AHA NT – AUSTRAC CHECKLIST

The AHA (NT) have created this checklist, along with a number of resources, to assist Members with their mandatory AUSTRAC compliance.
All documentation mentioned below should be placed in an 'AUSTRAC'FILE, ready for inspection from AUSTRAC compliance officers.
Please note this checklist is a 'Best-Practice' Guide only.

	YES/NO
Mandatory Enrolment	
Business is enrolled and registered with AUSTRAC Online http://www.austrac.gov.au/businesses/enrolment-and-remitter-registration/enrolment-and-registration *Note: all pubs and clubs with gaming machines need to register with AUSTRAC Online.	
Successful completion of enrolment will see AUSTRAC issue your venue with an **AUSTRAC ACCOUNT NUMBER (AAN)**	
Conduct a Money Laundering/Terrorism Financing (ML/TF) Risk Assessment for your Venue	
AHA NT Risk Assessment Tool (available from AHA NT Website) *Consider:* - Customer types, including any customers who are politically exposed persons (PEPs) and their associates; - The types of designated services (gaming machines, TAB, Keno etc) - How the entity provides its designated services (face-to-face, over the counter or online) Note: Your ML/TF Risk Assessment should be in writing and updated and reviewed regularly	
Print a copy of your Risk Assessment and file (update yearly or whenever business operations change)	
Appoint an AML/CTF Compliance Officer	
Duty statement included in template AML/CFT Template Program	
Print off a copy of Compliance Officer documentation and file	
Develop a AML/CTF Program	
AHA NT AML/CTF Program template (available from AHA NT Website) *(Fill out all relevant sections and adapt templates to your Venue)*	
Print off a copy of your complete AML/CTF Program and file	
Staff Training – AML/CFT Awareness	
All staff involved in gaming duties, as well as all management, view the 'AML/CFT Staff Awareness Training Program (available from AHA NT Website)	
Training register is kept in AUSTRAC File	
Gaming staff undertake AUSTRAC training e.g. Webinars when available	
AUSTRAC signage is displayed in staff areas (AHA NT Website)	
Implement an On-Going Customer Due Diligence Program – AUSTRAC Reporting Requirements	
Reporting procedures established for transactions over $10,000 e.g. gaming machine payments/prizes	
ID procedures in place for customers prior to the pay-out of winnings and/or accumulated credits greater than $10,000 (irrespective of payment)	
Reporting procedures established for 'suspicious matters', e.g. Customers who seeks to cash out after little or no play. Monitoring of suspicious matters include: - observation by staff of customer behaviour; - review of reports to AUSTRAC; - review of large cash transactions records, and - review of the Register and cross checking of customer names with reports and records.	
Implement an Employee Due Diligence Program	
(if appropriate) Screen and re-screen prospective or new employees who may be in a position to facilitate the commission of money laundering and terrorism financing offence. - Have a documented process for managing employee failure to comply with any system, control or procedure established in accordance with your AML/CTF Program	
Approval and Oversight by Boards/Senior Management	
Evidence that Risk Assessment and AML/CFT Program has been approved by Board/Management Oversight of AML/CFT Program may include; on-going reporting in meetings and periodic review of ML/TF Risk	
Undertake an Annual & Independent Review of AML/CFT Program	
Record Keeping – all records relating to AUSTRAC and the points listed above should be kept in a file	