusion of risks into branch plans will also streamline and improve reporting of risks to our Senior Executive and Audit and Risk Committee in 2020-21. In practice, we work with partners to identify shared risks and to manage control and mitigation strategies.

AUSTRAC faces a variety of potential risks across all its key activities:

| Key AUSTRAC activities and associated risks                     | Risk management and oversight approach  |
|---|---|
| Information and intelligence systems and service delivery risks | The risks involved in maintaining our information and intelligence service delivery and undertaking projects are managed through the agency's project governance mechanisms. In particular, the AUSTRAC Capability Sub-Committee provides advice and assurance to the Governance Committee on matters relating to the AUSTRAC Capability Enhancement Program, including program assurance and project delivery. This committee is supported by the Program Management Office, who provide program-wide assurance and scanning to detect and mitigate risks related to strategic alignment, interdependencies and emerging issues. |

| Key AUSTRAC activities and associated risks  | Risk management and oversight approach  |
|--|---|
| <p><b>Agency control and assurance frameworks and management of capability risks</b></p> | <p>Our risk and governance frameworks allow us to undertake an integrated approach to the management of these organisational risks through AUSTRAC's Governance Committee, chaired by the CEO. The Committee monitors the effectiveness and strengthens the agency control frameworks governing:</p> <ul style="list-style-type: none"> <li>» work health and safety</li> <li>» security and integrity</li> <li>» business planning</li> <li>» financial management</li> <li>» risk management</li> <li>» internal audit</li> <li>» business continuity management</li> <li>» people management (including employment conditions and staff consultation)</li> <li>» internal policy</li> <li>» information management</li> <li>» stakeholder engagement</li> <li>» change management</li> <li>» workforce planning</li> <li>» fraud and corruption prevention</li> </ul> <p>The accountable authority is supported in her role through the provision of independent review and advice by the agency's Audit and Risk Committee.</p> |

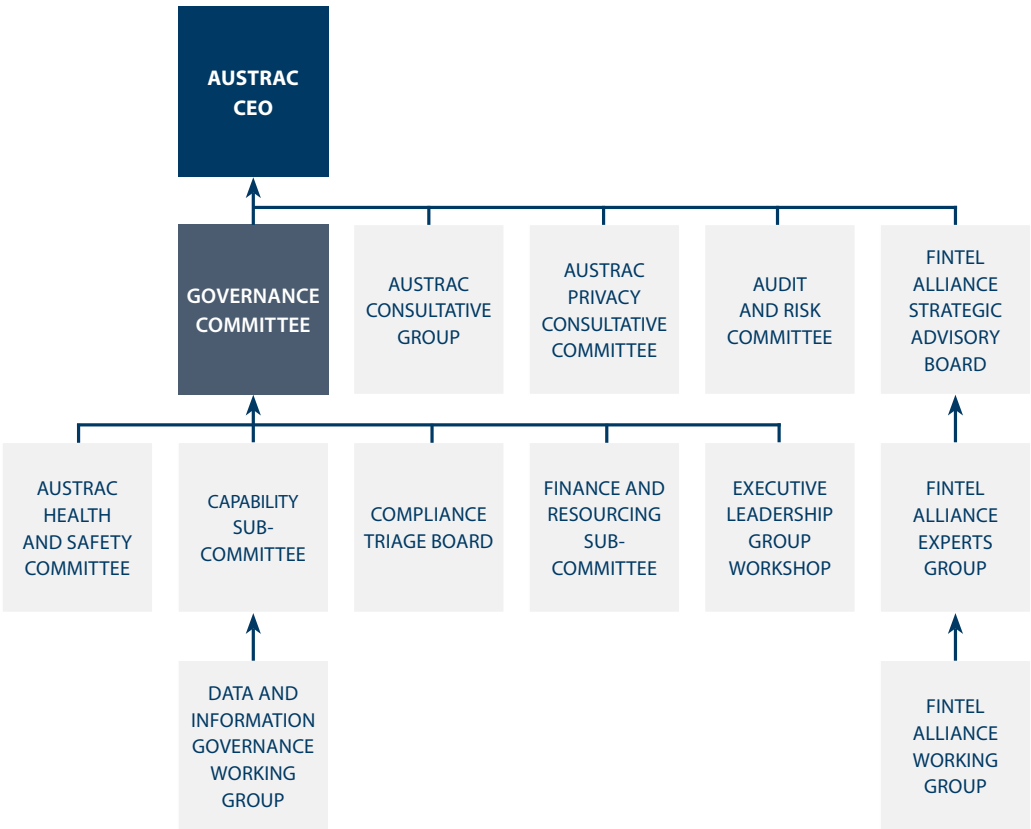
| Key AUSTRAC activities and associated risks | Risk management and oversight approach  |
|---|---|
| Regulation                                  | <p>Risks associated with our regulatory functions are managed through our risk and governance frameworks and associated control and oversight mechanisms. This means risks are managed in accordance with the roles and responsibilities outlined in our Risk Management Policy, captured in branch plans and can be escalated to the CEO, or Governance Committee as required.</p> |
| Intelligence                                | <p>Risks associated with our intelligence are managed through our risk and governance frameworks and control and oversight mechanisms contained within. This means risks are managed in accordance with the roles and responsibilities outlined in our Risk Management Policy, captured in branch plans and can be escalated to the CEO, or Governance Committee as required.</p>   |

# GOVERNANCE

AUSTRAC’s governance framework supports the CEO (as accountable authority) in her mandated responsibility for maintaining systems of risk oversight, management and internal control. This includes AUSTRAC’s primary decision-making body, the Governance Committee, which provides strategic oversight of AUSTRAC’s risk management framework and enterprise risks, including defining risk appetite and tolerance statements and supporting risk, control and treatment owners in the management of cross-agency risks.

The CEO is supported by the agency’s Executive and Governance structures which shape the agency’s risk culture, harness capability development to support effective risk management and facilitate risk-based decision making.

In addition, there are other key committees within AUSTRAC’s Governance Framework that support the CEO in her responsibilities.



To inform the considerations and decisions of the Governance Committee, its two key sub-committees—the Finance and Resourcing Sub-Committee and Capability Sub-Committee—provide mechanisms for consultation and escalation of resource allocation and capability management matters and associated risks.

The four independent members that make up AUSTRAC's Audit and Risk Committee provide the CEO with independent advice on the appropriateness of AUSTRAC's risk oversight, risk management framework and systems of internal control as well as advise her on the potential implications of emerging risks. The Committee also review AUSTRAC's business continuity planning arrangements.

AUSTRAC also convenes a Privacy Consultative Committee to provide advice to the CEO on privacy and civil liberties matters. The Committee comprises representatives of AUSTRAC, Department of Home Affairs, Office of the Australian Information Commissioner as well as public interest groups, including privacy and civil liberty organisations. The Committee identifies privacy risks which emerge from AUSTRAC initiatives and supports actions to mitigate those risks.

Under section 24 of the *Public Governance, Performance and Accountability Act 2013*, the AUSTRAC CEO established the Fintel Alliance Strategic Advisory Board. The Board provides strategic advice and guidance to the AUSTRAC CEO on the development and operation of Fintel Alliance. The composition of the Board represents a diversity of views and interests from across industry, government and academia. It ensures that advice to the CEO is relevant, wide-ranging and broadly representative.

