

This checklist contains key factors to take into consideration when identifying and comparing potential AML/CTF technology platform providers. This is not an exhaustive list of considerations.

Practitioners should note that their obligations under Tranche 2 of the AML/CTF regime cannot be fully outsourced. As each firm will remain responsible for any breach of its AML/CTF obligations, practitioners must ensure they conduct due diligence on any proposed providers to manage and mitigate any risks of outsourcing, take steps to ensure that the outsourced providers are appropriate for their firm and have appropriate oversight of their providers at all times. Further guidance on outsourcing is available at [Using outsourcing to help meet your obligations | AUSTRAC](#).

Considerations	Yes	Not sure	No
Australian data sources – Does the platform include Australian Politically Exposed Persons (PEPs), sanctioned persons and adverse media (e.g. newspaper article) links?			
Customer verification – Does the platform verify customer ID documents in a satisfactory way (e.g. biometrics, document verification service, electronic data matching, etc.)?			
Client/Transaction intake workflow – Can the platform collect data from clients, store it and conduct automated screening?			
Client/Transaction intake workflow – Can the platform be integrated with practice management systems and, if so, which ones?			
Risk assessment – Does the platform provide an integrated risk assessment tool (i.e. does it include a tool to risk-rate clients as high, medium or low)?			
Onshore data storage – Is the data stored in Australia			
Offshore data storage – If data is stored offshore, has the vendor provided appropriate assurance on the firm's privacy or cyber concerns?			
Ability to oncharge costs – Can costs be oncharged as a disbursement to a specific client? If the specific costs of online checks can be identified, they can be oncharged as a disbursement to the client. This should be outlined in the Cost Agreement. A range of fees can be provided as part of the fee estimate.			
Pricing – Does the pricing plan provide some flexibility in pricing (as opposed to a lump sum cost for the platform that must be considered)?			
Ongoing compliance updates – Does the vendor commit to updating the platform within a reasonable timeframe if and when relevant Australian regulatory guidelines change?			
Reporting – Does the platform assist in meeting AUSTRAC reporting requirements?			
Platform support – Does the vendor offer platform support (e.g. email, phone, knowledge bank, etc.)?			
Platform support availability during peak periods – Has the vendor committed to turnaround time for queries, taking into account that their support capabilities for July to September 2026 will need to be ramped up when demand is likely to be very high?			
Training – Will training be provided by the vendor to staff who will operate the platform?			
Termination – Can the vendor agreement be easily terminated by the firm, with appropriate records recovered and proper deletion of any stored client data assured?			