

LIVE FROM 1 JULY 2026 / PACK 02

AML/CTF real estate readiness pack

02

A board-to-front-desk map for the obligations applying to regulated real estate services from 1 July 2026.

THE FIVE-STAGE CONTROL MAP

A file becomes defensible when each stage has an owner, a current source, an approval and retained evidence.

01 Enrol	02 Assess	03 Identify	04 Monitor	05 Report
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W AGENT RULE

Draft the operational brief. Use official prescribed forms. Route legal instruments to the licensed professional responsible for them.

PACK 02 / ACTION CHECKLIST

Build the evidence file

Tick only when the document exists, is current, has been approved by the right person and is stored against the matter.

01	Scope decision	Record which W Agent activities are AUSTRAC designated services and which business lines need separate treatment.	☐
02	AUSTRAC enrolment	Enrol the reporting entity and keep the legal name, ABN, contacts, structure and service details current.	☐
03	Governance	Approve the AML/CTF program, appoint a senior manager and compliance officer, and minute oversight decisions.	☐
04	Risk assessment	Assess customer, service, delivery channel and geographic risks; define higher-risk triggers and controls.	☐
05	Initial customer due diligence	Identify and verify individuals and entities, beneficial owners, agents and authority before service starts.	☐
06	Ongoing due diligence	Monitor changes and transaction behaviour, refresh information and escalate unusual or higher-risk matters.	☐
07	Reporting	Create confidential processes for suspicious matter, threshold transaction and other applicable reports.	☐
08	Personnel and training	Screen relevant personnel, assign roles, train before duties begin and retain competency evidence.	☐
09	Privacy and records	Give appropriate collection notice, secure identity data, restrict access, retain required records and manage breaches.	☐
10	Independent evaluation	Schedule program review, track findings, record remediation and update after business or risk changes.	☐

PACK 02 / SIGNING BOUNDARY

What W Agent must not blur

These controls are deliberately conservative. They protect the client, the agency and the professional who is responsible for the final instrument.

1	Do not start a designated service until the required customer due diligence has been completed or an authorised exception applies.
2	Suspicious matter handling is confidential. Do not expose reports or suspicions to the customer.
3	AUSTRAC's starter kit is suitable only when the agency meets its stated eligibility characteristics; otherwise adapt with specialist advice.

OFFICIAL SOURCES

Open the live source again immediately before use. A saved or printed copy can become stale.

01	AUSTRAC real estate starter kit https://www.austrac.gov.au/industry-and-business/obligations-and-guidance/program-starter-kits/real-estate-program-starter-kit/real-estate-program-starter-kit-getting-started
02	AUSTRAC real estate services https://www.austrac.gov.au/new-austrac/designated-services-newly-regulated-entities/real-estate-designated-services
03	OAIC AML privacy guidance https://www.oaic.gov.au/privacy/privacy-guidance-for-organisations-and-government-agencies/organisations/privacy-guidance-for-reporting-entities-under-the-anti-money-laundering-and-counter-terrorism-financing-act

IMPORTANT

This W Agent pack is a general operational checklist, not legal, conveyancing, financial, tax, valuation, planning, building, employment or franchising advice. It is not a prescribed form, authority, contract, disclosure document or government-approved instrument. Laws, forms, facts and transaction risks change. Obtain matter-specific advice and use current official or professionally licensed documents before signing, serving, advertising, receiving trust money or providing a regulated service.