

Legal Professionals

AML/CTF Compliance Checklist

Use this checklist to track your progress towards meeting your AML/CTF obligations under AUSTRAC. Tick off each step as you complete it.

◆ **With ARCaml, you get secure portal access to manage all your customers, verifications, and compliance documentation in one place.**

1. Enrol & designate MLRO

Enrol with AUSTRAC and nominate a compliance officer (MLRO) with adequate seniority.

2. Risk assessment for matters

Profile matter types (property, trust, commercial), client profiles, delivery channels, and cross-border elements.

3. Program Part A (governance) & Part B (CDD)

Set risk-based controls, screening, and detailed KYC/KYB procedures including beneficial ownership and PEP checks.

4. Subscribe to ARCaml for portal access

Get secure access to the ARCaml portal — your centralised dashboard to manage clients, run verifications, track compliance status, and generate audit-ready CDD Certificates. Visit www.idealworks.com.au/arcaml to get started.

5. INITIAL ONBOARDING: ARCaml 5-Step Process

Step 1: Subscribe to ARCaml and set up your account for legal services compliance.

Step 2: Send your clients link from ARCaml before opening a matter for identity & ownership verification.

Step 3: ARCaml verifies identities, screens against PEP & sanctions lists — all AUSTRAC compliant.

Step 4: Receive audit-ready compliance pack confirming due diligence is complete.

Step 5: Focus on your practice with confidence — records retained for 7 years and audit ready.

6. Continuous Compliance for New Clients

Initial Phase (Matter Opening): Complete full CDD using the ARCaml 5-step process above before providing the designated service.

Ongoing Monitoring: Monitor for changes in client information and matter details. Re-verify KYC/KYB on trigger events (address changes, corporate restructuring, sanctions updates, adverse media).

Enhanced Due Diligence: Apply EDD procedures where red flags appear (complex trust structures, high-risk jurisdictions, unusual transaction patterns).

■ 7. Continuous Compliance for Existing Clients

Transition to Continuous Process: Establish risk-based profiles for existing clients. Update ARCaml with current client information and beneficial ownership structures.

Re-verification Schedule: Rescreen existing clients on a risk-based cycle (typically annually for low-risk matters, semi-annually for medium/high-risk).

Trigger-Based Re-screening: Immediately rescreen when: client details change, new beneficial owners appear, adverse media emerges, or relationship scope expands.

■ 8. EDD when red flags appear

Escalate to EDD with additional verification/evidence where risk indicators are present.

■ 9. SMR obligations

Lodge SMRs each time a new suspicion forms; include references to prior SMRs for the same client where relevant.

■ 10. 7-year records, training & independent review

Retain records for at least 7 years, train staff on AML/CTF, and arrange regular independent reviews of Part A.