

FRONT DESK GUIDE · 2026

AUSTRAC's New AML Rules, From the Front Desk

Six calls your team will take under the Tranche 2 AML/CTF rules, what to do with each, and what to keep on record. General information, not legal advice.

Since **1 July 2026** AUSTRAC regulates certain services from real estate agents, lawyers, conveyancers, accountants, trust and company service providers and jewellers. On **30 September** it announced the first infringement notices for failing to enrol: **\$21,840** for companies and **\$4,368** for individuals, able to accrue daily. Much of the day to day risk arrives as a phone call.

■ Six calls and what to do

The call	What to do	Why
"I've changed banks, update my details."	Do not act on the call. Ring back on the number on file and note how you confirmed.	Payment redirection scams cost \$166.8m in 2025 (Scamwatch, via AAP).
A familiar number on screen	Treat caller ID as a hint, not proof.	The ACMA warns numbers can be spoofed.
"Can I text you my licence?"	No. Use the verification method in your program.	The Act does not require copies of ID. Record what you checked.
"Why do you need my ID?"	Point them to AUSTRAC's "why you might be asked for ID" page.	You must not start the service without due diligence.
Cash split under \$10,000	Escalate to the compliance officer with a note.	Structuring is an AUSTRAC example of a suspicious matter.
"Have you reported me?"	One neutral line, then transfer. Never confirm or deny.	Tipping off: up to 2 years or 120 penalty units.

Doubt about identity is a reporting matter

If you suspect on reasonable grounds that a customer or their agent is not who they claim to be, a suspicious matter report may be required within **3 business days** (24 hours for terrorism financing), even if you never provide the service.

■ The obligations behind the calls

Obligation	Rule
Enrol	Within 28 days of first designated service; changes within 14 days.
Governance	Governing body, senior manager, compliance officer. One person can hold all three.
AML/CTF program	Risk assessment plus policies and controls.
Due diligence	Before you start; then ongoing monitoring.
Reports	Suspicious matters, cash of \$10,000 or more, annual compliance report.
Records	Generally 7 years.
Training and evaluation	Training on starting and ongoing; independent evaluation every 3 years.

■ What to keep

- Call notes on the file: who, which number, what was asked, how you checked, who approved.
- Recordings as audio files, with recording announced at the start of every call, after hours included.
- Sensitive records stored securely, with access limited to authorised staff.
- Due diligence records 7 years after the relationship ends.

■ The front desk card: six rules for anyone who answers

- ☐ No changes to bank details, contacts or authority on an inbound call. Call back on the file number.
- ☐ Caller ID is a hint, not proof.
- ☐ No ID documents by text, voicemail or personal mobile.
- ☐ Split cash, odd urgency or identity doubts go to the compliance officer, with a note.
- ☐ "Have you reported me?" gets one neutral line and a transfer.

A phone system can

Record calls with notice, log calls on every desk phone and app, and route after hours calls to an agent that takes a message.

It cannot

Enrol you, write your program, verify identity, decide what is suspicious or make you compliant.

Not legal advice. Where to get help

AUSTRAC Contact Centre 1300 021 037, the regulation check and free starter kits at austrac.gov.au.
VOCPhone: \$84.90 a month including 3 users on a 36 month term, call recording, our own network, Australian hosted. vocphone.com/book-demo or 1300 663 222.