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CLASS 1 LOCAL IMPACT ASSESSMENT

**TO ACCOMPANY AN APPLICATION TO INCREASE
THE GAMING MACHINE THRESHOLD**

OF

**THE QUEANBEYAN SPORTS AND COMMUNITY CLUB
LIMITED**

ALSO KNOWN ‘CAMPBELL AND GEORGE’

**97 CAMPBELL STREET
QUEANBEYAN NSW 2620**

PREPARED FOR THE APPLICANT

**SHANE HOLLAND
SECRETARY/GENERAL MANAGER**

**BY GEORGE W SMITH
AUGUST 2020
REF: 201450.1LIA**

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EXECUTIVE SUMMARY

The Queanbeyan Sports and Community Club's (*the Club*) clubhouse is located at the corner of Campbell and George Streets, close to the centre of Queanbeyan, where it currently has a bowling green for formal play and "The Paddock" that is used for barefoot bowling along with space for children to play soccer and outdoor games. It also has another two bowling greens and a croquet green on the opposite side of Campbell Street.

It has some 5,000 members and keeps 50 EGMS although it has a GMT of 54.

The application which this LIA accompanies seeks an increase of 20 in the Club's GMT to 74. While the Club provides all the facilities and services to be expected of a licensed club, it will be adding an area to accommodate the additional EGMS being sought which will enable social-distancing and provide an improved level of comfort for players.

The increase in GMT is also sought to enable the Club to assist in paying for its part of the recent refurbishment, and the proposed expansion, of the clubhouse; to cater for its rapidly increasing membership by providing better services and facilities; to provide funds for upgrading its outdoor areas for families; to maintain its greens and to attract more members and greater use of its facilities.

The Club lies in the Queanbeyan Statistical Area 2 (*QSA2*) which is part of the Queanbeyan urban area (*QUA*) which is in the Queanbeyan-Palerang Regional Council Area (*RCA*).

The RCA covers some 5,300 km² and had a population of 56,000 in 2016. Venues in that LGA kept 786 GMEs at the end of 2019 of which 707 were in the QUA. The QUA had a population of 36,348 at the 2016 Census and is growing slowly. Due to its proximity to Canberra, Queanbeyan is an atypical regional town in NSW. There are six clubs in Queanbeyan with 640 EGMS with two keeping 473 EGMS of them.

The QSA2 had a population of 10,842 in 2016. It covers the original part of the town including its main business area. **Table 1** sets out characteristics of its population and provides a comparison with Queanbeyan and NSW's populations. It is a Band 2 area. The three clubs in it keep 523 EGMS.

The Club engages Betsafe to assist it with its gaming operations and has a set of plans for harm minimisation (**Appendix G**) and has adopted a comprehensive plan for the management of gaming (**Appendix H**).

As the Club was closed for refurbishment for most of 2019, the Club's revenue did not rise to the level where it contributed to the ClubGrants scheme but it assists local organisation as set out in **Appendix I**. The Club offers to donate to the Responsible Gambling Fund, generally, in accord with the formula developed by ILGA.

Consultations, as required, about the application have been initiated.

THE CLUB

The Queanbeyan Sports and Community Club Ltd is the outcome of the amalgamation of the Club of that name and the Queanbeyan Bowling Club Ltd (*Bowling Club*) which took place on 23 April 2018.

The Club occupies two parcels of land. The clubhouse, a formal bowling green, a multi-use space (which was formerly a bowling green) and a car parking area lie on the western side of Campbell Street, immediately south of George Street. There is another, smaller clubhouse, two lawn bowling greens and a croquet green located on the eastern side of Campbell Street, immediately north of Farrar Place, which are known as the 'Ladies Club'. The former property is freehold land but the latter is located on Crown land in Queanbeyan Park. The locations of these properties are shown on **Plan 181188/1**, a recent aerial photograph.

The Club's clubhouse is a single-storied building of approximately 1000m² which was extensively refurbished during 2019. **Appendix A** contains a current floor plan of the clubhouse. The current gaming area is marked on that plan.

During 2019, the Club, with the assistance of its landlord - the Tuggeranong Valley Rugby Union and Sports Club - undertook a major re-development of the clubhouse which included the construction of a new gaming area. The intention of the refurbishment was to create a "point of difference" destination facility which would be attractive to new members and their guests while retaining the historic values of the town's longest established club, the Bowling Club having been formed in 1934. **Annexure B** contains some photographs of the refurbished interior of the clubhouse.

The Club now provides traditional lawn bowling, barefoot bowls, darts, croquet and pool as well as food, beverages and gaming and now a massive family space where children can play in safety. The clubhouse contains a bistro/lounge area; a small function/community room called Nonna's; the "Locker Room" premium sporting vision lounge and "The Paddock", the outdoor family space, as well as its gaming area.

While having light meals available all day from its snack bar, the Club's Brick and Basil Italian Bistro is open from noon to 3pm and 5pm to 9pm daily, providing full meals.

Prior to the COVID 19 shutdown, the clubhouse opened from 11.00 am to 11.00 pm, Monday to Thursday; 11.00 am to midnight, Friday and Saturday, and 11.00 am to 10.00 pm, Sunday. When current restrictions are removed, it may amend its operating hours.

The Club is now operating in accordance with current public health orders.

The re-development has successfully broadened the appeal of the Club to a wide range of local sporting and community groups and will compensate for the decline in lawn bowling and other changes likely in the club industry. The clubhouse is now a place for all the community to meet up, relax and enjoy.

Following its re-opening in late 2019 until the COVID-19 shutdown, the Club was very successful with its membership increasing by over 600% in a little over three months. The Club had a total of 4,948 members, made up of 120 bowling members and 4,828

social members, when the COVID 19 shutdown commenced. The COVID-19 shutdown trammelled that growth but membership has been increasing since the Club re-opened. In August 2020, the Club had 5,417 members.

Its members live throughout Queanbeyan and the surrounding rural areas as well as in the Australian Capital Territory (*ACT*). The applicant estimates that about 50% of the Club's members live in the QSA2 and about 72%, in the QUA. (The ACT and elsewhere in NSW each contributed about 14% to its membership.) The majority of its members are aged over 45 years although the average age appears to be falling as membership increases.

The Club currently keeps 50 electronic gaming machines (*EGM*) although its gaming machine threshold (*GMT*) is 54. The 50 EGM are kept in a separate, recently refurbished, gaming area which permits smoking at some machines. The Club plans to add to the Clubhouse to accommodate the additional EGMs being sought by the application which this LIA accompanies. That addition is shown on **Appendix A**, being the area shaded in pink. When it is completed in 2021, the clubhouse will cover some xxx sqm.

The applicant found that, during the brief period it was open before the COVID-19 shutdown, the 50 EGM it presently keeps were insufficient to satisfy the demands of members and their guests to play EGM at popular times which are, generally, between 4pm and closing. The applicant is seeking the increase in GMT to enable the Club to increase the number of EGMs it keeps in order to meet that demand and what the applicant believes will be the future increase in demand as its membership grows. With an increase in the number of EGMs it keeps, the Club hopes to reduce the already-evident significant movement of players from it to the larger clubs in the QUA when the demand to play exceeds its present gaming room's capacity.

SURROUNDING DEVELOPMENT

The clubhouse is located at the corner of Campbell and George Streets, some 500 metres from what might be described as the centre of the main business area in the QUA. Most of the land between the Club and that area is taken up by Queanbeyan Park and the Queanbeyan Showgrounds. The Queanbeyan Police Station also lies between the Club and the central business area of the QUA.

The balance of the surrounding development is residential, consisting mainly of cottages, with a sizeable retirement village and a large palliative care unit occupying much of the balance of the street block in which the Club is located. Scattered amongst the cottages are low rise residential flat buildings and small blocks of town houses.

The Kings Highway, which links Canberra to the South Coast, passes just to the south of the Club. Campbell Street joins that Highway.

The nearest churches are the Baptist, some 300 metres to the west when measured in a straight line, and the Catholic, some 400 metres to the east, again measured in a straight line. The Queanbeyan High School is about 600 metres to the west.

Appendix C contains a street map of Queanbeyan showing the locations of the Club and of relevant facilities near it and a map showing the extent of the QSA2 and surrounding SA2s within five kms in NSW, all of which are Band 1 areas.

COMMUNITIES

The Club is located in the QSA2 which is one of four SA2s which cover the QUA which, in turn, lies in the RCA.

Appendix D provides a brief description of the RCA and **Plan 201450/2** shows its extent and the location of the QUA. The RCA covers some 5,600 square kilometres and, at the 2016 Census, it had a population of 56,000 of whom 36,348 lived in the QUA. Its population had increased by about 3,700 in the previous five years.

The RCA abuts the northern and eastern boundaries of the ACT. Most of the RCA is devoted to grazing with State Forests and National Parks along its eastern edge. Nearer the ACT, there are many small rural residential lots, mainly, occupied by people who commute to work in Canberra. There are a number of small towns in the RCA, most of which have either a hotel or a club.

About 40% of the RCA's growth between 2011 and 2016 occurred in the 'new town' of Googong which lies about eight kilometres south of the centre of the QUA. Googong is planned to house some 18,000 people.

Appendix E contains a description of the QUA. The QUA abuts the border of the ACT and is closely related to Canberra, economically and socially. **Plan 201450/3** shows the extents of the QUA and of the four SA2s which cover it as well as its proximity to the ACT.

The QUA's population grew by about 500 in the 2011 to 2016 period, much of its potential growth having been diverted to Googong.

Appendix F provides information about the QSA2. In 2016, the QSA2 had a population of 10,842 compared to 10,234 in 2011. That is to say, it accounted for most of the growth in the QUA.

The population of the QSA2 has been growing slowly and is likely to continue to do so largely through the redevelopment of older cottages with residential flat buildings and townhouses.

Table 1 sets out data from Quickstats 2016 for NSW, the QUA and QSA2 which illustrates selected characteristics of their populations.

HARM MINIMISATION AND RESPONSIBLE GAMING MEASURES

The Club presently observes harm minimisation and responsible gambling by adhering to its Responsible Conduct of Gambling House Policy which forms **Appendix G**.

It is a member of Betsafe and puts in place that organisation's suggested best practice measures. The Club uses the services of Betsafe as its gambling counsellor should any player seek such assistance and for self-exclusion.

The Club has adopted and follows the provisions of the '*Plan of Management for harm minimisation and the responsible conduct of gaming at the Queanbeyan Sports and Community Club*' which appears at **Appendix H**. That Plan is intended to ensure that the Club's gaming operations comply with all the provisions in relevant legislation and sets out measures to ensure that occurs.

The Club has also adopted an '*Anti-Money Laundering and Counter-Terrorism Financing Program Manual*' (**Appendix J**) to reduce the potential for illegal activities arising from gambling on its premises.

COMMUNITY BENEFITS

The Act requires that the Independent Liquor and Gaming Authority (*ILGA*) be satisfied that approving the GMT increase being sought will make a positive contribution to the local community.

The Club provides a community benefit by supporting lawn bowls and croquet which attract older persons in the community as well as food, beverages and gaming for its members and their guests. Following its refurbishment, it now caters for minors through the outdoor playing space of The Paddock where they can play cornhole and other social games conducted on-site by the Club while their parents enjoy other facilities at the clubhouse. Young adults and others also enjoy barefoot bowls which are being promoted into an organised sport by the Club and other clubs in the ACT. The clubhouse also provides a safe and caring environment for its members and their guests close to the CBD of the QUA.

Due to its clubhouse having been closed for an extensive building programme for most of 2019, the Club did not reach the revenue threshold where it was required to make Clubgrants. It does, however, provide support in kind and by small donations to a variety of local organisations. **Appendix J** lists those contributions made in 2019.

When the application is granted and the number of gaming machines kept by the Club increases, the Club will continue to make contributions of this kind to the local community and expects to expand them. In due course, it expects to be required to participate in the ClubGrants scheme.

The Club is currently paying \$37,458 per annum to the Responsible Gambling Fund (*Fund*) as the result of being granted a GMT increase of 20 in 2018. Those payments

will continue until 2023. The payments are being directed by the Fund to Molonglo Support Services (formerly St Benedict's Community Centre) which provides social support to the community of Queanbeyan.

The Club anticipates that it will be required to make another financial contribution to the Fund when its application when this increase in its GMT is approved.

The Act provides that, if a club is required to make a financial contribution in order to satisfy ILGA that the increase in GMT sought will make a positive contribution to the local community, the club must make that contribution to the Fund.

If ILGA requires a club to provide an additional financial contribution to satisfy it that approval of an application will make a positive contribution to the community, that contribution is calculated on the basis of a formula set out in the '*Class 1 Local Impact Assessment process guidelines*' which it issued. That formula is:

$$\text{Amount payable} = 15\% \text{ of the average profit of existing gaming machines before tax} \times \text{GMT increase} \times 5 \text{ years}$$

(It is assumed that the reference to *average profit* is to *average annual profit per machine*.)

In the financial year ending 30 June 2019, the Club's net profit from its gaming machines was \$156,866. However, the Club was closed for six months of that financial year and did not have its full complement of EGMs in place for the whole of that year. Similarly, the Club was closed for the first half of the 2019/20 financial year. This makes it difficult to compute what the average annual profit per EGM may have been.

In these circumstances, the Club proposes that its annual contribution to the Fund for the increase of 20 in its GMT be set at that imposed when its previous application for a GMT increase of 20 was approved, viz. \$187,290, payable in equal instalments over five years.

CONSULTATION

In accordance with the consultation requirements set out in the *Class 1 Local Impact Assessment process guidelines*, before the application and LIA are submitted to Liquor and Gaming NSW:

- copies of the application and this LIA will have been served on the Queanbeyan-Palerang Council and on the Police at the Queanbeyan Police Station;
- the organisations listed in **Appendix K** will have been notified of the applicant's intention to submit the application and that the LIA is available on the Liquor and Gaming NSW website. (**Appendix L** contains that notification.)
- a public notice will be placed in the Canberra Times newspaper. (**Appendix M** is a copy of that notice.)
- a copy of that advertisement has been posted at the main entry to the clubhouse and will remain there until the LIA is determined.

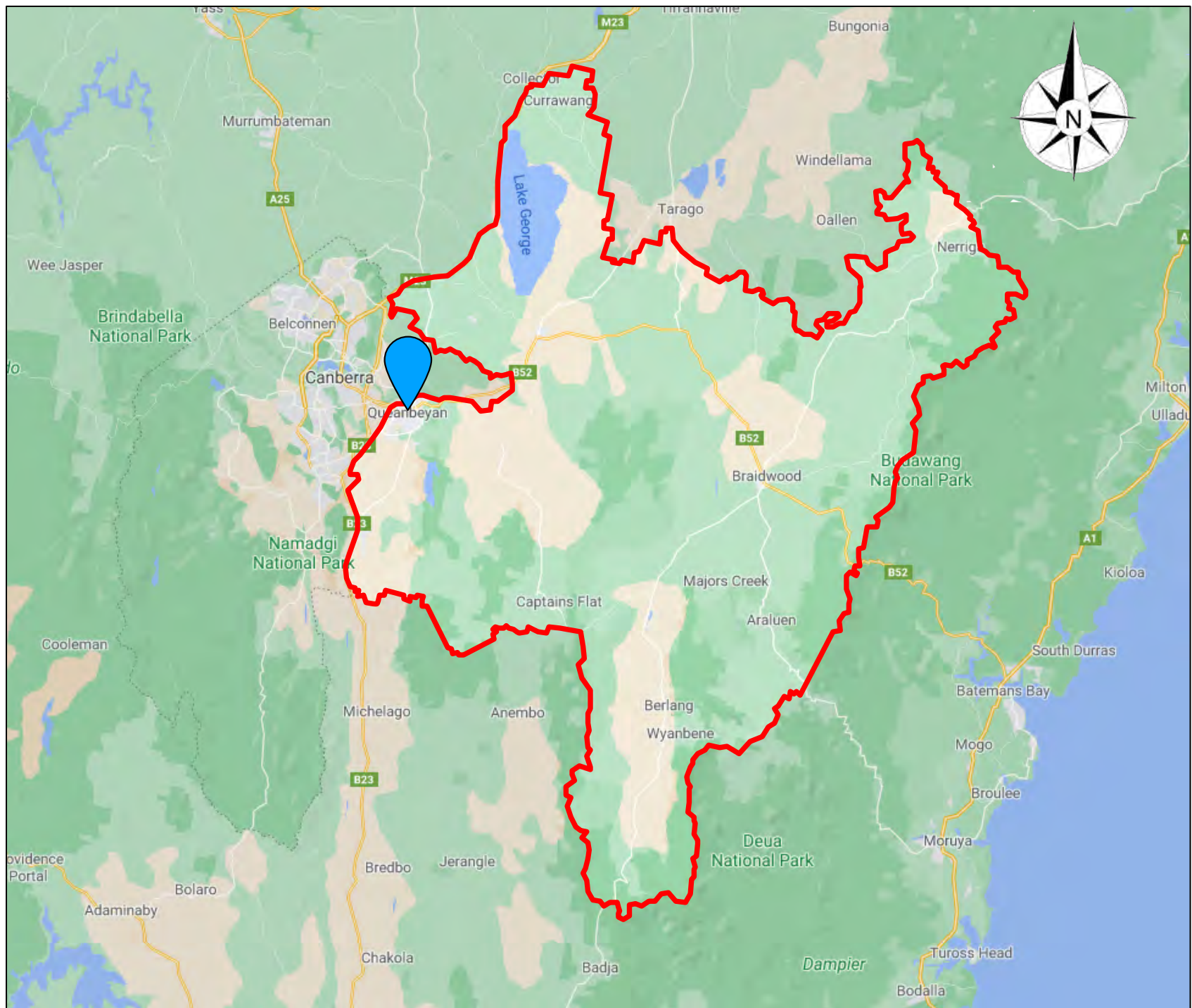
Table 1

	Queanbeyan (SA2)	Queanbeyan (Urban Area)	NSW
Population growth 2011-2016	606	473	562,570
Characteristic			
Median age	36	36	38
Percentage of males	50.1	50	49.3
Percentage ATSI descent	3	3.7	2.9
Percentage aged under 15	15.5	19.2	19.4
Percentage aged 15-24	20.7	12.7	12.5
Percentage aged over 65	10.8	11.3	16.2
Percentage of the population over 15			
separated	3.9	3.3	3.1
divorced	10.6	9.1	8.4
widowed	6.6	4.6	8.4
Level of highest educational achievement			
bachelors degree or better	21.5	21.7	23.4
year 12	16.1	17.1	15.3
year 9 or less	8.8	8	8.4
Education			
percentage attending education institution of which the percentages	26.4	30.1	26.1
Attending primary school	21.9	27.5	26.2
Attending secondary school	14.6	21.6	20.1
Attending technical or further education	9.4	7.4	6.2
Attending University or tertiary institution	16.6	15.4	16.2
Percentage of the population with both parents born overseas	31.4	26.4	37
Main countries of birth			
Australia	67	74.1	65.5
India	3.3	2.1	1.9
England	2	2.4	3
Philippines	1.8	1.1	1.2
New Zealand	1.6	1.5	1.6
Former Yugoslav Republic of Macedonia	1.4	1.4	-
Percentage of households where only English was spoken	71.3	78.5	68.5
Other main languages spoken			
Macedonian	2.3	2.3	na
Punjabi	1.8	1.1	na
Italian	1.6	1.4	na
Nepali	1	na	na
Greek	0.9	na	1.1
Percentage of the workforce classified as			
Professionals	18.6	18.9	23.6
Managers	11.1	14.2	13.5
Clerical and Administrative Workrs	17.7	18.9	13.8
labourers	9.4	7.8	8.8
Unemployed	5.2	4.5	6.3
Median weekly incomes			
Individual	837	911	664
Family	1844	2209	1780
Household	1400	1738	1486
Percentage of one parent families	19.1	16.8	16
Percentage of dwellings which are flats	33.8	17.2	19.9
Percentage of dwellings rented	45.3	35.8	31.8
Median weekly rent (\$)	280	300	380
Percentage of households with less than \$650 gross weekly income	19	15.1	19.7
Percentage of households where			
Rent exceed 30% of weekly income	13.5	10.2	12.9
Mortgage payment exceeded 30% of monthly income	5	5.5	7.4
Number of motor vehicles at dwelling			
None	8.4	5.5	9.2
One	47.1	36.4	36.3
Two	29.6	36.1	34.1
Three or more	11	18.7	16.7



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PLAN201450 - 1 - AERIAL PHOTOGRAPH
QUEANBEYAN SPORTS & COMMUNITY CLUB
CORNER GEORGE STREET & CAMPBELL STREET, QUEANBEYAN



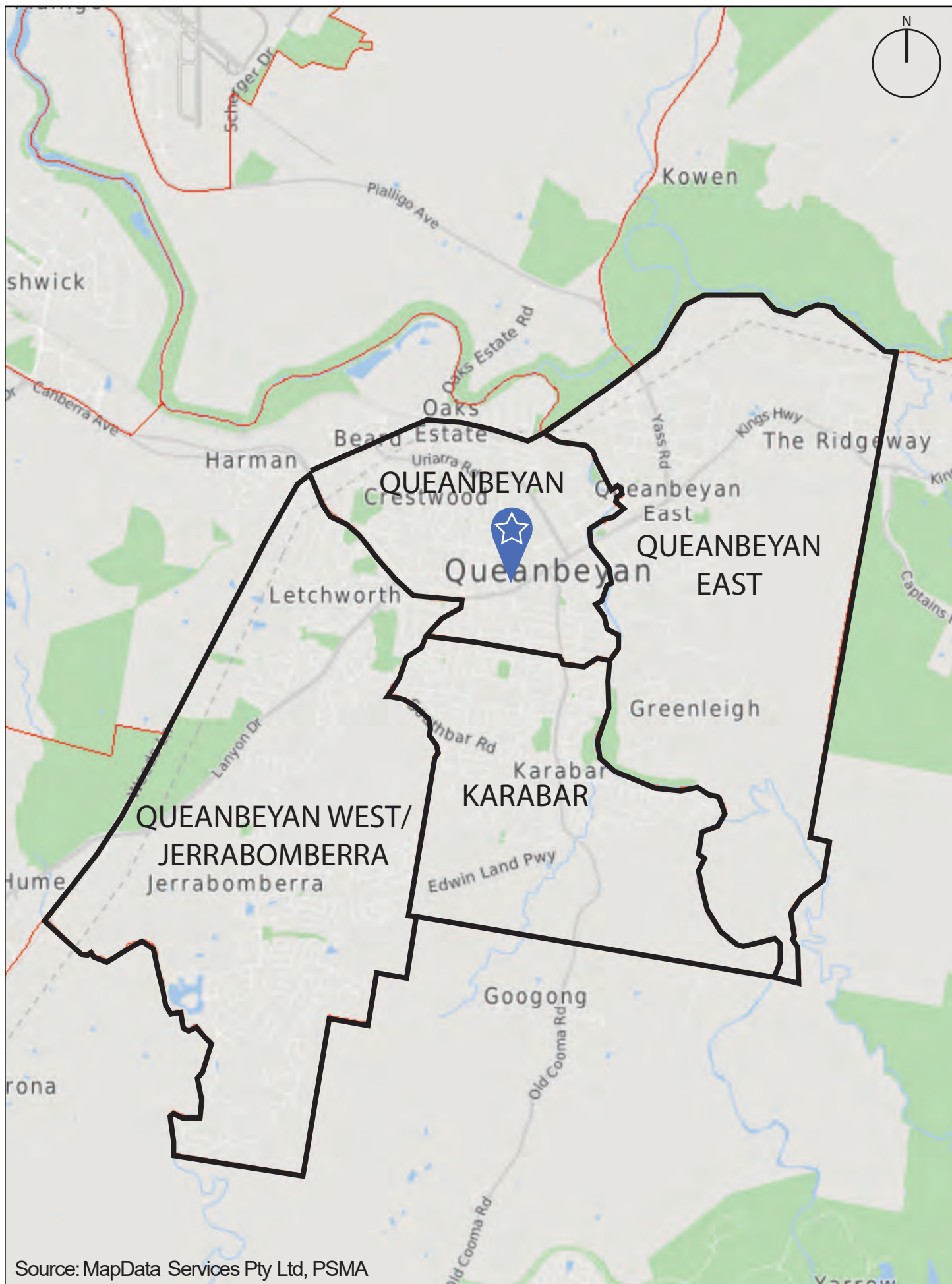
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Plan 201450/2 - Plan of the Quanbeyan-Palerang Regional Council



Source: MapData Services Pty Ltd, PSMA



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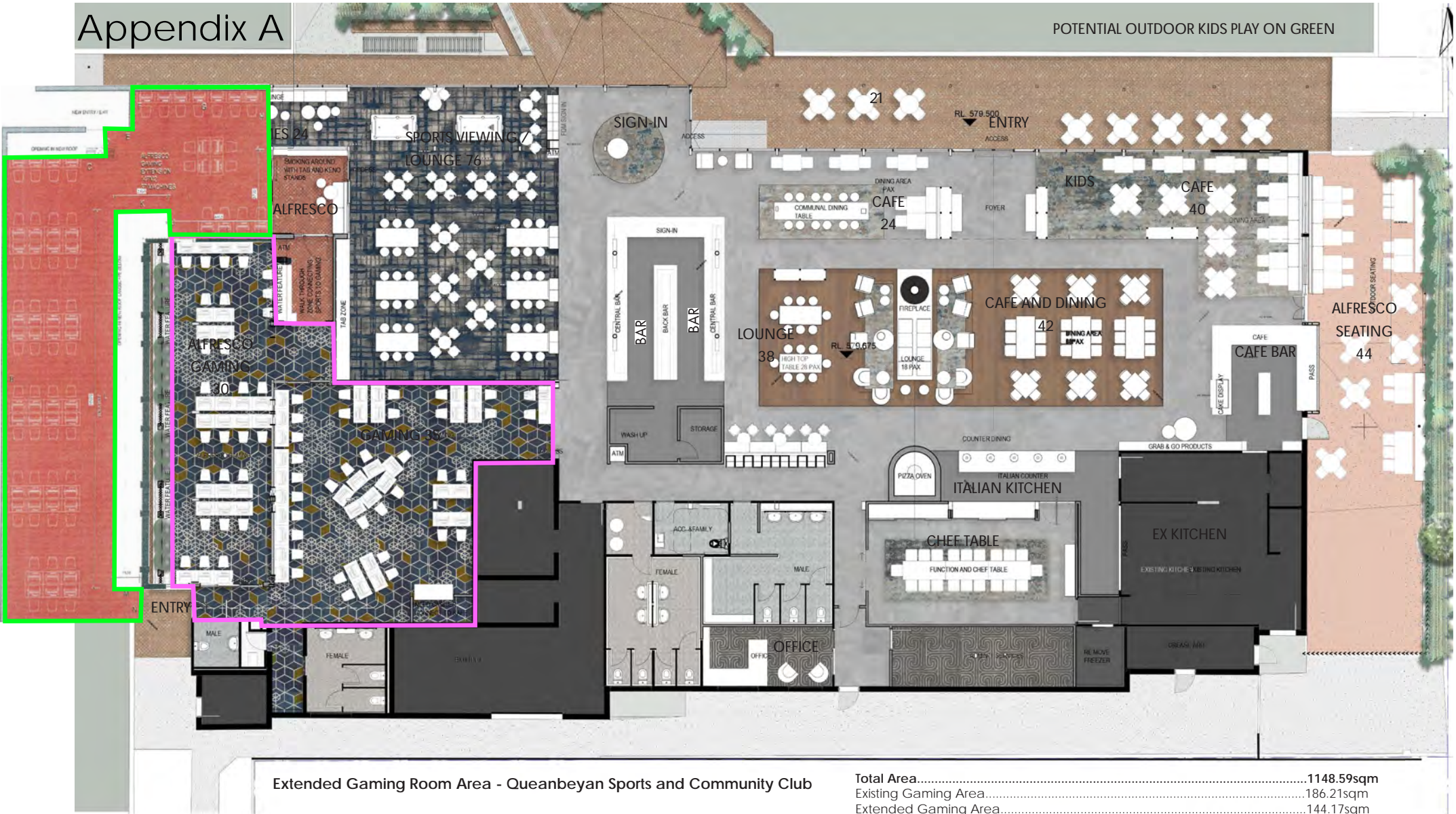
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PLAN 201450/3- SA2 IN QUEANBEYAN
QUEANBEYAN SPORTS & COMMUNITY CLUB
 CORNER GEORGE STREET & CAMPBELL STREET, QUEANBEYAN

Appendix A



Extended Gaming Room Area - Queanbeyan Sports and Community Club

- Existing Gaming Room Area
- Proposed Gaming Room Extension

Total Area.....	1148.59sqm
Existing Gaming Area.....	186.21sqm
Extended Gaming Area.....	144.17sqm
Alfresco/Walk Through.....	23.07sqm
Sports/Viewing Lounge.....	129.79sqm
Sign-In.....	42.70sqm
Bar.....	90.44sqm
Back of House (Toilets, Office, Admin Services, Grease Arrestor).....	249.04sqm
Chefs Table.....	49.26sqm
Kitchen.....	92.24sqm
Lounge.....	79.97sqm
Cafe and Dining.....	96.14sqm
Cafe.....	109.36sqm
Cafe Bar.....	41.97sqm
Alfresco Seating.....	114.86sqm



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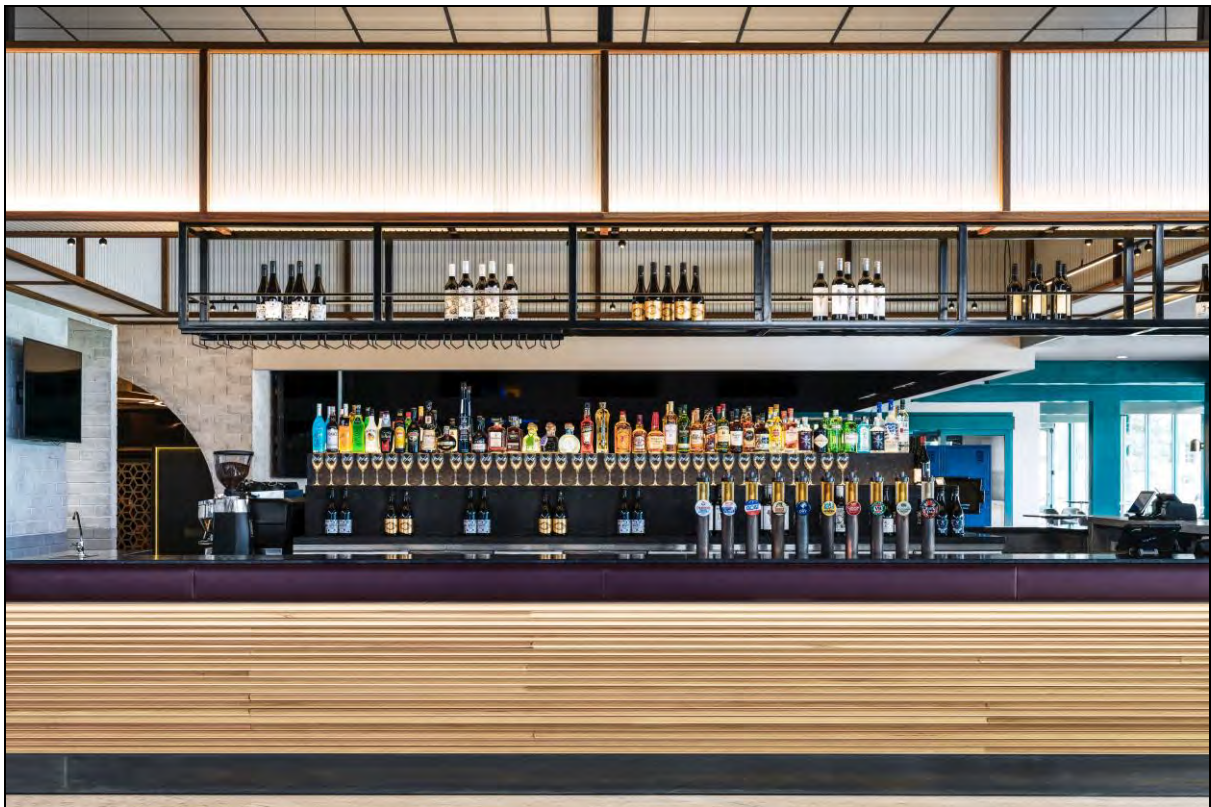
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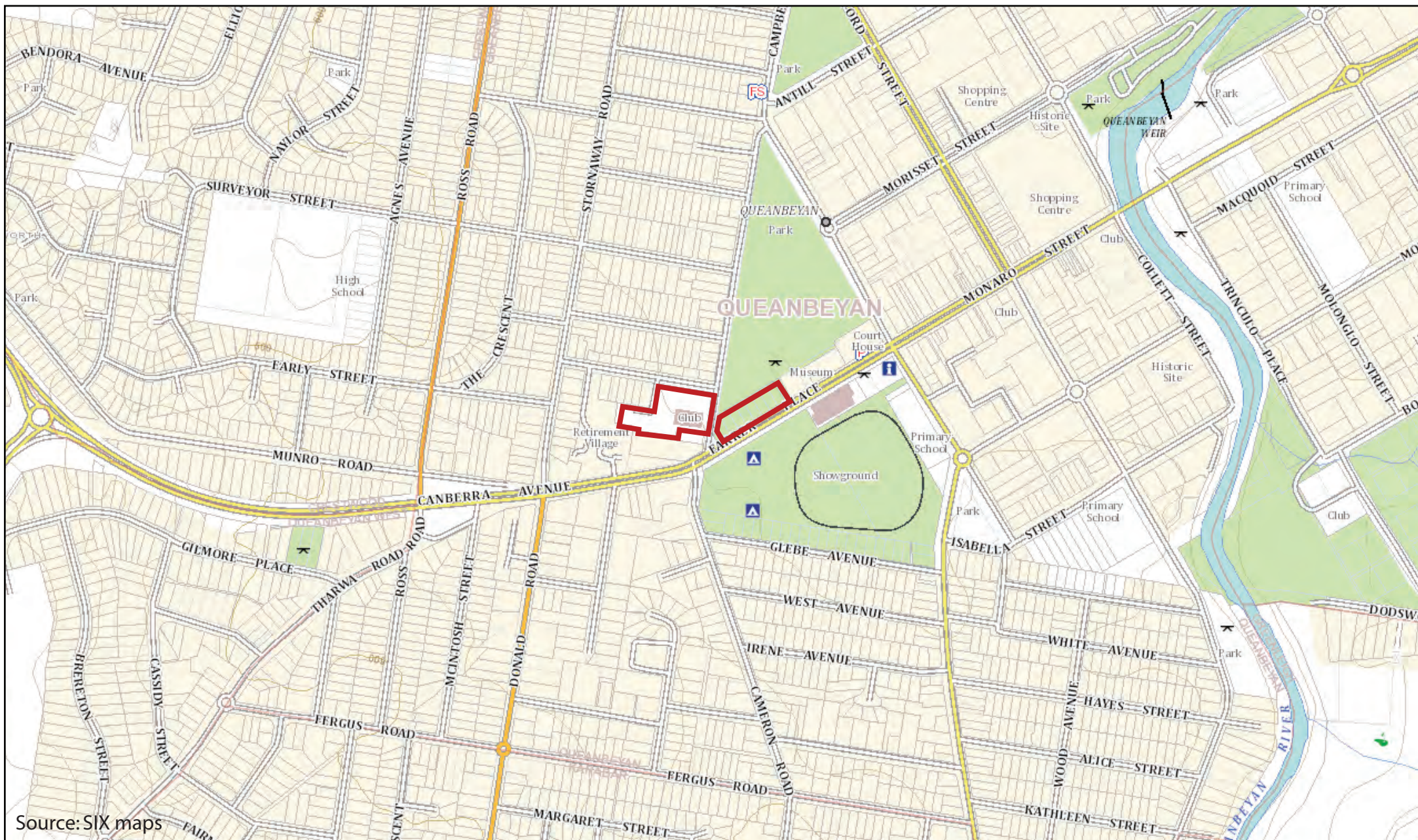
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Appendix B - Photos of refurbished clubhouse









Source: SIX maps



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APPENDIX C - LOCATION MAP

QUEANBEYAN SPORTS & COMMUNITY CLUB

CORNER GEORGE STREET & CAMPBELL STREET, QUEANBEYAN



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Appendix D. The Queanbeyan-Palerang Regional Council Area

The Queanbeyan-Palerang Regional Council Area (RCA) was formed on 12 May 2016 by the amalgamation of the former Queanbeyan and Palerang LGAs.

The Queanbeyan Urban Area (QUA) accounted for almost two-thirds of the RCA's population in 2016 but there are a number of other, much smaller, towns in the RCA which have hotels and/or clubs. Before the shutdown caused by COVID 19, they were, together with their distances from Queanbeyan, 2016 populations and licensed premises:

Bungendore (27 kms)	3,317	(1 club and 2 hotels)
Braidwood (73 kms)	1,273	(1 club and 2 hotels)
Sutton (24 kms)	1,660*	(1 hotel)
Captains Flat (50 kms)	449	(1 club)
Araluen (98 kms)	168*	(1 hotel)
Majors Creek (90 kms)	249*	(1 hotel)
Nerriga (114 kms)	72*	(1 hotel)

*(Populations of State Suburbs rather than urban areas indicated by *.)*

Source: Quickstats

According to the *Gaming Machine Bi-Annual Reports by local government areas* for the last six months of 2019, there were eight clubs with 639 EGMs and eight hotels with 147 EGMs in the RCA. (The hotels in Braidwood, Araluen, Majors Creek and Nerriga did not have gaming machine thresholds.)

In 2016, the RCA had an Index of Relative Advantage and Disadvantage (IRSAD) of 1057 which put it in Decile 9 among the LGAs in NSW.



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Appendix E. The Queanbeyan Urban Area

The QUA abuts the border of the ACT and is closely related to Canberra, economically and socially. Its growth has been closely related to that of Canberra. The following Census results show how the populations of Canberra and the QUA have grown since World War II:

Year	QUA	Canberra
1954	7,310	30,315
1966	12,515	90,032
1976	18,923	207,940
1986	22,698	258,910
1996	25,689	308,251
2001	29,752	307,053
2006	34,084	327,036
2011	35,878	357,222
2016	36,348	397,397

Source: Quickstats.

This table shows that the QUA's growth is slowing but, some 8 kms south of the centre of the QUA, the new town of Googong is developing in the RCA. Its first residents arrived in 2014. In 2016, the State Suburb of Googong had a population of 2,390 which was an increase of over 1,500 on its population in 2011 when it was essentially a rural residential area.

The new town is planned to accommodate some 18,000 people over the next 20 years. Googong appears to be absorbing much of the growth which may formerly have occurred in the QUA. Despite this, the QUA's growth can be expected to continue, albeit slowly, due to redevelopments in the existing urban area.

The QUA is divided, for statistical purposes, into four Statistical Areas, Level 2 (SA2s). **Plan 181188/2** shows the extents of those SA2s. Their populations at the 2011 and 2016 Census are set out below.

SA2	2011 population	2016 population
Queanbeyan	10,234	10,842
Queanbeyan East	4,641	4,786
Queanbeyan West/Jerrabomberra	12,511	12,643
Karabar	8,601	8,247
Total	35,987	36,518

Source: Quickstats

The QSA2 and Queanbeyan East SA2 cover the older parts of the QUA with the Karabar SA2 having been developed in the 1960s and 1970s and Queanbeyan West/Jerrabomberra being the most recently developed.

The four SA2s essentially equate to the Canberra-Queanbeyan (Queanbeyan Part) Urban Area (*QUA*) which had a 2016 population of 36,348 compared to 35,878 in 2011.

The QUA's economy and population growth are heavily dependent on the policies of the Commonwealth and ACT governments, central government administration being the dominant industry of its workforce (which numbered some 20,400 in total), accounting for 11.8% (or 2,279 persons) while defence accounted for another of 7.1% (or 1,384 persons) in 2016. Construction was also an important employer.

Historically, in the first few decades after World War II, when Canberra's growth was relatively rapid, Queanbeyan accommodated many of those involved in Canberra's development as it provided cheaper housing than Canberra and it accommodated industries which were considered unsuitable for the ACT. In many respects, the QUA was, and is, a suburb of Canberra.

Many people from the Balkans, some of whom had worked on the Snowy Mountains Hydro-electric Scheme, settled in the QUA. Their presence is still evident with the Former Yugoslav Republic of Macedonia appearing among the top five countries of birth and Macedonian being the language most commonly spoken after English at the 2016 Census. Other languages spoken included Italian, Punjabi, Hindi and Serbian. (Those speaking Punjabi and Hindi are more recent arrivals while Macedonian and Serbian are relic languages from the earlier influx.)

Despite much of its past growth being generated by blue collar workers, the QUA's workforce is now dominated by white collar workers. Professionals and managers constituted 33.1% of QUA's workforce, compared to 37.3% of NSW's, but clerical and administrative workers constituted 18.9% of its workforce compared to 13.8% in NSW's.

Median incomes in the QUA were well above the NSW medians in 2016.

In terms of socio-economic status, the Indexes of Relative Advantage and Disadvantage (*ISRAD*) of the SA2s in the QUA in 2016 were:

SA2	ISRAD	Decile
QSA2	943	5
Karabar	985	5
Queanbeyan East	943	6
Queanbeyan West/ Jerrabomberra	1113	9

(There is no published *ISRAD* for the QUA as whole.)

That is, the most recently developed part of the QUA had the highest socio-economic status. (Googong, the new settlement south of the QUA, had an *ISRAD* of 1159 putting it in Decile 10.)

It is reasonable to say that the QUA is an atypical regional urban centre in NSW due to its close affinity with Canberra. It has, and does, accommodate many businesses which find it difficult to meet the stringent controls imposed on them in the ACT and it provides lower cost accommodation for many who work and/or study in



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Appendix F. The Queanbeyan SA2 (QSA2)

The QSA2 contains three clubs and four hotels. The total number of EGMs kept in QSA2 in 2020 was 598 with two clubs – the Queanbeyan Leagues Club (with 372 EGMs) and the Queanbeyan Kangaroo Rugby League Football Club (with 101 EGMs) – accounting for 79% of the total number.

Based on 2016 Census population but 2020 gaming machine data, there are 0.055 EGMs per capita or 182 persons/EGM. Population growth since 2016 would have reduced the current number of EGMs/per capita.

As set out above, the QSA2 had a population in 2016 of 10,842 and it had grown slowly over the previous five years. That order of growth can be expected to continue over the foreseeable future as a result of older cottages being replaced by small apartment and townhouse projects.

Table 1 sets out a comparison of selected characteristics taken from the results of the 2016 Census for the QSA2, the QUA and NSW. It reveals the following:

- i. Population growth in the QSA2 and the QUA was limited in the 2011-2016 period with the SA2's population growing more, in absolute terms, than that of the QUA;
- ii. 84.5 % of the QSA2's population was aged 15 or over which was high when retirement villages at the time of the Census as well as having a higher percentage of one-person households in its population;
- iii. The median ages of the populations in the QSA2 and QUA were lower than that of NSW indicating that they contained higher proportions of younger adults despite the presence of retirement villages and lower percentage aged under 15 in the QSA2;
- iv. The QSA2's population contained a slightly higher percentage of ATSI descent than NSW's while the QUA's contained a higher percentage than either;
- v. There were higher percentages of those who were divorced in the QSA2 and QUA's populations than in NSW's but lower levels of those who were widowed;
- iii. The highest levels of educational achievement were fairly similar to those in NSW;
- iv. The QSA2's population contained substantially lower percentages attending primary and secondary schools but a higher percentage undertaking technical education than the NSW population contained while the percentages attending university were similar;
- v. The QSA2 and QUA's workforce contained lower percentages of professionals and managers but higher percentages of clerical and administrative workers than NSW's. (Public administration was the largest employment sector in the QSA2 followed by construction.)

- vi. The unemployment level was higher in the QSA2 than in NSW but, in the QUA, it was lower;
- vii. There were lower percentages of the QUA and QSA2's populations which had both parents born overseas and higher percentages of households speaking only English than in NSW;
- viii. Queanbeyan has attracted an appreciable number of migrants from the Indian sub-continent but few from China;
- ix. Median personal and family incomes were higher than in NSW but household incomes were lower in the QSA2 although all were higher in the QUA. (The lower household incomes on the QSA2 may reflect the presence of the retirement villages or smaller households and divorced persons.);
- x. The QSA2's population contained a higher proportion of one parent families than NSW's which could be linked to the higher proportion of divorced persons in it;
- xi. One third of the QSA2's housing stock consisted of flats and almost half of its dwellings were rented which were much higher than the percentages in the QUA or NSW. (Only 3% of the QSA2's housing stock was provided by a state housing authority);
- xii. In the QSA2, the high percentage of single person households reflects the presence of the retirement villages, divorcees and rental flats. The table below sets out comparative results from the 2016 Census.

Type	QSA2	QUA	NSW
Family	54.6%	67.3%	72%
Single person	41.7%	29.9%	23.8%
Group	3.7%	2.8%	4.2%

The QSA2, being the first part of the QUA to be settled, is thus the part which has seen the most re-development with residential flat buildings, town houses and the like. These provide lower cost accommodation for single persons such as students, divorcees and one parent families as is evident in the results of the 2016 Census.

Queanbeyan Sports and Community Club Safety Plan

The Queanbeyan Sports and Community Club has produced this safety plan to adhere to the highest standards of responsible service of alcohol and patron safety and welfare. In commitment to this plan, the Queanbeyan Sports and Community Club will continue to participate in the local liquor accord and will regularly consult with the local community and NSW Police regarding the safety of the club premise and patrons.

In addition to the mandatory license conditions, Queanbeyan Sports and Community Club management will demonstrate both new and existing safety strategies that will assist the venue's development from the date of implementation.

Existing measures – Alcohol.

The Queanbeyan Sports and Community Club intends to keep existing measures that have reduced incidents on premise. In particular, the club will maintain:

- A ban on all drinking games that encourage excessive alcohol consumption by members and guests.
- Discontinuance of bar service thirty minutes prior to closing time, as this measure has lowered the level of patrons being removed for unruly behaviour and intoxication.
- The banned sale of shots of spirits.
- A historical record of strong compliance with special license conditions and the Liquor Act 2008.
- Self-serve availability of iced water.
- A ban on any in-house promotions that promote excessive drinking and the abuse/misuse of alcoholic products.
- A daily compliance check on the required signage specific to the responsible service of alcohol and minors.

New Steps – Alcohol.

To promote responsible alcohol consumption, the club will:

- Provide refresher training to staff who distribute alcohol to confirm their awareness of legal duty to serve alcohol responsibly.
- Regularly distribute staff memo's pertaining to changed NSW liquor laws and/or the club's continued commitment to responsible service of alcohol.
- Further promote the low alcoholic strength beverages available for purchase.
- Implement a strong intervention policy with regards to intoxication for habitual offenders.
- Display more copies in-house of the Queanbeyan Sports and Community Club's house policy to ensure patrons are aware of both the club's commitment to their safety, and their personal obligations to both themselves and other patrons/staff members.
- Further train staff members in the early detection of unacceptable behaviour/s by patrons on premise and the steps to take in advising patrons of zero tolerance.

Existing measures – Security.

The Queanbeyan Sports and Community Club takes its security obligations to club staff and patrons seriously. In order to keep the occurrence of violent incidents on premise to a minimum, the club will continue to:

- Employ experienced and licensed security staff.
- Strictly monitor entry compliance by members and guests with reference to the correct and legal sign in procedures, ensuring only members, their guests and those who qualify for temporary membership enter the premise.
- Inform all contracted security staff of their legal and social responsibilities in managing patron and staff safety.
- Offer all patrons a safe way home through the use of the local taxi service, called by the club on the patron's behalf.
- Club management regularly consults with security staff on premise to assess and stop possible safety issues with regards to patrons driving while under the influence.

New Steps – Security.

- Consult with the local taxi service provider about ways to increase patron access to taxi services.
- Consult NSW Police on a regular basis to monitor and discuss incidents that may occur on premise or as a result of club patronage.
- Encourage the use of a 'Designated Driver' for large groups of patrons.
- Consult bi-annually with management from the club's contracted security company to analyse any incidents and/or concerns pertaining to both contracted security staff and procedural changes.

To ensure the continued effectiveness of the club's safety plan, management will initially review the plan after three months, and then every six months. Management will consult broadly with the Queanbeyan Sports and Community Club board, NSW police, members of the local liquor accord and relevant stakeholders should any changes be deemed necessary.

RESPONSIBLE CONDUCT OF GAMBLING HOUSE POLICY

Responsible Conduct of Gambling (RCG) refers to the conduct of wagering and gaming services in such a way that seeks to minimise the possibility of harm that may be caused by gambling to both individuals and their families and the community as a whole.

Queanbeyan Sports and Community Club endeavours to promote responsible gambling practices to staff and patrons. This is accomplished by implementing numerous harm minimisation and protection procedures as further detailed in this house policy.

Queanbeyan Sports and Community Club has adopted and implemented the ClubSAFE policies outlined in this document. The ClubSAFE program facilitates the fulfilment of RCG commitment through the following measures:

- Creation of best-practice procedures and policies for the responsible conduct of gambling.
- Provision of a free 24-hour counselling and crisis intervention service for staff and patrons that require assistance with their personal gambling problem, or access to information on behalf of friends or family.
- Provision of a practical and effective voluntary self-exclusion program for patrons.
- Responsible conduct of gambling training for staff.
- Support and guidance with the management of gambling-related incidents.
- Promoting responsible gambling practices among patrons, staff and the community.

Queanbeyan Sports and Community Club also complies with legislated gambling harm minimisations stipulations, including:

- Observing restrictions pertaining to the nature of certain gaming related advertising and promotion.
- Restrictions pertaining to the participation by minors in gambling activities and the advancement of credit for gambling activities,
- Procedures limiting the accessibility and availability of gambling activities in the broader public's interest.
- The provision of information to patrons and guests pertaining to counselling services, the use and operation of poker and gaming machines, the chances of winning and the problems stemming from excessive gambling.
- On entry to the Club and displayed on each gaming machine are contact details for the appropriate counselling providers.
- Limitation on cash payouts (\$2,000 maximum)

Queanbeyan Sports and Community Club's Responsible Conduct of Gambling Policy

- Stipulates cash dispensing facilities are located in separate areas to that where gaming machines are located and the restriction of the availability of cash to be withdrawn from a credit card account.
- Places restrictions on gambling-related advertising within the Club.
- The provision of working clocks set within 10 minutes of the correct time in all gambling areas.

- The restriction of inducements that encourage gambling.
- Requires all employees to undertake an approved training course in the Responsible Conduct of Gambling.
- Availability on request of 'Player Activity Statements' to members who use their club cards whilst playing gaming machines.
- Keno rules distinctly displayed at Keno points of sale.
- Other miscellaneous controls.

Queanbeyan Sports and Community Club promotes the responsible gambling by not:

- Cashing patron's cheques or providing credit for gambling practices.
- Offering loyalty points, due to Government legislation – as from the 2nd April 2002
Redemption of Loyalty points for cash is forbidden.
- Encouraging excessive gambling practices.

Voluntary Self-Exclusion Scheme

In accordance with the Gaming Machines Act 2001, Queanbeyan Sports and Community Club offers a voluntary self-exclusion scheme for patrons and guests who may have a problem with gambling. This information is gained from the Gaming Supervisor through members of staff, and through the patron themselves.

Problem Gambling Warning Signs:

- Family and friends of the individual find that money is regularly 'missing'.
- Constant borrowing of money and hardship in repayment.
- Deceit pertaining to financial matters.
- Unexplained absenteeism from work or home.
- Boredom with everyday 'normal' activities.
- Severe mood swings – between 'highs' and 'lows'.
- Heightened alcohol consumption.
- Unrealistic expectations from gaming machines.

Where to Find Help:

ClubSAFE 1800 99 77 66

Gamblers Anonymous 02 9726 6625

Gambling Help Brochures are readily available from our Gaming Lounge, TAB and KENO areas, and on request from management.

A confidential appointment can also be made with Management for Patrons who are concerned about their inability to control their gambling habit and may arrange for a ban on their entry to the club. Any information discussed during said meeting will remain strictly confidential.



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PLAN OF MANAGEMENT

FOR HARM MINIMISATION AND THE RESPONSIBLE CONDUCT OF GAMING

AT THE

QUEANBEYAN SPORTS AND COMMUNITY CLUB LTD

97 CAMPBELL STREET

QUEANBEYAN

August 2018

Ref: 181188.2P

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This Plan of Management has been prepared for the Queanbeyan Sports and Community Club Limited in support of a Local Impact Assessment application seeking an increase in its gaming machine threshold. You may make unaltered copies of this document, which must include this notice, for this purpose only. No part of this document may be altered, reproduced or copied for an alternate purpose without the express permission of the copyright holder.

References to provisions of the relevant legislation

[Abbreviations: GMA – Gaming Machines Act 2001; GMR – Gaming Machine Regulation 2010; PLR – Public Lotteries Regulation 2007; TR – Totalizator Regulation 2012; TA - Totalizator Act 1997; cl – Clause; s – Section]

1. Club rules, cls 3.1 (d) and (e).
2. GMA s43
3. GMR cl 26
4. GMR cl 56
5. GMR cl 27
6. PLR cl 13
7. TR cl 9
8. GMR cl 21
9. GMR cl 52

10. GMR cl 23
11. GMR cl 13
12. TR cl 6
13. PLR cl 9
14. GMR cl 54
15. GMR cl 21
16. GMR cl 25
17. GMA s 50
18. TA s 82
19. PLA s 44
20. GMR cl 96
21. GMR cl 58
22. GMR cl 29
23. GMR cl 32
24. GMA s 47C
25. GMA s44A
26. GMR cl 55; TR cl 13; PLR Cl 16
27. GMR cl 55
28. GMR cls 57 and 81
29. GMA s 48
30. GMA s 45 and GMR cl 48
31. GMR cl 48
32. GMR cl 48
33. GMR cl 48
34. GMR cl 48
35. GMR cl 30
36. GMR cl 98
37. GMR cl 98
38. GMR cl 48
39. GMR cl 53
40. GMA s49
41. GMR cl 53
42. GMR cl 52
43. GMR cl 52
44. GMR cl 28
45. GMA s 47 and GMR cl 59
46. GMR cl 58E
47. GMR cl 59
48. GMA s 48
49. GMR cl 47
50. GMR cl 13
51. GMR cl 11

1.0 INTRODUCTION

- 1) The purpose of this Plan of Management (*Plan*) is to outline operational criteria and requirements for harm minimisation and the responsible conduct of gaming at the Queanbeyan Sports and Community Club Ltd (*the Club*) having regard to the relevant matters under the *Gaming Machines Act, 2001*, *Gaming Machine Regulation 2008*, the *Public Lotteries Regulation 2007* and the *Totalizator Regulation 2012*.
- 2) All staff involved with the conduct of gaming including the overview, management or CMS system, shall be made familiar with this Plan and are to sign a register stating they have been made familiar with this Plan.
- 3) A copy of this Plan shall be available at the clubhouse at all times and immediately produced for inspection, upon request by NSW Police or Special Inspectors of Liquor and Gaming NSW.
- 4) Reference in this Plan to:
- 5) An obligation or responsibility
 - a) the Club is a reference to the body registered under the Registered Clubs Act;
 - b) the clubhouse is a reference to the building to which the Club's licence, issued under the Liquor Act 2007, applies;
 - c) the Authority or ILGA is a reference to the Independent Liquor and Gaming Authority; and
 - d) the Duty Manager is a reference to the most senior Club management person on duty, unless the role of Duty Manager has been delegated by the Secretary/General Manager to another person.
- 6) An obligation or responsibility under this Plan assigned to the Secretary may be delegated to the Duty Manager or to another member of staff.
- 7) The Club's liquor licence is attached at **Appendix A** together with a plan showing the location and extent of the clubhouse. **Appendix B** is a floor plan of the clubhouse showing where gaming machines are kept, where TAB betting is conducted and the point of sale of Keno tickets.
- 8) The Club must at all times serve the best interests of its members so as:
 - a) to establish, maintain and conduct a bowling club for the accommodation of its members, their friends and such persons as may be approved by the Club

and generally to afford them the usual privileges, advantages, conveniences and accommodation of a club and

- b) to promote and conduct the game of bowls and such other sports games, amusements and entertainments, pastimes and recreations indoor and outdoor as the Club may deem expedient and to promote social intercourse between members of the Club and between the Club and other clubs. [1]
- 9) The Club will not deploy more than 54 gaming machines in the clubhouse until such time as its gaming machine threshold (*GMT*) is altered.
- 10) The clubhouse opens the following hours:
- | | |
|---------------------|-------------------|
| Monday to Thursday | 11 am to 11 pm |
| Friday and Saturday | 11 am to midnight |
| Sunday | 11 am to 10 pm |
- These hours may be varied by the Club at any time but not so as to exceed the hours specified in any development consent granted relating to the clubhouse.
- 11) The Club will be an active member of the Queanbeyan Liquor Accord.

2.0 SIGNS, NOTICES AND BROCHURES

- 12) The Club must not erect any signage visible from outside the clubhouse that draws attention to, or can reasonably be taken to draw attention to, the presence of gaming machines in the clubhouse. [2]
- 13) The Club must display a counselling signage notice (which is in a form approved by the Authority and obtained for Liquor and Gaming NSW) in the vicinity of every entrance to the clubhouse in conspicuous locations such that any person using an entrance would be alerted to its contents. The notice must contain the following:

Think! About your choices.

Gambling More, enjoying it less?

For free and confidential information and advice about problem gambling, please contact Gambling Help.

1800 858 858

www.gamblinghelp.nsw.gov.au. [3]

- 14) Notices, obtained from Liquor and Gaming NSW, must be displayed in all bar areas reading:

PERSONS UNDER THE AGE OF 18 YEARS ARE NOT PERMITTED IN THIS AREA BY LAW

(Minors, performing in a show or other live entertainment performance held in a bar area when in the company of a responsible adult, are permitted to be in a bar area.)

[4]

- 15) a) The following ATM and cash-back terminal notice must be displayed on each such device in a position where it can easily be seen by any person using the device:

Think! About your choices

Call Gambling Help

1800 858 858

www.gamblinghelp.nsw.gov.au

- b) Cash back terminals must also display this additional statement:

Your player activity statement is available from the cashier

- c) The fonts used in the notices must be no less than 0.2cm in height and the notices may consist of a permanently visible light emitting display that forms part of the ATM or cash-back terminal. [5]

- 16) a) The following notice must be displayed at each point of sale of Keno tickets in such a manner as any person in the vicinity of the point of sale will be alerted to its contents:

Is gambling a problem for you? CALL G-line (NSW) counselling service 1800633635

- b) That notice must be at least 420 mm by 295 mm in size and the fonts used must be not less than 60 mm in height. [6]

- 17) A gambling counselling notice, obtained from Liquor and Gaming NSW, must be displayed in each part of the clubhouse in which totalizator betting is conducted in a manner and place that a person using that part of the clubhouse would be alerted to its content which is to be:

Think! About your choices

Gambling More, enjoying less?

For free and confidential information and advice about gambling, please contact Gambling Help

1800 858 858

www.gamblinghelp.nsw.gov.au [7]

- 18) The Club must ensure the following notices (obtained from Liquor and Gaming NSW) about the chances of winning a major prize from gaming machines are erected in the clubhouse and conspicuously at any entry to the gaming room:

Think! What are the odds of hitting the jackpot? Your chance of hitting the jackpot on a gaming machine is not better than a million to one. [8]

- 19) The Club must display a notice wherever gaming machines are kept in the clubhouse advising patrons of the availability of problem gambling counselling services and its self-exclusion scheme. Those notices must contain:

- a) The name and contract details of the Club's problem gambling counselling service providers;
- b) A statement advising patrons that a self-exclusion scheme is available to prevent patrons from entering or remaining in any nominated area of the clubhouse to assist in controlling their gambling;
- c) The name and contract details of a person or body who is able to assist patrons with becoming participants in a self-exclusion scheme;
- d) That the Club's gambling counselling services are free to access. [9]

- 20) The Club must ensure that player information brochures, approved by Liquor and Gaming NSW, are available:

- a) In the gaming room;
- b) Displayed in such a manner and in such a place that persons entering the gaming room would be alerted to their presence; and
- c) In languages in common use in Queanbeyan. [10]

- 21) If the Club offers or provides non-monetary prizes, it must make the following information readily accessible in any area of the clubhouse in which approved gaming machines are located:

- a) the nature or form of prizes offered,
- b) the terms on which prizes are awarded or paid,
- c) the right of a prize-winner to choose to receive money instead of any non-monetary prize awarded,

- d) any option available to a prize-winner to transfer a non-monetary prize for another non-monetary item or right,
 - e) if the award of a non-monetary prize will not be made within 48 hours of the request for the prize—the time in which the Club will award the prize. [11]
- 22) Problem gambling information brochures, obtained from Liquor and Gaming NSW and which may be in foreign languages in common use in Queanbeyan as well as in English, must be displayed in each part of the clubhouse where totalizator betting is conducted, in a manner and place such that it could reasonably be expected that a person in those part of the clubhouse would be alerted to their presence. [12]
- 23) a) Player information brochures, approved by the Minister and which may be in foreign languages in common use in Queanbeyan as well as in English, must be available at the point of sale of Keno tickets and must be displayed in a manner and place such that a person purchasing a ticket would be alerted to their presence.
- b) Such notices will provide information concerning the chances of winning a major prize and the G-line (NSW) helpline telephone number (1800 633 635). [13]
- 24) Gambling contact cards which provide the names and contact details for the Club's gambling counselling services and the availability of self-exclusion from any part of the clubhouse, are to be placed in clear plastic card holders, securely attached to each bank of gaming machines, in positions that enable a person to see the gambling contact cards while playing a machine or when approaching a bank of machines. The cards are to be in a form approved by the Authority and obtained from Liquor and Gaming NSW. [14]
- 25) Each gaming machine is to have affixed to it the following clearly visible gambling warning notices:
- a) a notice displaying the following:
What are the odds of hitting the jackpot? No better than a million to one. [15]
 - b) a ***problem warning notice*** which must contain one or more of the following statements:
 - i) **Think! About tomorrow**
 - ii) **Think! About getting help**
 - iii) **Think! About your family**

- iv) **Think! About your limits**
- c) a ***problem gambling notice*** which must contain the following:

Call Gambling Help

1800 858 858

www.gamblinghelp.nsw.gov.au

Each notice must be positioned so as to enable a person to see the notice while playing the machine.

The notices must be in a form approved by the Authority and must be obtained from Liquor and Gaming NSW unless they consist of a permanent visible light emitting display that forms part of the gaming machine. [16]

3.0 PROHIBITIONS

- 26) a) Minors are not permitted to operate gaming machines or to enter that part of the clubhouse where gaming machines are kept unless passing through it in the company of a responsible adult or engaged in employment in relation to servicing, repair or maintenance of gaming machines or providing entertainment; [17]
- b) Minors are not permitted to participate in totalizator betting; and [18]
- c) Minors are not permitted to purchase tickets in Keno. [19]
- 27) A player card must not be issued to a person:
 - a) who is under the age of 18 years;
 - b) unless the person provides the General Manager with documentary proof of the person's identity;
 - c) who already has already been issued with a card unless it is to replace a card which has been lost, stolen or destroyed; and
 - d) unless the warning and information contained in the gambling warning notice and problem gambling notice, as set out in under clause 24 above, are provided to the person and reference to the Gambling Help Line appears on the card. [20]
- 28) The Club must not publish anything which identifies any person who:

- a) Wins a prize of more than \$1,000 in value from playing gaming machines; and
 - b) When claiming the prize, requests in writing that anything disclosing that person's identity not be published. [21]
- 29) The Club must not cash cheques unless they are made out to the Club on the face of the cheque (and not by endorsement). Cheques must not be cashed if:
- a) The value is more than \$400;
 - b) A person seeks to cash more than one cheque in the same day;
 - c) The same person has had a cheque "bounce" (dishonoured) (unless later cleared).

All cheques cashed must be banked within two working days. [22]

- 30) Cash dispensing facilities are not permitted to be installed in the gaming room or any part of the clubhouse where gaming machines are located. [23]
- 31) Any cash dispensing facility in the clubhouse is prohibited from providing cash from a credit card account. [24]
- 32) Gaming machines are not to be visible from any public place outside the clubhouse and not be located in a manner that is designed to attract the attention of members of the public who are outside the clubhouse. [25]
- 33) The Club shall not offer or supply any free or discounted liquor as an inducement to play, or to play frequently, its gaming machines or as an inducement to participate in totalizator betting or to play Keno. [26]
- 34) The Club shall not offer free credits to players, or offer inducements to persons to become players of gaming machines, participants in totalizator betting or players of Keno, by means of letter box flyers, shopper dockets or any other similar means. [27]
- 35) Monitors used to display the jackpot prize from a linked gaming system are not permitted to be displayed anywhere but where gaming machines are kept in the clubhouse. [28]

4.0 PLAYER REWARD SCHEME

- 36) The Club may offer a **player reward scheme** which is a system used in connection with the operation of gaming machines in which players accumulate reward points to obtain a **promotional prize** from playing gaming machines. [29]

- 37) Promotional prizes are not permitted to:
- a) Be greater than \$1000 in value;
 - b) Consist of cash;
 - c) (c) Be indecent or offensive; or
 - d) (d) Be exchanged for cash. [30]
- 38) Participants in the scheme must be advised of the availability of player activity statements. A player activity statement is to be made available on request on a monthly basis and must include the following:
- a) The total amount of turnover recorded by the participant during the monthly period covered by the statement;
 - b) The total wins recorded during the monthly period;
 - c) The net expenditure (i.e., turnover less wins) recorded during the monthly period;
 - d) The total points earned and redeemed during the monthly period as a result of playing gaming machines under the scheme;
 - e) The total length of time over each 24 hour period during the monthly period when the participants player card was inserted in gaming machines under the scheme;
 - f) The total length of time that the participant's player card was inserted in gaming machines under the scheme during the monthly period;
 - g) A statement that the above information:
 - i) Only relates to the occasions on which the participant used his or her player card under the reward scheme;
 - ii) Does not necessarily relate to all of the participants gaming machine activity; and
 - iii) May not include information about wins from linked gaming system. [31] and
 - iv) Statements must contain the ***gambling warning notice***: viz:
Call Gambling Help
1800 858 858
www.gamblinghelp.nsw.gov.au [32]
- 39) Information to the effect that player activity statements are available on request must:

- a) Be given to each participant at the time of joining the scheme; and
 - b) Be included in any promotional material relating to the player reward scheme. [33]
- 40) Player activity statements are to be provided free of charge once a month. Subsequent requests in respect of a monthly period may be charged in accordance with the scale of charges approved by the Authority. [34]
- 41) The Club must pay any prize money that exceeds \$5,000, or the entire amount if so requested, by either:
- a) A cheque crossed with the words '*Prize Winning Cheque – Rules Apply*' payable to the person; or
 - b) If requested, and available to the Club, by an electronic funds transfer to an account nominated by the patron. [35]
- 42) The Club must not extend a cash advance or any other form of credit in respect of a player account. [36]
- 43) The following information must be provided to a person in writing at the time the person opens a player account:
- a) The security of money in player accounts is the responsibility of the both the Club and the account holder. The government and its agencies take no responsibility for any losses that might occur from the account;
 - b) An account holder is solely responsible for ensuring that the account holder's personal identification number ("PIN") is kept confidential and that no other person has access to the account holder's player card;
 - c) The account holder is liable for any losses that might arise from, or in connection with, the account holder's failure to comply with such responsibilities; and
 - d) A player information brochure. [37]
- 44) Any money that is held by the Club in a player account must:
- a) be kept separate from any other funds or accounts held or maintained by the Club, and
 - b) not be used by the Club for any purpose. [38]

5.0 PLAYER ASSISTANCE

- 45) The Club must operate a self-exclusion scheme in which patrons may be prevented, at their request, from entering or remaining in any area of the clubhouse or the entire clubhouse. [39] A list of persons excluded from the clubhouse or the relevant area of it must be available to the Duty Manager and/or Club's supervisor of gaming.
- 46) The manager may use no more force than is reasonable in the circumstances to prevent a participant in the self-exclusion scheme from entering, or remaining in, the nominated area of the clubhouse. [40]
- 47) The Club's self-exclusion scheme must make provision for the following:
- a) The General Manager and staff shall not refuse any request to participate in the scheme;
 - b) Requiring the participant to give a written and signed undertaking not to gamble in the clubhouse for the time specified;
 - c) Requiring the participant to be given the opportunity to seek independent legal or other professional advice, at their expense, as to the meaning of the undertaking;
 - d) Provision of the name and contact details of the Club's problem gambling counselling service;
 - e) Requiring the participant to provide a recent photograph to assist staff to identify the participant;
 - f) Ensuring the immediate availability, to any patron on request, of any standard agreement referred to in (b) above;
 - g) Prohibition on withdrawing from the scheme in the first 6 months. [41]
- 48) The Club must enter into an arrangement for problem gambling counselling services to be made available to members or their guests. Those services may be provided by any of the following organisations:
- a) ClubsNSW (Clubsafe)
 - b) Betsafe

- c) Any other body that receives funding from the Responsible Gambling Fund under the Casino Control Act 1992 for the specific purpose of providing gambling-related counselling services. [42]
- 49) The names and contact details of the gambling counselling services with which the Club has an arrangement must be available to all members and their guests. Those services and their contact details are: (to come) [43]

6.0 MISCELLANEOUS

- 50) Entry to any part of the clubhouse where gaming machines are kept must be free of charge.
- 51) All parts of the clubhouse where gaming machines are kept must be under constant supervision by the Duty Manager by way of CCTV or physical presence.
- 52) A clock or clocks in good working order, set to within 10 minutes of the correct time, must be placed in each part of the clubhouse where gaming machines are kept and must be so installed that any player at a gaming machine can see a clock. [44]
- 53) The General Manager and all staff whose duties concern the conduct of gaming machines in the clubhouse must have undertaken an approved RCG training course from an approved training provider. [45]
- 54) The General Manager and any staff whose duties concern the conduct of gaming machines in the clubhouse, must have at all times a copy of the recognised competency card on their person. The competency card must be produced on request of a police officer or special inspector. [46]
- 55) The Club must not employ any person whose duties concern the conduct of gaming machines unless they hold current recognised RCG certification. [47]
- 56) Any Code of Practice approved by the Minister and published in the Gazette will be observed by the Club. [48]
- 57) The manager and all staff whose duties concern the conduct of gaming machines must have received training in recognising signs that a player may have, or be developing, problems with gambling. Indicators of that include:
- Gambling every day of the week;
 - Gambling without taking a break for extended periods of time;

- Withdrawing cash from an ATM on multiple occasions for the purpose of gambling;
- Trying to borrow or “scam” money or sell valuables to others for gambling;
- Putting large win amounts back into the machine and keeping on playing;
- Friends or relatives asking if the person is still gambling;
- Blaming the Club, the staff or gaming machines for losses;
- Having unrealistic perceptions about the chance/odds of winning;
- Suffering from depression and/or have thoughts of suicide due to gambling;
- Displaying anger, kicking machines, looking sad and/or crying;
- Trying obsessively to win on a particular machine; or
- Spending what they consider to be too much time and/or money gambling [54]

The manager shall be trained in appropriate measures to use to assist players exhibiting any such symptoms to desist playing the gaming machines.

- 58) The Club may publish, advertise or promote the presence of gaming machines at the clubhouse provided it is limited to internal promotional material prepared solely for the purpose of, and only, distributed internally at the clubhouse. [49]
- 59) The total value of prizes won by players must not be less than 85% of the total money paid by the players of the gaming machines. [50]

7.0 MAINTENANCE

- 60) If the manager finds a fault with any gaming machine that affects the playing or result of any game, or the accuracy of any reading of any meter, that machine:
- a) Must be switched off the machine, rendering it inoperable by the public until the fault has been rectified; and
 - b) Must have a notice attached to it indicating that it is faulty. [51]
- 61) The duty manager must inspect all notices required by this Plan daily prior to the clubhouse opening and must ensure that all notices that are damaged or missing are replaced.
- 62) Each day, the duty manager shall ensure that adequate supplies of each of the brochures required by this Plan are in place before the clubhouse opens.

8.0 AMENDMENTS

- 63) If, in circumstances where better harm minimisation outcomes would be achieved by amendments to this Plan, such amendments must only be made following consultation with Liquor and Gaming NSW.

9.0 SECRETARY'S STATEMENT OF UNDERSTANDING

- 64) The Secretary hereby acknowledges that the above provisions have been read and are understood.



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Appendix I – Contributions made to local organisations in 2019

The Club has only been trading for a few months after almost 12 months closed for Stage 1 renovations. A list of the Club's recent contributions;

- St Gregory's \$2000
- Bushfire Aid \$701
- Queanbeyan Rural Service - Bushfire \$661.55
- Queanbeyan Darts Uniforms \$500
- Queanbeyan Home in kind food \$2,000

Appendix J

Queanbeyan Sports & Community Club Ltd



Anti-Money Laundering & Counter-Terrorism Financing (AML/CTF) Program Manual

The information contained in this manual is commercially sensitive, confidential and subject to applicable copyright laws. Other than for the purposes of and subject to the conditions prescribed under the Copyright Act 1968 (Cth) and the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) no part of any this manual may in any form or by any means be reproduced, adapted or transmitted without the prior written consent of BetSafe Pty Ltd and Queanbeyan Sports & Community Club Ltd.

Document Change Control Table

Note: prior to version 3.26.1 QSCC developed an in-house AML/CTF Compliance & Operations Guidelines manual.

Version Number	Date of Issue	Description of Change(s)
3.26.1	7 December 2018	<ul style="list-style-type: none">• Initial version

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1. **Introduction**

The *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)* (AML/CTF Act) requires the Club to have an Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) program in place. The Club's AML/CTF program is intended to identify, mitigate and manage the risk the Club may reasonably face through the provision of gaming services that might involve or facilitate money laundering or terrorism financing (ML/TF). The Club is required to self-assess the nature, size and complexity of its business in relation to exposure to ML/TF risk and collect and verify Know Your Customer (KYC) information in relation to threshold transactions and suspicious matters (i.e. customer identification program).

The AML/CTF reporting requirements commenced on 12 December 2008.

Information reported to the Australian Transaction Reports and Analysis Centre (AUSTRAC) may be utilised by the Australian Taxation Office, Australian Customs Service, National Crime Authority, Australian Federal Police, State Police and other government law enforcement agencies.

2. **Who Benefits From the Club's AML/CTF Program?**

1. **Your family** – fighting money laundering deters the underlying crimes that can affect you and your family directly
2. **Your community** – creating an environment that is hostile to criminal enterprise deters the criminalisation of the community
3. **Your organisation** – preventing the Club being used to launder proceeds of crime which protects your organisation and job
4. **Australia's financial system** – maintaining the world standing of Australia's financial system protects your investments, superannuation, shares etc.

3. **AUSTRAC**

3.1. **Role of AUSTRAC**

AUSTRAC is the government body responsible for administration of the AML/CTF laws.

AUSTRAC can be contacted as follows:

- Helpdesk: 1300 021 037
- Suspect Hotline: 02 9413 3705
- Fax: 02 9950 0071
- Email: help_desk@austrac.gov.au
- Postal Address: AUSTRAC, PO Box 5516, West Chatswood NSW 1515

3.2. **AUSTRAC enrolment procedure**

It is the Club's policy to fully comply with all legal requirements, including the Anti-Money Laundering and Counter Terrorism Financing Act (AML/CTF Act). The Club provides designated services under the AML/CTF Act so needs to enrol with AUSTRAC. Enrolment information provides AUSTRAC with a more accurate understanding of its regulated population. This is particularly important for identifying which entities are subject to the annual AUSTRAC supervisory levy and the amount of the levy which will apply to each applicable entity.

The Club must enrol with AUSTRAC and:

- provide information to AUSTRAC about its business and the services it provides;
- keep certain records relating to its business and annual financial statements; and
- keep this enrolment information up-to-date.

The Club initially enrolled by 28 November 2011. Enrolment took place electronically through AUSTRAC Online.

As part of the enrolment, the Club must declare if it:

- has been granted an exemption from Part 7 of the AML/CTF Act (requirements to have an anti-money laundering and counter-terrorism financing program); and
- provides gaming machine designated services and is licensed to operate no more than 15 gaming machines.

This information enables AUSTRAC to determine which entities are required to pay the annual AUSTRAC supervisory levy.

The law requires the Club to provide AUSTRAC with information about its business, including about the designated services provided; and whether the Club is exempt from the requirement to have an anti-money laundering and counter-terrorism financing program (Part 7 of the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (AML/CTF Act)).

As the Club is not exempt from Part 7 of the AML/CTF Act it will also need to provide details of the number of employees and the earnings of the Club.

After the form has been submitted AUSTRAC will notify the Club in writing that it has successfully enrolled and that the Club has been entered on the AUSTRAC Reporting Entities Roll. The Club will also receive an AUSTRAC Account Number (AAN) for the Club to refer to in future correspondence with AUSTRAC.

The Club is required to notify AUSTRAC of any changes to its enrolment details within 14 days of the change arising.

The Club can advise AUSTRAC of a change to its details electronically through the Club's AUSTRAC Online account using the following procedure:

1. Log into AUSTRAC Online: <https://online.austrac.gov.au>.
2. Click on 'My Business'.
3. Click on 'Business Profile'.
4. Click the 'Download AUSTRAC business profile form' (the form) button.
5. Complete your changes (you will not be required to re-enter all your information). Alternatively, save the form to your computer to return to at a later time to complete.
6. Once the form is complete, click the 'Submit' button. The information you enter in the form will be sent securely via the internet to AUSTRAC.
7. Click the 'Go to Submission Confirmation Page' button to save and print or email a copy of your completed form for your records.

For assistance with the enrolment procedure, the AUSTRAC Help Desk can be contacted using the above contact details.

3.3. AML/CTF compliance report

The AML/CTF compliance report is an annual report which provides AUSTRAC with information about the Club's compliance with the AML/CTF requirements. It is a legislative requirement under the AML/CTF Rules for the Club to submit an AML/CTF compliance report to AUSTRAC.

The AML/CTF compliance reports are due by 31 March each year and relate to the previous calendar year.

It is the Club's policy that the AML/CTF Compliance Officer will submit the annual AML/CTF compliance report to AUSTRAC, prior to the relevant deadline, by completing the following steps:

1. Log into AUSTRAC Online: <https://online.austrac.gov.au>.
2. Click on 'My Business'.
3. Click on 'Compliance Reports'.
4. Click the 'Create New Report' button.
5. Select the relevant reporting period in the drop down box (the correct reporting period should be automatically selected).
6. Answer all of the required questions on each page and click on the 'Next' button on the bottom of each page.
7. On the last page select the 'I agree' checkbox to confirm that the information provided is true and correct to the best of your knowledge.
8. Click the 'Lodge Compliance Report' button.

For assistance submitting the AML/CTF compliance report, the AUSTRAC Help Desk can be contacted using the above contact details.

3.4. Responding to AUSTRAC feedback

The Club is required to have appropriate procedures for responding to any feedback provided by AUSTRAC in respect of the Club's performance on the management of ML/TF risk.

The Club's procedure for responding to AUSTRAC feedback is:

- a. AUSTRAC feedback to be dealt with by the Club's AML/CTF Compliance Officer immediately upon receipt.
- b. The AML/CTF Compliance Officer shall give the highest priority to the AUSTRAC feedback and is to investigate any matter raised by AUSTRAC and respond within the time specified time period. Where there is no specified time period, the Club will endeavour to provide a written response to AUSTRAC within 14 days of receipt.
- c. Where additional time is required by the AML/CTF Compliance Officer, an initial response will be provided to AUSTRAC within 14 days of receipt, with an indication of the additional time required to respond to matters raised in the AUSTRAC feedback.
- d. The AML/CTF Compliance Officer will prepare a report to the Club Board comprising the AUSTRAC feedback, the Club's response and any other relevant information.
- e. The Club will respond appropriately to the AUSTRAC feedback as soon as reasonably practicable and take any advice into account.
- f. In the event that the Club disagrees or questions any matter contained in the AUSTRAC feedback, then the Club shall arrange to meet with AUSTRAC as soon as practicable to discuss and resolve the matter.

- g. The AUSTRAC feedback and the Club's response will be documented and kept with the AML/CTF documentation by the Compliance Officer.

4. Money Laundering & Terrorism Financing

4.1. What is money laundering?

Money Laundering is the process of legitimising funds obtained from illegal activities. Illegal arms dealing, smuggling and other criminal activities related to organised crime can generate huge profits. The goal of most criminal acts is to generate a profit for the individual or group carrying out the illegal activity.

Money Laundering allows criminals to enjoy their money by preventing law enforcement agencies being able to identify the source of the money.

4.2. The money laundering cycle

1. Placement: the initial entry of "dirty money" into the financial system.
2. Layering: consists of a series of transactions designed to conceal the origin of the funds.
3. Integration: money is returned to the Australian economy as legitimate funds. The money is now "clean".

Money laundering is often linked to the illicit global drug trade. Criminals including people smugglers, illegal prostitution rackets and terrorists launder an estimated \$4.5 billion dollars a year.

4.3. What is terrorism financing?

"The act of providing financial support to terrorists or terrorist organizations to enable them to carry out terrorist acts."

(UN Convention for the Suppression of the Financing of Terrorism, 2002)

AUSTRAC is Australia's financial intelligence unit and AML/CTF regulator. Information provided by the Club under this program may assist AUSTRAC and other government agencies to identify terrorism financing.

5. Designated Services

The Club provides the following designated services – see AML/CTF Act s. 6, Table 3.

5.1. Gaming machines

- Item 6 – **accepting the entry of a person into a game**, where:
 - (a) the game is played for money or anything else of value; and
 - (b) the game is a game of chance or of mixed chance and skill; and
 - (c) the service is provided in the course of carrying on a business; and
 - (d) the game is not played on a gaming machine located at an eligible gaming machine venue
- Item 9 – **paying out winnings, or awarding a prize**, in respect of a game, where:
 - (a) the game is played for money or anything else of value; and
 - (b) the game is a game of chance or of mixed chance and skill; and
 - (c) the service is provided in the course of carrying on a business; and
 - (d) the game is not played on a gaming machine located at an eligible gaming machine venue

AML/CTF Act s. 13 provides that:

- a “controller” of a gaming machine venue is a person who is in control of the gaming machine venue but is neither the owner nor the lessee of the gaming machines; and
- an “eligible gaming machine venue” is a venue that is neither the owner nor the lessee of the gaming machines.

Therefore, the Club is not considered a “controller” or an “eligible gaming machine venue” as it is the owner of the gaming machines.

5.2. Keno

Keno is exempt from the AML/CTF requirements.

5.3. Wagering

The Club is an agent for TABCORP in relation to the provision of TAB wagering services. The Club is required to comply with the requirements of TABCORP regarding wagering matters. Refer to the TAB AML/CTF program documentation.

6. **Elements of the Club’s AML/CTF Program**

6.1. Part A: General

The Club’s program is designed to identify, reduce and manage the ML/TF risk the Club may reasonably face through its provision of designated services. The Club’s program includes:

- The appointment of an AML/CTF Compliance Officer
- Employee Due Diligence
- Employee Training
- Monitoring & Review
- Board & Senior Management Approval
- The development and continuous updating of this manual

Obligations under AML/CTF Act	Systems/Controls Implemented
AML/CTF Compliance Officer	Appointment of AML/CTF Compliance Officer
Document AML/CTF program	AML/CTF Compliance Manual & Procedures
Employee Due Diligence	All new employees screened and on promotion
Employee Training	All staff receive AML/CTF training
Monitoring and Review	Ongoing internal monitoring and annual external review
Board and Senior Management Oversight	Regular AML/CTF reports to Management and Board
Risk Identification and Assessment	Risk Assessment reviewed annually and for new technologies/services
Know Your Customer	KYC applied to all payouts of \$10,000 or more
Enhanced Customer Due Diligence	Additional information obtained
Politically Exposed Persons	PEP procedures

Threshold Transaction Reporting	Not applicable
Suspicious Matter Reporting	Staff training/procedures
Confidentiality and Privacy	Staff training/procedures
Recording Procedures	Records kept in understandable form and readily retrievable for 7 years
New or Modified Designated Services	Assess risks, update staff training

6.2. Part B: Customer identification

The Club's customer identification procedures require the Club to gather identification information about customers who access designated services. The minimum information to be obtained from the customer is:

- full name
- date of birth (when a customer joins the Club as a member and/or when a Know Your Customer form is completed)
- residential address

However, in certain circumstances it will be necessary to seek additional information.

7. Application of the AML/CTF Law

The AML/CTF law applies to "reporting entities" which includes the Club, because it provides gaming machines services, which are defined as designated services.

The law requires the Club to develop and implement an AML/CTF program, which must comply with the legal reporting requirements.

AUSTRAC considers a group of clubs to be a single reporting entity where it has the same Australian Business Number (ABN). Where clubs within a group have different ABNs, they should register with AUSTRAC as separate entities. When a club amalgamates with another club and changes its ABN, it needs to notify AUSTRAC.

8. Penalties for Non-Compliance

The Club, Compliance Officer and staff risk prosecution and significant penalties for failure to comply with their AML/CTF obligations. The following are some of the offences and penalties for failure to comply with the legislation.

8.1. 'Tipping off' provisions

Tipping off a person that the Club is considering or has made a *Suspicious Matter Report* to AUSTRAC is an offence under AML/CTF Act s. 123 and carries a maximum sentence of 2 years imprisonment or 120 penalty units.

8.2. Assisting a person to launder money

Assisting a person to evade the requirements by using a false name or failing to notify AUSTRAC that a person is known to commonly use more than one name is an offence under AML/CTF Act s. 139 and carries a maximum sentence of 2 years imprisonment or 120 penalty units.

Assisting a person to structure their financial transactions for the purpose of avoiding the transaction threshold reporting limit is an offence under AML/CTF Act s. 142 with a maximum penalty of 5 years imprisonment or 300 penalty units.

8.3. Other penalties

A maximum penalty of 100,000 penalty units (\$21 million) applies to a company and 20,000 units (\$4.2 million) for a person if the CEO of AUSTRAC takes proceedings in the Federal Court and a civil penalty order is issued.

9. Risk Identification and Assessment

The law requires the Club to identify and assess its risk. Different levels of compliance are required by the AML/CTF law depending on the self-assessed level of risk.

ML/TF risk assessment means an assessment by the Club of the risk the Club may reasonably face that the provision by the Club of designated services might involve or facilitate ML/TF.

The Club is also required to identify, mitigate and manage the risk that the provision by the Club of the designated services might involve or facilitate ML/TF.

The Club's ML/TF risk identification process is ongoing. The Club is required to constantly re-evaluate the factors that may affect its risk and re-assessing the level of risk. Independent reviews are an essential part of the identification and assessment process. In particular, the Club must ensure that its risk management systems and procedures remain equipped to cover:

- potential new ML/TF risks posed by current or planned designated services;
- all new or developing technologies used to deliver designated services; and
- changes in its customer base or product patterns.

Examples of events that may result in changes to the Club's risk are:

- significant increase or reduction of either the group or a site's gaming machine entitlements;
- significant increase or reduction of either the group or a site's MTGMs (e.g. double);
- significant change in the customer types within either the group or a site's respective LGA;
- significant changes to the group's cash payouts procedures;
- significant changes to the group's loyalty program;
- significant changes to the group's policies and procedures;
- amalgamating with another Club which was located outside of existing LGAs; or
- introduction of a new designated service (e.g. player accounts, casino table games/chips).

Please refer to the Risk Management Table at **Appendix B** for the identification of the Club's current ML/TF risks and the Risk Assessment Table at **Appendix C** for the current assessment of the Club's ML/TF risks.

10. Significant changes to ML/TF risk

The Club's AML/CTF procedures reflect the assessed level of ML/TF risk. The Club must constantly assess its level of ML/TF risk. Matters to be considered when assessing the level of the Club's ML/TF risk include:

- size of the Club's gaming activities
- forms of gambling offered

- the available technology
- new or modified designated services
- types and volume of financial transactions
- changes in the demographics of the club membership catchment
- merger with another club
- persons of interest and politically exposed persons
- information about criminal activity in or near the club
- regulatory changes
- changes to club policy

When the Club becomes aware that a significant change to any one or more of the factors listed above (or any other relevant factor) is about to occur, or has occurred, then the Club must reassess its level of ML/TF risk.

From time to time the Club may introduce new designated services, delivery methods of designated service or modify existing designated services. The Club is required to assess the ML/TF risks posed by these changes prior to making them available to its customers. The results of the risk assessment process are to be documented and a copy provided to senior management and the Board.

In the event that the Club determines that its level of ML/TF risk has changed, it must immediately review all relevant AML/CTF policies and procedures and make such changes as are appropriate. In particular, if the level of ML/TF risk becomes high, the Club may need to change its customer identification requirements.

11. Compliance Officer

The Club is required to appoint an AML/CTF Compliance Officer. The AML/CTF Compliance Officer is responsible for AML/CTF compliance issues throughout the Club, including any subsidiary club premises. The Club is a single reporting entity, so only one AML/CTF Compliance Officer is required.

The AML/CTF Compliance Officer is required to ensure continuing compliance with the obligations of the AML/CTF Act and AML/CTF Rules, including:

- Enrolling and maintaining business details with AUSTRAC
- Approving the AML/CTF program and procedures
- Updating and maintaining the AML/CTF program and procedures
- Updating and maintain the ML/TF risk assessment
- AML/CTF training for staff members
- The Employee Due Diligence program
- Liaison with senior management and/or club Board on AML/CTF issues
- Organisation of independent reviews of Part A of the AML/CTF program (relating to reports of transactions of \$10,000 and over)
- Consideration of any AUSTRAC feedback regarding the reporting entity's risk management performance
- Acting as the contact officer for AUSTRAC matters such as reporting suspicious matters and threshold transactions, urgent reporting, compliance assessments or requests for information or documents
- Monitoring transaction and customer activity to identify suspicious transactions
- Conducting further enquiries on high-risk or suspicious customers
- Management of PEP procedures
- Sighting and recording identification for customers
- Reporting threshold transactions and suspicious matters to AUSTRAC

- Keeping records of the AML/CTF program and customer identification
- Submitting AML/CTF compliance reports to AUSTRAC
- Ensuring AML/CTF compliance.

The AML/CTF Compliance Officer's appointment is required to be approved by the Club's Board. Details of the AML/CTF Compliance Officer are contained in **Appendix A**.

In the event that the Compliance Officer ceases employment at the Club or their role as AML/CTF Compliance Officer is relinquished, the Club's Chief Executive Officer will appoint an interim AML/CTF compliance officer within 14 days. The Club's Board will be required formally appoint a permanent AML/CTF compliance officer at the next Board meeting.

12. Oversight of Program by Club Board and Senior Management

The Club's Board and senior management are legally required to have oversight of the Club's AML/CTF obligations. The Board and Senior Management must be aware of their AML/CTF obligations.

12.1. Oversight of ongoing compliance

The Board must be kept informed of AML/CTF matters. It is the Club's policy that the AML/CTF Compliance Officer provide regular reports to the Board. The AML/CTF Compliance Officer's report shall notify the Board about any *Suspicious Matter Reports* and provide information about the ongoing AML/CTF activities.

12.2. Approval of AML/CTF program

The Club's Board and Chief Executive Officer have approved the Club's AML/CTF program, as required the AML/CTF Act.

13. Staff Training

The effectiveness of the AML/CTF program depends on the extent to which staff appreciate the serious nature of money laundering, tax evasion, terrorism etc.

The law requires staff training to include the following:

- A general understanding of the possibility of the Club's financial processes being used for money laundering, tax evasion or corporate crime;
- Knowledge that the Club is legally required to have an AML/CTF program under the AML/CTF legislation;
- Awareness that significant penalties apply for breaches of the legal requirements;
- Specific reference to the AML/CTF legislation in all relevant areas of training;
- Understanding of their and the Club's AML/CTF obligations;
- An appreciation of the importance of reporting suspicious matters, as members of staff dealing with the public are the first point of contact with potential criminals and their efforts are vital to the fight against money laundering, major tax evasion and corporate crime;
- Identification of PEPs and high-risk ML/TF customers;
- The ability to identify and report suspicious matters.

Details of the Club's specific AML/CTF risk awareness training is located at **Appendix L**.

14. Employee Due Diligence Program

Employee due diligence means conducting ML/TF risk assessments for new and existing employees.

The Club's Employee Due Diligence Policy is located at **Appendix K**.

15. Ongoing Customer Due Diligence

The Club has an ongoing relationship with its full members. A temporary member, visitor or guest of member does not have an ongoing relationship with the Club. Their rights and obligations cease at the end of that trading day.

Ongoing Customer Due Diligence (OCDD) requires a reporting entity to monitor its ongoing customers with a view to identifying, mitigating and managing any ML/TF risk that may be posed by providing one or more designated services.

OCDD involves:

- collecting and verifying initial KYC information, and
- providing ongoing monitoring of customers and their transactions.

Refer to the AUSTRAC Ongoing Customer Due Diligence Flowchart located at **Appendix G** for more information.

15.1. Know Your Customer (KYC)

The Club must collect and verify initial Know Your Customer (KYC) information and provide ongoing monitoring of customers and their transactions.

The Club must monitor its customers with a view to identifying, mitigating and managing any ML/TF risk that may be posed by providing gambling services.

Parts 4.2 to 4.8 of the AML/CTF Rules require the Club to collect and verify customer information based on the particular customer type where the customer is considered a medium or lower ML/TF risk.

The KYC process applies to all of the Club's customers who receive gambling services, including persons who were customers of the Club before the AML/CTF laws commenced.

A process must be in place to address the KYC requirements of the AML/CTF Act. For gaming machine payouts of \$10,000 or more, the identity details of the customer are to be verified and recorded using reliable documentation. The minimum required information is:

- full name
- date of birth
- residential address

When the self-assessed ML/TF risk is medium or lower, then this process, known as the "documentation based safe harbour" identification standard may be used. However, entities that assess themselves as greater than medium level risk are required to use more stringent identification methods.

AML/CTF Rules cls. 4.2.10 & 4.2.11 provide that safe harbour documentation means:

- **Primary photo identification:** driver licence, passport or NSW photo card (or another Australian state or territory equivalent); or
- **Both** an original or certified copy of a **primary non-photographic identification** document such as a birth certificate, **and** an original or certified copy of a **secondary identification** document, such as a tax assessment, rates notice or electricity bill that is less than 3 months old.

AML/CTF Rules cl. 4.2.9 requires the Club to have a process in place to be reasonably satisfied that a customer is the person that he or she claims to be. Staff must check that the photograph on the identification matches the individual and that other information (e.g. the stated age on the documentation) is consistent with other information that is available.

More information relating to the acceptable forms of identification is located at **Appendix E**.

15.2. Requirements for entry to the Club

The Club complies with the requirements of *Registered Clubs Act 1976 (NSW) s. 30* (see **Appendix P** for extracts). All persons other than staff and full members must “sign in” to gain entry to the Club.

Customers who live within 5 km of the Club are generally not permitted entry as temporary members but must apply for full membership (with certain exceptions).

The Club requires both applicants for membership and visitors to provide document based safe harbour identification, usually a driver licence. Each time a full club member enters the Club, that member must produce their membership card and entry staff will compare the photo on the card with the member.

Temporary members, visitors and guests do not have an ongoing relationship with the Club and must sign in using the Club’s electronic sign in system upon entering the Club on each trading day. The system scans the customer’s identification and keeps it on record.

15.3. Applications for full club membership

To become a member, a customer must complete a Membership Application Form. The customer must also provide acceptable identification.

It is standard procedure for staff to select the type of identification produced and card number in the ‘Office use only’ section of the Membership Application Form.

The preferred identification documents to be produced by customers seeking to join the Club are listed on the Application for Membership form. Staff are required to check the customer’s identification to confirm that it is a genuine document, that it has not expired, and that the photo matches the customer seeking membership. The Club’s staff will then confirm the customer’s full name, residential address and date of birth.

In the event that the customer is unable to produce a driver licence, Club staff will request the alternative identification documentation at the discretion of the Supervisor. The form when completed will be retained by the Club.

15.4. Renewals of club membership

Membership staff will also check the contact details of customers when they renew their membership in person at the Club.

15.5. Change of customer details

Staff are to ensure that the Club has up-to-date information about members. When staff become aware that an existing customer's information has changed, for example a change of name or address, staff must take reasonable steps to verify the accuracy of the new information and then update the club records. This can be done by staff members notifying the Membership Coordinator or Duty Manager of the information that causes them to believe the customer's information has changed. The Membership Coordinator or Duty Manager will then take steps to verify the new information and notify the staff responsible for maintaining membership records.

15.6. Return of correspondence

When correspondence sent to a member by post is returned to the Club, membership staff shall seek to contact the member and obtain details of their change of address.

In the event a staff member is unable to contact the member to update their details, the respective membership record will be flagged to alert relevant staff members to update their details when they next make a membership enquiry at the Club.

15.7. Payout policy

The following legislative and club requirements apply in relation to processing payouts:

- *Gaming Machines Regulation 2010 (NSW) cl. 14* requires all gaming machine handwritten payouts have the name and signature of the claimant recorded (extracts of the Gaming Machines Regulation are included in **Appendix Q**).
- *Gaming Machines Regulation 2010 (NSW) cl. 112* requires all gaming machine ticket payouts exceeding \$5,000 have the name, address and the signature of the claimant recorded.
- *Gaming Machines Regulation 2010 (NSW) cl. 30* requires that gaming machine prizes exceeding \$5,000 must be paid by a crossed cheque payable to the prize-winner or by electronic funds transfer to an account nominated by the prize-winner. The following procedures are followed for all gaming machine prize cheques.
- Club policy requires staff to complete the Know Your Customer record (see **Appendix D**) for all gaming machine payouts of \$10,000 or more.

15.8. When there is a discrepancy in identification documents

In the event of a discrepancy in the identification provided by customers seeking membership or payouts then staff are required to report the discrepancy to the Duty Manager. The Duty Manager is to speak with the customer and seek an explanation for the discrepancy. The Duty Manager should decide whether the discrepancy:

- Can be clarified by the provision of additional supporting documentation;
- Is an attempt by a person under 18 years or an excluded person to gain admission to the Club by using false documents or another person's documents; or
- Is suspicious.

Where additional supporting documentation is provided by the customer, the additional information is to be noted in the customer's KYC records held by the Club. For example, the customer has married or changed their name between the time they joined the Club and the time they are seeking a prize payout. The customer would need to provide appropriate documentation evidencing the change of name, such as a marriage certificate. A person whose picture is different may have had facial surgery. In that case it will be necessary for the person to provide evidence that they now look significantly different, such as an updated driver licence.

Staff should check the Exclusion Register to see if the individual is presenting false identification to circumvent an exclusion and enter the Club. In that case, staff should follow the Club's procedures for dealing with self-excluded persons.

If the customer appears to be under 18 years old, then the Duty Manager is to follow the Club's procedures for dealing with minors who attempt to enter the Club.

In all other situations, the Duty Manager is to treat the matter as suspicious and escalate the matter in accordance with the Suspicious Matter Flowchart located at **Appendix H**.

15.9. Transaction Monitoring Program

The purpose of the Club's transaction monitoring program is to identify, having regard to ML/TF risk, any transaction that appears to be suspicious. The Club's transaction monitoring program is designed to identify complex, unusual, large transactions and unusual patterns of transactions, which have no apparent economic or visible lawful purpose.

The Club's transaction monitoring program is made up of the following elements:

- Daily reconciliation of all gaming machines checking for any variation of money cleared from the machine compared to the meter readings.
- Weekly and monthly cash flow analysis of all gaming machines.
- Monthly analysis of the cheque payout register (all payouts exceeding \$5,000) checking for any repeated payouts for individuals which may constitute a suspicious matter.
- Observations made by staff working in the Club's gaming machine areas. All of the Club's staff working in these areas are required to undergo AML/CTF training (as documented in the Club's AML/CTF Training Policy).

Staff conducting transaction monitoring look for gaming machine data that is unusual or distorted. Following are examples of transactions that may warrant further investigation as part of the Transaction Monitoring Program:

- unusually high number of cheques within a calendar month for an individual customer in comparison to their known turnover;
- significant increases in the amount of cheques or accumulated values of cheques for an individual customer within a calendar month, compared to previous calendar months;
- multiple payouts of \$10,000 or more for an individual customer within a calendar month;
- multiple payouts of an identical or similar amount for an individual customer within a calendar month;
- payouts that appear to be deliberately avoiding the additional KYC requirements (e.g. just under the \$10,000 threshold amount); or

- fraud or theft in relation to the playing of a gaming machine.

When a transaction or transactions have been deemed unusual as part of the Transaction Monitoring Program, they are required to immediately report the information to the AML/CTF Compliance Officer. The AML/CTF Compliance Officer will investigate and consider the matter, including utilising the following resources (where applicable and/or available):

- guest registers;
- KYC Records;
- cheque payout register;
- previously submitted Suspicious Matter Reports;
- Enhanced Customer Due Diligence records;
- membership records;
- polling information from related gaming machines (recorded in 15 minute intervals); and/or
- CCTV footage.

Unless there is a clear reason for the unusual or distorted data, the matter is to be treated as suspicious and the matter will be dealt with in accordance with the Suspicious Matter Flowchart located in **Appendix H**.

15.10. Enhanced Customer Due Diligence

The Club is required to monitor and maintain a proper understanding of its customers. It does this through the implementation of risk in risk-based systems and controls to determine whether any additional customer information needs to be collected, beyond the information collected in the initial applicable customer identification procedure.

The Club must seek additional KYC information when it determines under its risk-based systems and controls that the ML/TF risk is high in relation to a particular customer. These situations may include the following in relation to customers utilising the Club's designated services:

1. **Complex, unusual, large transaction or unusual patterns of transactions**, which have no apparent economic or visible lawful purpose.
2. **Significant increase in cheque payouts** for a customer where there is no apparent reason.
3. **More than one name** being used by a customer where there is no valid explanation.
4. **Discrepancy in identification documents** (e.g. when a customer has different addresses, names or dates-of-birth recorded on different documents).
5. Where it appears that the customer is identified as a possible **Politically Exposed Person**.
6. Where it is suspected that the customer may be **involved in criminal activity or have possible associations with criminal organisations**.
7. When there are **suspicious circumstances in relation to a transaction or attempted transaction** but insufficient evidence to justify a Suspicious Matter Report.

The AML/CTF Compliance Officer shall apply a risk-based decision making process when determining what ECDD measures are appropriate to the matter that gave rise to the suspicion or the assessment of high ML/TF risk. This will require:

- A review of the matter that gave rise to the suspicion or assessment of high ML/TF risk
- Consideration of all available evidence
- Anticipating which ECDD measures are most likely to provide useful information
- Avoiding ‘tipping-off’ the individual concerned

The AML/CTF Compliance Officer shall apply ECDD measures proportionately to the level of risk that is determined. Where an individual is assessed as being of extremely high risk, a greater degree of ECDD measures shall be applied. ECDD measures that may be appropriate include one or more of the following:

- making more detailed analysis of the customer’s KYC information;
- verifying or re-verifying KYC information;
- undertaking more detailed analysis and monitoring of the customer’s past and current gambling activity (such as analysis of records of previous prize payouts or credit redemptions made for the customer); and
- considering whether or not a *Suspicious Matter Report* ought to be made to AUSTRAC.

The AML/CTF Compliance Officer may direct staff to make discreet inquiries about the customer from other patrons or sources, such as:

- aliases or other names by which they are known;
- date of birth, if not already recorded;
- country of citizenship and residence;
- occupation; and/or
- employer.

The AML/CTF Compliance Officer may also make inquiries with the police regarding persons suspected of involvement in criminal activities.

Publicly available information can also be checked, such as a Google search on the person’s name.

The AML/CTF Compliance Officer should avoid making inquiries that are impractical or are likely to alert the customer to the fact that they are subject to the ECDD process.

The Enhanced Customer Due Diligence (ECDD) Form (located at **Appendix F**) must be completed for all customers subjected to the ECDD procedure. The completed form (and any supporting documentation) must be retained by the Compliance Officer.

Once the ECDD has been completed, the AML/CTF Compliance Officer shall:

1. record the results of the ECDD process and all information obtained about the individual;
2. determine whether any further action is required, e.g. report to senior management, Suspicious Matter report to AUSTRAC; and
3. record details of the individual in the Persons of Interest Register.

15.11. Politically Exposed Persons

Staff are trained to look out for possible Politically Exposed Persons (PEPs). When a patron is identified as a possible PEP, the AML/CTF Compliance Officer should consider the available evidence to determine whether the person is a PEP.

Information about PEPs may be sought from a range of information sources. See the Extracts from AUSTRAC Politically Exposed Persons Guidance Note (**Appendix S**) and Politically Exposed Persons Questionnaire (**Appendix T**) for details of the legal requirements and identification criteria.

Monthly procedure

The following procedure is carried out on a monthly basis to assist the Club in screening for any potential PEPs which have joined or re-joined the Club in the previous calendar month:

1. A list containing the names and occupations is obtained from the Club's membership system
2. The list is sorted by occupation
3. All members with occupations which may fall within the definition of a PEP are shortlisted
4. All shortlisted members' names are subjected to a Google search to assist in flagging anyone who may be a Politically Exposed Person.
5. The AML/CTF Compliance Officer shall review the shortlist and assess the risk of anyone flagged as potential PEPs in accordance with the Club's ECDD and/or Suspicious Matter procedures.

Payouts of \$10,000 or more

The Club is required to give consideration as to whether any customer receiving a payout of \$10,000 or more is a PEP prior to, or as soon as practicable after, the payout being made.

ECDD will be completed in relation to all payouts of \$10,000 or more. This will be completed as soon as practicable after the payout has been made.

Steps to follow once a customer has been deemed as a PEP

Once a customer has been deemed as a PEP the Club's AML/CTF Compliance Officer will:

1. take reasonable measures to establish the source of wealth and funds for the customer from a publicly available register of their interests;
2. give consideration to business relationship and scrutiny of transactions undertaken to ensure the transactions being conducted are consistent with the knowledge of the customer, their business and risk profile, including where necessary, their source of funds;
3. enter the details of all customers identified as PEPs to the Persons of Interest Register;
4. consider whether the Club should maintain an ongoing relationship with each identified PEP; and
5. notify the Club's board of any PEPs of whom the decision has been made to discontinue its ongoing relationship.

15.12. Persons of interest register

Customers are normally considered to be low-risk. However, when the AML/CTF Compliance Officer receives information about a person that warrants further

investigation, then the AML/CTF Compliance Officer shall record the name of that person in the Persons of Interest Register. Any further information about that person shall be added to the records held in the Persons of Interest Register. The AML/CTF Compliance Officer shall determine the ML/TF risk posed by all persons recorded in the Persons of Interest Register and make such further inquiries as are appropriate.

15.13. Security procedures

The Club has security procedures which assist Ongoing Customer Due Diligence. The Compliance Officer may wish to view security camera footage of the customer or interview staff as part of the ongoing customer due diligence process.

16. Suspicious Matters

16.1. Legal and procedural requirements

The Club must report suspicious matters to AUSTRAC about any service covered by the AML/CTF Act which is provided, proposed to be provided or which has been asked to be provided to a person. This requirement applies whether the Club provides the service to that person or not. A *Suspicious Matter Report* must be reported to AUSTRAC if a suspicion is formed on reasonable grounds that:

- the person (or their agent) is not who they claim to be;
- information you have may be relevant to investigate or prosecute a person for an evasion (or attempted evasion) of a tax law or an offence against a Commonwealth, state or territory law;
- it may be of assistance in enforcing the Proceeds of Crime Act 2002 or corresponding state or territory law; or
- providing a service may be relevant to a ML/TF offence.

All Suspicious Matter Reports must be submitted to AUSTRAC in the approved form and contain the specified information. AUSTRAC prefers reports to be submitted electronically via the AUSTRAC Online website. Alternatively reports can be submitted to AUSTRAC in paper form. A paper form can be obtained by calling the AUSTRAC Help Desk.

Further information and assistance is available from the AUSTRAC e-learning courses about transaction reporting which can be found through the website: www.austrac.gov.au/elearning_reporting/reporting_requirements_readme.html.

16.2. What is a suspicious matter?

A transaction or attempted transaction should be considered a suspicious matter when a feeling of apprehension or mistrust about the transaction is formed and suspicion is formed that the transaction is relevant to:

- Tax evasion
- Money laundering
- Terrorism financing
- Corporate crime
- Proceeds of crime
- Other serious crime

16.3. Suspicious activities that may be attempts to launder money

- Claiming gaming machine prizes/payouts whilst not being the legitimate prize winner
- Exchanging cash for prize-winning cheques or gaming machine tickets
- Inserting large amounts of cash/credits into gaming machines, then cancelling credits and/or claim a prize following a period of minimal play/turnover
- Employee collusion in money laundering activities
- Individuals buying winning tickets from other customers
- Individuals providing fake identification, or someone else's identification when claiming payouts
- Amounts being bet are large and the account holder has access to large amounts of money via their occupation, e.g. bank employee or accountant

16.4. Establishing the identity of a person

Although it is beneficial to identify a person prior to submitting a Suspicious Matter Report, reports are still required to be lodged for persons who have not or cannot be identified.

Suspicious Matter Reports must contain details of reliable and independent identification documentation (such as the documentation outlined in **Appendix E**) and cannot contain other non-official identification information, such as a club membership number.

The following information will also assist in the identification of the person and should be included (if known) in Suspicious Matter Reports:

- name;
- telephone number;
- residential address;
- postal address if different to residential address;
- email address;
- date of birth;
- country of citizenship;
- occupation, business or principal activity and ABN;
- any other name by which the person is known;
- description of the person; and/or
- whether the club holds any relevant documentation, video or photographs of the person.

16.5. What makes a good Suspicious Matter Report?

- A description of what led to the forming of the suspicion
- Full information on activity related to the suspicious matter
- Amount of the transaction and breakdown
- Pattern of related activity
- Copies of supporting related documentation
- Submitted in a timely manner

16.6. Indicators of possible suspicious matters

- Attempts to use a false name or address
- Production of seemingly false identification in the KYC process

- The refusal to provide identification when completing a KYC record
- Structuring of transactions – attempts to break up a transaction for an amount of \$10,000 or more into smaller amounts to avoid the reporting of the transaction
- Unusual financial activity, particularly where significant amounts of cash are involved in circumstances that are difficult to explain
- Customers receiving multiple cheque payments on a single day
- Customers receiving a volume of cheques within a specific time period that is beyond what would be considered normal
- Unusual behaviour of the customer involved in the transaction (e.g. unusual nervousness)
- A winnings cheque being requested in the name of a third party
- Exchange of smaller denomination bank notes to either larger denomination bank notes or cheques
- Exchange of paper notes to polymer notes

A suspicious matter must be reported even if it does not involve any dealing in cash. The transaction does not need to be completed to warrant a *Suspicious Matter Report*. An attempt to conduct a transaction that is suspicious must also be reported.

16.7. Examples

Associates betting against each other in even money games, and a winnings cheque being requested in a third party's name.

Customer 1 spent an hour playing the Roulette machine, betting on Red every time. Customer 2 also spent an hour playing the Roulette machine, betting on Black every time. Customers 1 and 2 then each request their payout by cheque to be made out in the name of a third party. Upon departing the Club the attendant was asked how long it would take to clear the cheque and receive their funds from the bank.

Exchange of paper notes to polymer notes.

A customer went to the cashier and asked her to exchange \$2,000 in the old style \$10 and \$20 paper notes for modern polymer notes, saying they didn't like to insert the notes into the note acceptor as they sometimes jammed.

Cheques being requested which are not a result of gaming winnings.

A customer loaded \$5,000 into a gaming machine and then played for a short while before asking for payment by a winnings cheque.

The refusal to provide identification when receiving a payout.

A customer was asked for identification by the cashier when receiving a payout. He claimed to have no identification with him. When he was asked to write down his name and address he stated his name as 'John Smith'. When pressed for an address he said he had 'no fixed address'.

Attempt to purchase a ticket from another customer

A customer reported another customer offering to purchase her prize-winning ticket for cash.

Further Examples

Refer to **Appendix R** for further examples provided by AUSTRAC.

16.8. Suspicious matter reporting procedure

Staff need to be trained to be alert for suspicious activity and report it. Management need a process whereby reported suspicious matters are documented and reported to AUSTRAC.

All suspicious activity is required to be reported to the Club's AML/CTF Compliance Officer immediately. In the event a gaming attendant or staff member becomes apprehensive about a customer, transaction or attempted transaction the following procedure will be used to escalate it to the Compliance Officer for their investigation:

1. The staff member immediately advises the Duty Manager
2. The Duty Manager immediately prepares an incident report, with the assistance of the staff member involved
3. The Duty Manager immediately forwards the incident report to the AML/CTF Compliance Officer for their investigation

Staff members are also able to report suspicious behaviour directly to the AML/CTF Compliance Officer.

The AML/CTF Compliance Officer should, as part of any investigation relating to a possible suspicious matter, consider whether conducting Enhanced Customer Due Diligence (ECDD) is appropriate.

Reports of suspicious matters involving gaming machines must be made by the Club to AUSTRAC using the *Suspicious Matter Report* form, within the required period of time.

Reports of suspicious matters involving wagering must be made to the TAB according to the TAB manual and circulars and within the time allowed by the TAB (which gives TAB time to process the report and comply with the AUSTRAC time requirements).

Note that there is no requirement to undertake disciplinary action against customers suspected of money laundering. In fact the law requires clubs to refrain from "tipping off" customers suspected of money laundering. The Club must not inform the customer that a report is being made.

16.9. Reporting deadlines

Where it is suspected that the matter relates to terrorism financing, AUSTRAC must be notified within 24 hours of suspicion being formed.

Where it is suspected that the matter relates to money laundering, AUSTRAC must be notified within 3 business days of suspicion being formed.

17. Large Payouts

17.1. Payouts of \$10,000 or more

Individual gaming machine payouts for \$10,000 or more require the identity of the customer to be verified, recorded and retained. The verification process requires reliable documentation. Because the self-assessed risk is very low, low or medium, then a "documentation based safe harbour" will be used.

The Club will complete a Know Your Customer record for all payouts of \$10,000 or more. In the event that a customer has a number of individual gaming machine or wagering tickets to be cashed, none of the tickets are for \$10,000 or more, but the total of the tickets is \$10,000, then the Club is NOT required to complete the KYC Record.

All completed KYC forms will be forwarded to the Gaming Department whose staff will check that identification is valid, update membership records with any new or changed information and sign the “Office Use Only” section of the form.

As soon as practicable after the payout is made the Club will also give consideration as to whether any patron receiving a payout of \$10,000 or more is a PEP and retain evidence to substantiate that this consideration has been made. In the event that a patron receiving a payout of \$10,000 or more is identified as a possible PEP they will be subjected to the Club’s PEP and ECDD procedures.

CASE STUDY

Denise spends a day in the gaming area and accumulates 7 tickets during the course of her day for \$1700, \$1000, \$1800, \$1500, \$1900, \$1500, 1600. The total value of tickets she cashes before leaving the Club is \$10,200.

The Club does not need to complete a *Know Your Customer* record, because none of the individual amounts exceed \$10,000.

However, this sort of behaviour may be deemed to be suspicious and as such may warrant a *Suspicious Matter Report* to AUSTRAC. If this is the case, a report should be made to the Club’s AML/CTF Compliance Officer as per the procedure set out in **Appendix H**.

17.2. Threshold transactions

A Threshold Transaction means a transaction involving the transfer of physical currency (i.e. cash), where the total amount of physical currency transferred is \$10,000 or more (*AML/CTF Act s. 5*).

Gaming Machines Regulation 2010 (NSW) s. 30(1) prohibits clubs from processing gaming machine payouts of more than \$5,000 in cash. Accordingly, the Club will never be required to submit a *Threshold Transaction Report*.

It is TABCORP’s responsibility, under the AML/CTF Act, to report any TAB threshold transactions to AUSTRAC. The Club will assist TABCORP in obtaining any necessary information.

The Large Payouts Flowchart is located at **Appendix I**.

18. Independent Review

The legislation requires a periodic independent review of the AML/CTF policies and procedures. The Club shall appoint an internal or external reviewer. It is the Club’s policy that a review will be undertaken of the Club’s AML/CTF policies and procedures annually by an independent reviewer.

The Club has appointed BetSafe Pty Ltd to conduct annual reviews of the Club’s AML/CTF program on an annual basis.

Where the review recommends change the Club will respond to the recommendations within the specified time period. Where there is no specified time period, the Club will endeavour to address all matters raised within 3 months of receipt.

18.1. Independence of the reviewer

The Club considers that BetSafe Pty Ltd is competent to act as the independent reviewer of the Club's AML/CTF Program. Although the Club retains BetSafe to assist the Club in developing and updating its AML/CTF program, the Club is solely responsible for the ongoing conduct of its AML/CTF program.

BetSafe is an independent contractor to the Club and receives a fee for its consultancy and other external services, of which AML/CTF is but one. BetSafe has no involvement in the internal working of the Club, no financial interest in the Club and no links with directors or key personnel. As it is only interested in ensuring that the Club has an effective and compliant AML/CTF program then there can be no conflict of interest.

The Club considers that BetSafe has greater independence than an internal audit department would have. More importantly, BetSafe provides consultancy services to a number of other leading registered clubs, so is able to apply its knowledge of industry best practice during the review process.

19. Record Keeping

Pursuant to AML/CTF Act ss. 104-108, 111-113 & 116, and the AML/CTF Rules, the following record keeping requirements apply:

- The AML/CTF Rules provide that the Club must make a record of a designated service and retain that record for at least 7 years.
- If a customer provides a document relating to the provision of a designated service, the Club must retain the original document or a soft copy of the document for at least 7 years.
- The Club must retain a record of an applicable customer identification procedure for 7 years after the end of the Club's relationship with the relevant customer.
- The Club must retain a copy of its AML/CTF program for 7 years after the day upon which the adoption ceases to be in force.

Records to be kept include all AML/CTF documents, gaming machine payouts where the customer has been identified, membership application forms, photographs of members and visitors, *Suspicious Matter Reports*, *Threshold Transaction Reports*, KYC records and superseded AML/CTF program manuals.

The Club may retain a soft copy of the above records or extract of those records (e.g. membership information on its computer database, rather than the original membership application form).

19.1. Procedure

AML/CTF Act s. 107 requires either the original record or a copy of the record or an extract from the record showing the prescribed information to be retained for 7 years after the relevant date. This means that computer records are sufficient. Privacy principles apply to the creation of records of customer personal information, and their use and storage.

20. Confidentiality

When the Club is investigating a possible suspicious matter or making a *Suspicious Matter Report*, it must not inform the individual who is the subject of the investigation or report. It is a crime to disclose to anyone outside the organisation that a suspicion has been formed or that information has been communicated to AUSTRAC.

21. Privacy Issues

The Club is aware of its obligations under the *Privacy Act 1988 (Cth)*. Under *Australian Privacy Principle 12* (formerly National Privacy Principle 6), customers may normally request access to personal information the Club has collected about them. This may include records relating to self-exclusion or gaming-related incidents involving them.

However, in relation to Suspicious Matter Reports, *Australian Privacy Principle 12.3(i)* prohibits giving access when it would be likely to prejudice enforcement related activities conducted by, or on behalf of, an enforcement body. In other words, the Club must refuse a customer's request to provide a copy of Suspicious Matter Reports that have been produced for AUSTRAC.

22. Legal Protection

The law provides legal protection for the Club and its staff who are complying with their legal obligations under the AML/CTF legislation. The Club and staff cannot be prosecuted for making a report to AUSTRAC even if the information provided is incorrect. This is important when the Compliance Officer is considering making a *Suspicious Matter Report*.

23. More Information

- *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)*: Available on www.austlii.edu.au
- AUSTRAC website: www.austrac.gov.au
 - Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No.1)
 - AUSTRAC Quick guide – Suspicious Matter Report (**Appendix U**)
 - AML/CTF Compliance Report – Gambling Services
 - AML/CTF Compliance Report Instruction Guide – Gambling Services
 - AUSTRAC Guidance Note – Risk Management and AML/CTF programs
 - Draft AUSTRAC Guidance Note – Ongoing customer due diligence
 - Draft AUSTRAC Guidance Note – AML/CTF Compliance Officers
 - Draft Guidance Note – Key terms used in ‘politically exposed person’ definition Policy (Additional Customer Due Diligence Requirements) Principles 2014
- TAB AML/CTF manuals, newsletters and training materials.

Appendix A – AML/CTF Compliance Officer

The Compliance Officer for the Club is:

Shane Holland (General Manager)

Phone: 02 6297 6022

Mobile Phone: 0412 246 080

Email: Shane.Holland@qsccl.com.au

Appendix B – Risk Management Table

Item	Identification of risk	Likelihood	Control procedures	Responses
1.	Abnormal play and credit redemption.	Low	Staff training, transaction monitoring	Investigation, Suspicious Matter Report
2.	Third party purchases of prize or payout entitlements where the actual winner is offered cash for the prize.	Low	Staff training, transaction monitoring	Investigation, Suspicious Matter Report
3.	Multi-terminal gaming machines (MTGMs) used to hedge bets or cover multiple winning combinations	Low	Staff training, transaction monitoring	Investigation, Suspicious Matter Report
4.	Use of false identification when collecting a payout, or joining or entering the Club	Low	Staff training, customer identification procedures, legislative requirements	Investigation, Enhanced Customer Due Diligence, Suspicious Matter Report
5.	Requests for prize cheques to be issued to someone other than the person who won the prize	Low	Staff training, prize payout procedures, identification procedures, legislative requirements	Investigation, Enhanced Customer Due Diligence, Suspicious Matter Report
6.	Refusal or hesitation to provide identification when required	Low	Staff training, identification procedures, legislative requirements	Investigation, Enhanced Customer Due Diligence, Suspicious Matter Report
7.	Stolen or counterfeit money inserted into machines or paid to cashier	Low	Staff training, cash handling procedures, gaming machine note acceptors	Investigation, Suspicious Matter Report
8.	Cash payouts of \$10,000 or more.	Very Low	Legislative requirements, independent review	Threshold Transaction Report
9.	Collusion between staff and money launderers to evade controls	Low	Employee due diligence, staff training	Investigation, Suspicious Matter Report
10.	Staff not reporting money laundering or terrorism financing activity.	Low	Employee due diligence, staff training	Investigation, Suspicious Matter Report, Staff Disciplinary Procedures
11.	Staff tipping off customers in relation possible money laundering or terrorism financing activity.	Low	Employee due diligence, staff training	Investigation, Suspicious Matter Report, Staff Disciplinary Procedures
12.	Politically Exposed Persons	Very Low	Staff training, customer identification procedures, review procedure	Enhanced Customer Due Diligence, Investigation

Appendix C – Risk Assessment Table

Type of risk	Details of risk	Responses to risk	Level of risk assessed
Gaming machines	Gaming machine entitlements at QSCC: 33 Annual Gaming Machine Revenue Band for QSCC: less than \$2 million	Annual review of systems and controls to mitigate ML/TF risks, Transaction Monitoring Program and Security & Surveillance	Very Low
Multi-terminal gaming machines	Multi terminal gaming machines (MTGMs) at QSCC: 0	N/A	Very Low
Customer types	<p>QSCC's customer types is generally reflective of the residential demographic within the Club's LGA.</p> <p>Residential demographical information for the Queanbeyan-Palerang LGA (as per the 2016 census) is as follows:</p> <ul style="list-style-type: none"> Country of Birth: Australia 75.0 %, England 3.0%, India 1.5%, New Zealand 1.4%, The former Yugoslav Republic of Macedonia 0.9% and Philippines 0.8%. Median age: 38 years. Main areas of employment: professionals 20.0%, clerical & administrative workers 18.3%, managers 16.1%, technicians & trades workers 13.3%, and community & personal service workers 10.3% Median weekly individual income: above the Australian median income. <p>QSCC only provides designated services to individuals. <i>Gaming Machines Regulation 2010 (NSW) cl. 30(1)(a)</i> requires that a prize cheque be made payable to the person who received the payout. In the event that an agent of a company, trust, partnership, association, co-operative or government body accesses a designated service within QSCC, that agent would be treated as an individual.</p>	<p>Enhanced Customer Due Diligence, following requirements of Registered Clubs Act and Security & Surveillance</p> <p>Update risk assessment when amalgamating with another club or when moving venue location</p> <p>PEP procedures</p>	Low

Type of risk	Details of risk	Responses to risk	Level of risk assessed
Cash payouts	<p>QSCC processes cash payouts using the following methods:</p> <ul style="list-style-type: none"> cash released directly by machine; issue of a handwritten payout voucher processed by a gaming machine attendant; and through a gaming machine ticket; and <p><u>Gaming Machines Regulation 2010 (NSW) cl. 30(1)</u> requires that the balance from any payout of more than \$5,000 be paid by crossed-cheque to the individual who received the payout.</p> <p><u>Gaming Machines Regulation 2010 (NSW) cl. 14</u> requires that for all handwritten payouts the name and signature of the patron be documented on the payout voucher.</p> <p><u>Gaming Machines Regulation 2010 (NSW) cl. 112</u> requires that for any gaming machine ticket which is for the value of \$5,000 or more, or is redeemed 2 or more days after issue, a record must be created containing the patron's name, address, signature and identification type & number.</p> <p>Cash redemption terminals (CRTs) provided at QSCC: 1</p>	Transaction Monitoring Program, legislative controls, prize payout procedures, customer identification procedures and staff training	Low
Loyalty program	<p>QSCC provides a non-tiered tiered loyalty program. In order to participate in the loyalty program the customer must be a member of the Club.</p> <p>In relation to gaming machines points are accrued based on the amount of money turned over whilst a membership card is inserted. Points cannot simply be earned by inserting money into a gaming machine.</p> <p>The Club does not consider that there is a correlation between the amount of points accrued by a member and their ML/TF risk. Members who are earning a large amount of points would have had to turn over a larger</p>	Staff training, legislative controls, customer identification procedures, ratio of money turned over to earn points	Very Low

Type of risk	Details of risk	Responses to risk	Level of risk assessed
	<p>amount of money within the specified period, compared to members who are earning fewer points. Large amounts of money being turned over in a gaming machine is not normally an indicator of ML/TF behaviour.</p> <p><u>Gaming Machines Act 2001 s. 45(1)</u> prohibits loyalty points from being exchanged for cash.</p> <p><u>Gaming Machines Act 2001 s. 45(2)</u> prohibits the Club from allowing a member to redeem their points for a prize valued more than \$1,000.</p> <p>As points cannot be converted to or from cash, and are earned based on turnover (rather than cash in) the Club's Loyalty Program cannot be directly used for ML/TF activities.</p>		
Ticket technology	<p>Ticket-in (TI) and ticket-out (TO) (as per the requirements of <u>Gaming Machines Regulation cls. 105-115</u>) is provided at QSCC.</p> <p>TI/TO allows patrons to easily transfer gaming machine credits to another machine, however when the patron wishes to receive a payout it must be done in accordance with the requirements of the Gaming Machines Regulation (outlined above).</p>	Staff training, customer identification procedures, legislative controls, prize payout procedures	Low
Player accounts	QSCC does not provide cashless gaming machine (stored value/smart cards) facilities.	N/A	Very Low
Types of service delivery	Only face to face gambling on QSCC's designated services is allowed. The Club does not permit gambling by telephone, mail, facsimile or internet.	Staff training and legislative controls	Low
Telephone betting accounts	QSCC does not administer the use of telephone betting accounts on its designated services. The Club does not accept bets or wagers over the internet or telephone.	N/A	Very Low
Foreign jurisdiction operations	QSCC does not operate designated services in any foreign jurisdictions.	N/A	Very Low
Foreign currency exchange	QSCC does not offer a currency exchange service.	N/A	Very Low

Overall assessment of risk for the Club is Very Low to Low.

Appendix D – Know Your Customer (KYC) Record**This record to is be completed before any gaming/TAB payout of \$10,000 or more is processed**

Payout Type:	<input type="checkbox"/> Gaming	<input type="checkbox"/> TAB	Payout/Ticket #: _____
Cheque Amount: \$ _____		Cash Amount: \$ _____	

Please record the following information as per reliable sources of identification:

Title: _____ First Name: _____ Middle Name/s: _____

Surname: _____ DOB: ____ / ____ / ____

Unit Number: _____ Street Number: _____ Street Name: _____

Suburb/Town: _____ State: _____ Post/Zip Code: _____

Country: _____

Please tick the reliable source/s of identification used and record all identification numbers for identification viewed. Member's card or sign in slip is not considered reliable identification. Remember that you must verify that any document produced by the customer has not expired (other than in the case of a passport issued by the Commonwealth that expired within the preceding two years).

☐

An original or certified copy of a primary photographic identification document e.g. driver's licence or passport (with photograph)

Type: _____ Number: _____ Expiry: ____ / ____ / ____

OR☐

An original or certified copy of a primary non-photographic identification document e.g. birth certificate

Type: _____ Number: _____ Expiry: ____ / ____ / ____

AND☐

An original or certified copy of a secondary identification document e.g. Australian Taxation Office assessment notice (less than 12 months old), rates or electricity bill (less than 3 months old).

Type: _____ Number: _____ Expiry: ____ / ____ / ____

Supervisor Name: _____ Signed: _____ Date: ____ / ____ / ____

Office Use Only

KYC Record checked to ensure valid identification and information entered correctly Y / N

Membership details checked and updated Y / N / N/A

Addendum to the KYC Record completed Y / N

Staff Name: _____ Signed: _____ Date: ____ / ____ / ____

Appendix E – Identification Documents

Primary Photographic Identification Document

- Driver license (Australian or foreign);
- Proof of age card (Australian or foreign);
- Passport or a similar document issued for the purpose of international travel (Australian or foreign);
- National identity card issued for the purpose of identification (Australian or foreign).

Primary Non-Photographic Identification Document

- Birth certificate (Australian or foreign);
- Citizenship certificate (Australian or foreign);
- Concession card issued by Centrelink.

Secondary Identification Document (Australian only)

- Government financial benefits notice (issued within the preceding 12 months);
- Australian Tax Office notice (issued within the preceding 12 months);
- Local government or utilities bill (issued within the preceding 3 months).

Notes:

1. Primary photographic documents used to identify an individual must include a photograph of the individual.
2. Expired primary identification documents should not be accepted, other than:
 - a) an Australian passport that expired within the previous 2 years; or
 - b) an Australian issued driver licence expired within the previous month, accompanied by an interim licence renewal receipt issued by an Australian driver licensing authority.
3. Foreign documents not written in English must be accompanied by an English translation prepared by an accredited translator.
4. This is not an exhaustive definition. A reporting entity may rely upon other documents not listed above as reliable and independent documents, where that is appropriate having regard to ML/TF risk.

Photocopied Documents

If a photocopied document is produced, it must be certified by a qualified person (generally a Justice of the Peace). Copies are certified by using the wording “CERTIFIED TRUE COPY”, and the qualified person must sign, date and print their name and profession or qualification on the copy.

Appendix F – Enhanced Customer Due Diligence (ECDD) Form**Customer Details***(where available or able to be obtained without tipping off customer)*Full name: _____
(including middle name/s)

Alias/es: _____

Current address: _____

Previous address/es: _____

Country of citizenship: _____ Country of residence: _____

Occupation: _____ Employer: _____

Is there evidence of the use of false ID? <i>(If yes, attach a report of the incident/s)</i>	Y / N	Is there evidence the customer is a PEP? <i>(A person, or close relative of a person, entrusted with prominent public functions)</i>	Y / N
---	-------	---	-------

Are there any known criminal associations? <i>(If yes, attach a report providing more detail)</i>	Y / N	Have any KYC forms been completed? <i>(If yes, attach copies of completed forms)</i>	Y / N
--	-------	---	-------

Club Membership

Membership number (if applicable): _____ How long has the customer been a member? _____

Is there carded gaming machine activity? <i>(If yes, attach a report of recent activity)</i>	Y / N	Are there abnormalities in carded data? <i>(If yes, attach an analysis)</i>	Y / N
---	-------	--	-------

Further Information

Reason/s for conducting ECDD

Did you discuss this customer with any other staff member/s as part of the ECDD procedure?
(If yes provide details of the staff and the discussions)

Did you conduct a Google, Facebook, Linked In or any other online search in relation to this customer? <i>(If yes attach details of the search, screenshots and any information gathered)</i>	Y / N
--	-------

Did you identify any matter that may give rise to a suspicious matter reporting obligation? <i>(If yes attach details)</i>	Y / N
---	-------

Risk Assessment

Is this customer deemed a high ML/TF risk? <i>(PEPs are always deemed high risk)</i>	Y / N	Has the AML/CTF Compliance Officer approved the Club's ongoing relationship with the customer?	Y / N
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Details of Staff Member Completing Form

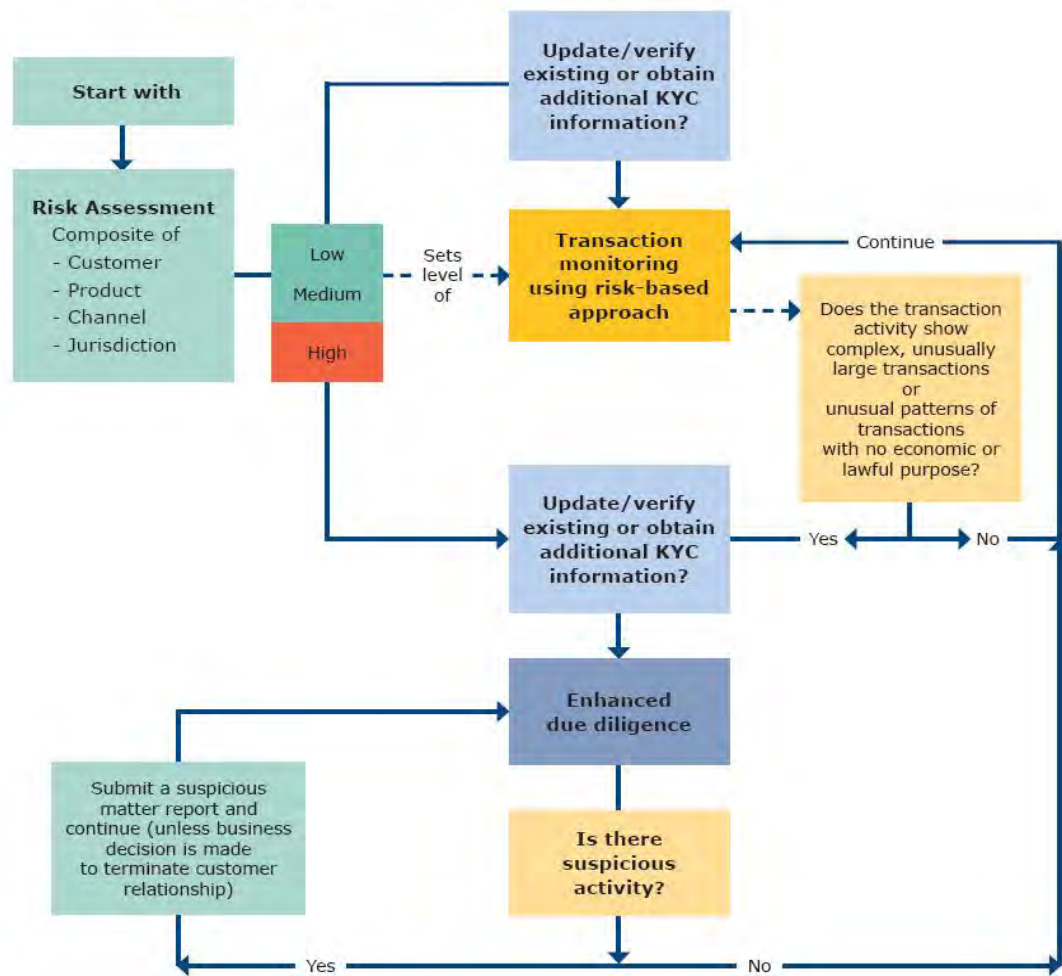
Name: _____ Position: _____

Signature: _____ Date: _____

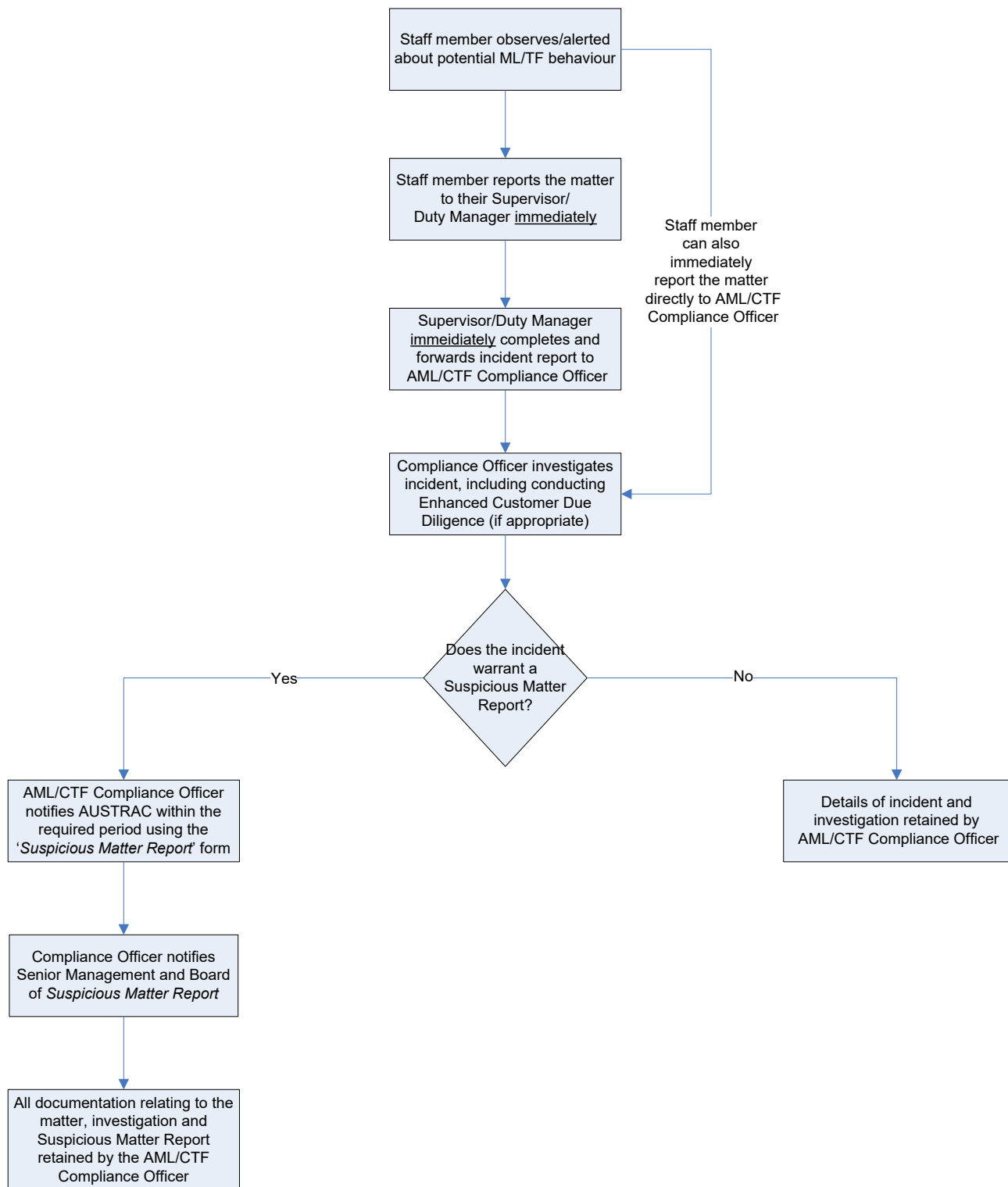
This form must be reviewed and signed off by the AML/CTF Compliance Officer

Appendix G – AUSTRAC Ongoing Customer Due Diligence Flowchart

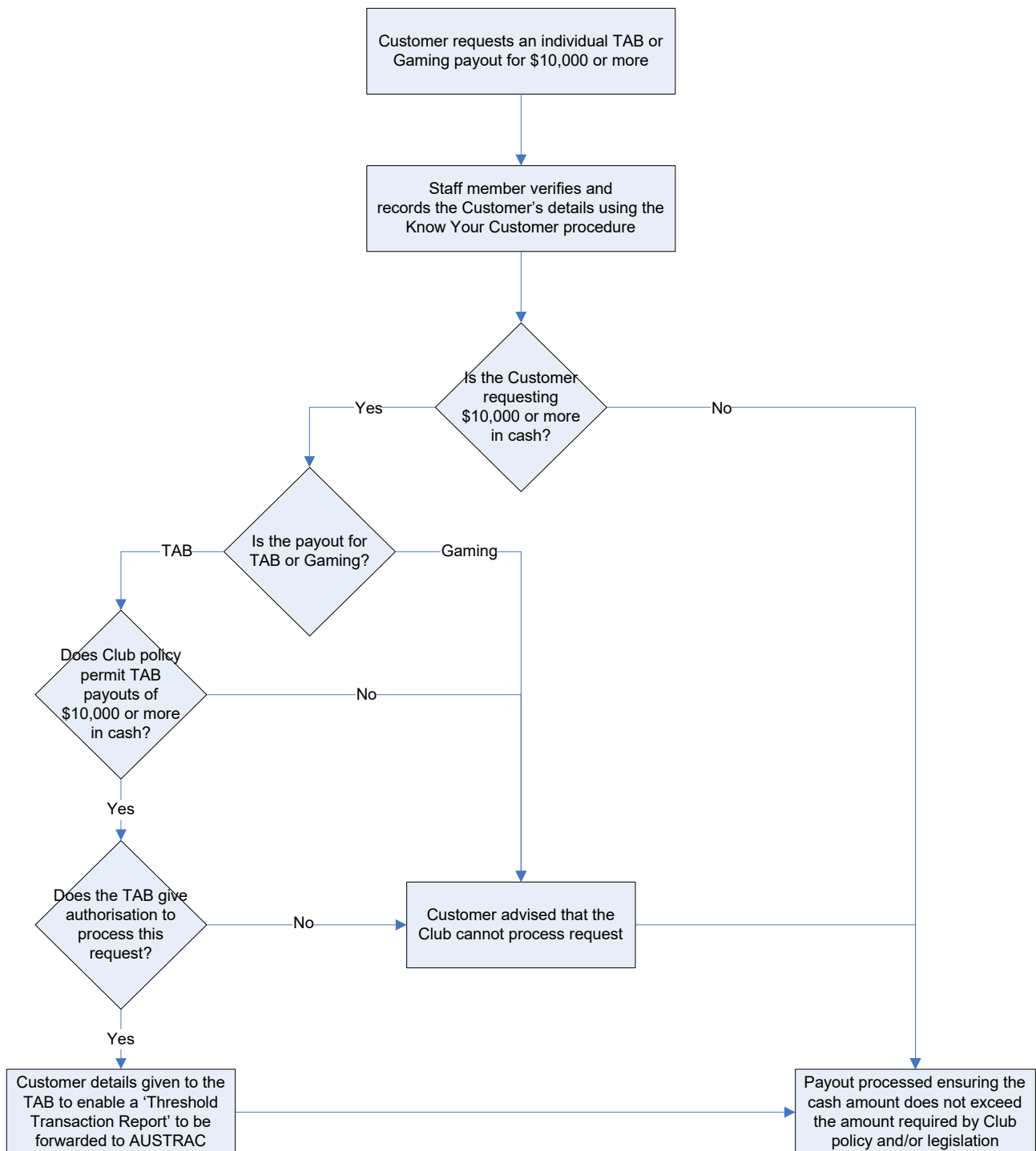
Ongoing customer due diligence



Appendix H – Suspicious Matter Flowchart



Appendix I – Large Payouts Flowchart



Appendix J – Transaction Monitoring Program (TMP) Checklist

This checklist relates to the period _____ to _____

Were daily reconciliations of all gaming machines conducted for this period, checking for any variation of money cleared from the machine compared to the meter readings? Y / N

Was there anything unusual detected which may indicate possible ML/TF behaviour? Y / N

1. _____
2. _____
3. _____

Was weekly and monthly cash flow analysis of all gaming machines conducted for this period? Y / N

Was there anything unusual detected which may indicate possible ML/TF behaviour? Y / N

1. _____
2. _____
3. _____

Was analysis of the cheque payout register (all payouts exceeding \$5,000) conducted for this period, checking for any repeated payouts for individuals which may constitute a suspicious matter Y / N

Was there anything unusual detected which may indicate possible ML/TF behaviour? Y / N

1. _____
2. _____
3. _____
4. _____

Was Enhanced Customer Due Diligence (ECDD) conducted in relation to any patrons flagged? Y / N

1. _____
2. _____
3. _____
4. _____

Were any patrons reported to AUSTRAC as part of a Suspicious Matter Report (SMR)? Y / N

1. _____
2. _____
3. _____
4. _____

Comments:

Conducted by: _____

Date: _____

Appendix K – Employee Due Diligence Policy

Employee Due Diligence means conducting ML/TF risk assessments for new and existing employees.

The Anti-Money Laundering and Counter-Terrorism Financing Act 2006 requires this club to have an Employee Due Diligence Policy in place as part of the club's AML/CTF program. The Employee Due Diligence Policy is designed to minimise the risk of employing or promoting staff who may not comply with the requirements of the AML/CTF law or may assist ML/TF activities.

Elements of the Club's Employee Due Diligence Policy are:

1. 2 x Telephone reference checks are always carried out when employing staff.
2. If the applicant provides a reference for an organization that would have a landline phone number (e.g. another club), the reference checker will phone the referee on the landline number and ask for the person employed in the role stated on the reference. If the referee is someone like a builder, then the reference checker will call the mobile number of that person.
3. Internal verbal reference checks are obtained from an employee's supervisor and/or manager before transferring or promoting staff, where appropriate.
4. Staff are not to be employed into positions of financial responsibility (i.e. change desk, gaming supervisor, duty manager or senior management) unless:
 - (a) they have worked for the club for at least 3 months and have a clear internal reference; or
 - (b) they have a clear reference from another gaming organization such as a club or casino where they have had worked for at least 3 months in a similar role; or
 - (c) they have cleared a police probity check.
5. New and promoted staff are made aware of their obligations under the AML/CTF legislation.
6. All new staff must undergo orientation. The Club's AML/CTF policy is contained in the Club's Staff Handbook. At the conclusion of the orientation, the employee must sign the Employee Declaration form to accept that they have read and understood the policies and procedures contained in the handbook.

Any employee who fails, without reasonable excuse, to comply with the club's AML/CTF program requirements shall be subject to the Club's standard disciplinary procedures.

This employee due diligence policy is to be reviewed by the club's AML/CTF Compliance Officer annually.

Appendix L – AML/CTF Training Policy

New Employees

All staff receive the induction training and staff handbook on the commencement of their employment.

All staff are required to read the Club's AML/CTF policy and sign the sign-off sheet to confirm they have read and understood the policy.

Refresher Training

AML/CTF training is incorporated into all BetSafe courses run at the Club. These courses are generally conducted annually or biannually.

Further refresher training will also be provided to staff when recommended by the AML/CTF independent review. In particular, refresher training is to be provided when the Club has introduced new designated services, delivery methods of designated service or modify existing designated services. This refresher training may include:

- Additional face-to-face training, provided by BetSafe
- Online training, provided by BetSafe
- Having staff re-read the Club's AML/CTF policy

Board of Directors and Senior Managers

The AML/CTF legislation requires the Club's Board to approve the Club's AML/CTF program whenever it is updated or amended. A full copy of the program manual is provided to, or accessible by, each Board members as part of the approval process. When approving any updates or amendments Board members are expected to read and understand the contents of the manual. The Club's Compliance Officer is available to answer any Board queries.

Staff Promotion

Where a staff member has been promoted to a role that requires further AML/CTF training, such as a duty manager, AML/CTF training will be provided prior to commencement of that role.

Training Records

The Club's General Manager is responsible for keeping a record of staff AML/CTF training, including:

- the date upon which each staff member receives initial AML/CTF training
- the dates upon which each staff member receives refresher AML/CTF training
- who delivered the training
- sign off/acknowledgement forms

Assessment of Effectiveness

Items relating to AML/CTF are included in the online training courses, which participants are required to successfully complete in order to be certified for these courses.

Face-to-face training courses do not have a formal assessment process, however the trainer will promote participation and interaction with the attendee/s. Opportunity is also given to training attendee/s to allow them ask questions relating to content material.

TAB training

TAB agents and operators are required to satisfactorily complete the TABCORP Wagering Accreditation Program which includes a component on AML/CTF responsibilities and obligations before staff are directly engaged in TAB duties.

Further Information

Further information relating to the content and delivery method of the Club's specific AML/CTF risk awareness training is provided as follows:

- **Appendix L** – Club's AML/CTF Policy
- **Appendix M** – Training Sign-Off Sheet
- **Appendix O** – BetSafe Training Slides

Appendix M – Training Sign-Off Sheet

QSCC AML/CTF POLICY STAFF SIGN-OFF SHEET

I _____ [name] have read and understand the QSCC AML/CTF policy.

I acknowledge that failure to comply with the Policy and AML/CTF Act may result disciplinary action (including termination of my employment) and/or prosecution (including a personal fine of up to \$4.2 million and/or jail).

Staff Signature: _____

Manager Signature: _____

Date: _____

Appendix N – AML/CTF Policy

Under the AML/CTF Act, the Club is required to have a program to identify, reduce and manage the money laundering and terrorism financing risk which may be faced through the provision of gambling services.

1. What is the AML/CTF Act?

- The Anti-Money Laundering and Counter Terrorism Financing Act is a Federal law that requires clubs, hotels, casinos and TABS to make reports about large cash transactions or suspect transactions.
- Terrorism Financing is the act of providing financial support to terrorists or terrorist organisations to enable them to carry out terrorist acts
- Australia co-operates with other countries that have signed the UN Convention for the Suppression of the Financing of Terrorism, 2002
- AUSTRAC (Australian Transaction Reports and Analysis Centre) is the government agency that receives reports of large and suspicious financial transactions
- Clubs may be used for money laundering or terrorism financing purposes as they have many financial activities
- By reporting large transactions or suspicious activities we can help fight money laundering and terrorism financing

2. Why do people launder money?

- Money Laundering is the process that criminals use to hide the profits they make from illegal activities
- Illegal drug dealing, arms smuggling and other criminal activities related to organised crime can generate huge profits
- The goal of these criminals is to conceal the profit they make out the illegal activity behind a legal front
- Money laundering allows criminals to keep their ill-gotten profits and encourages further crime
- Money laundering is often linked to the illegal drug trade
- Money laundering may also be used by people smugglers, illegal prostitution rackets and corporate criminals
- It is estimated that \$AUD 4.5 billion dollars is involved with money laundering each year

3. Penalties for non-compliance

- Severe penalties apply for failure to comply with the AML/CTF requirements.
- The Club can be fined up to \$21 million for failing to comply with its AML/CTF obligations
- Individuals can be fined up to \$4.2 million or sent to prison.
- Non-compliance includes tipping off someone that they are being investigated for suspect activities.

4. What should I be on the lookout for?

False name and address provided

For example, someone may use a name different to that on their identification.

Purchase of winning tickets

Customer A wins a prize at the club on a Members Draw, TAB, Keno, Gaming Machine or Link. Customer A transfers their prize-winning ticket to Customer B, so it looks like Customer B won the prize. Customers who redeem prize-winning tickets a couple of days after winning a large prize should be considered suspicious.

Abnormal play and credit redemption

A customer inserts large amounts of cash into a gaming machine and then collects a payout after a short time playing a machine. In the TAB area a customer could place a large bet and then cancel it.

Multi-Terminal Gaming Machines (MTGMs)

Unusual behaviour by customers playing Roulette or other Multi-Terminals (where maximum bet is \$100.)

Stolen or Counterfeit Notes

Customer may try to exchange or spend stolen or counterfeit money.

Customer may insert stolen or counterfeit money into the note acceptor of the gaming machine, play for a while, then collect. Some note acceptors may not recognise the counterfeit money. Clearance staff and other staff involved in cash handling should be on the lookout for suspect notes

Collusion between staff and money launderers

A corrupt staff member may alert the money launderer to significant payout situations and facilitate the introduction of the prize-winner and the money launderer. Staff may also be involved in other ways with money launderers.

Other suspicious activities

It is best to report activities that make you feel uncomfortable, no matter what they are. Suspicious activities don't just involve money or gambling. For example, a staff member reported a customer who wanted to know about the exact opening and closing times of the club and who was at work then.

5. *What do I do if I see something suspicious?*

- It is important that we report suspicious activity to management as soon as possible after we become aware of it.
- Try to identify the customer or customers involved in the suspicious activity
- Details are important – what was said, what was done, when and where
- Don't alert the individuals to your suspicions
- It can be helpful to write down the details – an Incident Report will probably be needed.
- Your Duty Manager will make a report to the club's Compliance Officer.
- The Compliance Officer may make further investigations
- The Club may make a report about the suspicious activity to AUSTRAC
- AUSTRAC will use the information provided to identify money laundering and terrorism financing activities and make Australia a safer place.

6. *Large Payouts*

- Anyone who received a payouts of \$10,000 or more need to be identified and have their details documented
- The 'Know Your Customer' form must be correctly completed in relation to every payouts of \$10,000 or more
- The Club is required to retain all completed 'Know Your Customer' forms for seven (7) years

7. *High Risk Customers*

What is a Politically Exposed Person and why are they important?

- Politically Exposed Persons (PEPs) are people who:
 - hold a prominent public position or function in a government body or an international organisation; or
 - are immediate family members or close associates of an individual who holds a prominent public position or function in a government body or an international organisation.

- PEPs are at risk of being corrupted or illegally obtain money through their position which may in turn be laundered to hide its origins.
- PEPs are deemed to be a higher risk of laundering money compared to the average person.
- The Club needs to individually assess the risk of each PEP who is a customer and decide whether to allow them continuing gambling at the Club.
- Whilst the majority of PEPs are honest persons, not involved in money laundering or terrorism financing, it is important that the Club is aware of any possible PEPs, to assess their risk.







How to do I know which customers are PEPs?

- It is important that you firstly understand what a PEP is and remain vigilant.
- You may suspect a customer is a PEP based on:
 - conversations with the customer;
 - their occupation provided when joining or re-joining;
 - other customers who attend the Club with known PEPs;
 - information you may become aware of in media reports;
 - information provided by other customers; or
 - name tags or identification which is sighted
- Alert your Duty Manager immediately to any suspected PEPs.
- If you are not sure whether a customer is a PEP, report it to your Duty Manager to be sure.
- In line with normal AML/CTF procedure, do not tip the customer off about your suspicions.

Other high risk customers

- The following are examples of other customers that are of a higher risk of laundering money:
 - known criminals;
 - customers who have previously been convicted of fraud, theft or other similar offences;
 - outlaw motorcycle gang members; or
 - customers who have previously found to be laundering money at the Club.
- Alert your Duty Manager immediately to any suspected high risk customers.
- In line with normal AML/CTF procedure, do not tip the customer off about your suspicions.

Appendix O – BetSafe Training Slides

 <h3>AML/CTF</h3> <p>Anti-Money Laundering & Counter-Terrorism Financing Act Requirements</p> <p>© BetSafe 2015</p>	 <h3>What is the AML/CTF Act?</h3> <ul style="list-style-type: none">• Anti-Money Laundering & Counter-Terrorism Financing Act 2006 (Cth).• Intent – To assist the Government in detecting people that may be laundering money and/or financing terrorism.• Relates to all gaming venues in Australia:<ul style="list-style-type: none">– gaming machines– TAB– bookmakers– casinos <p>© BetSafe 2015</p>
 <h3>Who is AUSTRAC?</h3> <ul style="list-style-type: none">• The government body responsible for enforcing the AML/CTF Act.• Investigates possible money laundering and terrorism financing incidents.• Liaise with other government agencies<ul style="list-style-type: none">– e.g. Centrelink, ATO, Police, Medicare• The club needs to report regularly to AUSTRAC. <p>© BetSafe 2015</p>	 <h3>What is Money Laundering and Terrorism Financing?</h3> <ul style="list-style-type: none">• Money Laundering<ul style="list-style-type: none">– The process whereby criminals attempt to hide and disguise the true origin and ownership of the proceeds of their criminal activities, thereby avoiding prosecution, conviction and confiscation of the criminal funds• Terrorism Financing<ul style="list-style-type: none">– The financing of terrorist acts and of terrorists and terrorist organisations <p>© BetSafe 2015</p>
 <h3>Why do I need to know this?</h3> <ul style="list-style-type: none">• The club has a legal obligation to follow the legislation.• Fines can be issued to:<ul style="list-style-type: none">– The club: maximum fine of \$11 million; and– Staff members: maximum fine of \$2.2 million.• Individual staff members can also be jailed under the legislation.• Examples where staff members can be prosecuted:<ul style="list-style-type: none">– Laundering money yourself– Assisting someone to launder money– Not reporting ML/TF activity– Tipping someone off <p>© BetSafe 2015</p>	 <h3>What do I need to do?</h3> <p>The main responsibilities of most staff members will be to report:</p> <ol style="list-style-type: none">1. Suspicious Behaviour Report any suspicious behaviour that may relate to ML/TF2. Large Payouts Identify, verify and document details of people receiving payouts of \$10,000 or more3. High Risk Customers Identify and report customers who may be a Politically Exposed Person (PEP) or high risk. <p>© BetSafe 2015</p>

Suspicious Behaviour – What is it?



- Any transaction that causes a staff member to have a feeling of apprehension or mistrust about the transaction.
- Generally involves:
 - hedging bets;
 - possibly losing some money to seem less suspicious;
 - wanting a cheque or payout voucher (paper trail); or
 - wanting to disguise origin/destination of money.

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Suspicious Behaviour – Examples



- Money Machines
 - Large amount of money in, little or no turnover/very small of money out.
 - Purchase of winning credits or tickets.
- Multi Winloss Machines
 - Betting red and black on same game.
 - Betting the board.
- Cashiers/Tell Accounts
 - Depositing money and withdrawing by cheque.
 - Different people depositing/withdrawing from one account.
- TAB
 - Large bets on "certainties".
 - Betting on both teams or betting the field.
- Other
 - Using fake identification to collect a payout (or just enter the club).
 - Repeating a cheque be made out to someone else.
 - Apprehensions when asked for identification.

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Suspicious Behaviour – What do I do?



- General staff: advise the DM.
- DMs: notify Compliance Officer immediately and complete incident report.
- Try to identify parties involved.
- Get as much information as possible.
- Do no alert parties to your suspicions.

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Counterfeit Money



- Can be any denomination, however generally the larger denominations.
- In our experience, most commonly \$50 notes.
- How to detect a counterfeit note:
 - Check it is polymer.
 - Check the clear window.
 - Look for the coat of arms.
 - Look for the (seven pointed) star.
 - Feel the dark printing.
 - Check the print quality.
 - Look for the microprinting.

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Genuine \$50 note



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Dealing with counterfeit/stolen money



- Refusing to accept or exchange counterfeit/stolen money would not be considered tipping off.
- General staff – advise the DM immediately.
- DMs:
 - consider notifying the police immediately.
 - consider confiscating the money.
 - do not accept/exchange money.

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Large Payouts



- An individual gaming or TAB payout of \$10,000 or more.
- The following details need to be documented on the 'Know Your Customer' form:
 - Full name;
 - Date of birth; and
 - Residential address.
- Need to be verified against valid primary photographic identification:
 - Driver's or Rider's License
 - Photo Card or Proof of Age Card
 - Passport
- Alternatively, can be identified through primary non-photographic identification and secondary identification.

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Politically Exposed Persons (PEPs) (1/2)



- Anyone who holds a prominent public position or function in a government body or an international organisation, including:
 - Head of State or head of a country or government; or
 - government minister or equivalent senior politician; or
 - senior government official; or
 - Judge of the High Court of Australia, the Federal Court of Australia or a Supreme Court of a State or Territory, or a Judge of a court of equivalent seniority in a foreign country or international organisation; or
 - governor of a central bank or any other position that has comparable influence to the Governor of the Reserve Bank of Australia; or
 - senior foreign representative, ambassador, or high commissioner; or
 - high-ranking member of the armed forces; or
 - board chair, chief executive, or chief financial officer of, or any other position that has comparable influence in, any State enterprise or international organisation

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Politically Exposed Persons (PEPs) (2/2)



- A PEP is also:
 - an immediate family member of these people, including:
 - a spouse
 - a de facto partner
 - a child and a child's spouse or de facto partner
 - a parent
 - A close associate (business or personal) of these people
- If you suspect any patron is a PEP they must be reported to the Duty Manager

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How to do I know which customers are PEPs?



- It is important that you firstly understand what a PEP is and remain vigilant.
- You may suspect a customer is a PEP based on:
 - conversations with the customer;
 - their occupation provided when joining or re-joining;
 - other customers who attend the Club with known PEPs;
 - information you may become aware of in media reports;
 - information provided by other customers; or
 - name tags or identification which is sighted
- Alert your Supervisor immediately to any suspected PEPs.
- If you are not sure whether a customer is a PEP, report it to your Supervisor to be sure.
- In line with normal AML/CTF procedure, do not tip the customer off about your suspicions.

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Other high risk customers



- The following are examples of other customers that are of a higher risk of laundering money:
 - known criminals;
 - customers who have previously been convicted of fraud, theft or other similar offences;
 - outlaw motorcycle gang members; or
 - customers who have previously found to be laundering money at the Club.
- Alert your Supervisor immediately to any suspected high risk customers.
- In line with normal AML/CTF procedure, do not tip the customer off about your suspicions.

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Appendix P – Extracts from Registered Clubs Act 1976 (NSW)

Extracts from Section 4 – Definitions

- "full member", in relation to a club, means a person who is an ordinary member or a life member of that club.
- "guest":
 - (a) of a full member, provisional member or honorary member of a registered club, means a person:
 - (i) whose name and address (unless the person is a minor), countersigned by the member, are entered in a register kept for the purpose by the club, and
 - (ii) who, at all times while on the club premises, remains in the reasonable company of the member, and
 - (iii) who does not remain on the club premises any longer than the member, and
 - (b) of a temporary member of a registered club, means a minor:
 - (i) who, at all times while on the club premises, remains in the company and immediate presence of the member, and
 - (ii) who does not remain on the club premises any longer than the member, and
 - (iv) in relation to whom the member is a responsible adult.
- "honorary member", in relation to a club, means a person who, under the rules of that club, is an honorary member of that club.
- "member" of a club means a person who is a full member, a provisional member, an honorary member or a temporary member of the club.
- "ordinary member" of a club means a person who is elected to membership of the club in accordance with the rule of the club referred to in section 30 (1) (g).
- "provisional member" of a club means a person who has applied for admission as a full member of the club, has paid the subscription appropriate for the membership applied for, and is awaiting a decision on the application.
- "temporary member", in relation to a club, means a person who, under the rules of the club, is a temporary member of that club.

Extracts from Section 30 - Rules of registered clubs

Section 30(2A)

If the rules of a club provide for the admission of honorary members or temporary members, the rules are taken also to include a rule that there is to be prominently displayed at all times at each entrance on the club premises at which members and guests are permitted to enter:

- (a) subject to any exception created by the regulations under subsection (3C), a map that clearly shows the limits of the area within which an ordinary resident of the area is not eligible for temporary membership otherwise than under section 30 (10), and
- (b) the rules of the club that relate to temporary membership of the club, and
- (c) a copy of section 30 (10), unless the rules of the club provide that the provisions of that subsection do not apply to the club, and
- (d) a copy of the definition of "guest" in section 4.

Section 30(3B)

A person whose ordinary place of residence is in New South Wales and is within a radius of 5 kilometres from the premises of a registered club (in this subsection referred to as "the host club") is not eligible for admission as a temporary member of the host club unless the person is:

- (a) a member of another registered club with similar objects to those of the host club, or
- (b) a member of another registered club who is attending the host club as provided by subsection (10).

Section 30(10)

The rules of a registered club (in this subsection referred to as "the host club") shall, unless its rules provide that the provisions of this subsection do not apply to that club, be deemed to include a rule that a full member of any other registered club or any interstate club (as defined in subsection (13)) who, at the invitation of the governing body or of a full member of the host club, attends on any day at the premises of the host club for the purpose of participating in an organised sport or competition to be conducted by the host club on that day shall be a temporary member of the host club from the time on that day when he or she so attends the premises of the host club until the end of that day.

Appendix Q – Extracts from Gaming Machines Regulation 2010 (NSW)

Clause 14 – Records relating to prizes to be kept by clubs

A registered club must keep or cause to be kept a written record with respect to the awarding or payment of each prize and the payment of short-pay of an approved gaming machine kept on the premises of the club (other than monetary payments released directly by the gaming machine or prizes awarded or paid by way of redemption of a gaming machine ticket within the meaning of Part 7) that contains the following particulars:

- (a) the date of the award or payment,
- (b) the serial number of the gaming machine in respect of which the award or payment was made,
- (c) the number of credits accumulated that are to be redeemed,
- (d) the amount of the prize, the value of the credits or the amount of the short-pay,
- (e) the name and signature of the person to whom the award or payment was made,
- (f) the name and signature of an employee or person authorised by the club certifying that the employee or person has sighted the number of credits and that the record made in accordance with this clause is correct in all details.

Maximum penalty: 50 penalty units.

Clause 17 – Clubs required to record certain information in relation to gaming machines

(1) A registered club must ensure that the requirements of this clause are complied with to the extent that they apply to the club.

Maximum penalty: 50 penalty units.

(2) A registered club must, at monthly intervals, record the following information in respect of each approved gaming machine kept on the premises of the club:

- (a) a cash flow analysis,
- (b) a comparison of cancelled credit meter readings with the corresponding entries in the club's payout sheets,
- (c) a comparison of the money out meter reading (in the case of an approved gaming machine that issues gaming machine tickets by means of equipment subsidiary to the gaming machine), or the cancelled credits payments meter reading (in the case of an approved gaming machine that issues gaming machine tickets otherwise than by means of subsidiary equipment), with the total of:
 - (i) the value of the gaming machine tickets issued from the gaming machine, being gaming machine tickets that have been redeemed, and
 - (ii) the value of the unclaimed gaming machine tickets issued from the gaming machine.

(3) The cash flow analysis must be in or to the effect of a form approved by the Director.

(4) The information contained in a record referred to in subclause (2) must be reported to the club's board or committee at monthly intervals.

(5) If a meter of an approved gaming machine kept on the premises of a registered club ceases to function or malfunctions, the club must cause it to be removed from play immediately and cause a notice to be attached to it indicating that it is faulty.

Clause 18 – Additional records by clubs

(1) A registered club must make, on or before the 21st day in each month with respect to each approved gaming machine kept on the premises of the club, a record in or to the effect of a form approved for the purpose by the Authority relating to the previous month and to that part of the previous 12 months for which information is available.

Maximum penalty: 50 penalty units.

(2) A record under this clause is to be examined by the club's board or committee within 1 month after the last date on which the record was made.

Clause 30 – Payment of prize money by cheque or electronic funds transfer

(1) A hotelier or registered club must pay so much of the total prize money payable to a person as exceeds \$5,000:

- (a) by means of a crossed cheque payable to the person, or
- (b) if the person so requests, by means of electronic funds transfer (if those means are available to the hotelier or club) to an account nominated by the person.

Maximum penalty: 50 penalty units.

(2) If the total prize money payable to a person exceeds \$5,000, a hotelier or registered club must, if the person so requests, pay the whole of the total prize money in the same manner as is required under subclause (1).

Maximum penalty: 50 penalty units.

(3) In this clause:

“account” means an account with a financial institution.

"crossed cheque" means a cheque crossed as referred to in section 53 of the Cheques Act 1986 of the Commonwealth.

"total prize money" means the total monetary value of credits displayed on an approved gaming machine at the end of a session of play on that machine. To avoid doubt, the total monetary value of credits is not subject to any deduction for the value of money inserted into the machine by the player.

Clause 50 – Requirement to keep record or copy of player activity statement

(1) A hotelier or registered club must keep a record or copy of any player activity statement made available by the hotelier or club (whether or not provided under section 45 (4) of the Act).

Maximum penalty: 50 penalty units.

(Clauses 96 & 99-102 applies to clubs with “card based” cashless systems installed)

Clause 96 – Issuing of player cards

(1) A player card must not be issued to a person who is under the age of 18 years.

(2) A player card must not be issued to a person unless the person provides a responsible person for the hotel or registered club with documentary proof of the person's identity.

(3) Only one player card per person may be issued by a hotelier or registered club. However, this subclause does not prevent a hotelier or club from issuing a person with another player card as a replacement for one that has been lost, stolen or destroyed.

(4) A hotelier or registered club must not issue a player card to a person unless the warning and information contained in the gambling warning notice and problem gambling notice under clause 25 is provided to the person.

(5) A hotelier or registered club must not issue a player card to a person unless the Gambling Help Line referred to in clause 25 (7) appears on the card.

Clause 99 – Maximum amount held in player accounts or stored on Smartcards

The amount of money that can be held in a player account or stored on a Smartcard must not exceed \$5,000.

Clause 100 – Transaction records-player accounts

(1) A transaction record must be provided on each occasion any money is paid into or withdrawn from a player account.

(2) The transaction record must include the following information:

- (a) the type of transaction completed,
- (b) the amount of money involved,
- (c) the time and date of the transaction,
- (d) the current balance in the player account.

(3) Subclause (2) does not limit the information that may be included in a transaction record.

Clause 101 – Player activity statements-player accounts

(1) Information to the effect that player activity statements are available on request must:

- (a) be given to each person at the time the person is issued with a player card, and
- (b) be included in any promotional material displayed in the hotel or registered club in relation to electronic payment gaming machines.

(2) A player activity statement must, on the request of a person who has a player account with a hotelier or registered club, be provided by the hotelier or club on a monthly basis.

(3) The following information, provided in the form approved by the Authority, is the minimum information that must be included in a player activity statement for the period covered by the statement:

- (a) the total amount of turnover by the player during the monthly period covered by the statement,
- (b) the total wins recorded during the monthly period,
- (c) the net expenditure (ie turnover less wins) during the monthly period,
- (d) the total length of time over each 24-hour period during the monthly period when the person's player card was inserted in electronic payment gaming machines in the hotel or on the premises of the club ("the daily record"),
- (e) the total length of time that the person's player card was inserted in electronic payment gaming machines in the hotel or on the premises of the club during the monthly period.

(4) In addition to subclause (3), the following information in relation to the period covered by a player activity statement must be kept by the hotelier or club and be provided to the player on request:

- (a) a list of each transaction involving the depositing of money into the player account at the cashier,
- (b) a list of each transaction involving the paying of credits into the player account as a result of playing electronic payment gaming machines,
- (c) a list of each transaction involving the withdrawal of money from the player account at the cashier.

(5) The daily record is required to be included in the player activity statement only in respect of those days that the person's player card was used.

(6) A player activity statement is to also include a note stating that the information detailed in the statement:

- (a) only relates to the occasions on which the player used his or her player account to play an electronic payment gaming machine, and
- (b) does not necessarily relate to all of the player's gaming machine activity during the monthly period, and
- (c) may not include information about wins from playing gaming machines that are part of a linked gaming system within the meaning of Part 10 of the Act.

(7) A player activity statement, if requested to be provided, is to be available from the cashier or other appropriate outlet at the hotel or club concerned.

(8) A player activity statement is to be provided in respect of a monthly period only if the player account has actually been used during that period.

(9) Player activity statements must be provided free of charge by the hotelier or registered club. However, if a player requests a subsequent player activity statement to be provided in respect of a monthly period, the hotelier or club may charge for providing the subsequent statement in accordance with the scale of charges approved by the Authority.

Clause 102 – Requirement to keep record or copy of player activity statement under this Part

A hotelier or registered club must keep a record or copy of any player activity statement made available by the hotelier or club under this Part.

Maximum penalty: 50 penalty units.

(Clauses 109, 112, 113, 114 & 115 apply to clubs with “ticket out” systems installed)

Clause 109 – Records of gaming machine tickets issued

(1) The approved gaming machine (or subsidiary equipment) from which a gaming machine ticket is issued must keep a record of the following:

- (a) the Gaming Machine Identification number issued by the Authority in respect of that gaming machine,
- (b) the unique identification number of the gaming machine ticket,
- (c) the value, in dollars and cents, of the accumulated credits represented by the gaming machine ticket,
- (d) the date and time of issue of the gaming machine ticket.

(2) A gaming machine ticket must include the following information:

- (a) the name of the hotel or registered club issuing the ticket,
- (b) the information contained in the problem gambling notice under clause 25.

Clause 112 – Records to be made on redemption

(1) A hotelier or registered club must cause a record to be made in accordance with this clause when a gaming machine ticket is redeemed.

(2) The record:

- (a) must contain the name, address and signature of the person claiming in respect of the ticket, and
- (b) must specify the nature and identifying numbers or letters of the documentary proof of identity produced by that person, and
- (c) must specify the time and date of the redemption, and
- (d) must contain the name and signature of the person who redeems the ticket.

(3) However, if a gaming machine ticket is redeemed on the day on which it was issued or on the next day:

- (a) a record is not required to be made under this clause unless the total value of the accumulated credits represented by the ticket is \$5,000 or more, and
- (b) documentary proof of the identity of the claimant is not required.

Clause 115 – Records and other material

- (1) A record required by this Part must be in a form approved by the Authority.
- (2) Gaming machine tickets that have been redeemed on presentation are taken to be records for the purposes of this Regulation and are required to be kept by the hotelier or registered club concerned.
- (3) Any such records and gaming machine tickets must be made available for inspection by an inspector during the period that they are required to be retained by the hotelier or club.

Clause 153 – General requirement for records to be kept for 3 years

- (1) A person who is required by the Act or this Regulation to keep a record must keep the record for a period of at least 3 years after it is made and provide for its safe keeping throughout that time.

Maximum penalty: 20 penalty units.

- (2) A person who is a dealer, hotelier or technician must keep any records relating to the person's business (in so far as the person's business relates to approved gaming machines) at the dealer's premises, the hotelier's licensed premises or the technician's place of business, or at such other place as the Authority approves.

Maximum penalty: 20 penalty units.

- (3) Subclause (1) does not apply to the keeping of a record under a provision of this Regulation that provides for the record to be kept for a different period.

Note. Section 11 (2) of the Electronic Transactions Act 2000 allows for hard copy documents that are required to be retained for a particular period to be retained in electronic format in certain circumstances.

Appendix R – AUSTRAC Money Laundering Examples

Criminals launder illicit funds through larger clubs

Organised crime syndicates may target larger club environments to launder the proceeds of crime. Several members of a syndicate may target a club. Each individual in the syndicate will insert cash into an EGM, allowing funds for game-play to build up and then, after only minimal game-play, will credit out the unused money.

Then that individual goes to the cashier to redeem the unused credit value as a cheque. The syndicate members often request the cheque to be drawn in the name of a third party. The syndicates can exploit larger clubs that have no central oversight of prize payouts or credit redemptions paid by cheque. Many larger clubs may have several cashier booths where prize or credit payouts can be redeemed. Syndicate members will avoid detection by redeeming unused credits at alternative cashier booths and/or from different cashiers after shift-changes.

In this example, the money laundering indicators may include:

- individuals crediting-out unused credits with minimal or no game-play to redeem a cheque. This indicator is equally applicable to any hotel or club with EGMs
- individuals redeeming cheques for unused credits through multiple cashiers individuals requesting cheques to be drawn in the name of third parties
- a customer refuses, or is reluctant to, produce identification upon request
- a customer's level of gaming activity is inconsistent with the profile of the customer (for example, the customer receives welfare benefits but gambles or carries substantial amounts of cash).

EGMs used to facilitate tax evasion

People who work in cash-based industries, or who are often paid in cash for their services, may use EGMs to facilitate tax evasion. They insert cash into EGMs and with little or no legitimate game-play, then credit-out the value from the EGM and collect a cheque payment for the value credited-out. The cheque, which constitutes a prize or credit payout, is then claimed not to form part of their taxable income. So the person effectively avoided paying any tax on what otherwise must be declared as taxable income.

In this example, the money laundering indicators may include:

- individuals crediting-out unused credits with minimal or no game-play to redeem a cheque
- multiple cheques paid to the same individual on a regular basis
- customer claiming a high-level of gaming machine payouts.

EGMs used to replace lower cash denominations for higher cash denominations

Organised criminal syndicates may have large amounts of illicit cash, and they prefer to maintain that cash in large denominations, for ease of concealment and portability.

Smaller denomination notes are fed into the bill feeders of EGMs. Credits for game-play are allowed to build up and then, after only minimal game-play, the unused credits are cashed out. The payout of these unused credits is specifically requested in large denomination notes.

In this example, the money laundering indicators may include:

- individuals cashing out unused credits with minimal game-play and specifically requesting the payout in high denomination notes
- customers attend 'ticket in/cash out (TICO)' kiosks more frequently than usual
- individuals carrying large sums of cash at gaming venues.

Money launderers purchase prize payout vouchers at a premium

Money launderers approach customers with EGM prize payout vouchers and offer to purchase these at a cash premium. The legitimate winner benefits from the cash premium and the launderer presents the winning prize payout voucher to the club or hotel to obtain a cheque, which can then be deposited into a bank account under the guise of legitimate winnings.

In this example, the money laundering indicators may include:

- customers loitering in the gaming area with no obvious intention of engaging in game-play
- customers offering to purchase gaming machine prize payout vouchers from other customers
- individuals claiming prize payouts by cheque more frequently than usual
- customer claiming multiple payouts on the same and/or successive days.

Collusion of cashier staff with money launderers

Money launderers prefer to remain anonymous to avoid prosecution if their illegal activity is detected. Money laundering syndicates have been known to collude with staff of hotels and clubs to launder their illicit funds. Criminals or money launderers are most likely to collude with cashiers responsible for making prize or credit payouts. This allows them to withdraw credit from EGMs and then collect the cheque payments without having their correct details recorded, as required under most state and territory gaming legislation. They subsequently avoid accurate detection.

In this example, the money laundering indicators may include:

- individuals withdrawing unused credits with minimal game-play to redeem a cheque
- cashiers pay out an unusually high amount of cheques
- venue staff not undertaking KYC requirements
- over-familiarisation between venue staff and gaming patrons.

The indicators are examples – and do not cover all possibilities – to help identify potential money laundering and other serious and organised criminal activity. A single indicator does not necessarily indicate illicit activity; it should prompt further monitoring and examination. Multiple indicators should raise suspicion.

Examples obtained from the 'AUSTRAC AML/CTF compliance guide for hotels & clubs licensed to operate electronic gaming machines'.

Appendix S – Extracts from AUSTRAC Politically Exposed Persons Guidance Note

Politically Exposed Person means an individual:

- (1) who holds a prominent public position or function in a government body or an international organisation, including:
 - (a) Head of State or head of a country or government; or
 - (b) government minister or equivalent senior politician; or
 - (c) senior government official; or
 - (d) Judge of the High Court of Australia, the Federal Court of Australia or a Supreme Court of a State or Territory, or a Judge of a court of equivalent seniority in a foreign country or international organisation; or
 - (e) governor of a central bank or any other position that has comparable influence to the Governor of the Reserve Bank of Australia; or
 - (f) senior foreign representative, ambassador, or high commissioner; or
 - (g) high-ranking member of the armed forces; or board chair, chief executive, or chief financial officer of, or any other position that has comparable influence in, any State enterprise or international organisation; and
- (2) who is an immediate family member of a person referred to in paragraph (1), including:
 - (a) a spouse; or
 - (b) a de facto partner; or
 - (c) a child and a child's spouse or de facto partner; or
 - (d) a parent; and
- (3) who is a close associate of a person referred to in paragraph (1), which means any individual who is known (having regard to information that is public or readily available) to have:
 - (a) joint beneficial ownership of a legal entity or legal arrangement with a person referred to in paragraph (1); or
 - (b) sole beneficial ownership of a legal entity or legal arrangement that is known to exist for the benefit of a person described in paragraph (1).
- (4) In these Rules:
 - (a) domestic politically exposed person means a politically exposed person of an Australian government body;
 - (b) foreign politically exposed person means a politically exposed person of a government body of a foreign country;
 - (c) international organisation politically exposed person means a politically exposed person of an international organisation.
- (5) In this definition international organisation means an organisation:
 - (a) established by formal political agreement by two or more countries and that agreement has the status of an international treaty; and
 - (b) recognised in the law of the countries which are members of the organisation.

Note: The term de facto partner is defined in the Acts Interpretation Act 1901 and the terms 'foreign country' and 'government body' are defined in the AML/CTF Act.

NOTES

- (1) A person who does not come into the specific list of PEPs should still be considered as a PEP by the Club if the person holds a public position or function in a government body or international organisation.
- (2) 'Source of wealth' refers to the origin of the PEP's total assets.
- (3) 'Source of funds' refers to the origin of the money that the PEP gambles at the Club.
- (4) Can the PEP's current income and sources of wealth and funds be explained from previous positions, business undertakings or family estates?
- (5) Information about the PEP's assets can be obtained from public sources of information such as a Register of Member's Interests which apply to politicians at the Commonwealth, state and territory levels in Australia.
- (6) The Commonwealth 'Statement of Registrable Interests', for example, requires the disclosure of information relating to shareholdings in public and private companies, family and business trusts, real estate, directorships, partnerships, liabilities, savings or investment accounts, bonds, debentures, substantial sources of income and any assets valued at over \$7,500.
- (7) The Club can also request information from the customer such as evidence of insurance payouts, bequests, gambling wins or asset sales.

KEY TERMS USED IN THE PEP DEFINITION

'Prominent public position or function'

This term relates to functions which may exist at the Commonwealth, state, territory or municipal levels or foreign equivalent. The meaning of 'prominent' may be determined through the size of the function in relation to the number of affected persons, the budget and relevant powers and responsibilities.

Examples include Heads of State or of government, senior politicians, senior government, judicial or military officials, senior executives of state-owned corporations, important party officials, or, in relation to international organisations, directors, deputy directors and members of the board or equivalent.

Such positions commonly hold specific powers in relation to approving government procurement processes, budgetary spending, development approvals and government subsidies and grants.

'Government body'

'government body' includes an agency or authority of the Commonwealth, state or territory and includes foreign government bodies.

The Government Online Directory provides details of government bodies at the Commonwealth, state and territory levels.

'International organisation'

'International organisations' are organisations established by formal political agreement between countries, where the agreement has the status of an international treaty, and the organisation is recognised in the law of the countries which are members.

These include the United Nations and affiliates such as the International Maritime Organisation; regional international organisations such as the Council of Europe, institutions of the European Union, the Organisation for Security and Co-operation in Europe, and the Organisation of American States; military international organisations such as the North

Atlantic Treaty Organisation; and economic organisations such as the World Trade Organisation.

'Government minister or equivalent senior politician'

Government minister:

In Australia, a government minister (at the Commonwealth, state or territory level) is an elected person who holds an executive office in the government and is responsible for administering one or more departments. A Parliamentary Secretary may be considered the equivalent of a minister.

For foreign PEPs, there may be situations where the government minister or equivalent is not an elected person but may be appointed directly by the government (for example, Cabinet Secretaries in the United States) with all the relevant or equivalent powers which ministers within Australia hold.

Equivalent senior politician:

The term 'equivalent senior politician' includes 'shadow' ministers in the opposition and will include persons such as the Leader of the Opposition and the leaders of parties in Parliament. At the local government level, Mayors and local councillors may be considered equivalent senior politicians.

In situations where the government does not have a clear majority and therefore relies upon members of other parties to pass legislation implementing its policies, politicians who would not fulfil the requirements of being ministers or have sufficient seniority, may be considered to fall within this category due to the power they have to influence the government of the day through the casting of their votes.

The 'ElectionGuide' website provides a worldwide overview of elections, including details of senior politicians.

'Senior government official'

These include the size of the function in relation to the number of affected persons, the budget and relevant powers and responsibilities, including the approval of government procurement processes, control over regulatory approvals including the awarding of licenses or concessions, budgetary spending and government subsidies and grants.

Reporting entities may also consider positions at lower levels if those persons are in roles that have powers and responsibilities which are equivalent or similar to those of senior government officials (for example a Chief Financial Officer and Chief Information Officer with significant procurement or other budgetary responsibility or oversight).

The roles of senior government officials in foreign countries may vary widely from those in Australia. The following may assist reporting entities in determining whether a person is a foreign senior government official.

Does the official have:

- substantial authority over or access to state assets and funds, policies and operations
- control over regulatory approvals
- control or influence over decisions that would effectively address identified shortcomings in the AML/CTF system of the country
- access, control or influence over government accounts?

Is the official involved in state industries such as:

- arms trade and defence industry

- banking and finance
- construction and large infrastructure
- government procurement
- mining and extraction
- provision of public goods and utilities?

‘Judge of a court of equivalent seniority in a foreign country or international organisation’

The PEP definition specifies courts of equivalent seniority to the High Court of Australia, the Federal Court of Australia or the Supreme Courts of a state or territory. Supreme courts are the highest court in the judicial hierarchy of each state or territory. The Federal Court covers almost all civil matters arising under Australian federal law, including some summary and indictable criminal matters. The High Court deals with cases which originate in the High Court and is the highest court of appeal in Australia on all legal matters.

For foreign country courts check whether the court is one of the superior courts within its relevant jurisdiction (such as a state or territory), or whether it is the highest within the country.

The PEP definition also refers to judges of ‘international organisations’. Not all international organisations will have judicial or similar functions; however, examples include the International Court of Justice and the European Union Court of Justice.

In these examples, the term ‘judge’ may not be used; however, their role (and therefore their title) may be the equivalent of a judge as those persons are required to determine matters through the application of a legal remedy.

‘Governor of a central bank or any other position that has comparable influence to the Governor of the Reserve Bank of Australia’

The Reserve Bank of Australia (RBA) is Australia’s ‘central bank’. The Governor of the RBA manages the bank and its operations.

Identifying the central bank of a foreign country and the position equivalent to the Governor of the RBA can usually be achieved by an internet search. For example, in the United States of America the central bank is the Federal Reserve, with the equivalent position being the Chairman of the Board of Governors. In the United Kingdom, the Bank of England is the central bank with the equivalent position being the Governor and in Indonesia, Bank Indonesia is the central bank and it is led by the Governor.

The Bank for International Settlements website provides a comprehensive overview of world central banks.

‘Senior foreign representative, ambassador or high commissioner’

The foreign postings of the Australian Government are categorised as:

- Ambassador – Head of an embassy which is the main representative office of one country in the capital city of another.
- High Commissioner – Head of the High Commission, a main representative office of a Commonwealth country in the capital city of another Commonwealth country.
- Consul-General – Head of the Consulate or Consulate-General, a lower level representative office, usually located in a city outside the capital city.
- Honorary Consul – Head of the Honorary Consulate. This is usually a private businessperson (usually an Australian citizen) who agrees to perform limited consular functions, in a city where Australia does not have an Australia-based representative.

With regard to the PEP definition, the postings relating to ‘Consul-General’ and ‘Honorary Consul’ may be characterised as ‘senior foreign representatives’.

Equivalent terms used by foreign countries include Head of Mission, Chief of Mission, Deputy Chief of Mission, Nuncio, Chargé d'affaires, Permanent Representative and minister plenipotentiary.

'High ranking member of the armed forces'

In Australia the 'armed forces' refer to the Australian Army, the Royal Australian Navy and the Royal Australian Air Force. However, foreign armed forces may vary regarding the services that exist.

In Australia the following may be considered to be 'high ranking' and are listed in descending order of seniority:

Australian Army:

- General
- Lieutenant General
- Major General

Royal Australian Navy:

- Admiral
- Vice Admiral
- Rear Admiral

Royal Australian Air Force:

- Air Chief Marshall
- Air Marshall
- Air Vice Marshall

'State enterprise'

In Australia, a 'state enterprise' is usually known as a government business enterprise (GBE) and may exist at the Commonwealth, state or territory level. It is characterised by the relevant Government controlling the body, the body being principally engaged in commercial activities, and the body having a legal personality separate to a department of government. It may be a body corporate established by legislation for a public purpose (state-owned or statutory corporations), or a company established under corporations law in which a state or territory government has a controlling interest.

Examples of current Commonwealth GBEs are ASC Pty Limited (formerly known as Australian Submarine Corporation), Australian Postal Corporation, Australian Rail Track Corporation Limited, Defence Housing Australia, and NBN Co Ltd. Details about Commonwealth GBEs may be accessed at the Department of Finance's website.

The Australian Government Organisations Register is produced by the Department of Finance.

In foreign countries, GBEs may be known as a crown corporation, government-owned corporation, state-owned company, state-owned entity, state enterprise, commercial government agency or public sector undertaking.

As noted in the PEP definition, a PEP in such organisations is the board chair, chief executive, chief financial officer or any other position which has comparable influence in the organisation.

'Immediate family member and close associate'

Family members and close associates of PEPs should be treated as PEPs because of the potential for abuse of the relationship for the purpose of moving the proceeds of crime, or facilitating their placement and disguise, as well as for terrorism financing purposes. For the

assessment of risk by the reporting entity, it is the identified links between the PEP and the close associate and/or family member which will determine the level of risk.

The close associate category does not purport to capture any person who has been associated with a PEP, such as friends or colleagues. A close associate is an individual who is known (having regard to information that is public or readily available) to have joint beneficial ownership of a legal entity (for example, a company) or legal arrangement (for example, a trust) with the PEP, or sole beneficial ownership of a legal entity or legal arrangement that is known to exist for the benefit of the PEP. This describes close business cooperation which may be involved in or facilitate any dealings with funds, and where the source of those funds may be a legitimate question.

The PEP definition specifies that an immediate family member includes a spouse, a de facto partner, a child and a child's spouse or de facto partner, and a parent.

The definition of an immediate family member is inclusive and therefore is not limited to the relationships specified. However, the list indicates what is captured by the term 'immediate family member' and will be informed by what information is public or readily available about the PEP. For example, it may be known that a particular PEP has a history of dealings with a sibling, and a reporting entity may therefore consider that a sibling relationship is sufficiently 'immediate' to fall within the term, even though not specifically included in the definition.

When does a PEP stop being a politically exposed person?

Once a person no longer holds the prominent public position, they are no longer considered a PEP. However, a reporting entity should continue to apply a risk-based approach to determine whether an existing customer who is no longer a PEP should continue to be treated as a high-risk customer.

Appendix T – Politically Exposed Persons Questionnaire

As a result of recent changes to the Club's AML/CTF obligations the Club is required to conduct screening on patrons who may be politically exposed persons (PEPs).

In order to conduct this screening the Club needs to first determine whether any patrons may fall within the definition of a PEP.

To assist the Club with this process we ask that you complete the questionnaire below and return it to the Club's AML/CTF Compliance Officer as soon as possible.

Are you aware of any patrons in which the following criteria may apply?

Part 1: Any patron who holds a prominent public position or function in a government body or an international organisation, including:

- | | |
|--|-------|
| 1. Head of state or head of a country or government | Y / N |
| 2. Government minister or equivalent senior politician | Y / N |
| 3. Senior government official | Y / N |
| 4. Judge of the High Court of Australia, the Federal Court of Australia or a Supreme Court of a State or Territory, or a Judge of a court of equivalent seniority in a foreign country or international organisation | Y / N |
| 5. Governor of a central bank or any other position that has comparable influence to the Governor of the Reserve Bank of Australia | Y / N |
| 6. Senior foreign representative, ambassador, or high commissioner | Y / N |
| 7. High-ranking military, including major general, rear admiral, air vice marshal | Y / N |
| 8. Board chair, chief executive, or chief financial officer of, or any other position that has comparable influence in, any State enterprise or international organisation | Y / N |

Part 2: Any patron who is an immediate family member of a person referred in Part 1, including a:

- | | |
|---|-------|
| 1. Spouse | Y / N |
| 2. De facto partner | Y / N |
| 3. Child and a child's spouse or de facto partner | Y / N |
| 4. Parent | Y / N |

Part 3: Any patron who is a close associate of a person referred to in Part 1, which means any individual who is known (having regard to information that is public or readily available) to have:

- | | |
|---|-------|
| 1. Joint ownership of a legal entity (e.g. a company) or legal arrangement with a person referred to in Part 1 | Y / N |
| 2. Ownership of a legal entity (e.g. a company) or legal arrangement that is known to exist for the benefit of a person described in Part 1 | Y / N |

Part 4: If you selected Yes in relation to any question above please provide details (e.g. names or descriptions) of these patrons

1. _____
2. _____
3. _____

Your Signature: _____

Date: _____

Your Name: _____

Your Position: _____

Appendix U – Suspicious Matter Report Quick Guide



Quick guide Suspicious Matter Report (SMR)

! Your reporting obligation

Under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (AML/CTF Act), you must provide a report to AUSTRAC when you form a suspicion on a matter that you suspect may be related to an offence.

! Why reporting is important

The objectives of the AML/CTF Act strongly focus on Australia's commitment to fulfil its international obligations to combat money laundering and terrorism financing. The greater the quality, accuracy and timeliness of these reports, the greater the value they have for the detection, deterrence and disruption of criminal and terrorist activity.

! Tipping off

The SMR is subject to 'tipping off' provisions. This makes it an offence for a reporting entity, or an employee of a reporting entity, to let another person or organisation know that a SMR has been reported to AUSTRAC, or that a reportable suspicion has been formed regarding a particular matter.

STOP Does the matter relate to a designated service?

An SMR can only be lodged if the matter relates to designated service(s) as defined in the AML/CTF Act, whether this is provided, requested or enquired about.

Is the suspicion related to an offence?

It is extremely important that you be able to relate the suspicious matter to one of the offences listed :

- ☐ financing of terrorism
- ☐ money laundering
- ☐ offence against a Commonwealth, state, or territory law
- ☐ proceeds of crime
- ☐ tax evasion
- ☐ a person/agent is not who they claim to be.

➔ Submission

From the time of having formed a suspicion an SMR must be given to the AUSTRAC Chief Executive Officer:

- within **24 hours** if the suspicion is related to the offence of **financing of terrorism**
- within **three business days** if the suspicion is related to money laundering or other offences listed.

? Help

Full question-by-question instructions are available in the AUSTRAC publication '**A guide to making a Suspicious Matter Report (SMR)**' which can be downloaded from AUSTRAC Online: www.austrac.gov.au/online.

Descriptions of designated services can be found in 'A guide to making a Suspicious Matter Report (SMR)' or on the 'Designated services/international currency codes' quick guide.

If you need further assistance please contact the **AUSTRAC Help Desk** on **1300 021 037** or email help_desk@austrac.gov.au.

✓ Checklist

- ☐ Have you completed as much of this report as possible?
- ☐ Have you related the suspicious matter to a designated service, as listed in question 1, and have you specified a reason for forming a suspicion, as listed in question 2?
- ☐ Have you described in your own words and in as much detail as possible in question 3 the nature and circumstances surrounding the matter? If your grounds for suspicion required you to write a separate statement, ensure that you have noted this in the space provided in the report form and attached this statement to the report.
- ☐ Have you answered question 60, and related the suspicious matter to one of the offences listed?
- ☐ Have you written a description wherever you have answered 'Other'?
- ☐ Have you provided your details as the person completing this report in question 67, and have you signed and dated the report in question 68?

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Disclaimer: The information contained in this document is intended to provide only a summary and general overview on these matters. It is not intended to be comprehensive. It does not constitute nor should it be treated as legal advice or opinions. The Commonwealth accepts no liability for any loss suffered as a result of reliance on this publication. AUSTRAC recommends that independent professional advice be sought. The information contained herein is current as at the date of this document.



Quick guide

Suspicious Matter Report (SMR)



Persons/organisations related to the suspicious matter

Part C records the details of the persons or organisations to which the suspicious matter relates.

- ☐ For an individual, write all given names and family name. For a non-individual write the full legal name of the organisation. Avoid using initials where full names are available.
- ☐ Ensure that you provide a physical address if known, where the person can be contacted, not just a postal address.
- ☐ The person may have provided more than one phone number. Write the number that is known to be the most reliable contact for this person or organisation.
- ☐ You must provide the account details if the account is related to the suspicious matter that is being reported, and you know these account details.

Part D records the details of any other party involved in the suspicious matter. The term 'any other party' can include:

- ☐ other persons or organisations about which the same suspicion relating to the matter has been formed
- ☐ any other person or organisation that may be involved in the matter, for example an identifiable person or organisation that may be the target of an offence related to the suspicious matter, and who you may have named in your statement for question 3.

Part E is to describe any person(s) whose identity could not be established and describe any documentation held on the person, e.g. a video, photograph, application form etc. Information that may assist in descriptions of the persons include:

- | | |
|---|---|
| <input type="checkbox"/> gender and age group | <input type="checkbox"/> voice (gruff, accents, speech impediments) |
| <input type="checkbox"/> height (tall, short, average) | <input type="checkbox"/> clothing, shoes, jewellery and accessories (handbags or ringtones) |
| <input type="checkbox"/> ethnicity or cultural appearance | <input type="checkbox"/> body markings, piercings or scars |
| <input type="checkbox"/> build (slim, stocky, overweight) | <input type="checkbox"/> style of walking (limp, strut, unusual gait) |
| <input type="checkbox"/> hair (curly, blond, receding) | <input type="checkbox"/> smells (petrol, perfumes, alcohol, food) |
| <input type="checkbox"/> facial features (broken nose, acne, glasses) | <input type="checkbox"/> emotional and mental state (agitated, composed, frightened). |



Transactions related to the suspicious matter

Part F requires you or your organisation to record the details of each transaction that is related to the suspicious matter.

- ☐ A list of transaction types and their descriptions are shown in Appendix 2 in the AUSTRAC publication 'A guide to making a Suspicious Matter Report (SMR)' which can be downloaded from AUSTRAC Online. If the descriptions in Appendix 2 do not reflect the type of transaction that occurred, describe in your own words the type of transaction undertaken.
- ☐ The term cash refers to physical currency. This means the coin and printed money of Australia, or of a foreign country, that is designated as legal tender, circulates as and is customarily used and accepted as medium of exchange in the country of issue.
- ☐ SENDER/DRAWER/ISSUER information requires details about the **source** of the funds in the transaction/s.
- ☐ PAYEE/BENEFICIARY information requires details about the **destination** of the funds in the transaction/s.
- ☐ You or your organisation are required to record the details of each transaction that is related to the suspicious matter. Details of additional transactions can be recorded in the TRANSACTION 2 section.

Part G is to outline the most likely offence that the matter relates to and to indicate any other associated reports.

- ☐ Provide the most likely offence to which the suspicious matter relates.
- ☐ If you suspect that the matter could have a high risk of a person evading law enforcement agencies or poses a high threat of an offence being committed do not delay in lodging your report.
- ☐ Even in the event that you or your organisation intend to investigate the matter more thoroughly it is preferable that you submit the SMR to AUSTRAC immediately so that it can be acted upon promptly. A follow-up SMR can be submitted with the details of this report being identified in the follow-up SMR using question 61.
- ☐ If you are referring to previously submitted SMRs, you should remember that completed SMRs are treated as containing in-confidence information. This means that you and your organisation should store and use the information and references to completed SMRs with due care. The contents of completed reports should not be made available to anyone unless they have a role that is responsible for SMRs within your organisation.

Appendix K

List of Stakeholders Notified for Queanbeyan Sports & Community Club

Queanbeyan-Palerang Regional Council
256 Crawford Street
Queanbeyan NSW 2620

Queanbeyan Police Station
8 Farrier Place,
Queanbeyan NSW 2620

NSW Council of Social Service
52-56 William Street,
Woolloomooloo NSW 2011

The Manager
Southern NSW Local Health District
cnr. Collett and Erin Streets,
Queanbeyan NSW 2620

Mission Australia Financial Counselling and Problem Gambling
22 John Bull St, Queanbeyan NSW 2620

Your Place
28 Rutledge St,
Queanbeyan NSW 2620

St Benedicts Community Centre
284 Crawford Street,
Queanbeyan NSW 2620

Indigenous Community Links
261 Crawford St,
Queanbeyan NSW 2620

Aboriginal Legal Service
17-21 University Ave,
Canberra ACT 2601

Munjuwa Health, Housing & Community Aboriginal Corporation
28 Rutledge St,
Queanbeyan NSW 2620

Salvation Army
Suite 1.02, Level 17,
9 Morisset St, Queanbeyan NSW 2620

Aboriginal and Torres Strait Islander Counselling, Support And Education Program
P.O Box 916 Dickson ACT 2602

Barnardos
24 Thornton Road,
Karabar NSW 2620

Anglicare
114-120 Monaro Street,
Queanbeyan NSW 2620

Catholic care- Family counselling
www.info@catholiccare.cg.org.au

Gambling Impact Society
bnicbic@gmail.com

Uniting Home & Community Care ACT & Southern Tablelands
Unit 2, 27 – 29 Napier Close
Deakin, ACT 2600

Red Cross
3 Dann Close,
Garran ACT 2605

Molonglo Support Services
Suite 104, Level 1 Riverside Plaza,
131 Monaro Street,
Queanbeyan NSW 2620

Kathleen Watson
SaverPlus
kathleen.watson@thesmithfamily.com.au

Anglicare Gambling Help- Counselling service
130 Cowper Street,
Goulburn NSW 2580

Anglicare NSW South and West
35 Beach Road,
Batemans Bay NSW 2536

Multicultural Problem Gambling Service
5 Fleet Street
North Parramatta NSW 2151



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BTP (UNSW)
MPIA

Director

David Rippingill
BEP (WSU)
Juris Doctor (UNE)
RPIA

Consultant

G W Smith
BSurv (QLD)
MCP (MIT)
FPIA (Life Fellow)
MIS Aust
MRTPI
FAPI

Appendix L

Form of notification to Council and Police

Dear Sir/Madam,

Re: Queanbeyan Sports and Community Club Ltd

As required by the Independent Liquor and Gaming Authority, we enclose herewith copies of an application, made by Shane Holland, as Secretary/Manager, and a local impact assessment seeking to increase the gaming machine threshold of Queanbeyan Sports and Community Club, 97 Campbell Street, Queanbeyan, from 54 to 74. These documents will be lodged with Liquor and Gaming NSW by about the time you receive this letter.

The gaming machine threshold is the number of gaming machines a club may keep at any time. The purpose of the local impact assessment is to inform and support a community consultation process that will enable the Authority to determine whether or not approving the application will provide a positive contribution to the local community.

Your Council may make a submission on the application within 60 days of the date on which it is posted on the website of Liquor and Gaming NSW under LIA Public Register or Noticeboard.

Should you require any further information, please contact the writer.

Yours faithfully

DESIGN COLLABORATIVE

G W Smith

Consultant

Form of notification to other stakeholders required to be notified

Dear Sir/Madam,

The purpose of this letter is to notify your organisation that Shane Holland, Secretary/Manager of the Queanbeyan Sports and Community Club, is making an application to the Independent Liquor and Gaming Authority, seeking an increase in the gaming machine threshold of that Club from 54 to 74. The application will be accompanied by a local impact assessment as required by the Gaming Machines Act.

The Authority requires your organisation to be notified of the application.

The gaming machine threshold of a club specifies the number of gaming machines which it can keep at any one time. The purpose of the local impact assessment is to inform and support a community consultation process that will enable the Authority to determine whether or not approving the application will provide a positive contribution to the local community.

The application and assessment will be posted on the website of Liquor and Gaming NSW accessible under LIA Public Register or Noticeboard.

Submissions can be made on the application for 60 days after it is first posted on the website. They may be emailed to submissions.licensing@liquorandgaming.nsw.gov.au, posted to Liquor and Gaming NSW, GPO Box 7060, Sydney NSW 2001 or delivered to Liquor and Gaming NSW, Level 6, 323 Castlereagh Street, Haymarket NSW 2001.

Should you require any further information, please contact the writer.

Yours faithfully

DESIGN COLLABORATIVE



G W Smith
Consultant

Form of notification to other organisations

Dear Sir/Madam,

The purpose of this letter is to notify your organisation that Shane Holland, Secretary/Manager of the Queanbeyan Sports and Community Club, is making an application to the Independent Liquor and Gaming Authority, seeking an increase in the gaming machine threshold of that Club from 54 to 74. The application will be accompanied by a local impact assessment as required by the Gaming Machines Act.

The Authority requires your organisation to be notified of the application because it is listed by the Queanbeyan- Palerang Regional Council as providing assistance with

The gaming machine threshold of a club specifies the number of gaming machines which it can keep at any one time. The purpose of the local impact assessment is to inform and support a community consultation process that will enable the Authority to determine whether or not approving the application will provide a positive contribution to the local community.

The application and assessment will be posted on the website of Liquor and Gaming NSW accessible under LIA Public Register or Noticeboard.

Submissions can be made on the application for 60 days after it is first posted on the website. They may be emailed to submissions.licensing@liquorandgaming.nsw.gov.au, posted to Liquor and Gaming NSW, GPO Box 7060, Sydney NSW 2001 or delivered to Liquor and Gaming NSW, Level 6, 323 Castlereagh Street, Haymarket NSW 2001.

Should you require any further information, please contact the writer.

Yours faithfully

DESIGN COLLABORATIVE



G W Smith
Consultant

**GAMING MACHINES ACT 2001
APPLICATION FOR GAMING MACHINE
THRESHOLD INCREASE**

Shane Holland, Secretary/Manager of the Queanbeyan Sports and Community Club Ltd, has applied to the Independent Liquor and Gaming Authority for an increase in the Gaming Machine Threshold (GMT) of that Club from 54 to 74

The GMT is the number of gaming machines that the Club can keep at any one time.

The application is accompanied by a Local Impact Assessment (LIA), the purpose of which is to inform and support a community consultation process to enable the Authority to determine whether or not approving the application will provide a positive contribution to the local community.

The application and the LIA will be posted, by Liquor and Gaming NSW, on its website which can be accessed by entering LIA Public Register or on the Liquor and Gaming NSW at Noticeboard.

Submissions may be made within 60 days of the date on which the application is posted on the website. Submissions may be made by email at submissions.licensing@liquorandgaming.nsw.gov.au, or by post to Liquor and Gaming NSW, GPO Box 7060, Sydney NSW 2001 or can be delivered to Liquor and Gaming NSW, Level 6, 323 Castlereagh Street, Haymarket NSW 2001.

Enquiries to G W Smith, DESIGN COLLABORATIVE, 304/105 Pitt Street, Sydney. Telephone 02 92623200