

APG Information and Communications Strategy



**Asia/Pacific Group
on Money Laundering**

2015

Minor amendments 2018

Asia/Pacific Group on Money Laundering

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APG INFORMATION AND COMMUNICATIONS STRATEGY 2015

Definitions

1. The following definitions apply throughout this document:

- *AML/CFT* Anti-money laundering, countering the financing of terrorism and proliferation
- *FATF* Financial Action Task Force
- *FSRB* *FATF-style regional body, including the APG, EAG, CFATF, GAFISUD, GIABA, MENAFATF, Moneyval and other such organisations*
- *Information* All information collected by the APG in the course of business including primary and secondary source material, communications from
- *Members* Jurisdictions within the Asia/Pacific region admitted, or seeking admission, to the APG as members in accordance with the APG Terms of Reference 2012
- *Observers* Jurisdictions and organisations admitted, or seeking admission, to the APG as observers in accordance with the APG Terms of Reference 2012
- *Standards* FATF 40 Recommendations 2012, interpretive notes and the 2013 assessment methodology

Stakeholders

2. The primary stakeholders of this policy are:

- APG members;
- APG observer jurisdictions and organisations;
- APG Co-Chairs, Governance Committee¹ and Working Groups; and
- APG Secretariat.

3. Secondary stakeholders include:

- FATF-style regional bodies not yet observers of the APG;
- Private sector banks, non-bank financial institutions and designated non-financial businesses and professions across the region;
- Non-members/non-observer jurisdictions and organisations in the APG region;
- International and regional (Asia/Pacific) media;
- General and specialist media (criminal/legal/business);
- Public and private sector professionals and academics in the region; and
- General public (communities of the Asia/Pacific region).

¹ The term “Governance Committee” replaced the term “Steering Group” in 2018.

Objectives

4. Effective communication to stakeholders and, on a more limited basis, to media outlets, including information about APG processes and procedures, is critical to successful achievement of the APG's mission for several reasons, including:
 - The large geographical spread of the APG's members and observers;
 - the cultural, linguistic and economic diversity of its members and observers;
 - the fact that the official language of the APG (English) is not the first language for many members and observers;
 - members and observers are only able to meet as a group once or twice a year (APG Annual Meeting and APG Typologies Workshop); and
 - the complex, technical and evolving nature of the strategic objectives.
5. Information collected and generated by the APG in the course of its business is a strategic business asset of the membership and is a resource independent of APG business requirements.
6. The objective of this strategy is to ensure that APG internal and external communications effectively support the APG's strategic objectives and annual work programme. In order to support the goals of the APG's Strategic Plan and the associated annual business plans, the APG will provide proactive communication by:
 - reaching all stakeholders;
 - encouraging communication between members and observers to achieve increased levels of participation in APG activities;
 - protecting and enhancing the APG's image and that of its members;
 - cooperating with other AML/CFT bodies and multilateral organisations; and
 - supporting public awareness, understanding and achievement of the APG's goals to ensure that members, observers and other relevant jurisdictions and organisations receive current information and material to support their AML/CFT programmes.

Context

7. Since its establishment, the APG has grown in membership and work. Consequently, the volume of data and information has increased substantially. The 1st and 2nd round of APG mutual evaluations, the APG's various working groups, the APG typologies programme, the technical assistance programme, annual meetings and various other APG functions and tasks have added to the amount of information collected.
8. Effective July 2014 the APG has 41 members and 6 observer jurisdictions. Levels of commitment amongst both member and observer jurisdictions to implement the standards vary, and there is a great diversity in economic size, institutional capacity and political and economic structures. These factors directly affect the levels, nature, and speed of communications and demand for information.

Principles

9. APG communication activities will address the following principles:
 - the audience must be clearly identified;
 - the message to be conveyed and/or the communication goal must be clearly understood;
 - the content must be clear and appropriate to communicate the message;
 - the presentation and delivery of the message must be appropriate to achieve the communication goal;
 - where appropriate, feedback should be gained from the audience to measure the impact of communication and to promote improvements; and

- any audience queries must be followed up.

APG Information Confidential

10. The APG Secretariat shall continue to be the primary custodian of APG information and to hold that information for the benefit of the membership. Information and communications (including emails, letters and other forms of communication) received by the Secretariat shall not be disseminated to third parties unless necessary for the proper functioning of the APG in accordance with the APG Strategic Plan and Annual Business Plans, for example, communicating with donors and providers, filing of reports with APG members or agencies who have provided funding for a specific mission etc.
11. Except as otherwise provided, requests for information by persons, agencies, governments or organisations on the activities of specific APG members and observers, or those seeking such status, that the Executive Secretary deems inappropriate or not necessary for the business activities of the APG, shall be denied.

Confidentiality of APG Meetings

General

12. In order to encourage free and frank interaction between APG members and observers, all plenary, workshop and working group deliberations, are confidential.

Confidential Membership-Only Sessions during Plenary Meetings

13. During APG annual meetings or any special plenaries, the membership may decide to hold confidential sessions for members only, to the exclusion of observers or 'guest jurisdictions'. These sessions relate usually to applications for member or observer status, members under review for failure to meet membership requirements, or other matters as the membership may decide, or the Governance Committee may refer.
14. The following points apply to those sessions, although the membership may decide otherwise during a confidential session:
- Discussions, exchanges and interventions made during confidential sessions (e.g. admission or non-admission of a new member or observer; the decision in relation to an existing member under the APG Terms of Reference etc.) will not be disclosed to non-members.
 - Final decisions i.e., outcomes of confidential sessions, may be disclosed to non-members bearing in mind the second bullet point unless the membership decides otherwise.

Referral to Governance Committee

15. Should unauthorised disclosures occur to third parties by any member, observer, or other participants in an APG activity (under paragraphs 13 and 14), the matter will be referred to the Governance Committee to consider the seriousness of the breach.
16. After considering any breach and facts relating thereto, the Governance Committee will, if necessary, ask the APG Co-Chairs to write to the relevant delegation including the responsible Minister, expressing concern over such disclosure. The Co-Chairs in that case will request an explanation from the responsible delegation and consider and, in the light of the response, consider whether further action is necessary, including referral to the full membership for possible membership action.

APG Logo and Promotional Material

17. The APG logo and associated promotional material are the intellectual property of the APG membership. The APG logo provides a distinct and recognizable image that promotes coherence and cohesiveness of APG communications.
18. APG intellectual property is available to all members and observers to promote visual awareness and branding which supports identification and awareness of the APG and its work.
19. Use of the APG logo and any promotional material by non-members may only be granted with the approval of the Executive Secretary. The guiding principle is that use of the logo or other APG material should not suggest, directly or indirectly, that the APG endorses any commercial product or any activity outside the APG's mandate.

Copyright and Ownership of Work and Information

20. Intellectual property rights in information created, received, collected or held by staff of the APG Secretariat in the course of their duties (in all forms, including reports, emails, correspondence, newsletters, images and presentations) will be held by the host agency of the Commonwealth government of Australia as custodian on behalf of the APG and managed on behalf of APG members by the APG Secretariat.
21. Any request for use of APG information, including the citation of APG reports, by the public or outside agencies must be submitted in writing to the APG Executive Secretary. Prior approval by the Executive Secretary must be issued in writing before the publication of any APG material in non-APG publications.
22. For mutual evaluation/follow-up reports relating to joint APG/FATF members, requests for citation, copies or other use of intellectual property rights inhering in that material, will be referred to the FATF in the first instance. The decision of the FATF in relation to any such request will be adopted by the APG.
23. The same rule above shall apply in relation to IMF and World Bank reports relating to APG members.

Communication Issues

24. Communication among APG Secretariat staff, between the Co-Chairs, members, working group co-chairs, Governance Committee and Secretariat is of strategic importance in the proper functioning of the APG. Challenges for the Secretariat and Co-Chairs include, *inter alia*:
 - managing the distribution of information to, and the collation of comments and responses from, members on a wide range of AML/CFT developments. Timely distribution of such information is vital;
 - providing advice to members and observers on technical assistance and training issues to ensure that members and observers are aware of developments and opportunities and that assistance is effectively managed and delivered;
 - helping members and observers to develop/maintain a full understanding of international standards and how to implement them;
 - the geographical challenges faced when communicating between the Secretariat, Co-Chairs and members - often in different places/countries/time zones; and
 - coping with contact point changes and practical difficulties in communicating with some members, for example by email or facsimile.
25. The APG Secretariat welcomes input into communication activities, including suggestions as to how the APG can communicate more effectively with primary stakeholders and other interested parties.

The Secretariat encourages any APG member or observer interested in these issues to forward suggestions to the Executive Secretary.

Tools and Activities

Annual Meetings

26. The single most significant communication medium for the APG is its annual meeting. This is normally the only time that representatives of all APG members and observers meet in the one place to discuss and decide on APG policies and work. As members and observers have come to know the work of the APG, and each other, better, annual meetings have become more effective vehicles for communication. The level and sophistication of debate during these meetings has been increasing each year.

27. In response to the growing workload of the APG, and to allow a proper discussion of issues, the length of the APG annual meeting is now generally four days. In addition, the APG Secretariat endeavours to send the documents relating to the meeting to participants as early as possible so that members have sufficient time to fully prepare for and contribute to the plenary discussions and decisions made at the meeting. This remains a significant workload challenge for both the Secretariat and members.

28. As well as the formal conduct of APG business in plenary sessions, annual meetings also offer an opportunity for APG members and observers to liaise and network, enhancing regional communication both formally and informally. This includes holding related side meetings and seminars in the margins of the annual meetings.

Mutual evaluations, technical assistance and training and other missions

29. Significant and very useful face-to-face communication also takes place in the course of APG mutual evaluation on-site visits and technical assistance and training (TA&T) visits and other outreach. These meetings continue to provide an excellent opportunity to discuss at greater length the issues of concern to members, including their TA&T needs, implementation issues and AML/CFT developments generally.

30. Whenever appropriate, APG evaluation team members and technical assistance and training outreach mission members should:

- disseminate relevant information to both public and private sector entities;
- inform agencies within APG members of programs and activities relevant to their needs; and
- encourage members to review their AML/CFT laws, regulations and others rules on a regular basis for compliance with evolving standards.

E-mail, facsimile and telephone

31. Outside of annual meetings, most of the APG's communication occurs by email and, to a lesser extent, by facsimile and telephone. In this regard, a reliable list of contact points for each member and observer is critical for the effective functioning of the APG. The APG Secretariat maintains Contact Point registers for members and observers. It is essential that members and observers inform the Secretariat of any changes to their contact information.

32. From the APG Secretariat's perspective, keeping on top of the growing email 'dialogue' and responding to messages in a timely manner is a significant challenge, given the amount and frequency of email exchange and the size of the Secretariat.

Attendance at external meetings, conferences and seminars

33. The APG Secretariat receives many requests to lecture at public and private sector conferences, seminars and meetings, both in Australia and throughout the region. There are insufficient resources to meet all of these demands and requests. The Secretariat, or other APG representatives may, without members' specific consent, participate in the more important of such events, within human and financial resource constraints, including regional and international seminars, conferences, academic lectures and media events.

34. The APG will seek to support public sector AML/CFT events held by APG members in particular. Participation in private sector events will generally be on the basis that the private sector provider funds the APG's participation; and that such participation supports the APG's mission and goals and does not suggest the APG's endorsement of any commercial product or activity outside of the APG's mandate.

Feedback

35. While the level of discussion, comment and debate within the APG has been steadily increasing, efforts will be made over the next three years to strengthen communication and to increase the level of comment/feedback from members on, for example, draft documents and reports circulated by the Secretariat or APG Working Groups, where even a 'no comment' or 'nil return' can be useful. An example where additional feedback would be appreciated is when the APG circulates documents relating to the FATF's ongoing activities to refine and to provide guidance on the global AML/CFT standards.

36. Audience feedback on the goals, content, delivery, and relevance of APG presentations and documents assists the APG to continuously improve its communications and allows the APG Secretariat to follow up on any further queries regarding the APG.

37. The Secretariat will seek feedback from members on the work of the APG, including the conduct of APG events (Annual Meetings, Typologies Workshop and other events). Feedback may be sought either in writing (hard copy) or through electronic means, including through the use of on-line/computer-based commercial solutions as appropriate, but consistent with the Secretariat's host agency policies.

Publications

APG website

38. The APG's website (www.apgml.org) is managed by the APG Secretariat. It is an effective tool for internal and external communication. The website continues to encourage communication by providing members, observers and the general public with APG source information and documents, current AML/CFT information, links to relevant external sources and APG contact details.

39. In addition, there is a secure, 'members-only' section for the exchange of APG documents, as well as secure sections for observers, the APG Donors and Providers Group, the Implementation Issues Working Group, the Typologies Working Group, the Mutual Evaluation Working Group and various projects. The Secretariat will continue to:

- use the secure website to post APG documents and related information for membership access prior to APG events such as the Annual Meeting, workshops, and other meetings; and
- regularly update and augment the website to increase its usefulness.

40. The APG Secretariat will use the website as the primary method of publication of APG annual reports and mutual evaluation reports.

Periodic reports

41. The most significant forms of general written communication in the APG (apart from formal APG documents such as the APG Terms of Reference, strategic and business plans and the APG website) are:

- APG annual reports;
- Mid-year report to members and observers.

42. The annual reports will be published as soon as possible following the annual meeting in each year and will incorporate the outcomes of that meeting. Mid-year reports are issued in January or February each year with an update of our activities over the previous six months and plans for the ensuing six months. A half-year budget update is included with these reports.

43. Members and observers are encouraged to provide the Secretariat with suggestions and comments on how to improve these documents.

Mutual evaluation reports and progress reports

44. Mutual evaluation reports are a significant source of information about an APG member's level of compliance with the standards. The APG publishes these reports on the APG website.

45. The APG's mutual evaluation follow-up process involving the preparation of a separate follow-up/progress report on a yearly basis is intended to encourage greater implementation of the standards and provide regular monitoring and up-to-date information on compliance with the standards by each APG member following a detailed mutual evaluation report. As a general principle the membership encourages public access to the current state of compliance with the standards by each member. The APG will therefore adopt separate publication policies for access by the general public to these follow-up/progress reports. The terms of these publication policies may change due to circumstances related to other assessor bodies.

Engagement with Media

46. The APG may issue media releases during or after APG Annual Meetings and Typologies Workshops to directly promote the role and importance of the APG's work to the general public. Other media releases may be issued during the year to promote positive coverage of particular issues or events.

Direct Engagement

47. The APG Secretariat receives many requests from media outlets throughout the APG region requesting information on APG activities and on members, including details relating to mutual evaluation reports, typologies reports and other information. In an effort to raise awareness among the general public within the region, the Secretariat may, without members' consent, answer media enquiries in relation to APG processes and procedures and refer to published reports and other open source material. The Secretariat may also, in broad terms, discuss regional money laundering and terrorist financing vulnerabilities, as well current and emerging typologies, and discuss the general challenges and possible impediments faced by members within the APG region in implementing the global AML/CFT standards.

48. The Secretariat will avoid, without prior consent, offering specific opinions on individual members' or observer's compliance with the standards (except those referred to in published mutual evaluation reports and other open sources) including in relation to AML/CFT structures and proposed legislation or in relation to membership obligations. Reference to published and publically available mutual evaluation reports does not include comments on updates and other initiatives underway to address recommendations in those reports. Secretariat comments will be of a general nature only.

49. Where media outlets request information from the APG Secretariat outside the ambit of what is referred to above, in relation to an APG member or observer, the Secretariat may refer those outlets to the primary AML/CFT agency in the jurisdiction enquired about.

50. The Secretariat is not obliged to discuss any APG business with the media even if it is general in nature.

FATF Document Distribution

51. The APG's associate membership status in the FATF has benefited the membership by allowing APG members to attend FATF plenary and working group meetings as an APG delegate and, with that access, to intervene at FATF meetings. The APG membership is entitled to receive and review FATF documents distributed for FATF meetings. The APG Secretariat will forward all FATF documents to the membership prior to those meetings when received through the use of the secure APG website.

Review

52. This Strategy will generally be reviewed every three years and amended as necessary to reflect changing communication and information challenges and the needs of APG stakeholders.

Endorsed:

APG Annual Meeting
July 2015

Minor amendments in 2018