



17 October 2019

Ciaren McGuire

Via email: fyi-request-11264-
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Dear Ciaren

Official Information Act 1982 (OIA) request dated 20 September 2019 (ref OIA19200259)

Thank you for your OIA request dated 20 September 2019 to the Department of Internal Affairs (the "Department"). You requested the following information regarding the costs and benefits of the Department's participation in the FIU/ACAMS conference this October. You asked:

1. *"How many staff are attending"*
2. *What the job title of each attendee is and how each staff member will be improved in their specific job by attending as looking at the agenda for the conference and DIAs very limited role in the AML regime it is hard to see how more than a third of the conference content offers real value to them.*
3. *Where in NZ each attendee in each role is based and on what basis they were chosen to attend*
4. *How much tax payer money was paid for the attendance of each staff member*
5. *How much tax payer money will be spent on travel and accommodation and food/other expenses for each staff member that these expenses applied to*
6. *How much money if any DIA contributed to funding the conference*

For membership of ACAMS and other professional bodies please provide:

7. *How many of your staff are members of ACAMS or other AML related professional bodies in cases that DIA pays for their membership*
8. *What actual benefit they get in terms of their ability to better do their jobs from these memberships*
9. *Please provide a detailed explanation of your AML group and its locations and structures*
10. *Please provide salary details for each role*
11. *Please provide a detailed explanation of what each role in the team actually entails in their job. Please do not provide the official job descriptions that are used when recruiting as the information contained within these is far removed from a true reflection of the jobs involved*
12. *Please provide details of all testing that is undertaken on potential recruits for the AML group and the associated criteria that the Department looks for*

13. Please provide detailed demographic information as captured by the optional starter equal opportunities voluntary information and any internal reviews. To include gender, ethnicity, professional background and any other demographic captured. Please break this down by role, team and geographic location and please provide this data longitudinally for the last five years (snapshots at three or six monthly intervals will be acceptable)"

Principle of availability

The starting point for considering your request is the principle of availability. That is, information must be made available on request unless there is a good reason for withholding it.

Request one: *number of staff attending FIU/ACAMS*

Thirteen staff from the AML Group attended the FIU/ACAMS conference.

Request two: *job titles of FIU/ACAMS conference attendees and conference relevance*

The job titles of the AML Group attendees at the FIU/ACAMS conference are as follows: Senior AML Regulator, AML Regulator, Analyst, Director of the AML Group, Senior Advisor, Manager and Principal Advisor.

The FIU/ACAMS conference gives each AML Group attendee insights into the wider anti-money laundering system broadening their knowledge of the sector and increasing their capability as regulators. It is also the leading AML/CFT conference in New Zealand and provides opportunities to network with other agencies, reporting entities and others in the system.

While the AML Group in the Department is not the only AML/CFT supervisor in New Zealand, it is worth noting, it does supervise the largest number of reporting entities. In this context, it is important that a variety of AML Group staff attend the FIU/ACAMS conference.

Request three: *geographic location of attendees and reason for attendance*

Six of the AML Group attendees at the FIU/ACAMS conference are based in Auckland. Six other AML Group attendees are based in Wellington and one staff member attended from Christchurch.

Attendees were chosen based on a number of factors including their professional development plans, and the relevance of the conference agenda for their roles. Some of the AML Group's attendees were also presenting at the conference or supporting the sector supervisors' session on the first day of the conference.

Request four: *cost of conference tickets*

Five AML Group attendees at the FIU/ACAMS conference were ACAMS members and the cost of each of their tickets was \$720. Four AML Group attendees were non-ACAMS members and the cost of each of their tickets was \$800. Four AML Group attendees used free tickets to attend the ACAMS conference. The total ticket cost incurred by the Department for the AML Group was \$6,800.

Request five: *cost of travel, accommodation, and food*

Travel costs for those staff attending the ACAMS conference, which were based outside of Wellington, totalled \$2,327.90. Accommodation costs for these staff totalled \$1,700.00. Therefore, the total cost for travel and accommodation was \$4,027.90.

The Department is unable to confirm food and other costs yet, as the attendees at the conference are unlikely to have submitted all of their expense claims for these categories yet. Therefore, the Department is refusing this part of your request under section 18(g) of the OIA.

The Department notes that lunch was provided at the conference, and staff that travelled from another city to attend the conference can claim for breakfast and dinner for the duration of the conference. The Department's travel policy allows staff to claim up to \$90.00 per 24 hours (for those staying in commercial accommodation), or up to \$100.00 per 24 hours (for those staying in private accommodation – i.e. with family or friends). As noted above, since staff were provided with lunch at the conference, their meal costs will be less than the maximum allowed.

Request six: *Department's contribution to conference*

The Department did not contribute any funds to running the FIU/ACAMS conference.

Request seven: *staff membership in professional bodies*

Eight of the AML Group's staff are ACAMS members, and four are members of the International Compliance Association (ICA). The Department pays for the associated membership costs.

Request eight: *benefits of staff membership in professional bodies*

The key benefits of memberships to ACAMS and other professional bodies include access to resources, webinars and other development opportunities. This supports staff to build their AML subject specific knowledge, and in turn lifts staff capability across the AML Group.

Request nine: *AML Group locations and structures*

The AML Group is led by the Director and has staff located in Auckland, Wellington and Christchurch. The Director of the AML Group has five direct reports namely: Manager Engagement and Innovation, Manager Service Design, Principal Advisor (AML system), Senior Operational Policy Analyst – Mutual Evaluation Lead and Deputy Director Operations.

Further details about the structure of the AML Group are outlined below:

- The Deputy Director Operations has five direct reports including four Operations Managers and Practice Leaders. Two Operations Managers are located in Auckland, one in Wellington and one in Christchurch;
- Each Operations Manager oversees a team of Senior AML Regulators, AML Regulators and Graduate AML Regulators;
- The Manager Service Design has a team of Intelligence Analysts and Operational Policy Analysts, which are based in Wellington; and

- The Manager Engagement and Innovation has a team of Senior Advisors in both Auckland and Wellington.

Request ten: *salary details for AML Group staff roles*

The Department is withholding the exact salary details of the AML Group's staff under section 9(2)(a) of the OIA, to protect the privacy of natural persons.

Please refer to Appendix 1 of this letter for a schedule of the 2019 salary bands for roles in the AML Group.

Request eleven: *explanation of AML Group staff roles*

In response to a request of this nature, the Department would normally provide the job descriptions for each role, but you have indicated you do not wish to be provided with these in this instance. The Department is refusing your request for "...a detailed explanation of what each role in the team actually entails in their job" under section 18(g), as the Department does not hold this information. Further, the Department is not required to create new information in response to this request.

Request twelve: *pre-employment testing of AML staff*

Pre-employment testing for potential recruits to the AML Group is not carried out for all roles. It is the decision of the individual hiring manager in question as to whether pre-employment testing is undertaken and the criteria that is applied. If testing occurs, it would be in addition to the usual interviewing and vetting procedures that apply to applicants. In situations where such additional pre-employment testing is carried out, this may include psychometric testing or other written tests and exercises.

Request thirteen: *demographic information of AML staff*

The Department is refusing this request under section 9(2)(a) of the OIA, to protect the privacy of natural persons. Due to the small size of the AML Group, release of the demographic information requested would prejudice the privacy of individuals employed in the AML Group.

The public interest balancing exercise required by section 9(1) of the OIA

In respect of the salary and staff demographic information, the Department considers that the withholding of information under section 9(2)(a) is not outweighed by other considerations which render it desirable, in the public interest, to make the information available. Therefore, section 9(2)(a) provides good reason for withholding the salary and staff demographic information.

Access to the Ombudsman

If you are dissatisfied with the Department's decision on your request for information, you have the right, under section 28 of the OIA, to make a complaint to the Office of the Ombudsman.

The Office of the Ombudsman can be contacted by phone on 0800 802 602, via post at PO Box 10152 Wellington or via email to info@ombudsman.parliament.nz.

Yours sincerely

A handwritten signature in black ink, appearing to read 'LC', with a long horizontal flourish extending to the right.

Louise Cavanagh
Acting Director Regulatory System, AML
Regulatory Services

Appendix 1 – AML Group salary bands

Job title	Salary range
AML Regulator	\$64,476 - \$87,231
Deputy Director Operations	\$126,223 - \$170,772
Director Regulatory System	\$148,274 - \$200,606
Forensic Accountant	\$92,316 - \$124,897
Graduate AML Regulator	\$47,176 - \$63,827
Intelligence Analyst	\$64,476 - \$87,231
Manager Engagement and Innovation	\$109,775 - \$148,518
Manager Operations	\$91,499 - \$123,792
Manager Service Design	\$109,775 - \$148,518
Operational Policy Analyst	\$64,486 - \$87,245
Personal Assistant	\$47,028 - \$63,625
Practice Leader	\$91,499 - \$123,792
Principal Advisor AML System	\$91,499 - \$123,792
Senior Advisor Engagement and Innovation	\$77,850 - \$105,327
Senior AML Regulator	\$77,850 - \$105,327
Senior Intelligence Analyst	\$77,850 - \$105,327
Senior Operational Policy Analyst	\$76,310 - \$103,243