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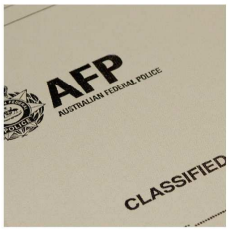

Fraud Control and Anti-Corruption Plan
2012-2013

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Foreword

In an increasingly complex and dynamic operating environment, it is critical that the Australian Federal Police (AFP) maintains the confidence of national and international governments, its law enforcement partners and the broader community. Central to this confidence and trust is the integrity and professionalism of our appointees.

The AFP promotes a culture of ethical conduct and behaviour. The AFP treats the prevention and detection of fraud and corruption very seriously. Fraudulent conduct by AFP appointees can attract criminal, civil and disciplinary sanctions and it will not be tolerated.

Fraud and anti-corruption control in the AFP is every appointee's individual responsibility. This Plan, therefore, applies to each and every appointee, regardless of level, in the AFP.

The AFP is committed to managing fraud and corruption risks as part of its everyday business.

In accordance with my responsibilities for developing an overall AFP Fraud Control and Anti-Corruption Strategy, I have prepared a Fraud Control and Anti-Corruption Policy Statement (the Policy Statement). The Policy Statement summarises the AFP's overall approach and policy with respect to internal and external fraud and anti-corruption control. The Policy Statement is provided at Attachment 1 and is also published on the AFPHUB.

This Plan is intended for internal use and sets out the AFP's strategy for the overall management of fraud and corruption risks for the next two years. This document is intended to be used and referenced regularly. From time to time, the Plan will be adjusted to ensure new and emerging fraud and corruption risks are identified and treated.

I ask that all appointees familiarise themselves with the Plan and the Policy Statement. Take the time to understand your role and responsibilities in preventing, minimising, reporting and combating fraud and corruption within the AFP.

T. Negus
Commissioner

January 2012

Contents

FOREWORD 1

PART A 3

1. INTRODUCTION 3

2. FRAUD AND CORRUPTION DEFINED 3

3. AFP OVERVIEW 4

ENVIRONMENT 4
ORGANISATIONAL STRUCTURE 5

4. AFP FRAUD CONTROL AND ANTI-CORRUPTION FRAMEWORK 5

FRAUD CONTROL AND ANTI-CORRUPTION POLICY STATEMENT 5
GOVERNANCE INSTRUMENT FRAMEWORK 5
BUSINESS PLANNING 6
GOVERNANCE COMMITTEES 6
PERFORMANCE MONITORING AND QUALITY ASSURANCE 7
EXTERNAL OVERSIGHT 8
INTEGRITY FRAMEWORK 8

5. MANAGING FRAUD AND CORRUPTION RISKS 9

SUMMARY OF FRAUD AND CORRUPTION RISKS 10
SUMMARY OF AFP FRAUD CONTROL AND ANTI-CORRUPTION RISK ASSESSMENT 10
SUMMARY OF FRAUD AND ANTI-CORRUPTION RISK MANAGEMENT ACTIVITIES 11

PART B 12

PART B OF THE PLAN COMPRISES THE AFP ENTERPRISE-LEVEL FRAUD CONTROL AND ANTI-CORRUPTION RISK REGISTER AND TREATMENT PLAN, INCLUDING A HEAT MAP AT ANNEX 1. 12

AFP FRAUD CONTROL AND ANTI-CORRUPTION POLICY STATEMENT.ERROR! BOOKMARK NOT DEFINED.

PART A

1. Introduction

The 2012–2013 AFP Fraud Control and Anti-Corruption Plan (FCAC Plan) has been produced in accordance with the Commonwealth Fraud Control Guidelines 2011, leading practice standards and the AFP's obligations pursuant to the *Financial Management & Accountability Act 1997* (FMA Act). It covers the period 1 January 2012 to 31 December 2013.

The Commonwealth Fraud Control Guidelines 2011 require agencies to conduct a fraud risk assessment at least every two years and update their FCAC Plans accordingly. The AFP follows better practice by considering fraud risk through regular risk reviews, undertaking a formal review annually and following any significant organisational change.

Purpose of the FCAC Plan

The FCAC Plan:

- provides an overview of the governance arrangements relating to fraud control and anti-corruption
- outlines the AFP's fraud and corruption key risk areas
- identifies the strategies and activities to further strengthen the AFP's fraud control and anti-corruption activities.

The Plan is based on a whole-of-AFP Fraud and Anti-Corruption Risk Assessment which has been developed in accordance with the AFP's National Guideline on Risk Management. As part of this process, nine (9) strategic fraud and corruption risks have been identified.

The term 'appointees' in this Plan has the same meaning as in s. 4 of the *Australian Federal Police Act 1979* (Cth) and, for the purposes of this document, includes the AFP Commissioner.

Key responsibilities

The AFP Commissioner (the Commissioner) and the senior executive are required to develop and implement an overall strategy for the deterrence, prevention and detection of fraud and corruption within the AFP. The AFP's fraud control and anti-corruption framework assists the Commissioner to exercise his responsibilities for fraud control under the FMA Act.

All appointees, contractors and service providers have a responsibility in preventing, detecting and combating fraud and corruption as set out in AFP Commissioner's Orders and associated governance documentation.

Responsibility for the preparing and coordinating the implementation of the FCAC Plan is delegated to the National Manager Policy and Governance.

2. Fraud and Corruption Defined

This Plan addresses both fraud and corruption control.

The Commonwealth Fraud Control Guidelines 2011 define fraud against the Commonwealth as:

'Dishonestly obtaining a benefit, or causing a loss, by deception or other means'.

This definition includes:

- theft
- accounting fraud (false invoices, misappropriation, etc.)
- unlawful use of, or obtaining property, equipment, material or services
- causing a loss, or avoiding and/or creating a liability
- providing false or misleading information to the Commonwealth, or failing to provide it when there is an obligation to do so
- misuse of Commonwealth assets, equipment or facilities
- making or using false, forged or falsified documents
- wrongfully using Commonwealth information or intellectual property.

The full definition of fraud from the Commonwealth Fraud Control Guidelines 2011 appears on the Attorney-General Department's website.

While 'corruption' is not defined in the Commonwealth Fraud Control Guidelines 2011, corrupt conduct in the AFP is defined by the *Law Enforcement Integrity Commissioner Act* (LEIC Act) as:

(a) conduct that involves, or that is engaged in for the purpose of, the staff member abusing his or her office as a staff member of the agency; or
(b) conduct that perverts, or that is engaged in for the purpose of perverting, the course of justice; or
(c) conduct that, having regard to the duties and powers of the staff member as a staff member of the agency, involves, or is engaged in for the purpose of, corruption of any other kind.

The AFP Act defines a conduct issue at section 40RH(1) as whether an AFP appointee has:

(a) engaged in conduct that contravenes the AFP professional standards; or
(b) engaged in corrupt conduct.

Three (3) categories of conduct are described in the AFP Act at 40RN, 40RO, and 40RP:

- Category 1 conduct offences relate to customer service and minor management matters
- Category 2 relates to repeated Category 1 issues
- Category 3 relates to serious misconduct (eg. excessive use of force, theft).

Corrupt behaviour must be referred to the Australian Commissioner for Law Enforcement Integrity.

3. AFP Overview

Environment

The AFP is Australia's international law enforcement and policing representative and the chief source of advice to the Commonwealth Government on policing issues. AFP functions are set out in accordance with the AFP Act, section 8, and by Ministerial Directions issued under section 37(2) of the AFP Act.

Since its establishment in 1979, the AFP's focus (as defined by Ministerial Direction) and the way it operates has changed significantly in response to both changes in the criminal environment and Australia's law enforcement operating framework.

One of the key strategic objectives for the AFP is to safeguard the economic interests of the nation from criminal activities such as serious fraud, money laundering, corruption, intellectual property crime and technology enabled crime.

In pursuing its objectives the AFP seeks to:

- maintain and enhance a professional culture, based on AFP core values, that ensures the community's confidence is maintained at all times including through effective policing and the AFP workforce respecting and reflecting the diversity of the Australian community, and
- maintain a high standard of corporate governance, including risk management, through legislative compliance and fostering a culture of continuous improvement.

The scale and geographical spread of the AFP's operations and the nature of the business has created particular challenges in relation to managing fraud and corruption risks. Unique circumstances, such as operating in remote parts of the world within different cultural frameworks, the high level of discretion and exposure to criminality in some areas of the AFP, and the growth in risks associated with terrorism and organised crime are all aspects of AFP business.

While the AFP has to manage its own fraud and corruption risks, it also has the primary law enforcement responsibility for investigating serious or complex fraud across the broader Commonwealth. The AFP evaluates all external matters referred to it for investigation in accordance with its Case Categorisation Priority Model.

Organisational Structure

The AFP's organisational structure is located via the Executive Structure link on the AFP website: www.afp.gov.au

4. AFP Fraud Control and Anti-Corruption Framework

The AFP has in place a number of governance functions and arrangements that support fraud control and anti-corruption in the AFP including:

- a AFP Fraud Control and Anti-Corruption Policy Statement
- a Governance Instrument Framework
- business planning processes
- governance committees
- performance monitoring and quality assurance
- external oversight
- an integrity framework that includes mechanisms for internal and external reporting of suspected fraud and corruption and communication strategies (eg. case studies, warning messages, values printed around building).

Fraud Control and Anti-Corruption Policy Statement

The AFP has developed a Fraud Control and Anti-Corruption Policy Statement that summarises the AFP's overall approach and policy with respect to internal and external fraud and anti-corruption control. The Policy Statement is provided at Attachment 1 and is also published on the AFPHUB.

Governance Instrument Framework

The AFP maintains a Governance Instrument Framework to enable AFP appointees' online access to AFP professional standards instruments and other key governance documents. It includes Commissioner's Orders (COs) issued

under section 38 of the AFP Act, guidelines issued under section 37 of the AFP Act and Commissioner's Financial Instructions, which constitute Chief Executive Instructions under section 52 of the *Financial Management and Accountability Act 1997*.

Section 39 of the AFP Act requires AFP appointees to comply with COs. The AFP Commissioner's Order on Professional Standards (CO2) and the *Australian Federal Police Categories of Conduct Determination 2006* (issued jointly by the Commonwealth Ombudsman and the Commissioner) sets a compliance regime for AFP conduct and practices issues.

The Commissioner, through CO2, requires AFP appointees to comply with AFP professional standards, including the AFP core values and the AFP Code of Conduct. It is mandatory for non-compliance to be reported to the AFP's Professional Standards area.

Business Planning

The AFP's business planning framework incorporates processes to assist the alignment of AFP people, financial resources, systems and capabilities to the measurable delivery of government specified outcomes as set out in the Portfolio Budget Statement.

The business plans include identified functional risks which could impact on the AFP's ability to achieve outcomes; and also identifies mitigation options which are reflected as strategies in the business plans.

AFP business plans are continually reviewed and adjusted in response to performance feedback, opportunities for improvement, changes to government expectations, and changes in the criminal, business and internal environments which affect the AFP.

Governance Committees

The two (2) main governance committees that have a role in the oversight of fraud control and anti-corruption management are the AFP Strategic Leaders Group and the AFP Audit Committee. There are several additional AFP committees which provide governance and oversight such as the National Occupational Health and Safety Committee, Finance Committee and the Security Committee.

Strategic Leaders Group (SLG)

The SLG is the peak advisory committee of the AFP and assists the Commissioner in making decisions and exercising his statutory responsibilities. The SLG focuses on strategic issues for the AFP and enables a streamlined approach in which to manage core AFP business issues. This includes, for example, reviewing and guiding the AFP's strategic direction, determining objectives and priorities for the AFP in line with Ministerial Direction, consideration and endorsement of new policy proposals and oversight of the AFP's governance and risk frameworks.

Audit Committee

The Audit Committee provides independent assurance and assistance to the Commissioner on the AFP's risk, control and compliance frameworks, internal audit plans and its external accountability responsibilities.

The role of the Audit Committee is directed towards:

- enhancement of governance treatments, in particular control systems such as embodied in policies, procedures and practices

- improving the objectivity and reliability of externally published financial information
- monitoring the propriety and integrity of the most significant/substantive operational and administrative practices; and
- assisting the Commissioner to comply with his obligations.

In relation to fraud control and anti-corruption the Audit Committee's charter responsibilities include:

- reviewing whether management has in place a current and comprehensive risk management framework, and associated procedures for effective identification and management of the AFPs financial and business risks, including fraud; and to
- review the AFP's FCAC Plan and satisfy itself that the AFP has appropriate processes and systems in place to capture and effectively investigate fraud related information.

The Audit Committee will regularly monitor the implementation of the FCAC Plan including risk treatments and whether the Commonwealth's fraud control reporting requirements are met. As part of the AFPs overall risk management framework, the FCAC Plan will also inform the development and targeting of the AFPs annual internal audit program.

Performance Monitoring and Quality Assurance

Performance information is regularly captured, monitored, reviewed and reported so as to promote accountability and highlight opportunities for continuous improvement.

Internal Assurance and Reporting

The AFP's Internal Audit function provides the Commissioner with assurance that organisational outputs and activities are operating effectively, efficiently and lawfully. An effective internal audit regime helps to avoid exposure to internal fraudulent schemes by determining whether the organisation has adequate internal controls and oversight. The Internal Audit function is monitored by the Audit Committee which, at least once a year, reports to the Commissioner on its operation and activities.

The AFP's FCAC Plan compliance reviews are conducted on an ongoing basis and results are reported to the Audit Committee at least every twelve (12) months or as required. Each quarter the Professional Standards unit analyses fraud and corruption data, aligning relevant incidents against fraud and corruption risk categories. As part of a quarterly risk review process, all functional areas are provided with relevant fraud and corruption data to assist them to review and strengthen controls around fraud and corruption risks.

External Assurance and Reporting

The AFP must comply with mandatory requirements as outlined in the Commonwealth Fraud Control Guidelines 2011. As such, the Commissioner must provide an annual report to the Minister for Home Affairs which includes:

- fraud initiatives undertaken by the agency in the reporting period including an evaluation of their effectiveness
- planned fraud initiatives not yet in place
- information regarding significant fraud related risks for the agency
- significant fraud incidents which occurred during this period.

Furthermore, the Commissioner certifies to the Minister in the AFP's Annual Report an assessment of satisfaction that the AFP has appropriate fraud prevention, detection, investigation, reporting and data collection procedures and processes in place.

External Oversight

With regard to AFP Professional Standards matters, the Commonwealth Law Enforcement Ombudsman maintains an oversight role and has the power to commence an 'own motion' investigation into the AFP.

The Australian Commission for Law Enforcement Integrity (ACLEI) also has a role in the prevention, detection and investigation of corruption in the AFP and other Commonwealth agencies. The Commissioner must notify ACLEI of any corruption issue that relates to the AFP. ACLEI can also accept a referral of a corruption allegation from any person or government agency or commence an investigation on its own initiative. The Parliamentary Joint Committees for Law Enforcement and the Australian Commissioner for Law Enforcement Integrity may conduct inquiries into the AFP and oversight key activities.

Integrity Framework

The AFP's Integrity Framework encompasses fraud, corruption and misconduct prevention, detection and response activities. Less serious misconduct issues are dealt with by in-line managers while more serious misconduct and corruption are managed by a separate Professional Standards (PRS) unit. This unit has responsibility for investigating more serious misconduct and corruption, liaising with external oversight bodies on issues of serious misconduct and corruption, and also managing prevention and awareness activities.

The work of the AFP's PRS unit, which is underpinned by Part V of the AFP Act, includes:

- investigating complaints of serious misconduct and corruption (in consultation with ACLEI)
- random and targeted drug testing
- maintaining professional standards governance instruments
- supporting a self-reporting process for inappropriate associations, conflict of interest, financial hardship, etc.
- development of early intervention/conduct management strategies
- communicating lessons learned via case studies on the AFPHUB
- training on, for example, ethical decision-making, integrity issues, complaint handling.

<u>Process for reporting suspected fraud and corruption</u>

AFP appointees are obliged to report any suspected incidents involving other AFP appointees involved in fraud, corruption or any instances of behaviour that is contrary to the AFP code of conduct. They must also receive and record any complaints made to them by anyone who is not an appointee. Further guidance on how to report any suspected incident is provided on the AFPHUB.

Members of the public can lodge complaints by completing an online form at www.afp.gov.au, attending or telephoning any AFP police station or office, or writing to or otherwise contacting PRS.

The PRS unit maintains the AFP Complaint Recording and Management System which is a formal system for recording all complaints about AFP appointees,

including complaints about fraud or corruption. There is also a Confidant Network which provides an assistance mechanism for AFP appointees to perform their reporting obligations, including anonymously, by reporting though specially trained 'confidantes' drawn from all ranks and levels in the AFP.

Process for investigating suspected fraud and corruption instances

PRS investigators are responsible for the evaluation and investigation of serious misconduct complaints. All evidence is given due consideration and weighting of that evidence will be determined by a number of factors. PRS adjudicators do make findings on the administrative standard of 'on the balance of probabilities'. However, the AFP takes the view that as the potential seriousness of the matter and the potential penalty imposed increases, so does the rigor needed for the evidence obtained in support of the facts. This approach is consistent with the Administrative Review Council best practice guidelines on Administrative Inquiry and other legal precedents.

There are seven (7) Investigation Teams comprising over 30 investigators within the Investigation Unit. Four (4) teams are based in Canberra with one team based in Brisbane, Melbourne and Sydney respectively and an officer posted to Solomon Islands. During 2009–2010, a dedicated team was established to specifically manage corruption matters and the increasing engagement with ACLEI.

PRS investigators are required to be appropriately trained and have extensive policing experience. This combination ensures compliance with the fraud control competency requirements as outlined in the Commonwealth Fraud Control Guidelines 2011.

The AFP has strong recruitment gateways to ensure candidates are rigorously assessed and, if necessary, excluded during the recruitment process. Employees are also required to maintain security clearances, which involves regular security vetting. This process highlights areas of integrity concern which are followed up.

The AFP actively engages with peer agencies nationally and internationally through a number of arrangements such as the Australian and New Zealand Police Advisory Agency (ANZPAA). The ANZPAA integrity forum is focussed on sharing information and experiences in relation to policing integrity.

5. Managing Fraud and Corruption Risks

Development of the AFP Fraud Control and Anti-Corruption Risk Register

Previous AFP Fraud Control and Anti-Corruption Plans have been developed using a 'bottom-up' risk assessment approach. This involved amalgamation of fraud risks and mitigation strategies identified by AFP functional areas in the context of their business activities.

For this FCAC Plan, a 'bottom up' risk assessment was again undertaken with an additional 'top-down' analysis conducted. This was achieved through the development of an enterprise-level risk register of AFP fraud and corruption risks. That process took into consideration:

- an analysis of common fraud risks identified across existing functional fraud risk registers
- requirements in the new Commonwealth Fraud Control Guidelines 2011
- alignment of the fraud risks with the description of fraud contained in the Guidelines and in the Criminal Code
- alignment with definitions of corruption in the LEIC Act and the Australian Standard on Fraud and Corruption Control
- alignment with the AFP's Integrity and Security Frameworks

- analysis of contemporary organisation complaint, allegation and security incident data
- benchmarking with other agencies/departments
- internal and external audit outcomes.

A Fraud Control Steering Group was established to oversee the process. The steering group consisted of the Manager Internal Audit and Business Analysis, Manager Professional Standards, Manager Security, Manager Finance and Budget Advice, Manager Special References and Deputy Chief Police Officer ACT. All AFP functions and the major state offices were consulted in the development of the enterprise-level risk register.

The AFP's risk analysis matrix (referenced in the AFP National Guideline on Risk Management) combining 'likelihood' and 'consequence' ratings was used to evaluate the residual risk rating of identified risks after assessment of the effectiveness of existing controls. Where residual risk levels were still considered too high, additional treatments have been identified.

The nature of this process has highlighted nine (9) areas of strategic fraud risk for the AFP that, as a result of the process used, all result in high level, residual risk, even after consideration of controls. These nine (9) areas will need to remain under close scrutiny and monitoring by the AFP.

All AFP fraud and corruption risk assessments are classified due the sensitivity of information.

Summary of fraud and corruption risks

The following table lists the nine (9) fraud and corruption risks that were identified through the fraud and corruption risk assessment process and are in no particular order.

Description
Theft of; dishonest use of; or dishonest claim for AFP/Commonwealth assets and funds.
Dishonest conduct which aims to or results in loss of revenue or creation of a liability due to the AFP or the Commonwealth.
Dishonest conduct regarding the use of procurement and supply relationships which seeks to or diverts funds away from an AFP project, program or activity.
Dishonest use of official information.
Dishonest use of AFP branding/insignia/logo.
Dishonest use or lack of use of power or authority or status as an AFP employee/contractor/special member.
Dishonest use or treatment of evidence, seized items, or miscellaneous property.
Dishonest disclosure or lack of disclosure relating to personal circumstances, financial situation, secondary employment, conflict of interest, history, incidents, associations to influence an AFP outcome.
Conspiring with others within the organisation or outside the organisation to exploit any of the previous risks.

Summary of AFP Fraud Control and Anti-Corruption Risk Assessment

The risk assessment summary highlights each of the risks according to their assessed likelihood of occurrence and consequence on the AFP if they did occur after existing controls have been considered.

Based on the AFP's risk assessment matrix, four (4) fraud and corruption risks were rated medium, four (4) rated as significant and one (1) was rated as high.

It should be noted that two (2) of the significant risk ratings and the risk rated as high were as a result of perceptions of major consequences should the risk arise rather than being attributed to any weakness in the control environment. A heat map detailing these ratings is at Annex 1 to Part B.

According to the AFP's risk appetite, all risks rated medium and above require additional treatment.

The AFP has a responsibility to monitor the existing control environment to prevent/detect known fraud and corruption risks and implement further treatments as required.

Implementation of treatments identified will be owned by AFP management and oversighted and monitored by the Professional Standards Unit, the Strategic Risk Management Team and the AFP Audit Committee.

Summary of Fraud and Anti-Corruption Risk Management Activities

The following table summarises the AFP's fraud and corruption risk management activities to be implemented over the next two (2) years as part of this Plan. These management activities are designed to ensure the AFP meets its obligations under the Fraud Control Guidelines 2011 and continue to build upon the AFP's strong governance framework.

These risk management activities are in addition to controls and treatments identified in the AFP Enterprise-level fraud and corruption risk register (refer Part B).

Part B of the Plan is classified Security-in-Confidence and is not for release outside the AFP due to the risk of compromise to current or future AFP operations and activities. Storage, handling and disclosure must be in accordance with AFP security governance.

Action Items	Actions	Responsibility	Timeframe
1.	Advise the Minister for Home Affairs and Justice that the FCAC Plan has 2012–2013 has been developed	NMPG (Strategic Risk Management Team - SRMT)	January 2012
2.	Rollout communication strategy for release of the FCAC Plan and Policy Statement and review Hub material	NMPG (SMRT)	29 February 2012
3.	Rollout enterprise-level fraud and corruption risk assessment to functions and align with business planning processes	NMPG (SRMT)	30 March 2012
4.	Review fraud and corruption risks and controls and report to Audit Committee	NMPG (SRMT)	May & November 2012 & 2013

Action Items	Actions	Responsibility	Timeframe
5.	Escalate significant/emerging fraud and corruption risks by ensuring that they are captured in the AFP's overarching strategic risk profile	NMPG (SRMT)	Quarterly review in March, June, September and Dec 2012 & 2013
6.	Review the possibility of testing fraud and corruption controls as part of the internal audit program and measuring and evaluating their effectiveness	NMPG (Internal Audit in conjunction with SRMT)	June 2012
7.	Liaise with the Commonwealth Ombudsman's Office regarding the review of AFP activities under Part V of the AFP Act	NMHR (MPRS)	Timeframes agreed between Ombudsman and AFP
8.	Certify in the AFP Annual Report that the AFP has an appropriate fraud control and anti-corruption framework in place	NMPG (SRMT)	August/Sept 2012 & 2013
9.	Continue to respond to the Australian Institute of Criminology's fraud questionnaire	NMPG (SRMT) in conjunction with MPRS	30 September 2012 & 2013
10.	Engage with ACLEI as part of annual review of FCAC Plan	MPRS	31 October 2012
11.	Report to the SLG on implementation of the FCAC Plan	NMPG (SRMT)	30 November 2012
12.	Submit annual report to the Minister for Home Affairs and Justice on fraud control and anti-corruption activities for the AFP	NMPG (SRMT)	21 December 2012
13.	Finalise new FCAC Plan for 2014–15	NMPG (SMRT) in conjunction with MPRS	December 2014

PART B

Part B of the Plan comprises the AFP Enterprise-level Fraud Control and Anti-Corruption Risk Register and Treatment Plan, including a Heat Map at Annex 1.

Part B is classified Security-in-Confidence and is not for release outside the AFP due to the risk of compromise to current or future AFP operations and activities. Storage, handling and disclosure must be in accordance with AFP security governance.