



Australian Government

AUSTRAC

FIGHTING  
FINANCIAL  
CRIME  
TOGETHER



2022–  
26 AUSTRAC  
CORPORATE  
PLAN

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## ACKNOWLEDGEMENT OF COUNTRY

AUSTRAC acknowledges the traditional owners and custodians of country throughout Australia. We recognise their continuing connection to the land, sea and community. We pay our respects to the people, cultures and elders – past, present and emerging.

**Protecting Country** by Indigenous Australian artist Riki Salam uses symbols that represent AUSTRAC's vision and purpose to protect Australians from criminal abuse, both in Australia and beyond its borders.



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## CEO FOREWORD

As Australia's anti-money laundering and counter-terrorism financing (AML/CTF) regulator and Financial Intelligence Unit (FIU), AUSTRAC's unique value is its dual, interconnected regulation and intelligence functions. This value is underpinned by our constant collaboration with industry, government and international partners in working toward the vision of a financial system free from criminal abuse.

AUSTRAC operates in a challenging environment with the increasing digitisation of the international financial system, new technologies and financial products, geopolitical events and the ongoing impacts of the COVID-19 pandemic continuing to shape our work. Serious financial crime continues to evolve, with transnational serious and organised crime groups harnessing new technologies, professional facilitators, and offshore service providers, to exploit vulnerabilities and launder the proceeds of their crime.

Against this backdrop, a rigorous AML/CTF regime is essential to ensure the integrity of the Australian financial system. We recognise the collaborative cross-jurisdictional effort that an effective AML/CTF regime requires with policy departments, regulators, law enforcement agencies and prosecutors all having a part to play in the fight against money laundering and terrorism financing. Australia's upcoming 5th Mutual Evaluation by the global AML/CTF standards body, the Financial Action Task Force (FATF), will be a key area of focus for AUSTRAC over the life of this Corporate Plan.

This Corporate Plan highlights the capabilities that we will harness to deliver on our purpose in the face of this evolving landscape.

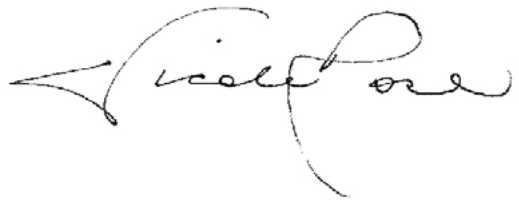
We will fight financial crime by supporting our regulated community to improve their AML/CTF capabilities and culture through more effective education, compliance and enforcement activities. This extends to educating the community more broadly as to the real-life harms of money laundering. Over the long term, investment in an improved engagement and reporting capability for industry will improve data capture, processing and storage systems to support our operations and make it easier for industry to engage with, and report to, us. This Reporting Entity System Transformation program and other technology and data uplift work, as outlined in this plan, will shape how we perform our key activities into the future.

At AUSTRAC, it is the specialist analysts and our robust partnerships and collaboration with industry and intelligence agencies that enable us to provide critical, targeted financial intelligence for the detection and disruption of money laundering, terrorism financing and other serious crimes. Given the opportunities and threats posed by new technologies, we continue to position AUSTRAC for the future as an agile FIU that is able to address evolving threats by harnessing our unique expertise, capabilities and technologies. This includes strengthening our partnerships with industry, law enforcement and national security partners and ensuring we remain a regional leader among fellow FIUs.

Despite the challenges of the pandemic and the need to work remotely over recent years, I am pleased that the positive, inclusive workplace culture of AUSTRAC has endured. We pride ourselves on being a great place to work, with AUSTRAC recognised as an Employer of Choice and one of the Australian Financial Review's Best Places to Work in 2022. Across AUSTRAC we are strongly committed to ensuring our current staff, and new staff who join the agency, continue to enjoy the benefits of our workplace culture, while actively contributing to it.

As the accountable authority for AUSTRAC, I present this AUSTRAC corporate plan for 2022-26 as required under paragraph 35(1)(b) of the *Public Governance, Performance and Accountability Act 2013*.

**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.

## WHAT WE'RE SEEKING TO ACHIEVE

**Our vision:** A financial system free from criminal abuse.

### WHAT WE'LL DO TO ACHIEVE THIS

#### OUR 5 STRATEGIC PILLARS



##### DISCOVER

AUSTRAC identifies criminal risks to Australia's financial system.



##### UNDERSTAND

AUSTRAC develops and shares a comprehensive understanding of vulnerabilities to criminal exploitation within Australia's financial system.



##### STRENGTHEN

AUSTRAC ensures criminal risks within Australia's financial system are identified, mitigated and managed effectively.



##### DISRUPT

AUSTRAC collaborates with partners to disrupt criminal exploitation of Australia's financial system.



##### OPTIMISE

AUSTRAC continuously evolves and adapts business operations to succeed in a dynamic operating environment.

### FACTORS IMPACTING THIS ACHIEVEMENT

#### ENVIRONMENTAL FACTORS

##### AUSTRAC centred:

- Resourcing challenges
- Exponential data growth
- Keeping pace with technological change
- Managing change on multiple fronts

##### National centred:

- Ensuring Australia's AML/CTF regime remains fit-for-purpose
- Australia's changing financial and gaming regulatory environments
- Mutual Evaluation 2025

##### International centred:

- Increasingly sophisticated criminal methods
- Evolving international financial system
- Geopolitical changes and tensions
- COVID-19 pandemic

#### OUR RISK MANAGEMENT

There are areas of strategic risk – across our functions - that, if realised, could affect AUSTRAC's ability to achieve its purpose. Controls to manage these risks have been identified and implemented.

**Our outcome:** The protection of the financial system from criminal abuse through actionable financial intelligence, risk-based regulation, and collaboration with domestic and international partners.

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

## OUR PARTNERSHIPS

Collaboration is a hallmark of how AUSTRAC interacts with our partners - across government, industry and internationally - as well as how we operate across our three Divisions internally.

## OUR CAPABILITY

AUSTRAC must continue to adapt to its changing environment in order to effectively protect the financial system and be a world leader in the fight against financial crime. To continue to successfully undertake our key activities to achieve our purpose, we have a diverse set of capability requirements for the coming four years, focussing on:

- future proofing Australia's financial intelligence capability
- regulatory enhancement, and
- corporate optimisation.

AUSTRAC operates in accordance with the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006*, the *Public Governance, Performance and Accountability Act 2013* and the Minister's Statement of Expectations

## HOW WE'LL MEASURE OUR PERFORMANCE

- 1.1 Referral value/outcome generation rate
- 1.2 Proactive identification/outcome rate
- 1.3 Fintel exchange rate with prioritised FIUs
- 2.1 Published guidance product access rate
- 2.2 Workshop attendee improved knowledge rating
- 2.3 Product usefulness rating
- 2.4 Intelligence product standardisation rate
- 2.5 Impact on partner vulnerability understanding rating
- 3.1 Reporting Entity strengthened controls following AUSTRAC engagement rating
- 3.2 On-time Compliance Report rate
- 3.3 Proactive identification rate
- 3.4 AML/CTF Rules/policy setting collaboration rating
- 3.5 Reporting Entity trust in AUSTRAC rating
- 3.6 Granted exemptions and modifications rate
- 3.7 International development program funder satisfaction rating
- 3.8 International development realised capability enhancement rating
- 3.9 Risk assessment product influence on behaviour rating
- 3.10 Fintel Alliance-coded SMR count
- 3.11 Repurpose of strategic analysis reports rate
- 3.12 Levy collection cost rate
- 4.1 Attributable ATO-recovered revenues and liabilities
- 4.2 Criminal Assets Confiscation Taskforce Gross Restricted assets
- 4.3 Financial intelligence impact to stakeholder work rating
- 4.4 Analyst WorkBench data impact to user work rating
- 5.1 Realised projects benefits rate
- 5.2 Perceived skill/capability/knowledge rate



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ABOUT  
US



## OUR FUNCTIONS

As Australia's anti-money laundering and counter-terrorism financing (AML/CTF) regulator and Financial Intelligence Unit (FIU), AUSTRAC performs both regulatory and intelligence functions.

AUSTRAC's functions are set out in the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (the AML/CTF Act).

Specifically, the legislation states AUSTRAC's role (as designated to the CEO) is to:

- retain, compile, analyse and disseminate AUSTRAC information
- provide access to, and to share, AUSTRAC information to support domestic and international efforts to combat money laundering and terrorism financing and other serious crimes
- provide advice and assistance, in relation to AUSTRAC information, to the persons and agencies who are authorised to access AUSTRAC information
- advise and assist reporting entities in relation to their obligations under the AML/CTF Act, the regulations and the AML/CTF Rules
- advise and assist the representatives of reporting entities in relation to compliance by reporting entities with the AML/CTF Act, the regulations and the AML/CTF Rules
- facilitate gaining access on a timely basis to the financial, administrative and law enforcement information that the AUSTRAC CEO requires to properly undertake the AUSTRAC CEO's financial intelligence functions
- promote and monitor compliance with the AML/CTF Act, the regulations and the AML/CTF Rules, and
- assist in the development of government policy or to assist academic research.

In addition to the functions set out above, AUSTRAC's CEO has powers, functions and duties described in other legislation including:

- *Public Governance, Performance and Accountability Act 2013* and other related legislative instruments
- employment legislation including but not limited to the *Public Service Act 1999*
- information management legislation including but not limited to the *Privacy Act 1988*
- legislation establishing rights to seek review of government decisions including the *Administrative Appeals Tribunal Act 1975*.

# OUR STRUCTURE

AUSTRAC’s unique value is achieved through its dual, interconnected government regulator and intelligence functions – a world first when established in 2006.

We are a FIU with strong regulatory powers used to regulate more than 16,000 businesses providing financial, gambling, bullion, remittance and digital currency exchange services to discover, understand and disrupt criminal threats. As one agency, we leverage the capabilities of our intelligence and regulatory branches – with the assistance of our enabling branches – to achieve our purpose.



## Regulation, Education and Policy Division

**Responsible for promoting reporting entity compliance with their AML/CTF obligations, ensuring that reporting entities comply, and undertaking enforcement actions when that compliance fails.**

### Education, Capability and Communications

Educates reporting entities on their AML/CTF obligations to build their understanding and resilience to financial crime risks. Provides policy advice and support, and engages with reporting entities to improve their AUSTRAC regulatory systems reporting.

### Regulatory Operations

Performs AUSTRAC's regulatory insights and supervision functions, including efforts to monitor and support compliance by reporting entities with their obligations under the AML/CTF Act.

### Legal and Enforcement

Influences regulatory compliance and proportionate regulation through the effective use of powers under the AML/CTF Act, including enforcement action and exemptions. Manages AUSTRAC's legal risk and compliance.

## Capability and Strategy Division

**Responsible for delivering technology, people and business solutions and providing integrated, strategic planning and financial management across AUSTRAC.**

### Innovation and Technology Solutions

Provides AUSTRAC's IT infrastructure, products and services. Leads innovation by co-designing solutions for customers and partners; solutions that enable our customers to make faster, better and more effective decisions.

### People and Business Solutions

Delivers internal services relating to the full employment lifecycle of staff. Includes organisational development, recruitment, training, and meeting compliance and operational needs relating to property and security.

### Strategic Planning, Finance and Performance

Ensures the effectiveness of AUSTRAC's financial, governance, performance and assurance frameworks. Provides integrated, strategic advice and expertise to support AUSTRAC in achieving its purpose.

# AUSTRAC's planning, performance and reporting cycle

## COMMONWEALTH PERFORMANCE FRAMEWORK

*Public Governance, Performance and Accountability Act 2013 (PGPA Act), Public Governance, Performance and Accountability Rule 2014 (PGPA Rule), Principles of Regulator Best Practice.*

### Planning

#### **Portfolio Budget Statements**

Portfolio Budget Statements (PBS) inform Senators and Members of Parliament of the proposed allocation of resources to government outcomes and programs.

Provides high level performance and financial information, including how performance (against that year's measures) is tracking.

#### **Ministerial Statement of Expectations**

Issued by our responsible minister, the Statement of Expectations (SOE) provides greater clarity about government policies and objectives relevant to AUSTRAC in line with our statutory objectives, and the priorities the Minister expects us to observe in conducting our operations.

#### **Statement of Intent**

The Statement of Intent (SOI) identifies how AUSTRAC will deliver on the Australian Government's expectations and embed these expectations in its performance and planning processes.

#### **Corporate Plan**

Our primary planning document for the coming four-year period, the Corporate Plan sets out our purpose, key activities and how our performance will be measured. It also outlines the environment we work in, the capability required to undertake our activities, our key risks and how we will manage them.

Our corporate plan guides our business planning cycle.

#### **Branch Business Plans**

Informed by our corporate plan, these detail each branch's annual key activities, outcomes and deliverables, how the branch's performance will be measured, risk oversight and management, and resource planning for the coming financial year.

## Annual Performance Statements and Annual Report

### Annual Report

Prepared each year by our CEO as accountable authority, our Annual Report informs Parliament and the public of our financial and non-financial performance during the financial year.

While the CEO has discretion on the presentation of the Annual Report, there are content requirements made by the PGPA Act and Rule as well as other legislative requirements that we must comply with.

### Annual Performance Statements

The Annual Performance Statements (APS) – included in our Annual Report – advises of our performance towards achieving our purpose for the relevant year.

The APS provides details of our actual performance results against the measures and targets set out in the Corporate Plan (and the forecasted performance reported in the PBS).

The APS must also include an analysis of the factors contributing to our performance.

### Branch Performance Reports

Details branch performance towards their respective measures. Advises on whether the branch is on-track to achieve the target, as well as providing (where possible) quantitative data with case studies and other evidence demonstrating performance over the relevant period.

Reported three times a year, the results provide performance insights and are used to inform strategic decision-making and drive continuous improvement.

## Reporting

### Individual performance agreements and mid- and end-cycle reviews

Plans and reviews detailing the key goals, activities, learning and development opportunities to be undertaken by our staff during the coming year.



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OUR  
PERFORMANCE

## Our key activities - and how we measure our performance

As Australia’s AML/CTF regulator and FIU, AUSTRAC is responsible for building resilience in our financial system. We do this by detecting, deterring, and disrupting abuse of the Australian financial system to protect the Australian community. AUSTRAC undertakes its functions through the prism of five key pillars that underpin how we work. It is through these pillars and related activities that AUSTRAC measures its performance and demonstrates achievement of its purpose.<sup>1</sup>

### REGULATOR PERFORMANCE REPORTING REQUIREMENTS

AUSTRAC is committed to remaining a high-performing and accountable organisation with a view to continuously improving its performance. AUSTRAC recognises the need to fulfil our statutory role while actively contributing to the protection of the Australian community. We continually look to minimise regulatory costs on reporting entities through improvements in our approach to regulation, legislative reform and streamlining reporting processes and systems.

In line with the Australian Government’s expectations for regulator performance, we have developed seven performance measures to demonstrate our performance against the three principles of regulator best practice, as well as towards achieving our purpose. The key below identifies those performance measures being used to report on our achievement against the principles. Our regulatory performance will be reported through our Annual Performance Statements in each AUSTRAC Annual Report to ensure we take – and provide – a holistic and integrated approach to agency performance.

Principles of regulator best practice	
	<b>1. Continuous improvement and building trust:</b> regulators adopt a whole-of-system perspective, continuously improving their performance, capability and culture to build trust and confidence in Australia’s regulatory settings.
	<b>2. Risk based and data driven:</b> regulators manage risks proportionately and maintain essential safeguards while minimising regulatory burden, and leveraging data and digital technology to support those they regulate to comply and grow.
	<b>3. Collaboration and engagement:</b> regulators are transparent and responsive communicators, implementing regulations in a modern and collaborative way.

<sup>1</sup> See Appendix A for further information on our performance measurement framework.



## DISCOVER

### **AUSTRAC identifies criminal risks to Australia's financial system.**

AUSTRAC collects financial transaction and suspicious matter reports submitted by reporting entities as required by the AML/CTF Act. The data from these reports is analysed alongside information shared with us by our domestic and international partners and open source data to identify criminal risks to Australia's financial system. To maximise the value and utility of the discovery effort, insights gained through AUSTRAC's financial analysis capabilities are shared with our partners.

Specifically, during the period covered by this Corporate Plan, we will:

- enrich the quality and value of the financial data we collect through the identification and acquisition of new datasets and sources, including open source and specialist data
- invest in innovative research and analytics – including machine learning, data transformations and custom visualisations – to chart anomalies in our data
- experiment with diverse and dynamic variants of known risks and trends, and
- leverage domestic and international partnerships to share experience and better understand over the horizon threats and risks.

With these activities we are seeking:

- to advance the quality of our financial intelligence capabilities
- to discover new and emerging risks and threats to our financial system
- insights that will help identify potential criminal activity or risks to national security
- means of identifying where new threats may emerge, and
- to provide our partners with valuable and actionable intelligence.

**DISCOVER cont.**

To evaluate our performance towards the Discover pillar, AUSTRAC will use the following performance measures:<sup>2</sup>

**Measure 1.1.** Percentage of referrals to selected taskforces that generated an outcome, annually.

**Measure 1.2.** Percentage of intelligence products that identify a new theme, threat or insight where one or more partner agencies has confirmed the product has generated an outcome, which may include new understanding, for that partner, annually.

**Measure 1.3.** Percentage of financial intelligence exchanges that are with prioritised foreign Financial Intelligence Units (FIUs), annually.

<sup>2</sup> Further information for each performance measure, including their 2022-26 targets, rationale and method, can be found in Appendix A, page 62.



## UNDERSTAND

### **AUSTRAC develops and shares a comprehensive understanding of vulnerabilities to criminal exploitation within Australia's financial system.**

To be effective as a regulator and FIU, AUSTRAC must understand the existing and potential future vulnerabilities that impact the financial system, and share those understandings with our partners and the entities we regulate.

Specifically, during the period covered by this Corporate Plan, we will:

- develop analytical capabilities to better present insights and targeted intelligence to our partners
- integrate our insights, knowledge and diverse experiences to construct a unified view of ML/CT-related vulnerabilities, how these vulnerabilities may be exploited, and the possible impacts of such exploitation
- support our regulated community to improve their AML/CTF capabilities by using our understanding of vulnerabilities to educate and provide guidance to reporting entities on their obligations and high-risk areas including through published guidance, online tools, workshops and one-on-one engagement
- negotiate information-sharing memoranda of understanding with domestic partner agencies and international counterparts prioritised for intelligence and regulatory collaboration
- share our insight and knowledge with our partners – domestic and international – via published intelligence product
- work with our domestic and international partners, including through our deployed officers located in overseas posts and regional forums, and
- partner with fellow law enforcement and national security agencies on taskforces and other collaborative opportunities.

**UNDERSTAND cont.**

With these activities we are seeking:

- to generate client focused intelligence and optimise the uptake of referrals and insights
- to continuously build our understanding of vulnerabilities and threats
- to map complex and dynamic illicit financing structures
- to build awareness and understanding by our partners and reporting entities of vulnerabilities impacting the financial system
- understanding in our reporting entity population of their AML/CTF obligations
- improved proactive compliance with AML/CTF obligations by our reporting entities
- recognition as a transparent and responsive communicator who implements regulations in a collaborative way
- to support the priorities and needs of partner agencies, and
- effective management of vulnerabilities in the financial system by way of informed responses - from both AUSTRAC and partners.

## UNDERSTAND cont.

To evaluate our performance towards the Understand pillar, AUSTRAC will use the following performance measures:



**Measure 2.1.** Number of instances published guidance products were accessed and downloaded from our website by individual external audience members and direct email recipients, within three months of publication, annually.



**Measure 2.2.** Percentage of event/workshop attendees/e-learning participants who report a MODERATE (or higher) improvement in their understanding of the AML/CTF obligations as a result of their attendance/completion, annually.



**Measure 2.3.** Percentage of industry associations representing AUSTRAC's reporting entities who report a MODERATELY (or higher) rating on the usefulness of AUSTRAC's guidance materials, annually.

**Measure 2.4.** Percentage of sampled intelligence products that meet AUSTRAC's intelligence writing standards, annually.

**Measure 2.5.** Percentage of stakeholders who report AUSTRAC's intelligence products had a MODERATE (or higher) level impact on their understanding of vulnerabilities in the financial system, annually.



## STRENGTHEN

**AUSTRAC ensures criminal risks within Australia's financial system are identified, mitigated and managed effectively.**

AUSTRAC's purpose is to build resilience in the financial system. As Australia's AML/CTF regulator, we ensure reporting entities comply with their obligations to have systems and controls in place to mitigate and manage the risk of criminal exploitation and the incidence of money laundering. As Australia's FIU, we seek to use the insights we have gained from our financial data to support international and domestic efforts to strengthen the global financial system, and secure Australia's place in it. This includes improving the capabilities of regional counterparts to detect and disrupt serious financial crime, enhancing regulated entities' reporting abilities and behaviour, and increasing the efficiency of our dealings with Australian authorities.

Specifically, during the period covered by this Corporate Plan, we will:

- pursue an efficient, effective and collaborative regulatory framework that better enables reporting entities to participate and manage risk
- supervise, monitor and assess compliance and remediation activities of reporting entities
- harness AUSTRAC data to proactively detect AML/CTF non-compliance by reporting entities, and respond to said non-compliance
- examine trends, vulnerabilities and new and emerging regulatory risks
- undertake rigorous assessment of remittance sector and digital currency exchange registration applications
- investigate alleged serious and systemic contraventions of the AML/CTF Act, and where appropriate take enforcement actions to deter and remediate serious and systemic non-compliance
- engage with partners to develop policy and legislative reforms that respond to current and emerging ML/TF risks
- respond to changes in the AML/CTF environment by amending the AML/CTF Rules
- maintain a proportionate regulatory scheme by determining requests from reporting entities for exemptions and modifications to AML/CTF obligations

## **STRENGTHEN cont.**

- support work to build upon the AML/CTF global standards through engagement with such bodies as the Financial Action Task Force (FATF)
- deliver capability development programs to international partner agencies
- keep reporting entities apprised of contemporary ML/TF risks, and
- harness the resources of industry, government and international partners to leverage our collective ability to detect crime and share actionable intelligence across a broad spectrum of threats, including tax avoidance, drug trafficking and virtual assets.

With these activities we are seeking:

- improved understanding and identification of ML/TF risks by reporting entities to foster a culture of risk management in reporting entities
- proactive compliance by reporting entities with their AML/CTF obligations and maintain a strong and credible deterrence for non-compliance
- improved reporting by reporting entities
- to prevent criminal infiltration and exploitation of reporting entities
- to inform and influence options – for AUSTRAC and stakeholders – to respond to new and emerging regulatory risks
- to use policy and legislative reform to minimise the adverse economic and social impacts on Australia of current and emerging ML/TF risks
- engagement and support from regulated entities for our regulatory work
- to take a risk-based, proportionate approach in exercising our regulatory powers
- to support international efforts to strengthen the global financial system
- to enhance AUSTRAC's effectiveness as a partner to our regional counterparts and Australian agencies, and
- improved capability of regional partner agencies to detect, combat and disrupt serious financial crime and national security threats.

**STRENGTHEN cont.**

To evaluate our performance towards the Strengthen pillar, AUSTRAC will use the following performance measures:



**Measure 3.1.** Percentage of reporting entities who strengthened their AML/CTF controls after AUSTRAC engagement, annually.

**Measure 3.2.** Percentage of reporting entities who submit their compliance reports on time, annually.



**Measure 3.3.** Percentage of regulatory work proactively identified by AUSTRAC, annually.

**Measure 3.4.** Percentage of industry associations representing AUSTRAC's reporting entities who assess AUSTRAC's level of collaboration in the development of AML/CTF Rules and policy settings to be USUALLY collaborative (or higher), annually.



**Measure 3.5.** Percentage of industry associations representing AUSTRAC's reporting entities who believe reporting entities have a MODERATE (or higher) level of trust in AUSTRAC as a result of AUSTRAC's efforts to harden the industry against ML/TF and other crime risks, annually.



**Measure 3.6.** Percentage of exemptions and modifications granted, annually.

**Measure 3.7.** Percentage of externally funded international capability development programs, completed during the current financial year, where the funder has confirmed the program served their purposes, annually.

**Measure 3.8.** Percentage of externally funded international capability development program activities, completed during the current financial year, which realised a capability uplift, annually.

**Measure 3.9.** Percentage of reporting entities who advise our sector-based Risk Assessment product had a MODERATE (or higher) influence on their risk mitigation attitudes or behaviours, per product.

## STRENGTHEN cont.

To evaluate our performance towards the Strengthen pillar, AUSTRAC will use the following performance measures:

**Measure 3.10.** Number of Fintel Alliance-coded suspicious matter reports (SMRs) received, annually.

**Measure 3.11.** Percentage of strategic analysis reports sanitised and repurposed for selective distribution to specific Reporting Entities, annually.

**Measure 3.12.** Percentage of the disbursed industry contribution levy that the levy collection process costs, annually.



## DISRUPT

### **AUSTRAC collaborates with partners to disrupt criminal exploitation of Australia's financial system.**

To achieve our purpose of using financial intelligence and regulation to disrupt money laundering, terrorism financing and other serious crime AUSTRAC must pursue new opportunities to collaborate closely with our partners, including through the sharing of our data and financial intelligence.

Specifically, during the period covered by this Corporate Plan, we will:

- generate and disseminate timely, actionable financial data and intelligence
- pursue opportunities to collaborate with and support our partners, and
- continue to make relevant and timely transactions and suspicious matters reported to AUSTRAC directly available – via Analyst WorkBench – to authorised users.

With these activities we are seeking:

- disruption of identified exploitation and criminal misuse of our financial system by our domestic and international law enforcement and national security partners
- reduced tax crime and evasion through ATO recovering revenues and liabilities as a result of our data and financial intelligence
- to prevent payment fraud through collaboration with Services Australia and other program delivery agencies
- restraint of criminal assets through provision of actionable financial intelligence as a member of the AFP-led Criminal Asset Confiscation Taskforce
- strengthened relationships and capabilities with our partner agencies, and
- to be a partner of choice for financial intelligence discovery and disruption support in meeting the financial intelligence needs of partner agencies.

## DISRUPT cont.

To evaluate our performance towards the Disrupt pillar, AUSTRAC will use the following performance measures:

**Measure 4.1.** Sum of ATO-recovered revenues and liabilities attributable to AUSTRAC data and AUSTRAC financial intelligence over the preceding 12 month period.

**Measure 4.2.** Sum of Criminal Assets Confiscation Taskforce (CACT) Gross Restrained assets, which AUSTRAC data and AUSTRAC financial intelligence have contributed to the restraint of, over the preceding 12 month period.

**Measure 4.3.** Percentage of stakeholders who rate the impact of AUSTRAC's financial intelligence to their work as SOMEWHAT OF AN IMPACT (or higher), annually.

**Measure 4.4.** Percentage of Analyst WorkBench (AWB) users who rate the impact of AUSTRAC's data available via AWB to their work as SOMEWHAT OF AN IMPACT (or higher), annually.



OPTIMISE

**AUSTRAC continuously evolves and adapts business operations to succeed in a dynamic operating environment.**

AUSTRAC is dedicated to being an effective, efficient, and sustainable business operation, which remains agile and contemporary regardless of the environmental factors impacting it.

Specifically, during the period covered by this Corporate Plan, we will:

- strengthen our project management governance arrangements
- optimise our enabling functions by designing and implementing improved and adaptable models of operation, and
- invest in targeted learning and development opportunities through close engagement with whole-of-Government, Portfolio and National Intelligence Community initiatives to meet staff and agency needs.

With these activities we are seeking:

- to ensure projects deliver what they were undertaken to achieve so that AUSTRAC remains capable and resilient in a changing operating environment
- to build a strong, agile and skilled workforce with the appropriate skills and capabilities to meet current and future demands
- to enhance employee capability to perform their roles, contributing to AUSTRAC’s ability to protect the financial system, and
- to ensure AUSTRAC continues to be an Employer of Choice.

To evaluate our performance towards the Optimise pillar, AUSTRAC will use the following performance measures:

- Measure 5.1.** Percentage of agency approved capability and transformation projects, closed during either the current financial year or the previous financial year, that realise their approved benefits, annually.
- Measure 5.2.** Percentage of AUSTRAC staff who agree their workgroup has the appropriate skills, capabilities and knowledge to perform well, annually.

# Our key activities and measures on a page



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OUR  
ENVIRONMENT



As both the AML/CTF regulator and FIU, AUSTRAC operates at the intersection of a broad and varied financial sector and a complex and evolving security environment. Environmental factors that will impact AUSTRAC’s ability to achieve its purpose – be they factors that support and enable or those that challenge that achievement – over the coming four years are:

	Environmental factors impacting AUSTRAC
AUSTRAC centred	<ul style="list-style-type: none"><li>• <b>Resourcing challenges</b> - The balance between supply and demand of a suitably skilled and qualified workforce continues to be a significant challenge for Australian private and public organisations. For AUSTRAC, the tightened labour market means we have substantial challenges attracting and retaining specialist staff, impacting AUSTRAC projects as well as ‘business as usual’ activities. To address these challenges we will consider and evaluate workforce planning strategies, introduce the AUSTRAC People Strategy and the AUSTRAC Strategic Workforce Plan,<sup>3</sup> and continue to demonstrate why AUSTRAC is an employer of choice.<sup>4</sup></li><li>• <b>Exponential data growth</b> - The volume of data we hold – predominately industry-submitted data – has grown exponentially in recent years, and is expected to continue to grow over the period of this plan. To manage our data holdings appropriately we will: (i) enhance our data governance arrangements;<sup>5</sup> (ii) invest in relevant architecture, managing our data as a valuable asset; (iii) continue to increase and augment our data science capability; and (iv) prioritise our efforts to mature our data capabilities. Together, these activities will help us determine what we are missing, what risks might be emerging that we need to address, and how we ensure we future-proof our capability and capacity.</li></ul>

3 For further information on the Strategy and Plan see *Our capability* chapter.

4 For further information on how we seek to be an employer of choice see *Our people* chapter.

5 For further information on the Data Governance Strategy see *Our capability* chapter.

	Environmental factors impacting AUSTRAC
AUSTRAC centred cont.	<ul style="list-style-type: none"><li>• <b>Keeping pace with technological change</b> – AUSTRAC’s ability to harden the financial system against financial crime risks relies on keeping pace with the rapid advancements of financial sector technologies, increasing criminal exploitation of fintech, and the increasingly digital nature of financial transactions. While the pace of technological change presents challenges, it also provides opportunities for new applications and innovations in how we undertake our intelligence and regulatory functions. Through our collaboration with government and industry partners, we will seek new solutions and capabilities that enable us to manage our ever-growing datasets, establish greater automation and connectivity, surface previously undetectable risks, and increase the efficiency of our analysts.<sup>6</sup></li><li>• <b>Managing change on multiple fronts</b> – As outlined in <i>Our capability</i> chapter, we have several transformational projects to be rolled out during the period of this plan. To ensure our staff are able to manage the change brought about by these projects, we will seek to uplift the change management capability of the agency while ensuring the multiple benefits of the relevant change activity is understood and shared widely.</li></ul>

6 For further information on the projects that will help us make this technological change, see *Our capability* chapter.

	Environmental factors impacting AUSTRAC
National centred	<ul style="list-style-type: none"> <li> <b>Ensuring Australia's AML/CTF regime remains fit-for-purpose</b> – Industry operating models, financial products and services, criminal typologies and the broader national security environment have evolved considerably since the implementation of the <i>Anti-Money Laundering and Counter-Terrorism Financing Act in 2006</i>. AUSTRAC remains committed to reforms that strengthen and streamline Australia's AML/CTF regime, to improve regulatory outcomes and deliver greater efficiencies for both government and business. We will work closely with the Attorney-General's Department to pursue legislative reform to ensure Australia's AML/CTF regime remains contemporary, technologically neutral and fit-for-purpose. </li> <li> <b>Australia's changing financial and gaming regulatory environments</b> – Multiple inquiries into Australia's financial and gaming sectors<sup>7</sup> over recent years are continuing to shape Australia's financial and gambling regulatory environments. AUSTRAC's own civil penalty proceedings are also having an impact. The heightened level of scrutiny and community expectations of financial and gaming institutions should motivate industry to review AML/CTF compliance, invest in AML/CTF compliance, and identify and report compliance failures, placing increasing demand on AUSTRAC's regulatory capabilities. To address this, we will continue to dedicate resources to assess and analyse the increasing volume of information reported by industry, generating intelligence, providing education, detecting non-compliance, and taking enforcement action in cases of serious and/or systemic non-compliance. We also maintain close relationships with fellow financial sector and gaming regulators (federal, state and territory) as well as law enforcement to address the risks of money laundering and terrorism financing in our financial system. </li> </ul>

<sup>7</sup> For example, Royal Commission into Misconduct in the Banking, Superannuation and Financial Services Industry, Report of the Inquiry under section 143 of the Casino Control Act 1992 (NSW) (the "Bergin Inquiry") or the Royal Commission into the Casino Operator and Licence ("Crown Melbourne").

	Environmental factors impacting AUSTRAC
<b>National centred cont.</b>	<ul style="list-style-type: none"> <li>• <b>Mutual Evaluation 2025</b> – The Financial Action Task Force (FATF) sets international standards that aim to prevent money laundering and terrorism financing and the harm they cause to society. The FATF conducts peer reviews of each member state to assess levels of implementation of the FATF Recommendations, providing an in-depth description and analysis of each country's system for preventing criminal abuse of the financial system. The next mutual evaluation of Australia's AML/CTF regime will commence in 2024 (the last occurred in 2015) and conclude in 2025. AUSTRAC has commenced engagement with relevant partners, as well as undertaking internal activities to realise a successful evaluation for Australia.</li> </ul>
<b>International centred</b>	<ul style="list-style-type: none"> <li>• <b>Increasingly sophisticated criminal methods</b> – Money laundering and terrorism financing techniques are becoming increasingly sophisticated as new technologies and financial products provide opportunities for criminal methods to evolve. The transaction of illicit funds through cryptocurrencies and the escalating rate of cybercrime are recent examples of such emerging threats. As outlined in <i>Our capability</i> chapter, we will enhance our intelligence capabilities and introduce new technologies so that we may detect and address these emerging threats. AUSTRAC cannot, however, identify and respond to all emerging threats alone. The interconnectedness of the international financial system means emerging threats in foreign countries will impact Australia's financial system. To address this, we will leverage our domestic, regional and international relationships to inform where new threats may emerge from partner experiences and international trends. We will also partner with our neighbours to counter regional threats.</li> </ul>

	Environmental factors impacting AUSTRAC
International centred cont.	<ul style="list-style-type: none"> <li>• <b>Evolving international financial system</b> – The breadth, complexity and increasing digitisation of the international financial system continues to challenge AUSTRAC and requires a coordinated effort by FIUs and AML/CTF regulators worldwide to detect and address critical vulnerabilities. Sharing knowledge, raising awareness of criminal methodologies and influencing compliance behaviours strengthens AML/CTF measures across the financial system. International standards – such as FATF Recommendations – are being continually reviewed and strengthened to address new risks. We will participate in international efforts to strengthen the global financial system by providing input into the development of international standards and the understanding of risks, and by assisting international partners to build their AML/CTF capabilities.</li> </ul>
	<ul style="list-style-type: none"> <li>• <b>Geopolitical changes and tensions</b> – The geopolitical environment, both within Australia's immediate region and further afield, is rapidly changing. AUSTRAC will continue to support whole-of-government international engagement and activities in response to these changes, including working with our regional partners and supporting efforts to implement and monitor sanctions against Russia in response to the Russian invasion of Ukraine. We will also seek to strengthen our international relationships, particularly through multilateral operational forums, with both fellow FIUs and AML/CTF regulators.</li> </ul>
	<ul style="list-style-type: none"> <li>• <b>COVID-19 pandemic</b> – The impact COVID-19 will have on AUSTRAC over 2022-26 is expected to be different to that of the past two years. With the ability for AUSTRAC staff to work remotely when required, we anticipate being able to respond quickly and appropriately to any workforce challenges arising from the pandemic. Noting criminals have taken advantage of this period of change and uncertainty to exploit money laundering and terrorism financing vulnerabilities, AUSTRAC will continue to focus our systems and intelligence capabilities as well as our specialist expertise on targeting these areas to contribute to broader portfolio, NIC and Government efforts.</li> </ul>



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OUR  
PARTNERSHIPS

# OUR PARTNERSHIPS

Collaboration is a hallmark of how AUSTRAC interacts with our partners across government and industry, as well as how we operate across our three Divisions internally.

## Government partners

### Attorney-General's Portfolio

We work with law enforcement and intelligence partners within our Portfolio to detect and disrupt serious crime, undertake reforms, and implement improvements to our legislative frameworks.

### National Intelligence Community

As Australia's FIU, AUSTRAC is a member of the National Intelligence Community (NIC), contributing our financial intelligence and expertise to the highest priority national security intelligence missions of the Australian Government.

### Commonwealth regulatory and revenue agencies

AUSTRAC works closely with a range of Commonwealth regulatory and revenue agencies to identify potential risks across the financial sector, ensuring a coordinated and consistent approach to managing industry risk and non-compliance, and thereby protecting the financial system from criminal abuse.

### State and Territory Governments

AUSTRAC maintains close working relationships with state and territory government entities, including law enforcement and relevant regulators, to drive compliance and disrupt crime.

## Partnering across industry

### Regulated Entities

As a financial regulator, AUSTRAC's relationship with the private sector is one of collaboration rather than purely supervision. This allows us to work with our more than 16,000 reporting entities on protecting the financial system from criminal exploitation.

### Fintel Alliance

AUSTRAC's public-private partnership, Fintel Alliance, enables its government and private sector members to collaboratively exchange and analyse financial intelligence to improve industry resilience and proactively support investigations into serious crimes and national security threats.

## International partners

### International forums and partnerships

AUSTRAC engages in international exchanges, partnerships and forums to collaboratively combat financial crime, supported by our network of outposted staff located overseas.

### Regional forums and partnerships

AUSTRAC plays a leading role in strengthening ties and building capability among regional partners through initiatives like the Financial Intelligence Consultative Group (FICG) and the Pacific Financial Intelligence Community (PFIC) as well as capability building programs across the Pacific and South East Asia.

### Foreign Financial Intelligence Units

AUSTRAC works collaboratively with our partners and counterparts in foreign jurisdictions to combat financial and other serious crime both in Australia and overseas.

## Engagement with other sectors

### RegTech/FinTech providers and AML/CTF advisors

AUSTRAC engages with firms who provide support to our reporting entities, thereby enabling industry compliance programs and technological solutions to meet AUSTRAC requirements.

### Academia

AUSTRAC maintains ties with various academics, specialist technology providers and research bodies to ensure our approach to technology, data and analytics is on the cutting edge of innovation and to leverage contemporary research expertise.

## Oversight

### Minister and Parliament

From 1 July 2022, AUSTRAC reports to the Attorney-General, the Hon Mark Dreyfus QC MP. As a statutory Australian Public Service agency, AUSTRAC is subject to parliamentary oversight, including through parliamentary committees.

### Independent oversight

AUSTRAC is also subject to external, independent oversight from various bodies, including the Australian National Audit Office and the Australian Commission for Law Enforcement Integrity.



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RISK  
MANAGEMENT

## Our risk management and governance

AUSTRAC's role is crucial to minimising harms caused to the Australian economy, society and national security as a result of money laundering, terrorism financing and other serious financial crime. As outlined elsewhere in this document, we operate in an inherently complex and evolving environment. Risk management includes identifying areas of strategic risk that, if realised, could affect AUSTRAC's ability to achieve its purpose and objectives.

AUSTRAC's approach to risk management is based on the International Standard for risk management ISO 31000:2018 Risk management – Guidelines, section 16 of the *Public Governance, Performance and Accountability Act 2013* and the Commonwealth Risk Management Policy. Our risk policy, risk framework, risk management strategy and simplified risk toolkit provide the foundation for AUSTRAC's consistent approach to identifying, assessing, monitoring and managing risks.

Embedding risk management principles and behaviours within our business processes and activities ensures that organisational performance and the quality of our decision-making continues to be enhanced at a systematic level. AUSTRAC's approach to embedding risk management within its business processes is focused on five key areas:

- **Alignment with the AUSTRAC Governance Framework** (risk oversight and reporting) – our risk management practices are reviewed and updated regularly in support of good governance. This alignment is reinforced by the regular monitoring of emerging risks by the agency's Governance Committee, maintaining and refining risk escalation and reporting arrangements for emerging and critical risks, and regular self-assessments of our risk maturity.
- **Corporate and Branch Planning** – environmental scanning and the consideration of risk enables AUSTRAC to identify challenges to the delivery of its strategic objectives and to anticipate future needs. Enterprise risks are drawn out of strategic planning discussions and feed into the corporate and branch planning process.

- **Change and Project Management**  
– appropriate consideration of risk is achieved by requiring early assessment of risk in the planning stages of projects, ensuring change and project management programs use consistent risk assessment criteria and tools, and tailored support for major projects and funding proposals.
- **Maintaining consistency across specialist risk functions** – noting we have a number of business line areas that engage specifically with managing risk, AUSTRAC will continue to seek alignment between these areas including through development of common terminology, co-design of risk management tools and registers, and the establishment of referral and information sharing processes between teams.
- **Staff training and development**  
– Online risk training and guidance materials – together with access to risk advice and support services – support staff understanding and managing risk in their work. Our risk management capability and the effectiveness of our risk management program is dependent on the ongoing capability of our workforce.

Risk management is embodied within AUSTRAC in terms of individual accountability, awareness and attitude, all of which influence how a staff member engages with risk in undertaking their work. At AUSTRAC, all staff are responsible for the identification, assessment and management of risk within their teams and their span of control.

As outlined in our Governance Framework, AUSTRAC relies on line management and a range of oversight committees to consider and review risks as part of broader agency governance and decision making channels.

## Our key risks and their respective controls

Regulation	
Risks	Risk controls
Failure to influence reporting entities' compliance with obligations under the AML/CTF Act.	<ul style="list-style-type: none"> <li>• Timely and effective engagement with reporting entities through education, communication, policy and regulatory capability project work</li> <li>• Reporting Entity onboarding processes</li> <li>• Annual Compliance Report processes</li> <li>• Ongoing monitoring of reporting entities including proactive detection of non-compliance</li> <li>• Targeted assessments and interventions</li> <li>• Undertaking data remediation activities</li> <li>• Utilise Regulatory insights function and data modelling capabilities to understand ML/TF risk exposure and prioritise compliance activity</li> <li>• Conduct appropriate enforcement actions in accordance with AUSTRAC's approach to regulation</li> </ul>
Failure to develop and maintain internal and external legal frameworks, guidance and reporting.	<ul style="list-style-type: none"> <li>• Support policy/legislative reforms to clarify and modernise the AML/CTF regime</li> <li>• Collaborate with reporting entities to develop regulatory relief through Rules, exemptions and modifications</li> <li>• Provide clarity and consistency in relation to AUSTRAC positions by providing internal legal advice and developing industry guidance</li> <li>• Implement, review and update memoranda of understanding (MOUs) to ensure alignment with AUSTRAC's security protocols and risk appetite</li> </ul>

## Intelligence

Risks	Risk controls
Failure to provide data and actionable intelligence which contributes to the delivery of outcomes for partners.	<ul style="list-style-type: none"> <li>• Harness and leverage Fintel Alliance, multilateral / international intelligence engagement and capabilities to:</li> <li>• provide insights and assessments on emerging domestic, regional and global threats, and</li> <li>• maximise domestic and international exchanges and collaboration</li> <li>• Data-matching activities</li> <li>• Acquisition of data sets and agency wide prioritisation for the collection and on-boarding of new data sets</li> <li>• Enhance AUSTRAC's intelligence product suite to meet partner agency requirements</li> <li>• Produce specialist financial analysis and intelligence products</li> </ul>
Inability to meet AUSTRAC international obligations and related delivery of international programs and operations.	<ul style="list-style-type: none"> <li>• Maturation of our international framework</li> <li>• International bilateral and multilateral operations</li> <li>• Delivery of capacity building programs and activities</li> <li>• International deployments and influence in regional collaboration forums</li> </ul>

Enabling Capabilities	
Risks	Risk controls
Failure to adapt AUSTRAC's operating model (including governance) to align with and support AUSTRAC's objectives, sound decision making, and external assurance requirements.	<ul style="list-style-type: none"> <li>• Delivery of program management capability and assurance functions</li> <li>• Ongoing alignment, integration, management and delivery of strategic planning, risk, audit, governance and financial management frameworks, strategies and plans</li> <li>• Ongoing enhancement of AUSTRAC's professional standards, governance and compliance arrangements</li> </ul>
Failure to have the appropriate workforce in relation to capability, size and location to deliver on business objectives and to inform strategic decision making.	<ul style="list-style-type: none"> <li>• Maintain, review and enhance AUSTRAC's hybrid operating model</li> <li>• Management of property and security environment</li> <li>• Ongoing workforce planning</li> <li>• Implementation of initiatives to address staff sentiment associated with the Australian Public Service Employee Census</li> <li>• Implementation of attraction and retention strategies</li> <li>• Effective management of agency pre-engagement suitability assessments, conflict of interest declarations and outside employment applications</li> <li>• Effective management of offshore deployments</li> <li>• Increased engagement in workforce data and reporting</li> <li>• Provision of relevant and required training</li> <li>• Effective business continuity management</li> </ul>

Risks	Risk controls
<p>Failure to effectively implement, use and protect AUSTRAC's technology systems and services, and to embed and manage appropriate cyber security arrangements.</p>	<ul style="list-style-type: none"> <li>• Develop and maintain external customer solutions that enable effective regulatory data collection</li> <li>• Develop and maintain scalable processing of new and existing data</li> <li>• Maintain and/or decommission legacy systems to ensure sustainment of operations</li> <li>• Enhance AUSTRAC's intelligence product suite to meet requirements</li> <li>• Revamp and introduce new collaboration, knowledge and information management tools</li> <li>• Perform ICT tasks to ensure capacity, stability and security of AUSTRAC data and systems</li> <li>• Operationalise and enhance value of CyberHub security services</li> </ul>
<p>Failure to manage, embed and enhance effective data holdings approaches including governance.</p>	<ul style="list-style-type: none"> <li>• Develop and maintain external customer solutions that enable effective regulatory data collection</li> <li>• Develop and maintain scalable processing of new and existing data</li> <li>• Implement secure sharing solutions to support collaboration</li> <li>• Revamp and introduce new collaboration, knowledge and information management tools</li> <li>• Support and optimise data sharing arrangements</li> <li>• Explore acquisition of data sets and contribute to agency wide prioritisation for the collection and on-boarding of new data sets</li> <li>• Ongoing enhancement of AUSTRAC's professional standards, data governance and compliance arrangements</li> <li>• Implement, review and update MOUs to ensure alignment with AUSTRAC's security protocols and risk appetite</li> </ul>

Risks	Risk controls
Failure to effectively manage AUSTRAC's reputation.	<ul style="list-style-type: none"> <li>• Ongoing stakeholder management and engagement</li> <li>• Promotion of joint-outcomes with task force, portfolio, law enforcement and national security partners to better inform of AUSTRAC's role in supporting national law enforcement and intelligence priorities</li> <li>• Represent AUSTRAC's interest in engagement on international AML/CTF policy</li> <li>• Timely and effective engagement with reporting entities through education, communication, policy and regulatory capability project work</li> </ul>
Failure to respond effectively to internal and external change.	<ul style="list-style-type: none"> <li>• Leverage domestic and international relationships and engagements to share experience and better understand emerging risks and threats</li> <li>• Conduct appropriate enforcement actions in accordance with AUSTRAC's approach to regulation</li> <li>• Support policy/legislative reforms to modernise the AML/CTF regime</li> <li>• Partner and collaborate internally and externally to ensure existing and future systems are fit for purpose</li> <li>• Delivery of program management capability and assurance functions</li> <li>• Ongoing alignment, integration, management and delivery of strategic planning, risk, audit, governance and financial management frameworks, strategies and plans</li> </ul>




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OUR  
CAPABILITY

AUSTRAC needs to continue to adapt to its changing environment in order to effectively protect the financial system and be a world leader in the fight against financial crime. In order to continue to successfully undertake our key activities to achieve our purpose, we have a diverse set of capability requirements for the coming four years. Our plans, strategies and projects to meet these requirements – and their planned stages of progression – are set out below, grouped under AUSTRAC’s three functional activities.

Plans, strategies and projects key:

Planning/ Discovery	Implementation/ Execution	Embedding/Continuous review and refinement
		





























## FUTURE PROOFING AUSTRALIA’S FINANCIAL INTELLIGENCE CAPABILITY

To be able to continue to respond to new and emerging technologies and detect and address emerging criminal threats, we must position AUSTRAC as a fit-for-purpose, future looking and scalable FIU that is able to harness its unique, specialist expertise, capabilities and technologies. We will achieve this by:

- future proofing our leading edge financial intelligence capabilities via expansion of specialist capabilities, enhancing our intelligence tradecraft through improved training and governance frameworks, and enhancing our multi-source financial intelligence capability, and,
- enhancing our collaborative efforts through private sector and international partnerships and forums, including working closely with partners to explore and harness opportunities for greater technology and data-led collaboration.

Our efforts to future proof Australia's financial intelligence capability will be guided by the following:

Plans, strategies and projects	What we will do / what we will achieve	2022 -23	2023 -24	2024 -25	2025 -26
<p><b>Intelligence Division Strategy 2021-26</b> and its associated Continuous Improvement Plan to build a 'FIU of the future' focused on the following core capability areas:</p> <p><b>Leveraging data.</b> Leveraging data more effectively and broadening the range of data sources to support multi-source analysis.</p> <p><b>Our analysts.</b> Developing world class analysts for tactical, operational and strategic financial intelligence.</p> <p><b>Analyst toolkit and systems.</b> Enhancing methods beyond entity analysis, integrating data analytics into tradecraft, and exploring new tools to enhance visualisation, reduce manual processes for analysts and support cutting edge analysis.</p>	A <b>discovery function</b> for tactical to strategic analysis				
	An integrated data science approach to <b>risk and strategic functions</b>				
	Enhanced <b>access to law enforcement and open source data</b>				
	Evolve <b>intelligence data quality controls and governance</b>				
	Data-skills-based <b>recruitment and on-boarding</b>				
	Data-centric <b>multi-disciplinary teams</b>				
	Revised data-centric <b>competency framework, training continuum and development pathway</b>				
	Data-centric <b>tradecraft enhancements</b> for tactical to strategic outputs				
	<b>Virtual domain and digital value transfer expertise</b> across all teams				
	Enhanced <b>tools for discovery and data analysis</b>				








Plans, strategies and projects	What we will do / what we will achieve	2022 -23	2023 -24	2024 -25	2025 -26
<b>FIU relationships.</b> Enabling the fight against financial crime through enhanced National Intelligence Community, partner agency, industry and FIU collaboration and support.	Strengthen and grow the <b>Fintel Alliance</b> for strategic and operational outcomes				
	Intelligence <b>training support for a broader set of partners</b>				
	Enhanced <b>classified capability</b> for better support to the NIC				
	Improved <b>secure collaboration</b> among international and private sector partners.				
<b>Exploring alerting technologies</b>	Test prototype, privacy preserving, technology to trace suspicious funds moving through the financial system.				
<b>Improving secure sharing platforms</b>	Improving secure collaboration among international and private sector partners including for the Fintel Alliance and AUSTRAC's international engagement and development programs.				
<b>Analytical Platform</b>	Enable ongoing partner agency access to relevant data whilst enhancing AUSTRAC's sophisticated analytical capabilities.				

# REGULATORY ENHANCEMENT

To continue to build industry resilience to risks in an ever-changing financial system, AUSTRAC will seek to enhance its regulatory capabilities for more effective education, compliance and enforcement outcomes . In particular, we will focus on:

- embedding our increased regulatory resources, including attracting, training and retaining staff
- supporting changes to the legislative framework to improve regulatory outcomes, deregulation and resilience to change, and
- delivering a new industry-facing reporting and engagement system for AUSTRAC to collect the growing volumes of information reported under the AML/CTF regime, and make it quicker and easier for reporting entities to meet their reporting obligations.

Plans, strategies and projects	What we will do / what we will achieve	2022-23	2023-24	2024-25	2025-26
Regulatory capability uplift	Regulatory capability uplift and the training of staff hired to support the compliance and enforcement outcomes of funding received in 2020-21 for Capability Uplift funding.	<div><div></div></div>	<div><div></div></div>	<div><div></div></div>	<div><div></div></div>
CASE Management	Delivery of an enterprise-wide case management and customer relationship management system to standardise processes and facilitate a single-view of information across AUSTRAC.	<div><div></div></div>	<div><div></div></div>	Completed	


















Plans, strategies and projects	What we will do / what we will achieve	2022 -23	2023 -24	2024 -25	2025 -26
<b>Ongoing regulatory reform</b>	Work on regulatory reform with the Attorney-General's Department to streamline and modernise the AML/CTF legal framework to clarify and strengthen compliance.				
<b>Reporting Entity System Transformation (REST) Program Capability and System Foundation</b> – to deliver the foundational technology components required for REST.	Progressive delivery of modernised online portal for improved reporting entity engagement and transaction reporting mechanisms. Consider ways to better manage ongoing capacity planning for AUSTRAC systems and reduce running costs.				

# CORPORATE OPTIMISATION

The expertise and capability of our people is key to AUSTRAC delivering its outcomes. The challenge for our people is being able to keep pace with the rapid advancements of financial sector technologies and the increasingly digital nature of the global financial ecosystem. Our corporate-focused capabilities – be they technology, workforce, infrastructure or data analytics - must constantly evolve to ensure we can deliver what is needed in a timely and sustainable manner. To effect this during the period covered by this Plan, AUSTRAC will:

- introduce and implement strategies and projects that will help us meet technology and data challenges in an evolving data-rich digital age
- uplift people and tradecraft capability, focussing on workforce reshaping, data literacy and specialist training for partners, and
- enhance AUSTRAC’s ability to engage with, manage and support staff and stakeholders through change.

Plans, strategies and projects	What we will do / what we will achieve	2022-23	2023-24	2024-25	2025-26
Workforce plans and strategies					
AUSTRAC People Strategy 2022-26	The People Strategy articulates goals and aspirations into future workforce requirements based on organisational direction.				
AUSTRAC Strategic Workforce Plan (SWFP) 2022-26	Informed by five key activities, the SWFP identifies initiatives across eight people strategy areas to ‘futureproof’ AUSTRAC’s workforce for the future.				

Plans, strategies and projects	What we will do / what we will achieve	2022 -23	2023 -24	2024 -25	2025 -26
<b>ONE AUSTRAC Leadership Strategy 2022-25</b>	This strategy identifies five key leadership qualities to uplift leadership and management capability within AUSTRAC. It will empower all AUSTRAC employees to see themselves as leaders, regardless of their nominal classification.				
<b>Technology and data plans, strategies and projects</b>					
<b>AUSTRAC data maturity and governance uplift</b>	Recognising that data is a key asset, we are strengthening our data governance. This includes improved management of our data, strong governance over access to it, and clear accountabilities within AUSTRAC.				
<b>Operating System replacement</b>	To transition AUSTRAC's applications that rely on the current operating system to a new operating system.				
<b>Migration to GovERP System</b>	Participate in the whole of GovERP program of work.				
<b>TES Decommission</b>	With AUSTRAC's data analytics tools, known as the Analyst Work Bench, rolled out to our partner agencies, its predecessor the 25-year-old Traq Enquiry System (TES) will be decommissioned.		Completed		








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PEOPLE AND  
CULTURE

## OUR PEOPLE AND CULTURE

Our **One AUSTRAC** philosophy – created by our employees – recognises that our employees are stronger together than as individuals. Adopting, believing in and supporting this philosophy is especially important for AUSTRAC as both Australia's AML/CTF regulator and FIU. It is only by working as one team, learning from each other's insights and expanding on those to meet our specific functional needs that as a whole we can support the disruption of serious crime and build resilience in our financial system.

United	Accountable	Empowered	Courageous	Inclusive
				



### 2022 AFR BOSS BEST PLACES TO WORK AWARD

In April 2022, AUSTRAC was recognised as one of the 'Best Places to Work' by the Australian Financial Review's BOSS magazine. More than 750 organisations in Australia and New Zealand were competing in the awards this year. AUSTRAC placed 7th in our category and was the only Federal Government Agency to make this list.

These awards recognise successful organisations that foster productive, creative, and focused staff in the face of endless digital distractions, and those who are pioneering best-practices in areas such as flexibility. This is a clear acknowledgment of our strong culture, future-focused workforce practices and our hybrid working model.

## FLEXIBLE HYBRID WORKING MODEL

Over the period of this plan we will continue to offer a forward-leaning hybrid work model, with staff provided the opportunity to balance the innovation and collaboration opportunities that come from engaging with colleagues in the office with the wellbeing and productivity benefits of working from home.

As a result of learnings over the pandemic, AUSTRAC identified opportunities to more effectively utilise our resources and better meet our obligations to the Australian Government and community. We understood the expectations of staff had changed dramatically and the labour market in which AUSTRAC competes expected more creativity in work approaches. Building on the agency's long history of flexibility, AUSTRAC redefined our operating model as a hybrid arrangement, and ensured this was embraced by employees, was sustainable for managers and supported optimal business outcomes.

An evaluation of the pilot showed that 83% of staff were very/somewhat positive about the initiative and the Net Promoter Score© increased from 4 to 40 after implementation.

## INCLUSIVE AND DIVERSE WORKPLACE

We remain committed to creating and maintaining an inclusive and diverse workplace. We take pride in advocating for our employees with diverse backgrounds, as well as offering opportunities for their voices to be represented in various forums, such as our Diversity and Inclusion Working Group. Through these forums, AUSTRAC staff progress initiatives of the AUSTRAC Diversity and Inclusion Program, such as formally recognising days of significance of the LGBTIQA+ and disability communities, establishing an AUSTRAC alumni network and broadening recruitment pathways to increase representation of diverse communities within our workforce

In recognition of the diversity of modern families and to enable both parents to more equally take on caring responsibilities, AUSTRAC recently extended parental leave entitlements outlined within the *Maternity Leave (Commonwealth Employees) Act 1973* to staff who are parents and assume a primary caring role, regardless of whether they are the birth parent.



## STEPPING INTO INTERNSHIP PROGRAM

In 2022, we participated in the Australian Network on Disability's *Stepping Into* Internship Program for the first time. Our continued participation in this program will enable us to provide internship opportunities – 'real world' work experience – for students with a disability. These opportunities raise awareness of the skills and talents of people with disability within AUSTRAC and among our employees.

"As an AUSTRAC manager, being involved with the Stepping Into Program has been hugely rewarding and eye-opening. I have been impressed with the maturity and professionalism of our intern and the valuable contribution she has been able to make. Through the program, I have also received useful training on how to support people with a disability in the workplace ensuring staff can feel confident in an inclusive work environment."

## PROVIDING DEVELOPMENT OPPORTUNITIES

AUSTRAC will continue to focus on developing future leaders, creating growth opportunities and providing staff with access to professional development programs. We remain committed to the development of our employees, and will continue to offer programs and initiatives that support this.

AUSTRAC will continue its annual Mentor program, providing an excellent opportunity for both mentors and mentees to develop professional capabilities, engage with colleagues and gain insight into other business areas. All staff are encouraged to apply and participate in the mentor program, as both mentors and mentees, regardless of age or what stage they might be in their career.

“I applied to be a mentor to meet colleagues within AUSTRAC who I wouldn’t normally interact with, to offer assistance and advice to other AUSTRAC staff and also as a development opportunity for myself. It was a gratifying experience to be able to assist a colleague who had recently been promoted to grow into their new role. I gained a deeper appreciation for their work area, learned about their functions and how much work goes into different aspects of their division’s core business. I would strongly recommend the program to anyone seeking to broaden their understanding of AUSTRAC and further develop inter-agency connections.”

“I have gained a great deal of information and inspiration from the Mentor Program. I have obtained a broader knowledge and appreciation of my existing skills and how to use these skills to progress my career goals. I have also been provided with relevant advice which has provided further inspiration to continue my career path.”

## WOMEN IN LAW ENFORCEMENT STRATEGY

Our involvement with the WILES (Women in Law Enforcement Strategy) program will enable us to provide two mentees and two mentors each year with the opportunity to participate in a program that helps high performing female Executive Level staff reach their career potential.

“Personally I get a huge amount out of being a mentor – learning about the other agencies in law enforcement and getting to know other people, working through issues together and helping to provide useful input to the careers of others whilst giving me pause to reflect on my own.”

“The WILES program has helped to build both my confidence and competence in tackling the biggest challenges I am facing in my role. Having a diverse and experienced network of participants to tap into has also assisted with my career planning, and understanding of the broader public service community.”

## FOCUS ON THE SAFETY AND WELLBEING OF OUR STAFF

The safety and wellbeing of our staff is, and will continue to be, a cornerstone of our workplace activities. On an annual basis AUSTRAC commits to providing staff with influenza vaccinations, skin or health checks and physical and mental health awareness activities. In 2021 AUSTRAC added a financial wellbeing pillar to our existing wellbeing program and we will continue to promote the importance of this.

Outside of the wellbeing program, the AUSTRAC Safety and Wellbeing team provides customised support to business areas. It is anticipated this support will focus on issues such as potential exposure to child exploitation material, regulated entity visits and international travel and deployments. Providing managers with support in the case management of sensitive and complex staffing matters will remain a key focus now and into the future.

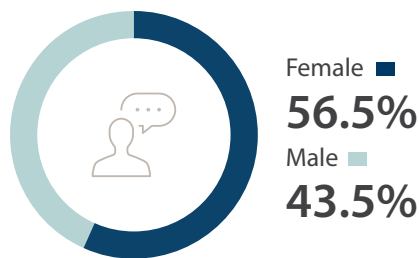
AUSTRAC has developed risk assessments to ensure the safety and wellbeing of our staff in response to COVID-19 and our adoption of a hybrid work model. These new considerations will be at the core of how we manage our workforce and uphold our WHS responsibilities into the future.

# AUSTRAC'S PEOPLE AND WHAT THEY THINK ABOUT WORKING IN AUSTRAC

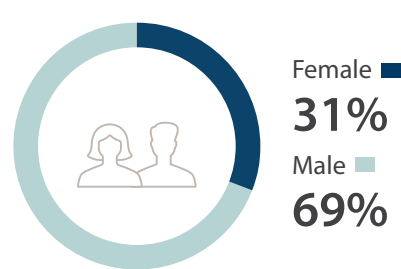
AUSTRAC aspires to be a diverse, inclusive workplace representative of the Australian population. Statistics below are drawn from the Australian Bureau of Statistics 2021 Census, the Australian Public Service Employee Census 2021 and internal records.

Total number of staff **465**

## How do you describe your gender?



## SES gender breakdown



**LGBTIQ+**  
**7.7%** of AUSTRAC identifying as LGBTIQ+\*

\*Self Reported in 2021 APS Employee Census

## Classification levels

APS 3-4: 5.7%	EL1: 23.9%
APS 5-6: 58%	EL2: 9.6%

## Divisional breakdown

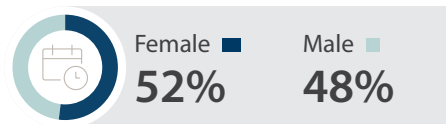
32.7%	Intelligence
40.5%	Regulation, Education and Policy
26.2%	Capability and Strategy

## Tenure at AUSTRAC

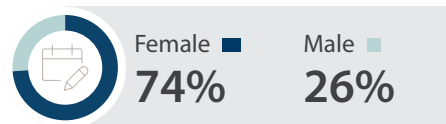
< 1 year: 26%	11-15 years: 10%
1-5 years: 40%	16-20 years: 8%
6-10 years: 14%	21-25 years: 2%

## Employment Type

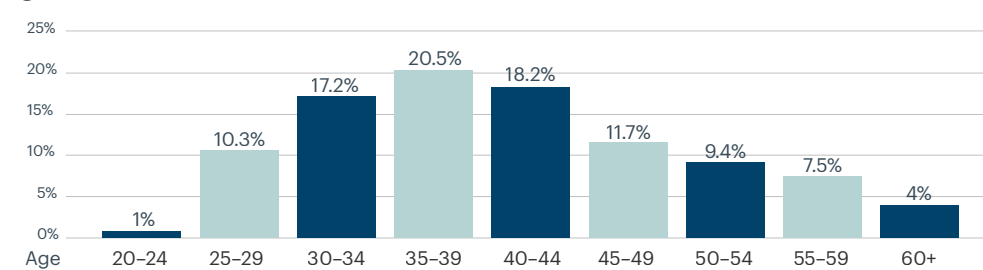
### Full-time



### Part-time



## Age breakdown



## Aboriginal or Torres Strait Islander

### 2% of AUSTRAC staff identify as an Aboriginal and/or Torres Strait Islander person\*

AUSTRAC aspires to achieve the whole-of-government Commonwealth Aboriginal and Torres Strait Islander Workforce Strategy 2020-24 targets for Aboriginal and Torres Strait Islander employee representation.

**5%** at the APS 4 – APS 6 levels by the end of **2022**

**5%** at the EL 1 to EL 2 levels by the end of **2024**

**3%** for the Senior Executive Service by **2024**

\*Self Reported in 2021 APS Employee Census



### Top 5 countries of birth

AUSTRAC		Australia	
<b>Australia:</b>	74.6%	<b>Australia:</b>	70.9%
<b>India:</b>	2.4%	<b>England:</b>	3.8%
<b>China:*</b>	2%	<b>India:</b>	2.8%
<b>Sri Lanka:</b>	2%	<b>China:*</b>	2.3%
<b>England:</b>	1.8%	<b>New Zealand:</b>	2.2%

\*excluding SARs and Taiwan

### Top 5 languages used at home

AUSTRAC		Australia	
<b>English:</b>	70.9%	<b>English:</b>	72.0%
<b>Cantonese:</b>	3.5%	<b>Mandarin:</b>	2.7%
<b>Vietnamese:</b>	2.2%	<b>Arabic:</b>	1.4%
<b>Chinese:</b>	2%	<b>Vietnamese:</b>	1.3%
<b>Arabic:</b>	1.6%	<b>Cantonese:</b>	1.2%

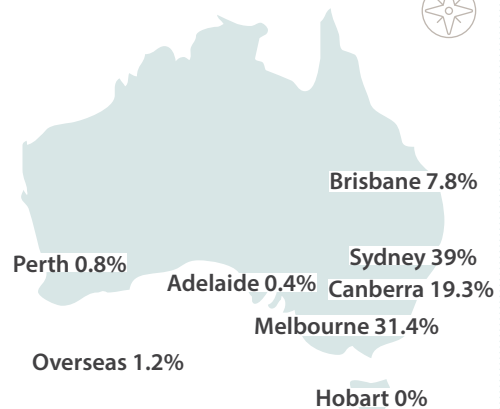
### Ongoing disability

**4.6%** of AUSTRAC with an ongoing disability \*

AUSTRAC supports the whole-of-government Australian Public Service Disability and Employment Strategy 2020-25 aim of increasing the employment of people with a disability across the APS to **7%** by **2025**.

\*Self Reported in 2021 APS Employee Census

### AUSTRAC locations



### Working at AUSTRAC

- 97%** of staff were happy to go the 'extra mile' at work when required
- 95%** of staff believed strongly in AUSTRAC's purpose and objectives
- 91%** of staff were proud to work for AUSTRAC
- 91%** of staff would recommend AUSTRAC as a good place to work
- 91%** of staff believed AUSTRAC supported and actively promoted an inclusive workplace culture
- 85%** of staff satisfied with their job



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APPENDICES



## Appendix A – AUSTRAC performance measures

Our progress against our performance measures – be it towards a target where one has been determined or where it is not practicable to set a target, performance that sufficiently supports achievement of the relevant key activity – is monitored via a regular reporting process. Three times a year branches report on their performance against their specific measures, advising if they are “on track”, “at risk” or “significantly behind”,<sup>8</sup> providing relevant statistics, evidence of what has been done to achieve the target and/or strategic objective, and the relevant data source/s for the results. The reports are cleared by the respective National Managers and Deputy CEOs. These results are then reviewed by both our Governance Committee and Audit and Risk Committee. Such reviews are supported by the provision of dashboards setting out progress across the reporting year as well as our performance team providing an independent assessment of branch performance based on the information made available.

We have deliberately adopted a performance measurement methodology that requires all of our measures to be based on a statistic – a “quantitative” measure. Being a quantification ensures we are able to rely on it to make data-driven decisions, and not decisions based on opinions or the squeakiest wheel. This has not, however, impacted our ability to obtain “qualitative” data; for example, we have quantitative measures specifically capturing stakeholder opinions. And in both our regular reporting process and annual performance statements we seek evidence of what has been done, why it has been done and what outcome has been achieved, using case studies where appropriate, for all our performance measures.

Measuring the disruption of crime – particularly crime that is part of the black economy – and the building of resilience to said crime across a system that comprises some 16 000 entities (at present) is a challenge. As such, we have used performance measures that capture the breadth - and impact - of the work that goes into building resilience in the financial system and disrupting crime through financial intelligence and regulation. Our performance measures are reviewed every year for continued relevance and use – both for decision-making and demonstrating our performance. Through this review process we will continue to seek the most appropriate measures, be they outputs, efficiency or effectiveness-focused.

<sup>8</sup> If a measure is not “on track” measure owners are required to identify the cause for this performance gap as well as the proposed actions to close said gap.



## DISCOVER - AUSTRAC identifies criminal risks to Australia's financial system.

Measure	1.1. Percentage of referrals to selected taskforces that generated an outcome, annually.			
Targets	2022-23 60-70%	2023-24 60-70%	2024-25 60-70%	2025-26 60-70%
Rationale	To demonstrate that AUSTRAC's financial intelligence reporting (in this instance referrals) provides value to selected taskforces (all of which we are a member) by enabling those taskforces to undertake actions towards the disruption of crime and/or the protection of Australia. An outcome is defined as a positive action taken by the taskforce to progress their matter/purpose and may include but is not limited to pursuing an operational outcome, opening a new line of investigative inquiry, enabling a disruption option, and leading to an operational decision being made. Our targets have been selected based on this being the first time we have used this measure and we are working within the reality of not all of our partners being able or willing to capture or provide this outcome-related information to us.			
Method	Number of instances when a referral generated an outcome divided by total number of referrals.  The selected taskforces are the following: Money laundering taskforce, Serious financial crime taskforce, Countering foreign interference taskforce and Joint threat finance taskforce.			
Data source/s	AUSTRAC JIRA. <sup>9</sup>			

<sup>9</sup> AUSTRAC uses JIRA as a task management tool for operational teams and IT projects. It helps teams plan, assign, track and report on progress of tasks and activities

Measure	1.2. Percentage of intelligence products that identify a new theme, threat or insight where one or more partner agencies has confirmed the product has generated an outcome, which may include new understanding, for that partner, annually.			
Targets	2022-23 40% or greater	2023-24 45% or greater	2024-25 50% or greater	2025-26 55% or greater
Rationale	Monitor the rate at which new intelligence (as identified by AUSTRAC) enables partner agencies to undertake actions towards the disruption of crime and/or the protection of Australia, helping to demonstrate the impact (and thus the value-add) of AUSTRAC's strategic financial analysis capabilities. For the purposes of this measure outcome is defined as including but not limited to new understanding, pursuing an operational outcome, opening a new line of investigative inquiry, enabling a disruption option, and leading to an operational decision being made. Our targets have been selected based on this being the first time we have used this measure and that we will be reliant on partners providing feedback.			
Method	Number of instances when a product identifying a new theme, threat or insight generated an outcome for one or more partner agencies divided by total number of products identifying a new theme, threat or insight.			
Data source/s	AUSTRAC JIRA for identification of instances. Partner agency feedback - gathered via survey - recorded in internal tracking spreadsheet stored in SAFE. <sup>10</sup>			

<sup>10</sup> SAFE (Save, Share, and Find Easily) is AUSTRAC's core enterprise content and records management solution. SAFE allows AUSTRAC to centrally store, share and manage content.

Measure	1.3. Percentage of financial intelligence exchanges that are with prioritised foreign Financial intelligence Units (FIUs), annually.			
Targets	2022-23 60-70%	2023-24 60-70%	2024-25 60-70%	2025-26 60-70%
Rationale	Sharing of information and intelligence between foreign FIUs is an important means of discovery as no one agency or country has access to all relevant data. AUSTRAC's Intelligence Strategy embraces enhanced intelligence collaboration with prioritised foreign FIUs – this collaboration includes financial intelligence exchanges with said prioritised partners. This measure provides us with initial insights into our relationships with prioritised international partners, what intelligence and information is available on topics of interest to AUSTRAC, and whether specific engagement activities with specific partners are having the desired effect. While we acknowledge enhanced activity does not necessarily lead to greater and/or more useful discovery, it does provide an opportunity for discovery.			
Method	Number of financial intelligence exchanges with prioritised foreign FIUs divided by total number of financial intelligence exchanges with foreign FIUs.			
Data source/s	AUSTRAC JIRA.			



**UNDERSTAND** - AUSTRAC develops and shares a comprehensive understanding of vulnerabilities to criminal exploitation within Australia's financial system.

Measure	2.1. Number of instances published guidance products were accessed and downloaded from our website by individual external audience members and direct email recipients, within three months of publication, annually.			
Targets	2022-23	2023-24	2024-25	2025-26
	Avg 969 downloads across all products published in the period	Avg 988 downloads across all products published in the period	Avg 1007 downloads across all products published in the period	Avg 1,027 downloads across all products published in the period
		2% increase on prior year target		
Rationale	To understand access across our AML/CTF guidance products on our website, and which audience segments are accessing guidance documents in response to a call to action in a direct email campaign, to gain insight into audience behaviour to improve future guidance product development and distribution.			
Method	Google Analytics will provide the number of external individual users who accessed and downloaded a guidance product from our website in the three month period after recent publication, promotion, event or media coverage. Link tracking will provide the number of external individual users within an audience segment (for example, a reporting entity or industry association) who accessed and downloaded a guidance product in response to a call to action in a direct email campaign or publication of a media release in the three month period after publication. The average number of downloads will be taken across all guidance products published in the period.			
Data source/s	Google Analytics <sup>11</sup> – relevant data recorded in monthly branch reports stored in SAFE.			

<sup>11</sup> Web analytics services offered by Google that tracks and reports website traffic.

Measure	2.2. Percentage of event/workshop attendees/e-learning participants who report a MODERATE (or higher) improvement in their understanding of the AML/CTF obligations as a result of their attendance/completion, annually.			
Targets	2022-23 72% or greater	2023-24 74% or greater	2024-25 76% or greater	2025-26 78% or greater
	2% increase on prior year target			
Rationale	Monitoring whether workshop attendees perceive their understanding has improved following a workshop that is designed to do so, is an important indicator as to the attendee perceived value gained from the workshop (and whether any changes may need to be made to meet customer needs).			
Method	Number of attendee/participant respondents who rate MODERATE (or higher) divided by total number of respondents. Ratings of MODERATE (or higher) represent the positive responses on a six-point survey scale.			
Data source/s	Recorded in monthly branch reports stored in SAFE.			

Measure	2.3. Percentage of industry associations representing AUSTRAC's reporting entities who report a MODERATELY (or higher) rating on the usefulness of AUSTRAC's guidance materials, annually.			
Targets	2022-23 72% or greater	2023-24 74% or greater	2024-25 76% or greater	2025-26 78% or greater
	2% increase on prior year target			
Rationale	Measuring how useful our guidance materials are perceived to be will provide us with a useful insight into the value of our products to our reporting entities (noting we are not asking REs directly). It may also be useful for informing future decision-making in terms of any adjustments required to our materials.			
Method	Number of survey respondents who report MODERATELY (or higher) divided by total number of survey respondents. Ratings of MODERATE (or higher) represent the positive responses on a seven-point survey scale.			
Data source/s	Annual stakeholder survey conducted by external provider. Responses are stored by the external provider in their Australian data centres, with AUSTRAC provided with a report as well as de-identified, unit record quantitative datasets. The datasets, report and associated documentation are stored in SAFE.			

Measure	2.4. Percentage of sampled intelligence products that meet AUSTRAC's intelligence writing standards, annually.			
Targets	2022-23 80% or greater	2023-24 90% or greater	2024-25 95% or greater	2025-26 95% or greater
Rationale	<p><i>The Intelligence Production Instructions – Writing and Analytic Standards</i> define eight standards that AUSTRAC products must meet, covering analysis, readability and timeliness. Measuring the rate at which products meet these standards will provide a quantitative understanding of the quality of AUSTRAC's intelligence writing and can inform where additional training and guidance are necessary. Measuring the quality of our product helps AUSTRAC to demonstrate the reliability and integrity of our advice. This is critical if we want to maintain our stakeholders' confidence in our capabilities.</p>			
Method	Number of sampled products that meet standards divided by sample size.			
Data source/s	AUSTRAC JIRA and SAFE.			

Measure	2.5. Percentage of stakeholders who report AUSTRAC's intelligence products had a MODERATE (or higher) level impact on their understanding of vulnerabilities in the financial system, annually.			
Targets	2022-23 70-85%	2023-24 70-85%	2024-25 70-85%	2025-26 70-85%
Rationale	<p>Sharing our knowledge in a way that is of use to stakeholders and partners is integral to our function. Knowing what impact our shared understanding is having on stakeholders will help us to continue to provide relevant, useful product.</p>			
Method	Number of survey respondents who report MODERATE (or higher) divided by total number of survey respondents. Ratings of MODERATE (or higher) represent the positive responses on a seven-point survey scale			
Data source/s	As per measure 2.3.			



**STRENGTHEN** - AUSTRAC ensures criminal risks within Australian's financial system are identified, mitigated and managed effectively.

Measure	3.1. Percentage of reporting entities who strengthened their AML/CTF controls after AUSTRAC engagement, annually.			
Targets	2022-23 67% or greater	2023-24 69% or greater	2024-25 71% or greater	2025-26 73% or greater
	2% increase on prior year target			
Rationale	One of AUSTRAC's goals is to make sure regulated businesses comply with their obligations to have systems and controls in place to manage ML/TF risks. We do this through a range of compliance, enforcement and education activities. Measuring the percentage of reporting entities who have strengthened their AML/CTF controls after engaging with AUSTRAC is an important indicator of whether our activities are achieving this objective.			
Method	Of the reporting entities, who submit a compliance report, that answer YES as to whether they had AUSTRAC engagement through the relevant reporting period, the percentage of those same entities who reported responding to that engagement by strengthening their controls.			
Data source/s	Analyst WorkBench (AWB). <sup>12</sup>			

<sup>12</sup> All transaction reporting received by AUSTRAC from reporting entities is uploaded to Analyst WorkBench (AWB) where it is used by AUSTRAC and partner agencies for financial intelligence searches and undertaking complex data analysis, including transactional and network linkages.

Measure	3.2. Percentage of reporting entities who submit their compliance reports on time, annually.			
Targets	2022-23 77% or greater	2023-24 79% or greater	2024-25 81% or greater	2025-26 83% or greater
	2% increase on prior year target			
Rationale	REs are obliged to submit a report each year on their compliance with the AML/CTF Act and Rules. Submitting this report on time demonstrates both an awareness in REs of their obligations as well as some level of agreement to follow those obligations (noting submitting the report does not mean they've met all other AML/CTF obligations). Monitoring this figure overtime may inform where further education in this space is required.			
Method	Number of reporting entities who submit their compliance report before the due date divided by the total number of reporting entities who complete the compliance report.			
Data source/s	AWB.			

Measure	3.3. Percentage of regulatory work proactively identified by AUSTRAC, annually.			
Targets	2022-23 50% or greater	2023-24 50% or greater	2024-25 50% or greater	2025-26 50% or greater
Rationale	AUSTRAC is seeking to increase its proactively identified work - that is, breaches not voluntarily disclosed to AUSTRAC by an RE - across the regulation and enforcement functions. This measure, monitored over time, will inform us of whether this is occurring.			
Method	Number of regulatory matters resulting from proactively identified work divided by all regulatory matters.			
Data source/s	SAFE.			

Measure	3.4. Percentage of industry associations representing AUSTRAC's reporting entities who assess AUSTRAC's level of collaboration in the development of AML/CTF Rules and policy settings to be USUALLY collaborative (or higher), annually.			
	2022-23 72% or greater	2023-24 74% or greater	2024-25 76% or greater	2025-26 78% or greater
Targets	2% increase on prior year target.			
Rationale	This measure will help us report our progress towards the Regulator Performance principle 3 (collaboration and engagement). It may also provide some insights into the view held by REs of AUSTRAC as a regulator.			
Method	Number of survey respondents who report USUALLY collaborative (or higher) divided by total number of survey respondents.			
Data source/s	As per measure 2.3.			

Measure	3.5. Percentage of industry associations representing AUSTRAC's reporting entities who believe reporting entities have a MODERATE (or higher) level of trust in AUSTRAC as a result of AUSTRAC's efforts to harden the industry against ML/TF and other crime risks, annually.			
Targets	2022-23 72% or greater	2023-24 74% or greater	2024-25 76% or greater	2025-26 78% or greater
	2% increase on prior year target.			
Rationale	Trust is an important component of our job – it helps with engagement, support and buy-in. Monitoring this on a regular basis may provide us with the opportunity to identify and address issues before they become significant.			
Method	Number of survey respondents who report MODERATE (or higher) divided by total number of survey respondents. Ratings of MODERATE (or higher) represent the positive responses on a seven-point survey scale.			
Data source/s	As per measure 2.3.			

Measure	3.6. Percentage of exemptions and modifications granted, annually.			
Targets	2022-23 75% or greater	2023-24 75% or greater	2024-25 75% or greater	2025-26 75% or greater
Rationale	Measured overtime this should help us demonstrate both whether the scheme is proportionate (i.e. are we having to provide too much relief in a cumbersome system?) and whether we are making the scheme proportionate where possible (i.e. we exercise our powers to provide relief). The targets have been developed taking into consideration the breadth and variation in the exemptions and modifications sought, and the cohort seeking these.			
Method	Number of exemptions and modifications granted divided by total number of exemptions and modifications sought.			
Data source/s	Recorded in a spreadsheet stored in SAFE.			

Measure	3.7. Percentage of externally funded international capability development programs, completed during the current financial year, where the funder has confirmed the program served their purposes, annually.			
Targets	2022-23 100%	2023-24 100%	2024-25 100%	2025-26 100%
Rationale	Knowing whether the program served the funder's purposes will enable us to (i) pivot if there are issues, (ii) know those parts of what we do that are valued, and (iii) report on this in an objective manner.			
Method	<p>Number of instances a funder confirmed a completed program served their purposes divided by the total number of completed AUSTRAC delivered externally funded programs during the reporting period.</p> <p>This measure is limited to those externally funded international capability development programs completed during the relevant financial year.</p>			
Data source/s	Stakeholder feedback - gathered via survey - recorded in internal tracking spreadsheet, stored in SAFE.			

Measure	<b>3.8. Percentage of externally funded international capability development program activities, completed during the current financial year, which realised a capability uplift, annually.</b>			
Targets	<b>2022-23</b> <b>100%</b>	<b>2023-24</b> <b>100%</b>	<b>2024-25</b> <b>100%</b>	<b>2025-26</b> <b>100%</b>
Rationale	We run these program activities to improve capability in foreign Financial Intelligence Units (FIUs). Monitoring across the board whether our program activities are doing so is an important means of (a) knowing whether each program meets its desired outcomes and (b) knowing the capability of our partners to identify, mitigate and manage risks.			
Method	<p>Number of completed program activities that realised a capability uplift divided by the number of completed program activities delivered.</p> <p>This measure is limited to those externally funded international capability development program activities completed during the relevant financial year.</p>			
Data source/s	Data recorded in internal tracking spreadsheet, stored in SAFE.			

Measure	<b>3.9. Percentage of reporting entities who advise our sector-based Risk Assessment product had a MODERATE (or higher) influence on their risk mitigation attitudes or behaviours, per product.</b>			
Targets	<b>2022-23</b> <b>50% or greater</b>	<b>2023-24</b> <b>50% or greater</b>	<b>2024-25</b> <b>50% or greater</b>	<b>2025-26</b> <b>50% or greater</b>
Rationale	We want to know if our advice is informing reporting entity behaviour, and by extension, hopefully strengthening the financial system. We are using a percentage range for our target noting this measure is capturing the value per product of numerous products during a reporting period.			
Method	Number of respondents who advise MODERATE or higher influence divided by the total number of respondents. Ratings of MODERATE (or higher) represent the positive responses on a seven-point survey scale. For each product, respondents will be those reporting entities who we engaged with/sought feedback from as we developed the product. Noting that some industry sectors have thousands of entities, and we do not engage with any significant portion of these due to both timeliness and expense reasons, we acknowledge the limitations of this being truly representative of the relevant population.			
Data source/s	Feedback recorded in internal tracking spreadsheet, stored in SAFE.			

Measure	3.10. Number of Fintel Alliance-coded suspicious matter reports (SMRs) received, annually.			
Targets	2022-23 5,455 or greater	2023-24 2% increase on prior year result	2024-25 2% increase on prior year result	2025-26 2% increase on prior year result
Rationale	The Fintel Alliance shares knowledge discovered via its projects with reporting entities (REs) to inform their identification of risks in the financial system. One outcome of RE enhanced knowledge is improved reporting behaviour, demonstrated through an increase in the number of relevant Suspicious Matter Reports (SMRs) – that is, reports informing AUSTRAC when activity may be related to a crime. Monitoring reporting volume of Fintel Alliance-coded SMRs provides us with insight into identified and emerging financial crime trends.			
Method	Counting of relevant SMRs.			
Data source/s	AWB.			

Measure	3.11. Percentage of strategic analysis reports sanitised and repurposed for selective distribution to specific Reporting Entities, annually.			
Targets	2022-23 40-60%	2023-24 40-60%	2024-25 40-60%	2025-26 40-60%
Rationale	AUSTRAC is committed to obtaining the most benefit from available resources, in this instance minimising the inputs used to share intelligence insights with multiple audiences for intelligence and industry education purposes, minimising duplication of agency effort. This measure will also enable us to demonstrate the advantage of AUSTRAC being a joint FIU-Regulator where intelligence developed within and by the FIU for Government and intelligence partners is used to directly inform AML/CTF risk mitigation by entities regulated by AUSTRAC. We note that not all our reports will be distributable to audiences beyond that originally intended because of the sensitive nature of the information it contains. Hence we will never repurpose 100% of our reports. However, we do want to repurpose a significant portion as it is an efficient means of sharing our knowledge with multiple, varied audiences.			

<b>Measure</b>	<b>3.11. Percentage of strategic analysis reports sanitised and repurposed for selective distribution to specific Reporting Entities, annually cont.</b>
<b>Method</b>	The number of reports repurposed for selective distribution divided by the total number of strategic analysis reports.
<b>Data source/s</b>	AUSTRAC JIRA.

<b>Measure</b>	<b>3.12. Percentage of the disbursed industry contribution levy that the levy collection process costs, annually.</b>			
<b>Targets</b>	<b>2022-23</b> <b>&lt;0.1%</b>	<b>2023-24</b> <b>&lt;0.1%</b>	<b>2024-25</b> <b>&lt;0.1%</b>	<b>2025-26</b> <b>&lt;0.1%</b>
<b>Rationale</b>	AUSTRAC recovers the costs of its activities as Australia's AML/CTF regulator and Financial Intelligence Unit through an industry contribution levy. The industry contribution is calculated to recover AUSTRAC's operating costs, including amortisation and annual depreciation costs of assets that AUSTRAC uses to undertake its regulatory and intelligence activities. Measuring levy collection process costs expressed as a percentage of the industry contribution levy enables AUSTRAC to monitor the efficiency of the collection process. AUSTRAC is seeking to modernise, including where possible through automation, the collection process over coming years and this measure will be one means of evaluating the value of this modernisation work.			
<b>Method</b>	Cost of levy collection process divided by industry contribution levy. The levy collection process costs are the direct staff costs incurred undertaking the updating and analysis of the model, ministerial consultation, industry consultation, issuance and collection of the levy and finally the management of disputes in relation to the levy.			
<b>Data source/s</b>	Relevant documents (including staff time and Ministerial Submission) are stored within SAFE.			



## DISRUPT - AUSTRAC collaborates with partners to disrupt criminal exploitation of Australia's financial system.

Measure	4.1. Sum of ATO-recovered revenues and liabilities attributable to AUSTRAC data and AUSTRAC financial intelligence over the preceding 12 month period.			
Targets	2022-23	2023-24	2024-25	2025-26
	Not practicable to set a target.			
Rationale	Monitoring the outcome of the ATO's use of our data and financial intelligence to government revenue protection is one means of measuring AUSTRAC's contribution to the disruption of criminal abuse in the financial system. We do not consider it practicable to set a target, given the dependency upon ATO efforts to meet any set target.			
Method	As determined by the Australian Taxation Office.			
Data source/s	Data provided by ATO.			

Measure	4.2. Sum of Criminal Assets Confiscation Taskforce (CACT) Gross Restrained assets, which AUSTRAC data and AUSTRAC financial intelligence have contributed to the restraint of, over the preceding 12 month period.			
Targets	2022-23	2023-24	2024-25	2025-26
	\$600 million over 5 years (up to 2024).	\$600 million over 5 years (up to 2024).	To be determined by CACT	To be determined by CACT
Rationale	Monitoring asset restraint outcomes of the CACT is an effective means of measuring AUSTRAC's contribution to the CACT national strategy and disruption of criminal abuse of the financial system.			
Method	Determined by CACT – the value of the assets before any consideration of encumbrances such as mortgages, loans etc.			
Data source/s	Data provided by CACT.			

Measure	4.3. Percentage of stakeholders who rate the impact of AUSTRAC's financial intelligence to their work as having SOMEWHAT OF AN IMPACT (or higher), annually.			
Targets	2022-23 75% or greater	2023-24 75% or greater	2024-25 75% or greater	2025-26 75% or greater
Rationale	Tracking stakeholder perception of the impact AUSTRAC's financial intelligence has had on their work provides us with an understanding of the value of this to stakeholders and partners as well as the potential impact AUSTRAC financial intelligence is having towards the disruption of crime and other areas of interest to stakeholders.			
Method	Number of survey respondents who report SOMEWHAT OF AN IMPACT (or higher) divided by total number of respondents. Ratings of SOMEWHAT OF AN IMPACT (or higher) represent the positive responses on a seven-point survey scale.			
Data source/s	As per measure 2.3.			

Measure	4.4. Percentage of Analyst WorkBench (AWB) users who rate the impact of AUSTRAC's data available via Analyst WorkBench (AWB) on their work as having SOMEWHAT OF AN IMPACT (or higher), annually.			
Targets	2022-23 60% or greater	2023-24 60% or greater	2024-25 60% or greater	2025-26 60% or greater
Rationale	AUSTRAC seeks to enable the disruption of criminal exploitation of the financial system by making our data available via Analyst WorkBench (AWB) to select partners to inform their work. This measure will provide some insights into the usefulness of our AWB-accessible data to the work of those stakeholders who have access to this tool.			
Method	Number of AWB users who report the impact of AUSTRAC's data available via AWB as having SOMEWHAT OF AN IMPACT (or higher) divided by total number of respondents. This measure is reliant on AWB users providing feedback. The proportion of users who provide feedback will impact how representative the results are.			
Data source/s	SAFE.			



**OPTIMISE** - AUSTRAC continuously evolves and adapts business operations to succeed in a dynamic operating environment.

Measure	5.1. Percentage of agency approved capability and transformation projects, closed during either the current financial year or the previous financial year, that realise their approved benefits, annually.			
Targets	2022-23 70% or greater	2023-24 70% or greater	2024-25 70% or greater	2025-26 70% or greater
Rationale	Tracking our project benefit realisation performance is a means of ensuring our projects achieve what they were undertaken to achieve (on an agency-wide scale). The time period of two financial years (the current financial year and the previous financial year) was adopted noting the diverse nature and timeframes of every project, and that benefits may not be realised upon the immediate finalisation of a project. The intent of the 70% target over the period covered by this Plan is to balance agency appetite for delivery and ambition with the flexibility to cease or alter projects as part of broader agency project management and capital investment considerations.			
Method	The number of closed projects that realised their approved benefits divided by the total number of closed projects.			
Data source/s	Internal project governance register recorded in SAFE.			

Measure	5.2. Percentage of AUSTRAC staff who agree their workgroup has the appropriate skills, capabilities and knowledge to perform well, annually.			
Targets	2022-23 85% or greater	2023-24 85% or greater	2024-25 85% or greater	2025-26 85% or greater
Rationale	The enhancement of our employees' capabilities impacts on the agency's ability to optimise its business operations. We support our employees and ensure they have the requisite skills and capabilities to perform their roles effectively. Evaluating the percentage of employees who believe our agency and their teams have enough capability enables us to understand whether our employees, subjectively, believe we are providing sufficient resources and support to them to do their work. We are seeking to maintain a high target during a period of rapid growth and change within AUSTRAC.			
Method	Australian Public Service Employee Census results.			
Data source/s	APS Employee Census – AUSTRAC results.			

## APPENDIX B – LIST OF REQUIREMENTS

This corporate plan has been prepared in accordance with the requirements of:

- subsection 35(1) of the PGPA Act; and
- subsection 16E(2) of the PGPA Rule 2014.

The table below details the requirements met by AUSTRAC's corporate plan and the page references(s) for each requirement.

Requirements	Page(s)
<b>Introduction</b> <ul style="list-style-type: none"><li>• Statement of preparation</li><li>• The reporting period for which the plan is prepared</li><li>• The reporting periods covered by the plan</li></ul>	<b>5</b>
<b>Purpose</b>	<b>7</b>
<b>Key activities</b>	<b>15-27</b>
<b>Operating context</b>	
<ul style="list-style-type: none"><li>• <b>Environment</b></li></ul>	<b>30-34</b>
<ul style="list-style-type: none"><li>• <b>Capability</b></li></ul>	<b>47-53</b>
<ul style="list-style-type: none"><li>• <b>Risk oversight and management</b>, including key risks and their management</li></ul>	<b>39-45</b>
<ul style="list-style-type: none"><li>• <b>Cooperation</b></li></ul>	<b>36-37</b>
<b>Performance</b>	
<ul style="list-style-type: none"><li>• <b>Performance measures</b></li></ul>	<b>64-81</b>
<ul style="list-style-type: none"><li>• <b>Targets</b> for each performance measure (if reasonably practicable to set a target)</li></ul>	<b>64-81</b>

