



26 August 2016

**The Coordinating Officer  
Lotteries and Art Unions Act Review  
Liquor & Gaming NSW  
GPO Box 7060  
SYDNEY NSW 2001**

Dear Coordinating Officer,

**Have Your Say: Review of the Lotteries and Art Unions Act 1901**

I thank you for the opportunity to provide specific feedback on the review. For ease of reference I submit this feedback in point form:

1. Firstly, I congratulate the NSW Government on their initiative to review the Act in order to assist simplify processes and implement resource efficiencies for both government and organisations (i.e. charitable institutions) while at the same time protecting the communities we serve.  
As the Permit Holder for charitable lotteries conducted in multiple State jurisdictions, I can attest to the complexity of processes to meet all jurisdiction requirements. Commonalities therefore across jurisdictions will assist greatly.
2. The proposed NSW model as presented on page 10 of the 'Discussion paper' appears to have many similarities to the QLD model. A change to this model would still ensure community protection, and reduce resource overheads. The model however does not stipulate whether other specific requirements, current in today's requirements, would remain unchanged – in particular the stipulation that expenses must be capped at 70% and that internet sales cannot exceed 15% of total sales. Should requirements such as these be removed and replaced with the base requirements in the proposed model (i.e. a change to ensuring prize value must be 20% of total sales recorded), then the model is appropriate and supported. If these aspects are to be retained then the model is not supported.
3. In order to implement additional resource efficiencies, I recommend further consideration of changes in process for permit application lodgement and reconciliation. For organisations operating a multi Lottery program in each financial year, NSW OLGR requires individual permit application processes (each current individual application can be c150 pages) and separate audit processes for each Lottery undertaken. I propose moving to a similar process such as the one adopted by QLD Gaming Office which provides a single annual permit (which identifies the proposed Lotteries for the period) and a single audit return. Additionally, WA Office of Liquor and Gaming have now moved to an online application and returns process.  
The current process with NSW OLGR is by far the most resource intensive to complete for both the charity holding the Lottery, and the OLGR in assessing applications/audits.

Thank you again for the opportunity to provide feedback.

Regards,

A handwritten signature in blue ink, appearing to read 'Steve Francia'.

**Steve Francia  
Multiple Permit Holder  
Company Secretary**

**The Surf Life Saving Foundation**

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