



PROCEDURE: \$10,000 PAYOUT

1. PURPOSE

Club Harrington has customer identification and verification obligations under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (AML/CTF Act)* for payments of \$10,000 or more.

2. PROCEDURE TO BE FOLLOWED BY:

- Gaming Staff
- Supervisor/Duty Manager
- AML/CTF Compliance Officer

2.1. Gaming Floor Staff

Gaming Staff Must inform the Shift Supervisor/Duty Manager immediately that a payment over \$10,000 occurs for a cancelled credit, jackpot payout or TAB transaction. There are specific requirements for TAB payments and the TAB Resource Manual should be consulted.

- The Club has customer identification and verification obligations under the *AML/CTF Act* for payments of \$10,000 or more.
- Normal gaming payout procedures apply for these payments; however, certain documentation must be sighted, and information recorded for auditing purposes.

2.2. Shift Supervisor/Duty Manager

The Supervisor/Duty Manager must, ensure that the customer is identified and verified before payment is made. The customer must provide their name, date of birth and residential address.

3. When a transaction of \$10,000 occurs:

- 1) Complete the payment as per Liquor & Gaming NSW requirements and Club Harrington procedure.
- 2) Complete the PRIZE WINNER FORM. The patron must verbally provide their full name, date of birth and residential address.
- 3) Verify the CUSTOMER'S FULL NAME, and either their:
 - Date of Birth or
 - Residential Address

Sight a current original or certified copy of one of the following documents (Table 1), in the immediate presence of the prize-winning customer:

Table 1 – Preferred method of identification using Primary Photographic ID

IDENTIFICATION VERIFICATION METHOD NO 1	
1.	Australian Passport (current)
2.	Australian Driver Licence (current)
3.	Proof of Age card (current)
4.	National Identity Card (current)
5.	Foreign Drivers Licence – must be written in English (current)
6.	Foreign Passport – must be written in English (current)

- 4) Verify that the documents produced by the customer have not expired.
- 5) Complete Section 4 VERIFICATION OF IDENTIFICATION - Record the type of identification document/s that have been used to verify the customers, full name, date of birth and residential address on the PRIZE WINNER FORM.
- 6) Any documentation that is not written in English must be a language that is understood by the person carrying out the verification. If the document is accompanied by an English translation, an accredited translator must have prepared it.
- 7) Verify that the customer's name and either the date of birth or residential address are correct. If a discrepancy is evident then:
 - a. The customer must provide a minimum of one other form of photographic identification as per Table 1 above which shows their current name and either their date of birth or residential address as per Table 1 above: or
 - b. The customer must provide a minimum of one non-photographic identification document from Table 2 (7, 8 or 9) and one secondary identification document from Table 3 (10, 11, or 12) below; that when combined, show their current name, date of birth and residential address.

Table 2. An original or Certified Copy of:

Identification Verification Method No 2 – Non-Photographic	
7.	Birth Certificate or Birth Extract
8.	Citizenship certificate (C/Wealth issue or in English)
9.	Centrelink Pension Card

Table 3. An original or Certified Copy of:

Identification Verification Method No 2 - Secondary Documentation	
10.	Any government financial benefits notice
11.	ATO notice (not less than 12 months old)

Identification Verification Method No 2 - Secondary Documentation	
12.	Local Government or utilities notice (rates notice, electricity or gas bill – not less than 3 months old), where the notice contains the name and residential address of the customer

- 9) All identification documents must be an original or certified copy.
- 10) Ensure that photocopies of the following documents as per Table 4 below are attached to the Customer Identification Form. These documents are the ‘Transaction Records’.

Table 4.

Transaction Records	
1.	Gaming Machine Payout Voucher
2.	Prize Winner Form
3.	Copy of Cheque or EFT Payment

- 11) If the customer cannot provide acceptable identification the AML/CTF Compliance Officer must be notified.
- 12) Payment cannot be made until one of the **Identification Verification Methods** has been met.
- 13) The cheque may only be given to the person who is the prize-winner and whose name appears on the PRIZE WINNER FORM. ID must be requested to confirm the identity of the person collecting the cheque as the legitimate prize-winner.
- 14) If any of the boxes at Section 5 - ECDD PROCEDURE are ticked ✓ refer to the PROCEDURE: POLITICALLY EXPOSED PERSON.
- 15) Follow the PROCEDURE: POLITICALLY EXPOSED PERSON to establish if the PEP is high risk.

NOTE 1:

PEPs fit into either a low risk (generally domestic or international organisation PEPs), or high-risk category (foreign PEPs or high ML/TF risk domestic PEPs). The Club is required to determine which risk category the PEP fits into and then conduct the customer identification procedure accordingly. If, for example the PEP uses the Clubs Gaming Machines and receives a \$10,000 (or more) payout, they will need to be identified as per normal customer identification procedures – i.e., the Club will need to collect the PEPs:

- Full name
- Residential address; and
- Date of birth.

Then verify, using acceptable identification, the PEPs:

- Full name; and either their
- Address or date of birth.

NOTE 2:

The AML/CTF Compliance Officer must ensure that customer identification records are kept safe and secure in accordance with the *Privacy Act* and the *AML/CTC Act*.

Transaction Records must be filed appropriately and produced upon request for auditing purposes.

- Any transaction of \$10,000 or more must be documented and filed in the Transaction Register.
- Transaction Records must be filed appropriately and be produced upon request for auditing purposes.

AML/CTF Transaction Records must be kept for 7 years

4. REFERENCES

- PROCEDURE: PRIZE WINNERS FORM
 - PROCEDURE: \$10,000 PAYOUT
 - PROCEDURE: POLITICALLY EXPOSED PERSON
 - PROCEDURE: ENHANCED CUSTOMER DUE DILIGENCE
 - PROCEDURE: UNUSUAL MATTER REPORT
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