

Leigh Barrett and Associates

Venue e-Newsletter May 2016

Gambling Issues

** Annual RG Code Evaluation Documentation to Venue Partners

Material for the mandatory annual Responsible Gambling Code of Conduct evaluation will be circulated to all LBA venue partners during the last week of May.

The material will include:

- a questionnaire for venue managers;
- a questionnaire template for photocopying and completion by all gaming room staff;
- a questionnaire template for photocopying and completion by a sample number of (preferably regular) customers (as many as possible);
- a sample sign for a customer survey collection box (preferably located at the cashier's station);
- a sample sign for a staff survey collection box (preferably located in the manager's office); and
- a reply paid address slip that will facilitate return of the material by the due date – **28 June 2016.**

If a venue partner has an adopted RG Code other than the LBA Code and is completing the evaluation with the other Code provider, please advise us by emailing johnnie@leighbarrett.com.au

Venue participation in the annual RG Code evaluation is a legal requirement.

LBA requests that venues complete the evaluation surveys and return them by 28 June 2016

** Final Reminder - Unclaimed Winnings to State Revenue Office

As advised in last month's newsletter, gaming machine winnings that remain unclaimed for at least 12 months as of 1 March each year must be paid to the State Revenue Office (SRO) by **31 May** of that year. The SRO has an Excel spreadsheet template for the lodgement of unclaimed winnings on their website that is not appropriate for unclaimed EGM winnings, except for unclaimed bookpays.

LBA has developed a simple template for use by venue partners. The template accompanies this newsletter. If any of the information is unknown, then write "Unknown" in that cell of the template.



Venue partners are reminded that they can deduct the “reasonable costs, including staff time, involved in unsuccessfully identifying the person/s entitled to the winnings.

**** Amended EGM Accounting and Auditing Requirements**

All clubs and hotels in Victoria with EGMs should have recently received advice from the VCGLR about amendments to the Accounting and Auditing Venue Requirements (AAVR) pertaining to EGMs.

Some of the amendments relate to unclaimed winnings (as discussed above). Other amendments relate to jackpot management. The updated AAVR are have been included in the venue manual section on the VCGLR’s website.

LBA recommends that venue partners discuss the amendments with their gaming financial reconciliation provider.

Privacy Issues

**** Electronic Collection of Personal Information**

LBA believes that most venue partners would make reference to the electronic collection and retention of patron information in the venue’s Privacy Policy. However, many venues may not make specific reference to collection of such information if a person electronically enters a venue promotion or uses a venue’s free Wi-fi facility.

Your Privacy Policy should make specific reference to the collection and use of patron information collected in these circumstances.

If you are unsure whether your Privacy Policy is compliant with the current Australian Privacy Principles and would like advice, email leigh@leighbarrett.com.au

AUSTRAC Issues

**** Monthly AML Check-up – Transaction Monitoring**

Money laundering could occur as a result of any monetary transaction within your venue. This is why ongoing Transaction Monitoring is important.

Regular reviews of the following transaction types should be conducted:

- Cheques issued;
- Book-pay vouchers issued;
- Cashier transactions; and
- Game-play history on EGMs.

Regular reviews of these transactions can also reflect on, and can trigger, other AML requirements such as management oversight, staff awareness of suspicious matters, staff due diligence, reporting obligations and Know Your Customer and Enhanced Customer Due Diligence Requirements.

It is vital that, when these reviews are conducted, the fact that they are performed is recorded. A handy tool for recording these is the Suspicious Matter Incident Register supplied in your LBA AML/CTF folder.

**** 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.

© Leigh Barrett and Associates Pty Ltd 2016