AUSTRAC Independent Evaluations for Pubs, Hotels and Clubs

FREQUENTLY ASKED QUESTIONS

Answers to common questions about your AML/CTF obligations and what to expect from an Independent Evaluation.

UNDERSTANDING YOUR REQUIREMENTS

1. My venue is licensed for 16 or more gaming machines but operates fewer. Do the requirements still apply?

Yes. The AML/CTF requirements are based on the number of gaming machine entitlements under your licence, not simply the number of machines currently operating.

So, if your venue has entitlements for 16 or more gaming machines but currently operates fewer, the 16+ requirements still apply.

2. How do I know when my first Independent Evaluation is 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.**

If you're unsure when your venue is due, aceia can help you work through your circumstances and ascertain whether your previous review meets independent review requirements.

3. How often will I need an Independent Evaluation?

Your AML/CTF policies need to specify how often Independent Evaluations are conducted, with an evaluation required at least once every three years.

4. What's the difference between an Independent Review and an Independent Evaluation?

From 31 March 2026, Independent Evaluations of AML/CTF programs replaced the previous Independent Review requirements.

An Independent Evaluation looks at whether your AML/CTF program and policies are appropriate for your venue(s), whether your money laundering and terrorism financing risks are being identified and managed, and whether your business is following its AML/CTF policies.

ABOUT THE INDEPENDENT EVALUATION

5. What does an Independent Evaluation look at?

The exact scope depends on your venue(s) and circumstances. It can include your:

- AML/CTF program and policies
- Money laundering and terrorism financing risk assessments
- Customer due diligence
- Transaction monitoring
- AML/CTF staff training
- Employee due diligence
- AUSTRAC reporting
- Governance and management oversight
- Record keeping and outsourced activities.

6. What if we already have AML/CTF processes in place?

That's a good starting point. An Independent Evaluation provides an independent check of how your existing processes and controls are working and helps identify anything that may need attention.

In many cases, it's about strengthening or better documenting what you're already doing rather than starting again.

7. What if we don't have everything in place yet?

You don't need to have everything sorted before talking to aceia.

We start by understanding your venue(s), gaming operations and what AML/CTF arrangements you currently have in place. The scope of the evaluation is then tailored to your venue(s), your current arrangements and AUSTRAC expectations.

8. Why does the person conducting the evaluation need to be independent?

The person conducting your Independent Evaluation needs to be appropriately independent from the AML/CTF program and controls being evaluated.

This provides an objective view of how your program is working and where attention may be needed.

9. What will we receive at the end of the evaluation?

You'll receive a report including clear findings and practical recommendations on what needs attention.

The aim is to help you understand what's working, identify gaps and know where to focus your effort.

WORKING WITH ACEIA

10. I'm not sure whether we need an Independent Evaluation. Can I talk to someone first?

Absolutely. You don't need to have all the answers before contacting aceia. An initial conversation can help you understand what applies to your venue(s) and what your next step should be.

As an AHA|SA member, you can also contact the Association for advice and insights on Independent Evaluations.

Your conversation with aceia is complimentary and comes with no obligation.

Contact us on 1300 791 794 or +61 8 8133 4900, or email info@aceia.com.au

11. How much does an Independent Evaluation cost?

The cost will depend on the scope of the evaluation and your venue's circumstances, including the complexity of your operations and the AML/CTF arrangements you currently have in place.

Before any work begins, we'll discuss your requirements and the proposed scope so you understand what's involved and the associated cost.

12. How long does an Independent Evaluation take?

The timeframe will depend on your venue(s), the scope of the evaluation, the AML/CTF arrangements you currently have in place and the availability of the information required. Evaluations typically take between 4 to 6 weeks.

We'll agree the scope and expected timeframe with you before commencing the evaluation.

13. Will you need to visit our venue(s)?

Yes, site visits are required for each venue. The nature and duration of the site visit(s) depend on the scope and circumstances of your Independent Evaluation.

We'll let you know what is required as part of the agreed scope before the evaluation begins.

14. What information will we need to provide?

The information required will depend on your venue(s) and what you currently have in place.

This typically includes your AML/CTF program and policies, risk assessments, training records, relevant reporting and records, and information about the processes and controls used within your gaming operations.

If you're not sure what you have or where to start, we'll explain what we need and work through it with you.

15. We operate more than one venue. Can the Independent Evaluation cover multiple venues?

If your business operates multiple venues, we'll first look at how your AML/CTF arrangements are structured across the group and the circumstances of each venue.

From there, we can determine the appropriate scope for the Independent Evaluation and discuss the most practical approach with you.

STILL HAVE QUESTIONS?

NOT SURE WHERE YOUR VENUE STANDS?

Whether you're checking your obligations, preparing for an Independent Evaluation or unsure where to begin, aceia can help.

TALK TO ACEIA

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

SUPPORTING SA'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 FAQ sheet provides general information only. Requirements and evaluation deadlines depend on your venue's circumstances.

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delivering assurance

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