

Procedure: Unusual Matter – Level 1 & 2

1. Purpose

To assist Ipswich Jets meet with suspicious matter reporting obligations under the *Anti-Money Laundering & Counter Terrorism Financing Act 2006*.

2. Responsibilities

All Staff

3. What is an unusual matter

The Club considers the following as red flags/unusual matters for transaction monitoring purposes:

Examples of red flags or unusual matters:

- Unusual transactions or circumstances are evident.
- Known background including business background of the customer may be considered suspicious.
- Production of unusual or false identification.
- The use of aliases and, or a variety of similar addresses.
- Customer sources of funds are suspected of being linked to criminal activity – patron is a known criminal, money launderer or terrorism financier, patron is involved in a suspicious matter.
- Customer asks for cheques to be made out below \$10,000 or in the name of a third-party.
- Customer in the gaming machine areas that appear to have no visible intention of playing gaming machines, customer inserts cash into a gaming machine with little or no legitimate game play
- A customer who approaches other customers to purchase payout vouchers, credits on machines or prize-winning cheques
- A customer with a high number of redemptions over a short period.
- Sum of transactions adds up to significant amounts of money.
- Transactions involving stolen or counterfeit money
- Staff collusion – including staff not reporting suspicious matters
- Customer using another person's player loyalty card

- Customer preferring to use CRT to avoid staff contact and possible detection of high number of transactions.
- Customer receiving a volume of cheques within a specific period that is beyond that of which would be a reasonable amount of winnings by one person.
- Customer profile does not match the amount of funds they are gambling. Low income versus large amounts gambled:
Customers who gamble with large amounts of cash and do not use the ATM.
- Customer is known to be on Centrelink benefits or a lower income earner; however, they gamble large amounts of money.
- Customers who gamble with large amounts of cash and do not use the ATM.
- Staff collusion:
 - Customers have preferences for certain staff.
 - Where staff fail to report their suspicions or may be involved in unusual activity.
- Customer sources of funds are suspected to be linked to criminal activity.
- Customers asking for cheques to be made out below \$10,000.
- Customers in the gaming machine areas that appear to have no visible intention of playing gaming machines.
- Customers who approach other customers to purchase payout vouchers or gaming prize payment cheques.
- Customer who may make a request for a cheque to be written in the name of a third party.
- High redemptions over a short period of time.
- Sum of transactions adds up to significant amounts of money.
- Customer receiving a volume of cheques within a specific time-period that is beyond that of which would be reasonable amount of winnings by one person.
- Customer receiving multiple cheque payments on a single day beyond that of which would be reasonable amount of winnings by one person for one day.
- Customer involved in a transaction is considered a high risk politically exposed person.
- Customer involved in the transaction is considered a high risk politically exposed person.

Procedure

WHAT ACTION NEEDS TO BE TAKEN?

1. Where a staff member identifies a matter which may be considered unusual, they are required to report the matter, as soon as is reasonably practicable, to their immediate Supervisor or Duty Manager.
2. The Duty Manager, will record the details of the unusual matter that has been reported to them using the UNUSUAL MATTER REPORT and provide a copy of the report to the AML/CTF COMPLIANCE OFFICER. If the customer is not known to the Club – collect as much information as possible about the customer without tipping them off:

- Attempt to identify or re-identify the customer. If possible inform the customer that the Club needs to update its records and will request the patron to complete a new MEMBERSHIP APPLICATION FORM.
 - If the customer is not already a member, a free membership can be offered.
3. The AML/CTF COMPLIANCE OFFICER will conduct further investigation as may be required. Which may include conducting employee interviews as required at any stage in the investigation
- Conduct further enquiry of the customer at any stage of the investigation to ascertain more information about them, without “tipping” the customer off.
 - Review information that is held about the customers identify (i.e. membership records, payout records, review cheque register).

Related Documents:

- DAILY SHIFT REPORTS
 - FORM: UNUSUAL MATTER REPORT
 - PROCEDURE: UNUSUAL MATTER
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