AUSTRAC Independent Evaluations for Pubs, Hotels and Clubs

DOES THIS APPLY TO MY VENUE? CHECKLIST

LICENSED FOR 16+ GAMING MACHINES? HERE'S WHAT YOU NEED TO KNOW.

If your venue has licence entitlements for 16 or more gaming machines, specific AML/CTF obligations apply, even if you're operating fewer machines. Use this checklist to see where you stand and what to do next.

1. DOES THIS APPLY TO YOUR VENUE?

Does your licence include entitlements for 16 or more gaming machines?

☐ Yes ☐ No ☐ Not sure

Have you checked your licence entitlements, rather than just the machines operating?

☐ Yes ☐ No ☐ Not sure

WHAT DO YOUR ANSWERS MEAN?

YES: The 16+ AML/CTF requirements apply to your venue.

NO: The specific 16+ requirements may not apply. Check whether other AML/CTF obligations apply.

NOT SURE: Check your gaming machine licence to confirm your entitlements.

YOUR NEXT STEP

Confirm whether the requirements apply. If you're unsure, aceia can help clarify your position and what may be required.

TALK TO ACEIA

1300 791 794
info@aceia.com.au
aceia.com.au/aml-ctf-pubs-clubs

2. HOW ARE YOUR AML/CTF ARRANGEMENTS LOOKING?

Tick what you currently have in place. Leave anything you're unsure about unticked.

- ☐ AML/CTF program and policies – Documented policies and procedures.
- ☐ Risk assessment – Assessment of money laundering and terrorism financing risks.
- ☐ Compliance responsibilities – Someone responsible for AML/CTF oversight.
- ☐ Customer due diligence – Processes to identify and verify customers when required.
- ☐ Transaction monitoring – Processes to identify unusual or suspicious activity.
- ☐ Staff training – Relevant staff trained in AML/CTF responsibilities.
- ☐ Employee due diligence – Appropriate employee screening and checks.
- ☐ AUSTRAC reporting – Processes to meet reporting obligations.
- ☐ Records and oversight – Record keeping, management oversight and outsourced AML/CTF activities, where relevant.

WHAT DO YOUR ANSWERS MEAN?

TICKED MOST OR ALL? A good starting point, but are your arrangements documented and working effectively?

HAVE SOME GAPS? Identify what's missing or may need attention.

NOT SURE? Start by locating your AML/CTF program, policies, risk assessment and training records.

YOUR NEXT STEP

Identify what's in place and what needs attention. If you're unsure where to start or whether your arrangements are adequate, aceia can help.

Ticking every box doesn't confirm compliance. An Independent Evaluation assesses whether your arrangements are appropriate and working effectively.

3. ARE YOU UP TO DATE WITH INDEPENDENT EVALUATIONS?

From 31 March 2026, Independent Evaluations replaced the previous Independent Review requirements. Tick what applies to your venue.

- ☐ We know when our last Independent Review or Evaluation was completed.
- ☐ We have a copy of our most recent Independent Review report.
- ☐ We have not previously had an Independent Review completed.
- ☐ We know when our next Independent Evaluation is due.
- ☐ Our AML/CTF policies, procedures and controls are documented and specify how often evaluations are to be conducted.
- ☐ We understand that the evaluator must be appropriately independent.

WHEN IS YOUR FIRST INDEPENDENT EVALUATION DUE?

For existing regulated businesses that completed an Independent Review under the previous Rules, the first Independent Evaluation is due by the later of:

- **31 March 2027, or**
- **four years after your most recent Independent Review.**

Independent Evaluations are then required at least once every three years, with the frequency specified in your AML/CTF policies.

Your circumstances may affect your deadline. A previous report doesn't automatically mean the review meets the relevant requirements.

WHAT DO YOUR ANSWERS MEAN?

HAD A PREVIOUS REVIEW? Check whether it meets the requirements and confirm your next deadline.

NEVER HAD A REVIEW? Don't assume the transitional deadline applies to you.

NOT SURE WHEN YOU'RE DUE? Your deadline depends on your venue's circumstances and previous review history.

YOUR NEXT STEP

Locate your previous report, if you have one, and confirm your next deadline. If you're unsure, aceia can help you work through what applies to your venue.

SO, WHERE DOES YOUR VENUE STAND?

Whether you've ticked every box, identified gaps or aren't sure where to start, you don't need to have everything sorted before talking to aceia.

Our specialist team can help you understand your current arrangements, clarify your Independent Evaluation requirements and determine what needs to happen next.

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Your initial conversation is complimentary and comes with no obligation.

SUPPORTING SOUTH AUSTRALIA'S HOTEL INDUSTRY

aceia is an AHA|SA Corporate Partner, providing specialist internal audit, risk, compliance and AML/CTF expertise.

CORPORATE PARTNER 2026-27 | AHA|SA Australian Hotels Association (SA)

This checklist is a general guide, not a comprehensive compliance assessment or a substitute for an Independent Evaluation. Requirements depend on your venue's circumstances.

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delivering assurance

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