

No.	Questions on Notice	Response / Comments
1.	<p>Nicholas McGOWAN: Can they seek a warrant to do so? Scott MAY: Yes, we can seek warrants from a court. Nicholas McGOWAN: And do you know whether that has occurred at all? Scott MAY: Not in the recent past, as I understand it. Fran THORN: No. Nicholas McGOWAN: It has not? Fran THORN: No. Scott MAY: No. Nicholas McGOWAN: Not ever? Fran THORN: We would have to take that one on notice. But certainly not since we have been there, no. Nicholas McGOWAN: No. Okay. If you could take that on notice, that would be great. Thank you. Fran THORN: Yes.</p>	<p>During the hearing Mr May referred to the obtaining of a warrant. Mr May was referring to the general powers under the <i>Gambling Regulation Act 2003</i> for obtaining a warrant from the Magistrates' Court to seize an object and/or enter a premises. However, the VGCCC does not have powers to seek a warrant for surveillance, because the VGCCC is not a defined 'law enforcement agency' under the <i>Surveillance Devices Act 1999 (SDA)</i>.</p> <p>The SDA regulates the entities who can apply for warrants to install, use and maintain surveillance devices such as listening, optical surveillance, tracking and data surveillance devices.</p>
2.	<p>Lauren KATHAGE: You spoke about conducting a number of blitzes, but what proportion of venues, licences, businesses have been compliance checked since the establishment of the VGCCC and what are the key findings from that? Fran THORN: Unless you know that off the top of your head, we are going to have to take that one on notice. Annette KIMMITT: We might take that one on notice. We know how many inspections, but we will have to take on notice the proportion findings and come back to you.</p>	<p>In FY23, the VGCCC conducted 2063 inspections in the metropolitan area - 300 of the 301 metropolitan venues were inspected. The VGCCC also conducted 489 regional inspections across 78 venues from a total of 183 venues.</p> <p>During FY23, the VGCCC undertook three significant operations to target high risk venues:</p> <ul style="list-style-type: none"> • a metropolitan blitz that targeted recidivist venues and initiated regulatory and enforcement action • Spring Racing Carnival Operation targeting high harm breaches involving minors gambling and intoxicated gambling • a regional blitz targeting 19 high risk regional local government areas. <p>Some of the key themes that emerged were:</p> <ul style="list-style-type: none"> • YourPlay breaches – interactive screen not available, failure to encode card, kiosk availability • Failure to have player account equipment installed as required by regulation, for example on EGMs • Failure to retain CCTV for 28 days

	<ul style="list-style-type: none"> • Code of Conduct noncompliance such as: <ul style="list-style-type: none"> ○ Responsible Gambling (RG) Officer not in the green line area, ○ RG signage not on display, ○ staff not trained in the required Responsible Gambling training modules ○ inadequate records relating to responsible gambling interactions ○ delivery of food and beverages to machines ○ Failure to produce cheque and complaints register • Failure to display entrance signs required by regulations <p><u>Tower Hotel gaming room shutdown – a key finding</u> Through our metropolitan blitz, we identified ongoing breaches by the operator of the Tower Hotel, with none of the 33 EGMs at that hotel connected to the YourPlay system. Following inspections conducted at the venue, the venue operator was issued with a letter in December 2022 putting them on notice that they were in breach of their legislative requirements. This letter also required the venue operator to confirm within 24 hours that it had either:</p> <ul style="list-style-type: none"> • rectified the issue and that YourPlay functionality was available on all EGMs; or • cease operating all EGMs so that the breach did not continue. <p>The operator’s failure to act on our letter resulted in the VGCCC forcing the closure of the Tower Hotel gaming room and all EGMs being turned off until YourPlay was restored. Our investigation into the Tower Hotel continues, including whether additional enforcement action is required.</p>
<p>3. Nicholas McGOWAN: So what is the principal behaviour you would issue an infringement for currently that comes to your mind? Fran THORN: It would be things like absence of responsible gambling officers on the floor, perhaps, or the fact that they do not have YourPlay connected. They are just a couple that I can think of. Scott MAY: There are various failures to maintain responsible gambling registers. Fran THORN: There is a whole bunch of things. Annette KIMMITT: CCTV failures. Fran THORN: CCTV. Nicholas McGOWAN: Could you just provide us with a list of the things you would be – obviously you have got that in mind.</p>	<p>There are only 31 offences under the <i>Gambling Regulation Act 2003</i> and <i>Gambling Regulations 2015</i> for which the VGCCC is able to issue a penalty infringement notice.</p> <p>There are 15 offences under the <i>Casino Control Act 1991</i> for which the VGCCC is able to issue a penalty infringement notice. See Attachment A.</p> <p>The VGCCC is working with DJCS to review penalty infringements under the <i>Gambling Regulation Act 2003</i>, <i>Gambling Regulations 2015</i> and the <i>Casino Control Act 1991</i>, prioritising the offences highlighted in yellow in the attachment.</p> <p>An appropriate method may be for the regulations to specify that the regulator has the option to issue an infringement notice for <u>all offences</u> and set an appropriate percentage of the maximum</p>

<p>Fran THORN: Yes, we are happy to take that on notice.</p> <p>List of things the VGCCC would issues an infringement for?</p>	<p>penalty of the relevant offence (for example, 10%). Given the number of offences and obligations in gambling legislation, this would be the preferred basis to extend the infringement capability.</p>
<p>4. Danny O'BRIEN: Thank you. Just while we are on this, I wonder if you could provide a list of the staff. I think you said there are 40 inspectors at the moment, heading for 190 staff. Could you provide a list of the positions, the classifications, of what everyone does?</p> <p>Fran THORN: Yes, I think we can.</p>	<p>Attachment B provides a staffing breakdown by division, teams and classification as at 29 July 2023. This count does not include Commissioners, staff on unpaid leave or secondment, or contractors.</p>
<p>5. Danny O'BRIEN: And further to Ms Sandell's questions about online gambling – sorry, first I will go to your most recent comment about technology. Are operators or VGCCC utilising facial recognition technology in venues to identify (a) criminals or criminal activity or (b) problem gamblers?</p> <p>Fran THORN: The main venue that I can think of that uses facial recognition technology is the casino, and I think they have got to about 80 per cent coverage in use of facial recognition technology.</p> <p>Danny O'BRIEN: What do you mean by coverage – 80 per cent of the venue?</p> <p>Fran THORN: Eighty per cent of the venue, yes. We might have to take this on notice, but I do not believe – we are certainly not requiring venues to use FRT at this stage.</p> <p>Does 80% of the casino venue have FRT coverage?</p>	<p>Crown has a large number of surveillance cameras and, following a recommendation for Facial Recognition Technology (FRT) to be expanded to cover all entrances to the casino, Crown has placed FRT cameras at all casino entrances, the wider complex entrances, and around the gaming floor.</p> <p>Currently, there are 91 FRT cameras installed in and around the Crown casino complex.</p> <p>All entrances to the casino have two cameras positioned with an additional three cameras situated at Pit 8 entrance, one at Pits 10/11 and one at Teak Room entrance. The remaining cameras are scattered within the casino complex including retail and car parks.</p> <p>In additional, there are 4100 CCTV cameras (excluding table cameras).</p> <p>Attachment C provides maps of the coverage of the FRT cameras.</p>
<p>6. Danny O'BRIEN: Yes. I know that you said data sets are not great, but do we have data at all on losses for EGMs, casino –</p> <p>Fran THORN: Yes, we do.</p> <p>Danny O'BRIEN: Online gaming?</p> <p>Fran THORN: Yes.</p> <p>Danny O'BRIEN: Could that be provided to us?</p> <p>Scott MAY: Yes, we could. I believe online wagering, because the taxation is captured at point of consumption, will actually sit with the State Revenue Office, so we will certainly have –</p>	<p>See Attachment D for data on gambling losses.</p>

Fran THORN: But we can try and get it.
Danny O'BRIEN: If there is data on the percentage of where the dollar is lost –
Fran THORN: We do monitor it and we do break it down by various segments: casino, pubs and clubs, wagering providers and in sports.
Annette KIMMITT: In very rough numbers, it was last year – again these are very rough but we will firm them up for you – about –
Fran THORN: \$3.2 billion on pokies, \$2.6 billion on wagering and service providers, and that included sports betting. Then there is a small amount of keno and lotteries.

7. **Michael GALEA:** Thank you, Chair. Mr May, **you talked about the regional blitz and a particular focus on different areas. Could you provide the committee with a breakdown of compliance results by LGA?**
Scott MAY: I will need to take that on notice, but yes.

Breakdown of 2022-23 Regional Compliance Results, including but not limited to the regional blitz.

Inspections	Breaches	LGA
9	2	Alpine
35	5	Ballarat
6	3	Bass Coast
1		Baw
16	4	Benalla
20	2	Bendigo
21	4	Campaspe
11	2	Central Goldfields
23	2	Colac Otway
48	2	East Gippsland
6		Gannawarra
11		Hepburn
85	9	Latrobe
3		Macedon Ranges
42	3	Mildura

	4	2	Mitchell
	12	2	Moira
	19	1	Moorabool
	6		Murrindindi
	1		Queenscliffe
	45	9	Shepparton
	7	2	Strathbogie
	11	2	Swan Hill
	4	1	Towong
	24	5	Wangaratta
	1		Wellington
	18	4	Wodonga

Supplementary Questions

No.	Question	Response / Comment
1.	What functions are the VGCCC taking over from the VRGF? What functions will remain with the VRGF regarding gambling harm minimization?	<p>The VGCCC is working with DJCS and VRGF on the machinery of government change.</p> <p>Decisions regarding the future of functions presently held by VRGF are matters for Government.</p>
2.	<p>In relation to liquor and gambling licensing applications:</p> <p>a. What does the assessment process entail?</p> <p>b. Is there a set of risk factors which have been developed for licensing officers to use, as per the audit recommendations?</p> <p>c. Is there a checklist that contains specific triggers for escalation of applications? If so, what triggers are on this checklist?</p> <p>d. Do these risk factors or triggers form any official policies or guidance documents?</p>	<p>a. The assessment process differs depending on the gambling licence applied for, but there are common elements across all licence types– such as national police checks, financial checks and in some cases an ASIC check.</p> <p>b. Yes, for each individual licence type the risk factors are built into the licencing system and are used as critical hurdles for consideration and escalation. To determine the level of risk present in an application, the gambling framework generally takes into consideration four major risk factors that have been linked to the likelihood of gambling-related harm. These major risk factors provides guidance for assessing suitability under the <i>Gambling Regulation Act 2003</i>:</p> <ul style="list-style-type: none"> • Offence history

	<p>e. What systems and quality controls are in place to ensure licensing officers use this guidance?</p> <p>f. One of the audit recommendations was to implement a risk matrix in the determination phase. Has this been done, and if so, how is this risk matrix used?</p>	<ul style="list-style-type: none"> • Regulatory history • Financial matters • Legal action <p>c. Triggers are based on the overall assessment of risk in each application which is embedded in the Gambling Licensing System (GLS). Applications flagged as medium or high are escalated to an appropriate supervisor.</p> <p>d. Yes, the VGCCC has created guidance that forms the baseline for licensing officers on how to assess and complete a risk assessment for:</p> <ul style="list-style-type: none"> • Gaming Industry Employees and Casino Special Employees • Venue operators • Associated individual • Associated entity • Bookmaker applications • Bookmaker corporate entities <p>These are internal guidance documents and can be accessed via the VGCCC intranet.</p> <p>e. The GLS includes the inbuilt assessment tool. Any application that is assessed as medium or high risk is flagged and cannot proceed unless it is reviewed by the relevant supervisor; thus enforcing an understanding of the risk factors, policies and guidelines. There is also the ability of affected persons to request review of a decision by a Commissioner.</p> <p>f. Yes, this has been described in steps (b) to (e), above. We also have a Responsible Gambling Assessment Tool (RGAT) to assess harm in all new game applications that are received by the VGCCC.</p>
<p>3.</p>	<p>How does the VGCCC check the integrity of the data provided in liquor and gambling license applications? And within VGCCC systems?</p>	<p>We assess accuracy and completeness of data through various assurance processes. This includes comparing data to alternative data sets, and assessing the relevant systems that produce the data, and associated controls linked to those systems, to ensure data integrity and accuracy is protected.</p>
<p>4.</p>	<p>Do EGM licences ever expire? Or do they have to be re-tendered for at any set period by the licence holder?</p>	<p>Venue operator licences are issued for 10 years but may be renewed. Gaming machine entitlements operate for 20 years. Entitlements were last awarded in August 2022 and will expire on 16 August 2042. Approval of a premises for gaming remains in force until an approval is revoked or surrendered.</p>
<p>5.</p>	<p>a. Are breaches of regulations by licence holders reported publicly?</p> <p>b. If not, is there a mechanism (eg. FOI requests) for the public to obtain this information?</p>	<p>a. Data on breaches is reported in our annual report. Enforcement action taken is also published on our website.</p>

		<p>b. FOI applications can be made by any member of the community about any of our functions, including breaches. The VGCCC provides as much information as possible for a request, subject only to exemptions under the <i>Gambling Regulation Act 2003</i> that are necessary to protect the public interest or maintain compliance with laws and regulations.</p>
<p>6.</p>	<p>Can an individual, Council or community group apply to have a gambling venue’s EGM licence revoked?</p>	<p>There is no mechanism for an individual, Council or community group to apply to have a gambling venue’s EGM licence revoked.</p> <p>The VGCCC can revoke an approval of a premise or cancel a venue operator licence but only in limited circumstances and as set out in the legislation.</p> <p>However, the VGCCC certainly invites the provision of relevant information from the community and has recently launched a tip off service to alert the regulator to issues. In addition, in approving a new premise (or varying the amount of EGMs at an existing premise), the VGCCC publishes details of the application and invites members of the community to provide their views on the application which is taken into account in determining whether the application will impact the wellbeing of the relevant community.</p>
<p>7.</p>	<p>a. What are the circumstances in which the VGCCC would revoke a venue’s EGM licence for breaches of the licence? b. What would the process be for this to happen? What would constitute severe and / or repetitive enough conduct to warrant a licence revocation? c. If an EGM licence is seized, would the allocation of EGMs be put to tender for other venues in the area or would there be no replacement?</p>	<p>a. The revocation (or cancellation) of a licence is an outcome of Disciplinary Action. It is a decision for the Commission and would need to be assessed on a case-by-case basis. Cancellation of licence is the most serious penalty available to the Commission when taking disciplinary action. If conduct by a venue operator amounts to grounds for disciplinary action, the Commission can:</p> <ul style="list-style-type: none"> • commence disciplinary proceedings by issuing a show cause notice to the venue operator • consider the evidence before them in relation to the conduct and the submissions made by the venue operator • determine the appropriate disciplinary action to take. <p>b. The particular facts of each case provide the basis for assessing whether conduct is sufficiently serious to warrant licence revocation/cancellation.</p>

		<p>c. The <i>Gambling Regulation Act 2003</i> contains provisions about what occurs to gaming machine entitlements in the event of a licence cancellation. They are forfeited to the State and the Minister may direct they be advertised.</p>
8.	<p>Noting the last change to municipal and regional caps of EGMs was undertaken in September 2017:</p> <p>a. Is there a statutory requirement for these caps to be reviewed within a particular timeframe?</p> <p>b. Can you please supply the Committee with a breakdown of the number of EGMs operating and licenced in each of the 25 capped regions?</p> <p>c. Can you please supply the Committee with a breakdown of the number of EGMs operating and licenced in each municipality?</p> <p>d. If you have the data available, can you please supply the Committee with data on the number of EGMs operating in each municipality in each year of the past 20 years?</p>	<p>a. Further detail on gaming machine entitlements can be found on the DJCS website</p> <p>b. Please note that the VGCCC is working with DJCS regarding this matter and the review has been delayed due to delays in receiving census and socio-economic indexes (SEIFA) information which is required to conduct the review. DJCS anticipate the review will be completed in late 2023.</p> <p>c. A breakdown of EGMs operating and licensed in LGAs can be found at Attachment D.</p> <p>d. See Attachment D.</p> <p>e. See Attachment D.</p>
9.	<p>a. How regularly is the map which shows all gaming venues and EGM allocations updated?</p> <p>b. The Pink Hill Hotel in Beaconsfield (20 Pink Hill Blvd, Beaconsfield) has been open for several months with EGMs operating on site. However, it is not listed on the VGCCC's map. Why is this the case?</p> <p>c. What is the licenced allocation of EGMs at the Pink Hill Hotel?</p> <p>d. Are there any other licenced EGM venues operating in Victoria which are not shown on the map?</p>	<p>a. The map is updated via the GLS and, therefore, updated each time a change occurs</p> <p>b. The Pink Hill Hotel is on the map here: https://apps.vgccc.vic.gov.au/CA2570C30016EEF3/pages/map_cardinia</p> <p>c. The licensed number of EGMs at Pink Hill Hotel is 60.</p> <p>d. The map is updated from the GLS and, therefore, updated each time a change occurs.</p>
10.	<p>a. What are the annual average losses per EGM in Victoria?</p> <p>b. Is there any notable geographic variation with annual average losses?</p>	<p>a. See Attachment E for the average losses.</p> <p>b. Geographic location is not the sole indicator of annual average loss. This is why we look at player loss data by LGAs, by venue and by population density.</p>
11.	<p>The 2023-24 budget papers (Budget Paper 3, page 400) show the expected number of gambling inspections undertaken in the</p>	<p>a. In the PAEC presentation, it stated that 2556 inspections were conducted in FY22/23. Please be advised that the final figure is as follows:</p>

<p>metropolitan area to be above target (1,550 on a target of 1,350) whilst inspections expected to be undertaken in regional areas was below target (183 on a target of 250):</p> <ol style="list-style-type: none"> a. Noting there is a difference between these figures and those outlined in the VGCCC’s presentation and answers supplied to the Committee on the 24th July, could you please clarify what the final figures are? b. Noting also that a key theme of VAGO’s recommendations in its initial 2017 audit called on the regulator to move to a risk-based approach to compliance rather than merely quotas for compliance checks (which is also noted in the budget papers), do the expected compliance check numbers in the budget papers reflect this shift to a risk-based approach? c. Are metropolitan venues more likely to breach compliance regulations than regional venues? 	<p><i>In FY23, the VGCCC conducted 2063 metropolitan and 489 regional inspections.</i></p> <p>This figure is slightly different to the PAEC presentation. When preparing these responses, data reports were rerun to identify any additional information that had been added to the system. In doing so, a small error was identified that impacted the previously reported figures.</p> <ol style="list-style-type: none"> b. Yes, the VGCCC has been prioritising inspections based on a risk-based approach. As an example, in the regional operation blitz, focus areas were prioritised based on the following factors: <ul style="list-style-type: none"> • projected gambling losses (significant projected 2022-23 gambling loss growth in comparison to pre-COVID years) • high concentration of poker machines • SEIFA ranking • breach history c. If calculated by number of breaches against number of venues inspected then regional venues are only slightly more likely to breach compliance regulations than metropolitan venues.
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Documents Request	Response / Comments
<p>The Committee requests copies of the checklists used by the VGCCC to guide the application process and the training documents provided to licensing officers, on the basis that any information provided will not be published publicly.</p>	<p>Sample of risk assessment framework and tools at Attachment F. These are embedded into the GLS.</p> <p>Additionally, the VGCCC uses a Harm Minimisation Assessment Tool to assess product applications.</p>

Section	Act	Brief Description of Offence
3.4.6	Gambling Regulation Act 2003	Venue operator must comply with all conditions to which the licence is subject.
3.5.35A(1)	Gambling Regulation Act 2003	Venue operator not display, or cause to be displayed, outside every entrance to a gaming machine area of an approved venue a responsible gambling sign.
3.8A.10(1)	Gambling Regulation Act 2003	Fail to ensure that player account equipment is installed in the approved venue in the prescribed manner, quantity and location (if any).
3.8A.12(1)	Gambling Regulation Act 2003	Fail to ensure that the player account equipment installed in the approved venue is functioning in the manner in which it is designed and programmed to function.
3.5.26	Gambling Regulation Act 2003	Fail to enforce rules made by the Commission under Section 3.5.23 and applicable to operator.
3.8A.15	Gambling Regulation Act 2003	A wagering service provider must comply with a harm minimisation direction that applies.
4.7.18	Gambling Regulation Act 2003	Offer credit, voucher or reward as an inducement to betting.
10.7.7(1)	Gambling Regulation Act 2003	Minor enter, or remain in, a gaming machine area of an approved venue.
10.7.8(3)	Gambling Regulation Act 2003	Gambling provider or registered bookmaker not display any notice that the Commission directs.
10.7.8(3)	Gambling Regulation Act 2003	Casino operator allow a minor to enter a casino.
3.3.16	Gambling Regulation Act 2003	Modify a gaming machine area in an approved venue without the approval of the Commission.
3.5.8(3)	Gambling Regulation Act 2003	Possesses a gaming machine without a securely fixed identification number.
3.5.22	Gambling Regulation Act 2003	Play a gaming machine in an approved venue at a time when the approved venue is closed to the public.
3.5.30(1)	Gambling Regulation Act 2003	Fail to pay out by cheque or EFT, accumulated credits on a gaming machine worth \$2000 or more that is not payable by cash.
3.5.35(1)	Gambling Regulation Act 2003	Person display, or cause to be displayed, any gaming machine related sign.
4.5.31(1)	Gambling Regulation Act 2003	Offer bets on prohibited betting contingencies.
4.5.22(1)	Gambling Regulation Act 2003	Offer betting service without agreement or determination.
4.7.24(a)	Gambling Regulation Act 2003	Accept a bet from any person prohibited by or does not conform to this Act.
4.8.24	Gambling Regulation Act 2003	Fail to comply with the notice to provide the inspector with a statement of an account and/or other particulars relating to the account as specified by the notice.
8A.1.16	Gambling Regulation Act 2003	Gaming industry employee contravene a condition of his or her licence.
10.5.5	Gambling Regulation Act 2003	Inspector participate in gaming, interactive gaming or club keno games while on duty, other than as required in the course of his or her employment.
10.7.3(1)	Gambling Regulation Act 2003	Gambling provider allow a minor to gamble.
10.7.5	Gambling Regulation Act 2003	Minor gamble.
10.7.6(1)	Gambling Regulation Act 2003	Venue operator allow a minor to enter a gaming machine area of an approved venue.
10.7.7(1)	Gambling Regulation Act 2003	Minor enter, or remain in, a gaming machine area of an approved venue.
10.7.7(2)	Gambling Regulation Act 2003	Minor enter, or remain in, a casino.
13(1)-(GR2015)	Gambling Regulations 2015	Fail to ensure a player information taker is displayed on the gaming machine in an approved venue so that it is clearly visible from the front of the machine.
14(1)-(GR2015)	Gambling Regulations 2015	Fail to ensure that player information brochures are available at each cashier area in the approved venue and that the number of brochures available is at least equal to the number of gaming machines in the approved venue.
4.3A.34(1)	Gambling Regulation Act 2003	Allow a person to offer or accept a bet by way of a betting exchange who is not a registered player.
4.3A.34(2)	Gambling Regulation Act 2003	Solicit a person who is the subject of an exclusion order to offer or accept a bet through a betting exchange.
4.3A.34(3)	Gambling Regulation Act 2003	Fail to inform the Commission of the suspicion that a person has offered or accepted, or is trying to offer or accept, a bet of the kind referred to in section 4.3A.34(1), 4.3A.34(2) or 4.3A.34(3) through a betting exchange conducted by the licensee.
4.3A.34	Gambling Regulation Act 2003	Fail to verify a registered player's identity is verified in accordance with the conditions of the licensee's wagering and betting licence.
4.5.22(1)	Gambling Regulation Act 2003	Offer betting service without agreement or determination.
4.5.31(1)	Gambling Regulation Act 2003	Offer bets on prohibited betting contingencies.
4.7.24(a)	Gambling Regulation Act 2003	Accept a bet from any person prohibited by or does not conform to this Act.
4.7.24(b)	Gambling Regulation Act 2003	Receive or permit to be received any bet in a totalisator in respect of an event after the start of the event.
4.7.24(c)	Gambling Regulation Act 2003	Receive or permit to be received any bet in an approved betting competition after the start of the competition or after specific times as specified in the betting rules applicable to that competition.
4.7.24(d)	Gambling Regulation Act 2003	Accept or act on any request, instructions or directions relating to a bet on a totalisator transmitted by letter, telephone, fax, e-mail or any other means of communication from a person with no betting account established with the licensee.
5.2.2(2)	Gambling Regulation Act 2003	Fail to conduct a public lottery in accordance with the public lottery rules.
6A.7.6	Gambling Regulation Act 2003	Keno game provider must comply with harm minimisation direction.
6A.7.6	Gambling Regulation Act 2003	Keno game provider must comply with harm minimisation direction.
8A.1.16	Gambling Regulation Act 2003	Gaming industry employee contravene a condition of his or her licence.
3.4.14(1)(a)	Gambling Regulation Act 2003	Fail, within 60 days of a licence being granted, to nominate a natural person to be responsible as licensee on behalf of the venue operator.
3.4.14(1)(b)	Gambling Regulation Act 2003	Fail, within 60 days of a licence being granted, to apply to the Commission for approval of a natural person who has been nominated as licensee on behalf of the venue operator.
3.4.14(2)(a)	Gambling Regulation Act 2003	Fail, within 60 days of licence being amended to include an additional venue, to nominate a natural person to be responsible as licensee on behalf of the venue operator.
3.4.14(2)(b)	Gambling Regulation Act 2003	Fail, within 60 days of licence being amended to include an additional venue, to apply to the Commission for approval of a natural person who has been nominated as licensee on behalf of the venue operator.
3.4.14(3)	Gambling Regulation Act 2003	Fail, within 60 days of a nominated licensee ceasing employment or being refused approval, to nominate another natural person as licensee on behalf of the venue operator and apply to the Commission for approval of that nomination.
3.5.25(1)	Gambling Regulation Act 2003	Fail to display notice informing patrons where rules under Section 3.5.23 may be inspected.
3.5.9(1)	Gambling Regulation Act 2003	Fail to lodge with the Commission a community benefit statement relating to an approved venue.
3.7.5(1)	Gambling Regulation Act 2003	Fail to keep operating documents at the approved venue/principal place of business and to retain them for not less than 7 years.
4.5.18(1)	Gambling Regulation Act 2003	Fail, within 14 days, to notify the Commission of change of a kind specified in writing by the Commission.
4.5A.6(5)	Gambling Regulation Act 2003	Fail, within 14 days, to return certificate of registration and identity card to the Commission where the registration has been suspended or cancelled.
4.8.41(A)	Gambling Regulation Act 2003	Failure by the wagering operator to keep operating documents at the principal place of business or such other place approved by the Commission.
4.8.41(B)	Gambling Regulation Act 2003	Failure by the wagering operator to retain all documents relating to the operations for not less than 7 years.
4.8.41(A)(a)	Gambling Regulation Act 2003	Failure by the wagering and betting licensee to keep operating documents at the principal place of business or such other place approved by the Commission.
4.8.41(A)(b)	Gambling Regulation Act 2003	Failure by the wagering and betting licensee to retain all documents relating to the operations for not less than 7 years.
4.8.42(a)	Gambling Regulation Act 2003	Failure by the permit holder to keep operating documents at the principal place of business or such other place approved by the Commission.
4.8.42(b)	Gambling Regulation Act 2003	Failure by the permit holder to retain all documents relating to the operations for not less than 7 years.
8.5.9(1)(a)	Gambling Regulation Act 2003	Fail, within 60 days of a licence being granted, to nominate a natural person to be responsible as operator on behalf of the bingo centre operator.
8.5.9(1)(b)	Gambling Regulation Act 2003	Fail, within 60 days of a licence being granted, to apply to the Commission for approval of a natural person who has been nominated as operator on behalf of bingo centre operator.
8.5.9(2)	Gambling Regulation Act 2003	Fail, within 60 days of a nominated operator ceasing employment or being refused approval, to nominate another natural person as operator on behalf of the bingo centre operator and apply to the Commission for approval of that nomination.
8.5.38	Gambling Regulation Act 2003	Fail, within 3 months of end of financial year, to send a full and accurate statement in the form approved by the Commission about all sessions of bingo conduct at the bingo centre.
8.5A.10(1)(a)	Gambling Regulation Act 2003	Licensee fail, within 60 days of a licence being granted, to nominate a natural person to be responsible as licensee on behalf of the commercial raffle organiser.
8.5A.10(1)(b)	Gambling Regulation Act 2003	Licensee fail, within 60 days of a licence being granted, to apply to the Commission for approval of a natural person who has been nominated as licensee of the commercial raffle organiser.
8.5A.10(2)	Gambling Regulation Act 2003	Fail, within 60 days of a nominated licensee ceasing employment or being refused approval, to nominate another natural person as licensee on behalf of the commercial raffle organiser (licensee) and apply to the Commission for approval of that nomination.
8.5A.27	Gambling Regulation Act 2003	Fail, within 3 months after the draw of a raffle, to send to Commission a full and accurate statement about the raffle in the form approved by the Commission.
8.6.2(2)	Gambling Regulation Act 2003	Fail to keep records containing prescribed information for a period of 3 years after the completion of the transactions to which they relate.
8.6.3(2)	Gambling Regulation Act 2003	Fail, within 14 days, to notify the Commission of change of a kind specified in writing by the Commission.
8A.1.6(4)	Gambling Regulation Act 2003	Contravene conditions of gaming industry employee's licence.
8A.1.15	Gambling Regulation Act 2003	Fail, within 14 days, to return license to the Commission after suspension or cancellation.
8A.1.18(2)	Gambling Regulation Act 2003	Fail to ensure a person employed to work in the gaming machine area does not perform the functions of a gaming industry employee without having completed an approved training course.
8A.1.22(1)	Gambling Regulation Act 2003	Fail, within 14 days, to notify the Commission of change of a kind specified in writing by the Commission.
10.4A.4(1)(a)	Gambling Regulation Act 2003	Fail, within 14 days, to notify the Commission of change of a kind specified in writing by the Commission.
54A	Casino Control Act 1991	Fail, within 14 days, to return licence to the Commission after suspension or cancellation.
56(1)(a)	Casino Control Act 1991	Fail, within 7 days, to notify the Commission after a licensed employee commences to have functions in or in relation to the casino.
56(1)(b)	Casino Control Act 1991	Fail to submit to the Commission on dates specified by the Commission, a list of the licensed employees having functions in or in relation to the casino.
56(1)(c)	Casino Control Act 1991	Fail, within 7 days, to notify the Commission after a licensed employee ceases to have functions in or in relation to the casino.
57(1)	Casino Control Act 1991	Fail, within 14 days, to notify the Commission of change of a kind specified by the Commission.
58A(2)	Casino Control Act 1991	Fail to ensure a person employed as a special employee does not perform any functions relating to gaming machines without completing an approved training course.
66(1)(a)	Casino Control Act 1991	Fail to display a notice in a form and manner approved by the Commission informing patrons where a copy of rules may be inspected.
66(1)(b)	Casino Control Act 1991	Fail to display information as directed by the Commission including the rules, mode of payment for winning wagers and odds of winning each wager.
66(1)(c)	Casino Control Act 1991	Fail to display at each gaming table or location related to the playing of a game, a sign indicating the permissible minimum and maximum wagers.
77(1)	Casino Control Act 1991	Enter or remain in the casino when subject to an exclusion order under Section 72.
77(2)	Casino Control Act 1991	Enter or remain in the casino or casino complex when subject to an exclusion order made by the Chief Commissioner of Police under Section 74.
77(3)	Casino Control Act 1991	Enter or remain in the casino or casino complex when subject to an exclusion order made by an Interstate Chief Commissioner of Police.
78(2)	Casino Control Act 1991	Special employee must not gamble or bet in the casino.
126(1)	Casino Control Act 1991	Fail to keep operating documents at the casino and retain them for not less than 7 years.
127(2)	Casino Control Act 1991	Fail, within 4 months of the end of financial year, to lodge an auditor's report, profit and loss account and balance sheet to the Commission.

Key
Priority offences not infringeable (commonly occurring with no current power to PIN)
Other offences where infringement powers are sought
Extensive power to PIN

TABLE 1 - VGCCC STAFF CLASSIFICATIONS BY DIVISION AND TEAM AS AT 29/07/23

DIVISION	TEAM	VPSG2	VPSG3	VPSG4	VPSG5	VPSG6	STS	SES	Grand Total
CORPORATE SERVICES	BUSINESS SERVICES			1		1			2
CORPORATE SERVICES	CORPORATE SERVICES			1			1		2
CORPORATE SERVICES	FINANCE		2	2	2				6
CORPORATE SERVICES	GOVERNANCE & RISK					1	1		2
CORPORATE SERVICES	PEOPLE & CULTURE		1	2	2		1		6
CORPORATE SERVICES	RECORDS MANAGEMENT		2	1	1				4
CORPORATE SERVICES	STRATEGIC COMMUNICATIONS			2	4				6
CORPORATE SERVICES Total			7	7	11	3			28
INFO, COMM & TECHNOLOGY	APPLICATION SERVICES				2	1			3
INFO, COMM & TECHNOLOGY	GOVERNANCE & PLANNING				1	1			2
INFO, COMM & TECHNOLOGY	ICT OPERATIONS		3	1	2	1		1	8
INFO, COMM & TECHNOLOGY	INFO & COMM TECHNOLOGY	1							1
INFO, COMM & TECHNOLOGY Total		1	3	1	5	3		1	14
LEGAL POLICY & HARM MIN.	COMMISS SECRETARIAT & REG					1			1
LEGAL POLICY & HARM MIN.	HARM MINIMISATION						1		1
LEGAL POLICY & HARM MIN.	LEGAL POLICY & HARM MIN.					1		1	2
LEGAL POLICY & HARM MIN.	LEGAL SERVICES			1	1		4		6
LEGAL POLICY & HARM MIN.	REG STRATEGY & RESEARCH		1	1	2				4
LEGAL POLICY & HARM MIN. Total			1	2	4	6		1	14
OFFICE OF THE CEO	OFFICE OF THE CEO				2	2		1	5
OFFICE OF THE CEO Total					2	2		1	5
PROJECTS	CROWN SUITABILITY DECISI							1	1
PROJECTS	WAGERING & BETTING LIC						1		1
PROJECTS Total							1	1	2
R.O - CASINO	CASINO		1			1		1	3
R.O - CASINO	INSPECTIONS (CASINO)			12	3	1			16
R.O - CASINO	INVESTIGATIONS & INTEL.				1	1			2
R.O - CASINO	LICENCE ASSMT & DETERM.		2						2
R.O - CASINO	LICENCE MGMT (CASINO)		1	1		1			3
R.O - CASINO Total			4	13	5	3		1	26
R.O - GAMBLING	GAMBLING		1					1	2
R.O - GAMBLING	INSPECTIONS (GAMBLING)		2	8	1	1			12
R.O - GAMBLING	INVESTIGATIONS (GAMBL.)			4		2			6
R.O - GAMBLING	LICENCE MGMT (GAMBL.)		1	1	1				3
R.O - GAMBLING	LICENCING (GAMBLING)	4	5	1	1				11
R.O - GAMBLING	VENUE OPERATIONS		1	2					3
R.O - GAMBLING Total		4	10	16	3	3		1	37
R.O - REGULATORY SERVICE	COMPLAINTS		1	1	1	1			4
R.O - REGULATORY SERVICE	DATA MONITORING & ASSURA		4	3		1			8
R.O - REGULATORY SERVICE	EDUCAT. & INFO. SERVICES	1	2	1	1	1			6
R.O - REGULATORY SERVICE	INTELLIGENCE & INSIGHTS			1		1			2
R.O - REGULATORY SERVICE	REGULATORY SERVICES					1		1	2
R.O - REGULATORY SERVICE	SYSTEMS ASSURANCE			1	1				2
R.O - REGULATORY SERVICE	TECH. ASSURANCE & EVAL.		1	3	1				5
R.O - REGULATORY SERVICE Total		1	8	10	4	5		1	29
REGULATORY OPERATIONS	REGULATORY OPERATIONS				1	1	1	1	4
REGULATORY OPERATIONS Total					1	1	1	1	4
Grand Total		6	33	49	35	27	1	8	159

*Count does not include Commissioners, staff on unpaid leave/secondment, contractors or agency staff.

Gambling Products Player Loss	FY2021	FY2122	FY2223
Gaming Venue	1,565,234,389.26	2,237,203,905.00	3,021,664,869.23
Casino	399,190,806.46	644,616,684.58	983,212,381.28
Lotteries (public & instant lotteries)	774,582,524.11	844,820,761.08	821,253,696.95
Keno (Tabcorp)^^^	13,416,620.79	16,409,658.45	28,934,547.11
Keno (Lottoland)^^	n/a	n/a	3,693,741.65
Keno (Other)*	n/a	4,771,923.20	16,879,600.58
Pari-mutuel Wagering (Tabcorp)	334,182,865.11	364,656,355.12	335,061,236.16
Fixed Odds Wagering (Tabcorp)	406,212,245.26	387,368,807.15	437,168,787.05
Trackside (Tabcorp)	23,204,709.91	23,629,876.46	30,355,294.40
Wagering (Other)**	1,621,857,364.31	1,834,490,202.29	1,785,263,270.79

= SRO data

**Fields calculated using data supplied by the SRO based on player loss totals submitted by tax paying entities to Victoria, as received by the SRO, less player loss calculated by VGCCC in relation to Tabcorp

^^LL launched November 2022

^^^ TLC Online launched February 2023

LGA Name	FY2223	FY2122	FY2021	FY1920	FY1819	FY1718	FY1617	FY1516	FY1415	FY1314	Licensed
CITY OF WHITTLESEA	780	775	771	780	781	781	778	757	740	631	817
SHIRE OF NORTHERN GRAMPIANS	168	168	168	168	168	168	162	157	174	88	168
CITY OF GREATER GEELONG	1,370	1,361	1,357	1,316	1,304	1,302	1,299	1,326	1,408	1,331	1,518
SHIRE OF COLAC-OTWAY	167	167	167	167	167	167	167	167	167	110	167
SHIRE OF MOORABOOL	167	167	167	164	160	160	160	160	160	110	167
SHIRE OF CENTRAL GOLDFIELDS	129	129	129	129	129	129	129	129	129	149	129
SHIRE OF MITCHELL	263	269	264	269	287	293	293	293	289	225	313
SHIRE OF ALPINE	68	68	68	68	68	68	68	57	73	63	68
RURAL CITY OF BENALLA	240	240	240	240	237	240	240	235	235	105	247
SHIRE OF CAMPASPE	254	254	253	253	254	254	254	254	254	209	266
SHIRE OF GLENELG	195	195	195	195	195	195	195	195	195	120	195
Shire of Wellington	318	318	318	318	318	318	318	310	306	304	324
Rural City of Wodonga	140	142	142	136	135	135	135	136	155	178	150
City of Warrnambool	234	233	233	233	234	234	234	234	234	234	250
City of Greater Bendigo	662	662	660	660	647	606	634	629	618	614	662
City of Ballarat	648	646	638	639	650	657	663	663	663	663	677
Rural City of Swan Hill	159	159	157	159	159	160	160	158	135	134	165
City of Greater Shepparton	329	329	328	329	329	329	329	329	329	329	348
Rural City of Mildura	281	281	280	281	281	281	285	285	285	285	285
Shire of East Gippsland	332	331	332	332	332	332	332	332	332	332	388
Shire of Bass Coast	213	212	213	213	213	210	204	216	216	216	213
City of Latrobe	522	519	522	521	522	522	522	522	522	522	557
Shire of Surf Coast	89	89	88	89	85	74	74	73	90	107	101
Shire of South Gippsland	105	105	105	105	105	105	105	105	105	105	105
Shire of Macedon Ranges	102	103	103	103	103	103	103	103	101	95	103
Rural City of Horsham	153	153	153	153	153	148	148	148	148	148	153
Shire of Baw Baw	238	237	238	238	238	234	209	198	198	194	238
Rural City of Wangaratta	154	154	154	154	140	136	136	136	133	130	154
City of Melbourne	710	704	696	699	702	705	745	746	745	767	754
City of Moreland	639	640	638	629	650	651	641	651	713	721	719
City of Darebin	743	742	740	744	743	744	741	775	775	786	877
City of Boroondara	162	162	162	162	162	162	162	176	202	196	170
City of Whitehorse	430	429	431	431	431	431	430	431	420	440	537
City of Manningham	453	518	520	522	522	521	519	515	509	509	600
City of Banyule	635	633	633	635	625	635	634	601	607	620	667
City of Maroondah	640	640	638	759	759	757	751	742	730	709	790
City of Knox	767	764	766	765	767	766	766	723	699	763	861
City of Monash	953	952	952	954	952	953	945	955	957	938	997
City of Port Phillip	377	377	368	377	377	374	384	384	384	361	430
City of Kingston	913	912	899	902	898	897	897	897	895	886	945
City of Greater Dandenong	927	926	926	950	958	956	958	955	946	933	951
City of Frankston	519	513	518	519	518	517	512	532	537	529	574
City of Casey	912	906	910	912	913	908	902	898	888	885	944
Shire of Cardinia	400	345	342	324	325	325	312	302	281	243	405
Shire of Yarra Ranges	449	445	444	436	437	442	442	442	436	345	467
City of Hume	833	831	830	833	833	807	809	813	805	801	876
City of Brimbank	952	952	946	953	953	950	947	944	946	946	988
Shire of Melton	523	522	520	521	510	503	502	494	493	491	523
City of Hobsons Bay	534	535	533	534	535	535	556	577	577	577	554
City of Wyndham	902	899	902	902	897	893	892	890	891	891	903
Shire of Mornington Peninsula	819	818	806	827	819	812	813	816	815	806	873
City of Yarra	288	282	288	303	307	308	308	308	308	308	288
City of Maribyrnong	471	470	468	471	464	454	445	418	400	398	471
City of Stonnington	235	244	243	244	257	286	287	287	288	285	285
City of Glen Eira	662	737	777	779	779	776	768	771	772	758	724
City of Bayside	208	207	207	208	208	208	208	211	246	248	235
City of Moonee Valley	746	745	731	746	742	732	732	732	732	726	760

	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23
FY2223												
Player Loss	269,934,998.83	271,374,019.57	263,219,031.37	265,760,191.94	249,146,019.31	260,282,602.12	244,146,722.67	223,630,502.82	247,937,065.70	240,619,424.11	243,737,139.15	241,877,151.73
No. of EGM	26,306	26,307	26,263	26,256	26,263	26,285	26,291	26,266	26,248	26,242	26,262	26,284
Average Player Loss	10261.34718	10,315.66	10,022.43	10,121.88	9,486.58	9,902.32	9,286.32	8,514.07	9,445.94	9,169.25	9,280.98	9,202.45
												115,009.23
FY2122												
Player Loss	162,561,388.52	61,571,985.32	16,858,757.53	50,329,107.56	234,766,941.72	251,018,887.03	224,333,217.05	221,533,368.13	257,316,756.16	257,578,638.72	253,763,847.66	245,571,009.60
No. of EGM	26,300	26,295	26,225	26,077	26,302	26,343	26,372	26,361	26,360	26,384	26,374	26,380
Average Player Loss	6181.041389	2,341.59	642.85	1,930.02	8,925.82	9,528.86	8,506.49	8,403.83	9,761.64	9,762.68	9,621.74	9,308.98
												84,915.55
FY2021												
Player Loss	-	-	-	-	98,001,342.88	235,941,318.95	238,896,325.03	182,067,861.90	246,586,706.21	240,124,463.12	210,209,703.89	113,406,667.28
No. of EGM	-	-	-	-	25,939	26,209	26,332	26,353	26,334	26,359	26,330	26,321
Average Player Loss	-	-	-	-	3,778.15	9,002.30	9,072.47	6,908.81	9,363.82	9,109.77	7,983.66	4,308.60
												59,527.57

LGA Name	FY2223	FY2122	FY2021
SHIRE OF ALPINE	45,324.21	38,774.64	25,196.18
Shire of Surf Coast	46,339.38	38,164.39	25,251.58
SHIRE OF CAMPASPE	51,328.00	43,279.39	26,512.24
RURAL CITY OF BENALLA	60,522.63	50,495.59	29,086.97
Rural City of Swan Hill	63,987.59	52,274.64	35,138.08
SHIRE OF NORTHERN GRAMPIANS	66,134.61	46,554.84	32,502.07
SHIRE OF COLAC-OTWAY	66,183.32	54,298.95	35,482.49
City of Bayside	66,860.38	48,927.58	35,841.39
Shire of Yarra Ranges	67,424.57	49,080.92	35,631.30
Shire of South Gippsland	67,711.24	60,692.77	33,753.29
Rural City of Wangaratta	70,700.25	56,417.40	34,122.36
City of Port Phillip	75,600.89	55,453.42	44,119.34
Rural City of Horsham	76,323.12	58,395.14	38,296.98
Rural City of Wodonga	76,765.72	64,514.48	30,006.11
SHIRE OF GLENELG	80,328.38	65,192.21	44,365.20
Shire of Wellington	81,664.51	66,037.32	41,042.68
Shire of Baw Baw	83,455.88	65,999.72	40,656.29
City of Stonnington	86,855.05	62,496.15	45,943.18
SHIRE OF MOORABOOL	86,931.29	72,847.05	46,252.08
Shire of Cardinia	87,870.74	70,488.73	48,233.38
City of Greater Bendigo	89,316.43	69,488.62	45,159.61
Shire of Macedon Ranges	89,334.75	75,164.52	51,389.37
City of Hobsons Bay	89,742.65	65,146.29	48,550.36
SHIRE OF CENTRAL GOLDFIELDS	89,899.49	71,485.62	44,488.32
City of Banyule	90,078.75	62,920.07	48,704.95
Shire of East Gippsland	92,187.68	71,386.18	47,731.76
SHIRE OF MITCHELL	92,245.01	68,593.53	45,208.29
Shire of Bass Coast	92,703.00	69,103.53	47,980.83
City of Kingston	94,228.64	68,576.02	49,113.02
City of Latrobe	95,709.03	75,221.66	50,140.79
City of Moreland	97,167.38	72,144.20	54,375.61
City of Maroondah	97,400.48	71,768.38	52,870.00
CITY OF GREATER GEELONG	98,982.78	77,499.69	51,977.14
City of Ballarat	99,299.62	79,216.38	52,830.86
City of Warrnambool	99,324.14	79,066.19	54,330.89
City of Knox	102,157.10	73,481.45	52,656.63
City of Yarra	105,594.28	80,421.24	59,736.49
City of Glen Eira	106,520.12	69,526.45	50,428.02
Shire of Mornington Peninsula	110,309.24	82,329.76	61,162.18
City of Moonee Valley	114,282.53	83,787.42	59,630.67
City of Darebin	115,505.61	85,448.59	63,188.47
City of Boroondara	116,090.57	81,045.89	57,690.42
City of Melbourne	121,679.39	86,370.49	59,610.50
City of Monash	128,487.27	89,092.83	65,401.67
City of Greater Shepparton	129,906.53	99,880.11	70,664.06
City of Frankston	130,491.02	96,081.14	68,811.34
City of Whitehorse	130,593.59	92,272.27	66,724.72
City of Manningham	133,345.91	84,721.42	58,551.44
Rural City of Mildura	136,986.84	103,910.96	62,721.92

City of Wyndham	138,489.92	97,157.16	68,312.32
City of Maribyrnong	140,526.21	106,738.20	76,239.18
City of Greater Dandenong	148,166.25	110,755.26	78,620.06
Shire of Melton	166,014.77	116,931.02	80,931.21
City of Hume	167,007.85	125,622.56	86,987.22
City of Casey	174,713.03	125,967.23	88,141.97
City of Brimbank	181,617.51	134,785.62	97,174.31
CITY OF WHITTLESEA	189,120.98	134,896.76	93,024.79