



**Electoral and Referendum Amendment
(Electoral Integrity and Other Measures)
Bill 2005**

Submission Paper

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On 8 February 2006 the Parliament of Australia Senate referred the provisions of the Electoral and Referendum Amendment (Electoral Integrity and Other Measures) Bill 2005 (the Bill) to the Finance and Public Administration Legislation Committee for inquiry and report.

To provide comment as part of this inquiry, HBOS Australia has compiled this submission paper to provide support with a Bill that will allow access to the Electoral Role to assist financial institutions in their customer verification processes.

HBOS Australia Pty Ltd (HBOS Australia) comprises four diverse financial services companies:

- Bank of Western Australia Ltd (BankWest);
- Capital Finance Australia Limited (Capital Finance);
- St Andrew's Australia Pty Ltd (St Andrew's); and
- BOS International (Australia) Ltd (BOS International).

By bringing the offerings of these companies together, HBOS Australia is a new and distinctive force in the Australian marketplace.

HBOS Australia is 100% owned by HBOS plc which is one of the world's largest financial services groups, with more than 25 million customers, 60 thousand staff and assets of more than £400 billion.

HBOS Australia supports Schedule 1 Section 8 of the Bill which has scheduled an amendment to Subsection 90B (4) of the Commonwealth Electoral Act 1918 to allow prescribed persons and organisations to gain access to the electoral role to assist in the verification of persons under the Financial Transaction Reports Act 1988 (FTRA).

While HBOS Australia is in support of this addition, it is also believed the scope of this subsection should reach to other purposes other than the FTRA.

On the 16th of December 2005, the Attorney-Generals Department (AGD) issued to the public the exposure Anti-Money Laundering and Counter-Terrorism Financing Bill 2005 (AML/CTF Bill).

This AML/CTF Bill is intended to replace the Financial Transaction Reports Act 1988 and the Financial Transaction Reports Regulations 1990, including the FTRA's obligation for reporting entities identify customers to whom they are providing a service.

As such, it is believed that the Bill should also encompass a provision for the use of the electoral roll to verify the identity of persons for purposes of the AML/CTF Bill and for usage within general customer verification processes.

HBOS Australia sees access to the electoral roll either directly, or via a 3rd party, as a vital step in preventing fraud and money laundering, particularly in view of the ease in which existing 'identification' documents can be compromised.

We trust this submission is reviewed with due consideration and if you require any further details to assist with your decisioning process please feel free to contact the below parties.

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