

# Leigh Barrett and Associates

## Venue e-Newsletter June 2016

### Business Management Issues

#### \*\* Monthly Webinars

LBA is pleased to announce that commencing in September 2016, in addition to the monthly e-newsletters, LBA will be conducting monthly webinars on a range of compliance and business management issues requested by our venue partners and associates.

The webinars are aimed at providing practical advice and strategies to assist the day-to-day management of compliance for all areas of your business. Dependent on the subject matter for each particular month, the webinars will be important information tools not only for venue managers, but also Food Safety Supervisors, Workplace Health and Safety representatives, AML/CTF Compliance Officers, Board and Committee members and other key staff.

*If you have a particular topic you would like us to cover in a webinar, please email it to [leigh@leighbarrett.com.au](mailto:leigh@leighbarrett.com.au) Watch for further details in next month's e-newsletter.*

#### \*\* Venue Hosting – A Proven Formula for Patron Retention

In business, the value of repeat customers increases the income/expenditure ratio significantly. That is why almost every club and hotel has a Customer Loyalty Program. Many venue partners have fed back that the association between LBA and Immaculate Events venue hosting is proving successful for venues increasing the proportion of “ongoing” patrons.

The highly experienced and professional Immaculate Events Venue Hosts facilitate a variety of in-venue activities and promotions that work to engage and entertain your patrons with a range of events, including Members' Nights, Gala Events and many others that grow your venue membership program and the value of each patron member to your business.

*For more information on Venue Hosting or to arrange an event, please phone Porzia on 0433 082 885 or email her at [porzia@emaculateevents.com.au](mailto:porzia@emaculateevents.com.au)*

### Gambling Issues

#### \*\* URGENT – New \$ 5.00 Notes Will Not Work in Current BNA's

The Australian Reserve Bank will be issuing new \$ 5.00 notes from September 2016, with a new \$ 10.00 note also due to be circulated from late 2016/early 2017. The new notes,



featuring upgraded security technologies, will not be accepted by current EGM bank note acceptors (BNAs).

By now, EGM suppliers should have sought and received approval for new BNAs that will accept the new notes as well as the current currency. If your venue's EGM BNAs have not been upgraded by September, LBA recommends that venue partners have a supply of the current notes available for customers to use and that you display a sign advising patrons to exchanges any new note for an old one or for coins.

***If you have not been contacted by your EGM supplier about updating your BNAs LBA recommends that you contact them urgently.***

## **\*\* Annual RG Code Evaluations – Final Call**

As you know, the VCGLR requires all providers of gambling products to conduct an annual Evaluation of their compliance with their adopted Responsible Gambling Code of Conduct.

Earlier this month LBA circulated all our venue partners with a pack of management, staff and customer questionnaires together with supporting materials for this VCGLR Evaluation process. We asked for the completed questionnaires to be returned using the Reply Paid address label by the end of June. **That's this week team!**

Remember there are three different questionnaires in the pack. The management questionnaire is to be filled out only by venue management ie. venue manager or gaming manager. All other gaming staff use the staff questionnaire. Staff are allowed to assist customers with their responses ( its much quicker !)

If you have not yet returned the completed questionnaires please do so asap.

***If your venue is using a Code other than the LBA Code and you have already completed Evaluation information for that other Code, please advise us via email at [johnnie@leighbarrett.com.au](mailto:johnnie@leighbarrett.com.au) so that we can formally notify the VCGLR on your behalf. Similarly if you are not using our Code but would prefer us to do the Evaluation for you then please let us know accordingly.***

## **\*\* Disabled Patrons and Discrimination– What Is Your Duty of Care?**

Recently venue partners, that have experienced issues with patrons who have physical and/or mental disability issues playing gaming machines, have contacted LBA for advice about how to prevent the venue from discriminating against such patrons whilst exercising a duty of care.

For example, a blind female patron frequents a partner venue to enjoy the range of facilities, including playing gaming machines. The only apparent handicap suffered by the patron is blindness. The venue was unsure about their duty of care in such a

situation, given that the patron is well aware of what she is doing and how much she is spending on her gaming.

LBA provided advice to the venue about procedures to adopt to ensure that they were not discriminating against the patron whilst satisfying their duty of care.

Because each situation is unique, there is no “magic formula” to address such issues.

***If your venue experiences a situation like the one described above, please email [leigh@leighbarrett.com.au](mailto:leigh@leighbarrett.com.au) or call us 9404-1642. For existing venue partners, this ad hoc advice is included in the services we already provide.***

## **Liquor Issues**

### **\*\* Knock-off Drinks Out of Bounds**

It has been a time-honoured tradition in many Australian workplaces to allow knock-off drinks for staff.

Are staff allowed to have knock-off drinks outside of a venue’s approved trading hours? The short answer is **NO**. Is this a new law? Again the answer is **NO**.

The law was introduced many years ago to overcome the infamous lock-in, often associated with country hotels, where the venue would continue to trade after closing time and the hotelier claim that those remaining were their guests. (If a license holder lives on the premises, they can take guests into their residence to have a drink.)

***For information or assistance on liquor licensing issues email [George@leighbarrett.com.au](mailto:George@leighbarrett.com.au)***

## **AUSTRAC Issues**

### **\*\* Smart Use of Your Suspicious Matter Incident Register (SMIR)**

Your AML Program requires you to record and maintain records of any Anti Money Laundering activities which can take quite a few forms.

A very handy tool for these records can be the SMIR that does not necessarily have to be solely for recording of suspicious matters.

It can be used as a DIARY of AML activities with just a short one line notation of things such as:

- Transaction monitoring performed and results;
- Training sessions in AML;
- Induction training of new or transferred staff;

- Audits or reviews conducted by management of the AML program, risk assessment or systems and controls;
- Audits performed by LBA;
- AML review performed by independent reviewer;
- Suspicious matters;
- Staff meetings where AML on agenda; and
- Changes in AML risks, systems and controls.

All LBA venue partners that use our AML services also have a folder in which to file:

- Half-yearly Board Reports;
- Staff training records;
- KYC of payouts of \$ 10,000 or more;
- Reports to Austrac of suspicious matters;
- Submission of Annual Compliance Report to Austrac; and
- Feedback or letters from Austrac.

Your program requires the Compliance Officer to submit a six monthly report to the Director(s), or Board of the venue and this DIARY is where you could quite quickly extract the information for the report.

It is also a very good reference point for evidence that the program is being implemented and complied with for any external compliance organisation.

***For more information and advice about your AML program email [leigh@leighbarrett.com.au](mailto:leigh@leighbarrett.com.au)***

**\*\* AML Half-Yearly Reports**

One of the constant issues identified in compliance audits is venues not having a copy of the 6-monthly AML report to the Board/Committee/Directors filed in their AML/CTF folder.

The reasons that this report is important are:

- Although there is a nominated AML/CTF Compliance Officer at the venue, the Board/Directors are responsible for overseeing the AML/CTF Program;
- AUSTRAC usually require evidence of this happening; and
- The reports provide the evidence.

LBA routinely reminds venues in our June and December Newsletters about the completion of the Report. Compliance Officers should ensure a copy of each report is filed in their AML/CTF folder. LBA partner venues have a proforma in their AML/CTF folder to make this task easy to do.

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