



AUSTRAC agency multicultural plan 2013–15

A key recommendation of the 2012 Access and Equity Inquiry Panel's report was for all Australian Government agencies to develop a two-yearly agency multicultural plan (AMP) to address their obligations under Australia's Multicultural Policy.

Our vision for Multicultural Access and Equity Policy

AUSTRAC will have an open, responsive, and flexible approach to its engagement and communication with linguistically and culturally diverse stakeholders that are impacted by Australia's anti-money laundering and counter-terrorism financing (AML/CTF) regime.

Our agency

AUSTRAC's purpose is to protect the integrity of Australia's financial system and contribute to the administration of justice through our expertise in countering money laundering and the financing of terrorism.

The agency's purpose is achieved through two interdependent and complementary functions: Australia's financial intelligence unit (FIU) and Australia's AML/CTF regulator.

As Australia's FIU, AUSTRAC collects, retains, analyses and disseminates financial intelligence to revenue, law enforcement, national security, human services, regulatory, and other partner agencies in Australia and overseas.

As Australia's AML/CTF regulator, AUSTRAC educates, monitors and works to improve the effectiveness of reporting entities' compliance with the requirements of the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (AML/CTF Act). In some circumstances AUSTRAC seeks to enforce compliance with the Act through more formal mechanisms.

AUSTRAC deals directly with the following types of stakeholders:

- Individuals and businesses with obligations under the AML/CTF Act (known as 'reporting entities') and the *Financial Transaction Reports Act 1988* (known as 'cash dealers'). They include financial services providers, bullion sellers, designated remittance service providers, the gambling industry and other specified reporting entities.
- People travelling into and out of Australia with requirements to report currency in excess of certain thresholds, and bearer negotiable instruments.

AUSTRAC's stakeholders come from a broad range of culturally and linguistically diverse backgrounds. For example, AUSTRAC regulates entities in the alternative remittance sector that operate international money transfer businesses for specific ethnic and cultural communities. Members of the public are also directly impacted when reporting at the border.

There is a strong link between an enhanced understanding of AML/CTF Act compliance obligations and the quality and quantity of reports that are submitted to AUSTRAC, which are then made available to designated agencies under the AML/CTF Act.

Our agency multicultural plan

The senior executive officers responsible for AUSTRAC's AMP are the General Manager Legal and Policy, and the General Manager Operations Support.

Through our AMP, we hope to enhance our understanding of, and engagement with, stakeholders from a range of culturally and linguistically diverse backgrounds. In doing so, we hope to develop a heightened level of cooperation and trust with these communities to improve their understanding of and compliance with their AML/CTF obligations.

1. Leadership

We believe that leadership commitment and advocacy is important to increase our stakeholders' understanding of, and compliance with, their obligations under Australia's AML/CTF regime.

The table below shows what actions AUSTRAC plans to take to show leadership in multicultural access and equity.

	Action	Responsibility	Timeline	Target
1.1	Executive accountability			
	Appoint a Senior Executive Officer to oversee the implementation of the AMP.	General Manager Legal & Policy, General Manager Operations Support	Upon commencement of the AMP (1 July 2013).	Senior Executive Officer appointed.
	Appoint Multicultural Access and Equity leaders within each branch.	General Managers	October 2013	Multicultural Access and Equity leaders appointed.
	Include oversight of the AMP within established governance processes.	General Managers	December 2013	AMP governance process established.
1.2	Department or agency Commitment			
	Promotion of this initiative to all staff by the AUSTRAC Chief Executive Officer (CEO) and all members of the senior executive.	CEO, Executive General Managers and General Managers	July 2013	CEO email sent, initiative promoted and discussed at various forums.
	Publication of dedicated AUSTRAC intranet page.	General Manager Legal & Policy, General Manager Operations Support	July 2014	Intranet page published.
	If required, subsequent update emails from the Multicultural Access and Equity 'champion' and/or CEO about the implementation of the AMP.	General Manager Legal & Policy, General Manager Operations Support	June 2015	Update email(s) sent.

2. Engagement

We acknowledge the importance of ensuring that we have strong and cooperative relationships with stakeholders from linguistically and culturally diverse communities, to raise awareness of their compliance obligations.

The table below shows what actions AUSTRAC plans to take to engage effectively with culturally and linguistically diverse communities.

	Action	Responsibility	Timeline	Target
2.1	Stakeholder engagement			
	AUSTRAC's engagement strategy to be premised on the collection of baseline information, as follows: <ul style="list-style-type: none"> • Research and identify the key characteristic(s) of AUSTRAC's linguistically and culturally diverse reporting entities. • Determine whether existing information held by AUSTRAC about these stakeholders is sufficient to adequately understand and engage with them. 	Director Stakeholder Relations	December 2014	Decision made as to whether existing information is sufficient and if not, recommendations developed to obtain the required information.
2.2	Language and communication			
	Develop an AUSTRAC language and communication plan for culturally and linguistically diverse stakeholders.	Director Stakeholder Relations	June 2015	Language and communication plan in place.
	<ul style="list-style-type: none"> • Review and update AUSTRAC's internal register of bi/multi-lingual staff. • Review AUSTRAC's English language policy. • Review existing arrangements for engaging accredited translators and interpreters. 	Director Stakeholder Relations	June 2015	Reviews carried out, including recommendations for changes.
	Determine whether any other public documents, information on the website or transaction reporting approved forms should be translated and prioritise this work.	Director Stakeholder Relations	June 2015	Priority list of documents for translation developed.
	Develop a list of priority languages for translation.	Director Stakeholder Relations	June 2015	Priority language list developed.

	Seek funding from the Department of Immigration and Citizenship (DIAC) to carry out high-priority translation work.	Director Stakeholder Relations	June 2015	Funding proposal submitted to DIAC.
2.3	Other actions			
	Engage with DIAC Settlement Services to determine if AUSTRAC provides basic information/key messages to incorporate into migrant settlement packs. AUSTRAC messages could be in relation to access to the financial and gambling sectors and the requirement to provide identification documentation to access these services under Australian law.	Director Stakeholder Relations	June 2015	AUSTRAC's key messages for incorporating into migrant settlement packs are developed and delivered to DIAC.

3. Performance

We will continue to monitor and report on our performance in engagement with stakeholders from linguistically and culturally diverse communities so we can improve our ability to meet the needs of these communities.

The table below shows what actions AUSTRAC plans to take to improve and measure its AMP performance.

	Action	Responsibility	Timeline	Target
3.1	Performance indicators and reporting			
	Review existing key performance indicators (KPIs) to determine whether they are aligned with the multicultural equity and access policies.	General Manager Legal & Policy, General Manager Operations Support	March 2014	Review completed.
	Modify existing KPIs, or develop new KPIs.	General Manager Legal & Policy, General Manager Operations Support	March 2014	KPIs developed.
3.2	Feedback			
	Determine whether the existing AUSTRAC Help Desk arrangements are suitable for culturally and linguistically diverse stakeholders to provide feedback about agency multicultural access and equity performance, and make improvements where required.	Director Planning Co-ordination and Relief.	June 2015	Adequate feedback mechanisms developed.

4. Capability

It is important for our staff and contractors to have cultural competency so we can build relationships and provide appropriate and effective engagement with stakeholders from linguistically and culturally diverse communities.

The table below shows what actions AUSTRAC plans to take to build/sustain its Policy capability.

	Action	Responsibility	Timeline	Target
4.1	Cultural competency			
	Develop a cultural competency training package/plan to equip staff with cultural competency skills suitable to their roles. The package/plan is to include: <ul style="list-style-type: none"> information about AUSTRAC's AMP at induction and in the new starter pack training for staff in specific areas that deal with linguistically and culturally diverse stakeholders on a regular basis, for example front-line supervision and Help Desk. 	Director Workforce Capability & Performance	June 2015	Cultural competency plan/package developed.
	Invite community leaders to speak to staff.	Director Workforce Capability & Performance	June 2015	As above
	Determine incorporation of DIAC Australian Public Service-wide cultural competence e-learning product into AUSTRAC's staff development and training.	Director Workforce Capability & Performance	June 2015	As above
4.2	Research and data			
	Where possible, collect data about the number of emails and telephone calls to the AUSTRAC Help Desk from stakeholders that are from linguistically and culturally diverse communities (based on their updated enrolment form information).	Director Planning Co-ordination and Relief.	June 2014	System for collecting Help Desk data in place.
	Where possible, collect data about the number of compliance assessments undertaken with reporting entities from linguistically and culturally diverse communities.	Director Planning Co-ordination and Relief.	June 2015	Compliance data collected.

	Consider whether AUSTRAC should conduct any further research in relation to reporting entities from linguistically and culturally diverse communities.	Director Planning Co-ordination and Relief.	June 2015	Committee consideration and recommendation to CEO.
	Consider DIAC/ABS data to better understand AUSTRAC's culturally and linguistically diverse stakeholders.	Director Planning Co-ordination and Relief.	June 2015	Committee consideration and recommendation to CEO.

5. Responsiveness

We will strive to respond effectively to the needs of our stakeholders from linguistically and culturally diverse communities so that these reporting entities better understand their obligations under Australia's AML/CTF regime. We understand that multicultural communities, especially people with low English language proficiency, are likely to require tailored information and services to help them understand their AML/CTF obligations.

The table below shows what actions AUSTRAC plans to take to improve its Policy responsiveness.

	Action	Responsibility	Timeline	Target
5.1	Standards			
	AUSTRAC to adhere to DIAC's Multicultural Language Service Guidelines for government agencies	General Manager Legal & Policy, General Manager Operations Support	June 2015	AMP published on AUSTRAC website. DIAC standards reviewed and AUSTRAC's compliance assessed.
5.2	Policy, program and service delivery			
	Review agency strategies, business plans, the Service Charter and policies, to determine where multicultural access and equity considerations need to be taken into account.	All General Managers	June 2015	Documents have been reviewed.
	Incorporate flexibility into the way in which AUSTRAC engages with reporting entities from linguistically and culturally diverse communities. Adopt a 'one size fits all' approach only when necessary.	General Manager Compliance	June 2015	Draft policy and recommendations reviewed and endorsed by AUSTRAC Executives.
	Research and develop a Multicultural Access and Equity Policy which meets the requirements for AUSTRAC's culturally diverse reporting entities.	Director Planning Co-ordination and Relief.	June 2015	Draft policy and recommendations reviewed and endorsed by AUSTRAC Executives.

5.3	Outsourced services			
	Review AUSTRAC's procurement activities and determine whether changes are required to meet the multicultural equity and access policy requirements.	Director Procurement & Contracts	June 2015	Review has been conducted, including recommendations for changes.

6. Openness

Where possible, we are open and transparent in our dealings with stakeholders from linguistically and culturally diverse communities, and expect that they are open and transparent with AUSTRAC in return, to achieve better awareness of and compliance with AML/CTF Act obligations.

The table below shows what actions AUSTRAC plans to take to be open and accountable about the Policy.

	Action	Responsibility	Timeline	Target
6.1	Publishing			
	Publish the AMP on the website.	Director Stakeholder Relations	July 2013	AMP published on the AUSTRAC website.
	Report against KPIs in the AUSTRAC annual report (see 3.1).	General Manager Legal & Policy, General Manager Operations Support	October 2014	Reported against KPIs in the AUSTRAC 2013-14 annual report.
6.2	Data			
	Engage DIAC's Multicultural Policy Section to determine how AUSTRAC can share examples of innovative and effective practices with other agencies.	Director Stakeholder Relations	June 2015	AUSTRAC/DIAC meeting determines whether AUSTRAC examples should be shared with other agencies.