

VICTORIAN CASINO AND GAMING AUTHORITY

SECOND SUBMISSION TO THE PRODUCTIVITY COMMISSION INQUIRY INTO AUSTRALIA'S GAMBLING INDUSTRIES

PURPOSE

The purpose of this submission from the Victorian Casino and Gaming Authority is to respond to allegations made by the representatives of the Victorian Council of Churches - Gaming Task Force at public hearings held by the Productivity Commission in Melbourne on 23 November 1998.

SUBMISSION

The following information is provided in response to the Allegations made by the Victorian Council of Churches - Gaming Task Force representatives:

Independence of Authority from Government

Allegations made by Victorian Council of Churches - Gaming Task Force representatives:

(Reference 373R. CLEARY and OTHERS paragraph 2 - attributed to Mr Costello)

"I won't go through all the other heads of our submission. You've seen that we've made certain recommendations about the Victorian Casino and Gaming Authority's powers, which we believe fell prey to the confusion of the cultural shifts, that they were acting with the technical correctness of a legal approach that looked at what their terms of reference were, when the whole culture suddenly had shifted so far so quickly that technical approach was actually right out of date. They were not restraining, they were not seeing the inherent contradiction between regulating gaming and promoting tourism, which the culture here said is all centred on Crown Casino and the opening up of pubs, and therefore the VCGA literally got, in my view, washed aside - and I think it's the view of the task force, washed aside by the power of the state government and the premier."

(Reference 373R. CLEARY and OTHERS paragraph 3 - attributed to Mr Costello)

"Our evidence for that is that when the Crown Casino asked for an extra 150 gaming tables, which is a huge jump, the premier came out immediately and said, "Of course they should get them, the need's there." When he was reminded that it's not his decision, it's the Victorian Casino and Gaming Authority's decision, he said, "Oh, well, of course it's up to them." We sought to make submissions to the VCGA and weren't given standing to even be heard on it. The decision was effectively made. There wasn't proper regulation and hearing and consultation because the nature of this fast-running culture just literally ran over the VCGA."

(Reference 373R. CLEARY and OTHERS paragraph 2 - attributed to Mr Costello)

"So you will see that we make submissions about clarifying its powers, that it isn't there to promote tourism and the hospitality industry, that it's there to actually regulate. You will see we've made submissions about the Community Support Fund. ..."

(Reference 374R. CLEARY and OTHERS paragraph 4 - attributed to Mr Costello)
“... Again I say there is proper attention that needs to be given to the regulatory role of the VCGA, the role of government, not promoting and sponsoring this, and proper restraints upon the industry, at least within the terms of the recommendations we’ve made here, thank you.”

(Reference 388R. CLEARY and OTHERS paragraph 1 - attributed to Mr Cleary)
“But who does he ask them to - the government or the - so I suppose in a sense I’m saying there will also need to be a delineation between policy: policy which is macro state, of a political nature; and policy which is in fact interpreting and putting in place the framework in which the industry operates. I see the latter being clearly the responsibility of the VCGA. But to do that in the current situation will need, I think, a revisit of the legislation that they’ve currently set up because they’ve got this confused role of regulator, promoter and tourist initiator.”

(Reference 389R. CLEARY and OTHERS paragraph 3 - attributed to Ms Webster)
“I think just to add to that is to note the constant amendments since 91 when the first acts were introduced to the role of the VCGA and the management of the Community Support Fund and the causes to which it might be directed. I think it’s a very telling process and hopefully someone will do a PhD on it.”

Response by Victorian Casino and Gaming Authority:

The Victorian Casino and Gaming Authority is the independent statutory body responsible for the regulation of Victoria’s gambling industry. The Authority is established pursuant to Section 82 of the *Gaming and Betting Act 1994*. The majority of the Authority’s powers, objects and duties are conferred on it under this Act together with the *Casino Control Act 1991*, the *Casino (Management Agreement) Act 1993*, the *Gaming Machine Control Act 1991*, the *Club Keno Act 1993* and the *Gaming No 2 Act 1997*.

The Authority was established in June 1994. The objectives of the Authority are to:

- to ensure that gambling operations are conducted honestly and that the management and operation of approved gambling activities remain free from criminal influence and exploitation;
- to ensure that wagering and approved betting competitions are conducted honestly and remain free from criminal influence and exploitation;
- to act as a source of advice to the Minister for Gaming on gambling issues and ensure that the Government’s policy on gambling is implemented;
- to fund research into the social impact of gambling; and
- to promote tourism, employment and economic development generally in the State through the administration of the various Acts.

Attachment 1 provides an extensive listing of the objects, functions, powers and duties of the Authority. There has been no substantial change to the legislated role of the Authority since its establishment.

It should be noted that prior to the establishment of the Authority in 1994 the Victorian Gaming Commission had the statutory obligation for the regulation of and to conduct

research into electronic gaming machine play in Victoria. Further, the Victorian Casino Control Authority had the statutory obligation for the regulation of the casino.

Responsibility for Policy Decisions

Allegations made by Victorian Council of Churches - Gaming Task Force representatives:

(Reference 385R. CLEARY and OTHERS paragraph 1 - attributed to Mr Cleary)

“I think one of the arguments we would be putting forward there which we’ve been making for some time is that the regulatory body, the Victorian Casino and Gaming Authority, needs to establish some criteria based on some sound research. It’s like the catch-22 situation. We’ve been arguing for the research for 5 years. The research is still not really up and running in terms of the depth of the research - criteria about the size or the number of poker machines in any one venue, the closeness to other venues, the socioeconomic data that’s available for that particular region, rates of return.”

(Reference 387R. CLEARY and OTHERS paragraph 1 - attributed to Ms Webster)

“... Again, we would be pressing for a clear delineation of - clear policy power and decision-making on the part of the government from the oversight and application and implementation of that policy by a body such as the Victorian Casino and Gaming Authority. We think there’s a role there for it - and I speak on behalf of Catholic Social Services. There may be differences - - - .”

(Reference 387R. CLEARY and OTHERS paragraph 5 - attributed to Mr Cleary)

“... We asked the authority, ‘Who actually makes those decisions? Is it the government or is it the authority?’ The authority’s response to me was, ‘We can enter in discussion with you about that, but policy issues are made by the government.’ It’s sort of you’re in a no-win situation. The CEO of Tabcorp I think it was at the time said, ‘Oh well, if Crown can ask for tax cuts so can we.’

(Reference 391R. CLEARY and OTHERS paragraph 2 - attributed to Mr Costello)

“... The Victorian government or the VCGA was considering giving all hotels the right to have keno and our view was, “Well, we don’t really want that and we don’t particularly like that, but insofar as you’ve got to go and actually by a ticket and talk to someone and have some distance from a machine” - a poker machine becomes quite mesmerising. Free drinks are often brought to you etcetera.”

The Authority is responsible for the regulation of the industry, it does not determine gambling policy. This is entirely the province of government - eg whether or not there is to be a moratorium on EGMs or the introduction of Club Keno etc. Legislative amendments would be required if the Authority was to become involved in any policy making procedures.

Role of the Director of Gaming and Betting

Allegations made by Victorian Council of Churches - Gaming Task Force representatives:

(Reference 388R. CLEARY and OTHERS paragraph 3 - attributed to Mr Costello)

“... If you had an independent regulatory body in the VCGA to set policy that might be - if it was truly arm’s length, and it’s not - the executive director of the VCGA is a member of the minister’s staff.”

(Reference 388R. CLEARY and OTHERS paragraph 4 - attributed to Ms Webster)

“He is required to advise the minister.”

(Reference 388R. CLEARY and OTHERS paragraph 5 - attributed to Mr Costello)

“Right. You often get these mixed messages quite working out who’s representing who here. VCGA as a fully independent, statutory body - or it may not be statutory, but a body that’s actually full arm’s length may be a better policy set-up. ...”

Response by Victorian Casino and Gaming Authority:

The Director of Gaming and Betting is appointed by the Governor in General under Section 97 of the *Gaming and Betting Act 1994*, with the specific role and functions set out in Section 102 of that Act (see Attachment 2). The Director of Gaming and Betting is not a member of the Minister for Gaming’s staff.

Extent of Research Conducted

Allegations made by Victorian Council of Churches - Gaming Task Force representatives:

(Reference 369R. CLEARY and OTHERS paragraph 3 - attributed to Mr Costello)

“Until this time - and I’m sure Marilyn will elaborate a little more on this when we come to the issue of the research - most of the research which has been undertaken, we believe, is no more than surveys, perceptions, ideas, although in the last 12 or 18 months we have had a degree of participation with the Victorian Casino and Gaming Authority. We still believe that the basic research which comes out may give us some indicators, but it actually doesn’t address the social and economic impacts to the level and degree that we believe is necessary. In fact, in our submission it’s argued basically that the short-term gains in taxation that the state receive now will be at the expense of long-term social costs which in fact may be greater than the short-term benefits. ...”

Response by Victorian Casino and Gaming Authority:

The Victorian Council of Churches Gaming Task Force makes a number of broad generalisations about the research conducted by the Authority. These comments ignore the range of projects that have been undertaken since 1994 (with different methodology and foci) all of which have been published and widely used and cannot be plainly described simply as attitudinal surveys, specifically the 1996-97 program and not just the 1998-99 program as implied.

All projects undertaken by the Authority are designed to examine aspects of both the social and economic impacts of gambling (the process of the development of research programs is outlined below).

The Authority has consulted on the development and conduct of its research projects far longer than just the last 12 to 18 months. During the development of the Authority's various research programs the Victorian Council of Churches Gaming Task Force have been approached to provide input into the research that the Authority conducts. During this process the Authority has considered the suggestions put forward by the Victorian Council of Churches Gaming Task Force and, where appropriate, incorporated these suggestions into its programs. At present, there are no matters which the Victorian Council of Churches Gaming Task Force have suggested which have not been incorporated into the Authority's research program. Accordingly, the basis of this claim is unclear to the Authority.

Timing and Conduct of Research

Allegations made by Victorian Council of Churches - Gaming Task Force representatives:

(Reference 375R. CLEARY and OTHERS paragraph 2 - attributed to Ms Webster)

"I will address some of the issues around research, which is an area that the Inter-Church Gambling Task Force have been extremely critical of over the last 4 years. I think the statement which best encapsulates the state of gambling research in Victoria is that it has been too little too late, and by that the Inter-Church Gambling Task Force understands that the research has been piecemeal. It has concentrated on certain geographical areas at the expense of others. It has been research which has not been able to be replicated over a period of time, other than those surveys which have actually been attitudinal surveys by way of virtual marketing surveys for the industry, and it has been research which has largely ignored some of the social impacts which the Inter-Church Gambling Task Force has been pointing out for some time."

(Reference 375R. CLEARY and OTHERS paragraph 3 - attributed to Ms Webster)

"Research itself is one of the key functions of the Victorian Casino and Gaming Authority. Of the \$90,000,000 that passed through the authority last year into the Community Support Fund about 1.7 million was spent on research. ..."

(Reference 375R. CLEARY and OTHERS paragraph 4 - attributed to Ms Webster)

"In 1994 the Victoria Casino and Gaming Authority established a research protocol which really lapsed for a period of some 18 months and despite numerous submissions by the Inter-Church Gambling Task Force we were unable to establish why it was that this research was not getting up. However, it does appear in retrospect that the VCGA were having difficulty getting funding from the Community Support Fund and also difficulty in getting approval from the premier for the conduct of the research. At last this year I think it's fair to say that we can see some significant research projects being undertaken by the VCGA and in recent months there has been a number of research projects which are really quite significant and which do reflect some of the submissions that the Inter-Church Gambling Task Force has been making over a period of time."

(Reference 375R. CLEARY and OTHERS paragraph 5 - attributed to Ms Webster)

"The first one I'd like to point out is the research into crime and gambling which has just recently been advertised. There has been no attempt, as far as we are aware, to standardise statistics within either the police statistics or court statistics, to actually quantify the impact of gambling on court appearances and reports of crime. ..."

Response to comments on page 376R

(Reference 376R. CLEARY and OTHERS paragraph 1 - attributed to Ms Webster)

“The second research project which is of significance is the one that I have already pointed out and that is the social and economic impact study. We look forward to the quantification of some of the social and economic impacts to be taken into account in that study and are really concerned that some of the social costs are taken into account in the modelling that is proposed. The other study which is of great interest to us is the study into problem gambling. One might ask why is a study into problem gambling of such issue, both for the industry and for agencies and for the churches, when we have an understanding that perhaps 1 per cent of the population is perhaps affected by compulsive or problem gambling.”

Response by Victorian Casino and Gaming Authority:

The Authority was established in June 1994. The first task it undertook in relation to its research objective was to develop and have approved a research charter, which provides the foundation for the Authority’s research focus. This research charter sets guidelines for the Authority to follow in conducting research on the social impact of gambling, and requires the Authority to consider:

- the impact on individuals and families;
- the impact on communities and neighbourhoods;
- the cultural and social impact; and
- the socio-economic impact.

The research charter has been extensively published, being reproduced in the three annual reports of the Authority and being made available on request.

The Authority believes that “the social and economic impact of gaming” is complex and multi-dimensional and requires different projects with varying methodology and foci to examine these impacts, and not just a simple “inquiry”. The research charter and scoping matrix elaborate on this general approach (a copy of these documents were included in the Authority’s previous submission).

Once the Authority had adopted its Research Charter, the 1995 Research Program was developed. This program incorporated the initiatives recommended by the consultants engaged to develop the research charter and to recommend priority projects. The program was announced in February 1995 and incorporated 5 projects.

Following the completion of the 1995 Research Program the Authority developed its 1996/97 Research Program, which was announced in June 1996, with a number of projects subsequently being added. This program was developed in consultation with the Victorian Council of Churches - Gaming Task Force and other community and industry groups. Likewise the 1998-99 Research Program, which was announced on 1 July 1998 was developed in consultation with the Victorian Council of Churches - Gaming Task Force and other community and industry groups. Details of all three research programs was provided in the Authority’s submission to the Productivity Commission dated 11 November 1998.

The Authority's 1998-99 Research Program does include the following projects referred to by Victorian Council of Churches - Gaming Task Force:

- the impact of gaming on crime statistics - to evaluate the availability of suitable crime statistics to enable meaningful analysis of the impact of gaming (currently the Authority is seeking approval to access data held by the Department of Justice and tenders have yet to be called);
- problem gambler measurement instrument - to develop a survey instrument to accurately measure the prevalence of problem gambling; and
- a study to develop a framework to measure the social and economic impacts of gaming and the subsequent use of this framework in critically analysing and summarising the whole of the 1998-99 research program.

Note: prior to the establishment of the Authority in June 1994, a number of research initiatives had been undertaken, this included the first comprehensive State review, known as the "Schilling Report" conducted in 1994, and the research conducted by the Victorian Gaming Commission which included the first two Community Gambling Patterns surveys (1992 and 1994).

Subsequently as part of its research programs the Authority has continued the series of annual surveys which commenced in 1992 that examines community gambling patterns and perceptions. The first survey in this series commenced prior to the introduction of electronic gaming machines and the opening of the casino. Further, two projects have been included in the Authority's 1998-99 Research Program which are longitudinal in nature and will measure impacts annually over the three years, from 1999 to 2001.

VCGA and Department of Human Services Research

Allegations made by Victorian Council of Churches - Gaming Task Force representatives:

(Reference 376R. CLEARY and OTHERS paragraph 3 - attributed to Ms Webster)
"There are some gaps, however, which still require to be addressed. They are gaps perhaps not so much that fall within the realm of responsibility of the Victorian Casino and Gaming Authority, but they are gaps which actually fall within the responsibility of the minister for community services. The minister for community services is actually responsible for both research into problem gambling and the delivery of problem gambling services. I must say that the research program has actually suffered by being split into its two halves, between the VCGA and the Department of Human Services."

Response by Victorian Casino and Gaming Authority:

The Authority is unaware of any gaps between its research and that of the Department of Human Services. Further, it is the Authority's view that the research it conducts is complemented by the research conducted by the Department of Human Services. The Research conducted by the Department of Human Services focuses on the services and facilities for those people who experience difficulty with their gambling activities.

Contracts with Consultants

Allegations made by Victorian Council of Churches - Gaming Task Force representatives:

(Reference 377R. CLEARY and OTHERS paragraph 1 - attributed to Ms Webster)
“Finally, of great concern to the Inter-Church Gambling Task Force has been the impact of confidentiality agreements on the researchers who have been undertaking significant research projects for the Victorian Casino and Gaming Authority and the Department of Human Services. Perhaps this has been one reason for the resultant delays, but it has certainly meant that data has not been accessible for people wishing to access the and assess the wider social impacts.”

Response by Victorian Casino and Gaming Authority:

The Authority does include confidentiality clauses in contracts it enters into with researchers. This is done for a number of reasons, including:

- to maintain the confidentiality of persons who provide information to the researchers; and
- to ensure compliance with the secrecy provisions applying to the Authority regarding commercial in confidence information that is provided to the consultants in the conduct of the research.

Copyright Provisions

Allegations made by Victorian Council of Churches - Gaming Task Force representatives:

(Reference 377R. CLEARY and OTHERS paragraph 2 - attributed to Ms Webster)
“Finally, an associated issue is the issue of copyright. This will be particularly difficult in relation to the problem gambling study where an instrument is to be devised by the Victorian Casino and Gaming Authority and it will be copyrighted and require approval for its use. The Inter-Church Gambling Task Force has consistently made submissions both to the Department of Human Services to the Victorian Casino and Gaming Authority about the importance of this information being under community ownership. At this stage we really have to say that we are not there yet. I think that concludes my presentation on research.”

Response by Victorian Casino and Gaming Authority:

The Authority does propose to hold copyright over instruments it develops, but not over research data generally. This is to be done, not for commercial gain, but to ensure the creditable use of such instruments.

Release of Research Findings

Allegations made by Victorian Council of Churches - Gaming Task Force representatives:

(Reference 377R. CLEARY and OTHERS paragraph 6 - attributed to Ms Webster)
“I think there are a number of practical reasons which have to do with the passage of the information between the department and the contracted researcher and the negotiation around the presentation of that to the point where it is publishable or agreed to be publishable by both parties. I think that has played a significant role in the delays. Then there is the issue of ministerial approval required, particularly for data from the

Department of Human Services and I know there have been circumstances of delay there. I presume that those delays have to do with wider considerations.”

(Reference 378R. CLEARY and OTHERS paragraph 2 - attributed to Mr Costello)

“It’s also true though, it’s hearsay evidence that at least two researchers have spoken to me and told me about how their report had to be in their words, cleaned up, before it was acceptable to be released and that was the reason for the delay. Of course it becomes very difficult for people who are in academic contexts to talk openly about this, because now their academic budgets depend on getting these contracts in the future.”

(Reference 378R. CLEARY and OTHERS paragraph 4 - attributed to Mr Costello)

“In one instance the VCGA asked them to clean it up with particular references they didn’t like. In one instance it was the references this person made to Crown Casino that had to be cleaned up.”

(Reference 406M. WEBSTER paragraph 6 - attributed to Ms Webster)

“I think I indicated this morning that there were two areas. One was the constant negotiation with the researchers or evaluators responsible in order to bring the material to a publishable standard, and the definition of publishable standard I think has kind of political overtones to it. I think that delays it, and then again there are also issues around ministerial decisions about when to time release of data. It’s difficult to substantiate any particular incidences of data being withheld to accord with kind of a more beneficial time for release, but we believe that’s happening.”

Response by Victorian Casino and Gaming Authority:

The Authority disputes the claim regarding delays in the release of research reports and can substantiate that there has not been any significant delays. Further, the Authority has established a process by which it provides 5 days notice to key stakeholders of the impending release of all reports.

Further, given the Authority’s independence from Government , it does not require, nor does it seek, approval from the Minister for Gaming to release research reports.

It is the view of the Authority that the comment “... Of course it becomes very difficult for people who are in academic contexts to talk openly about this, because now their academic budgets depend on getting these contracts in the future...” implies the tender evaluation process used by the Authority in awarding future possible research tenders would be somehow less than objective towards researchers who talked openly about previous contracts. This comment also implies that researchers would compromise their academic and professional integrity in order to gain future contracts.

The Authority strenuously rejects any implied criticism of the probity and objectiveness of its tender evaluation process which conforms rigorously to government guidelines.

The Authority also disputes the claims that “... their report had to be in their words, cleaned up, before it was acceptable to be released and that was the reason for the delay In one instance it was references this person made to Crown Casino that had to be cleaned up ...” and “... One was the constant negotiation with the researchers or evaluators responsible in

order to bring material to a publishable standard, and the definition of publishable standard I think has kind of political overtones to it. I think that delays it, and then again there are also issues around ministerial decisions about when to time release of data. It's difficult to substantiate any particular incidences of data being withheld to accord with kind of a more beneficial time for release, but we believe that's happening ...".

It is common practice for the Authority to extensively detail factual errors to the consultant, but in no way are the findings altered, which the above quotes imply.

Development of Research Proposals

Allegations made by Victorian Council of Churches - Gaming Task Force representatives:

(Reference 378R. CLEARY and OTHERS paragraph 1 - attributed to Mr Cleary)
"Many of the delays initially, particularly with the Victorian Casino and Gaming Authority, related to the long time in which the actual research questions were being prepared and discussed and in the initial stages the issue of data base commercial sensitivity to information. Requests that we were making in terms of specific projects, there seemed to be a large time lag between the commitment to do research and the beginning of the first research projects."

Response by Victorian Casino and Gaming Authority:

The Authority disputes this claim. If there was a period of delay, this was attributed to the extensive consultation process the Authority does undertake in the development of its project briefs, to ensure that the key stakeholder in a project has had the opportunity to contribute to the project brief. Once this process is undertaken the Authority is then required to go through an extensive public tender process. This process has been adopted by the Authority to ensure the independence of the research it conducts.

Authority Comment on Research Findings

Allegations made by Victorian Council of Churches - Gaming Task Force representatives:

(Reference 387R. CLEARY and OTHERS paragraph 4 - attributed to Mr Cleary)
"If I could add to that, I think in terms of the VCGA one of the issues that we have been discussing with them and with the minister is in relation to the way in which the research undertaken by the authority, that it has done already, how they actually use that research. In our discussions with them on numerous occasions their advice to us is they had done the research but they then don't advise government of the implications of the research on what policy there already is. So there seems to be a disconnected - you do the research but that sits out there, and policy is over there somewhere. Some policy is over there but other policy is here."

Response by Victorian Casino and Gaming Authority:

On 16 December 1997, I responded to the Victorian Council of Churches - Gaming Task Force in relation to this matter by advising that:

“With regard to your query about the Authority making a statement in relation to the findings of the research program, I wish to put in writing my explanation to you about the role of the Authority in this matter. One of the objects of the Authority is to act as a source of advice to the Minister on gaming issues. The Authority has and will continue to provide advice on particular issues as and when they arise. However, it is not the function of the Authority to interpret research findings. The findings of the research reports, all of which are publicly released, stand on their own and are sufficient to inform debate within the community regarding the impact of gambling in the State of Victoria.”

Release of Financial Data

Allegations made by Victorian Council of Churches - Gaming Task Force representatives:

(Reference 405M. WEBSTER paragraph 8 - attributed to Ms Webster)

“Well, we certainly make use of it. One of the problems, as I mentioned this morning, is the delay in publication. For instance I inquired about the availability of data for the last financial year for today’s presentation but it has still not be released.”

Response by Victorian Casino and Gaming Authority:

For the 1995-96 and 1996-97 financial years details for gambling expenditure were provided in the Authority’s Community Gambling Patterns and Perceptions report. It is proposed that the 1997-98 financial data be incorporated into the sixth survey of Community Gambling Patterns and Perceptions, which is anticipated to be released early in the new year.

Objects, Functions, Powers and Duties of the Authority

The objects, functions, powers and duties of the Authority are set out in section 84 of the *Gaming and Betting Act 1994*, which reads as follows:

“ 84. Objects, functions, powers and duties

The Authority has the functions, powers, objects and duties conferred on it under this Act, the **Casino Control Act 1991**, the **Casino (Management Agreement) Act 1993**, the **Gaming Machine Control Act 1991**, the **Club Keno Act 1993**, **Gaming and Betting Act 1994**, **Gaming No 2 Act 1997**, or any other Act.”.

Gaming and Betting Act 1994

- Licensing powers in relation to a gaming and a wagering licence and power to issue an on-course wagering permit
- Disciplinary powers in relation to the gaming and wagering licences (only the gaming licence currently held by Tabcorp)
- Budgetary powers
- Regulatory powers and functions, such as approval of approved betting competitions, totalisator equipment and the making of betting rules and powers of inspection
- Taxing powers
- Power to prosecute for offences

Casino Control Act 1991

- Licensing powers in relation to the casino licence (including enforcement of shareholder limits in the casino operator)
- ongoing monitoring of associates
- Disciplinary powers in relation to the casino licence and special employee’s licences
- Appeal body for applicants for special employee licences refused by the Director of Casino Surveillance
- Regulatory powers and functions, such as approval of the casino operator’s Internal Control Manual, approval of the rules for casino games, power to object to controlled contracts and powers of inspection
- Taxing powers
- Power to prosecute for offences

Casino (Management Agreement) Act

- Power to contract with the casino operator
- Functions and powers under the Management Agreement for the Melbourne Casino in relation to the details of development of the Melbourne Casino Complex

Gaming Machine Control Act 1991

- Licensing powers in relation to venue operators
- Disciplinary powers in relation to special employees, technicians, gaming operators and venue operators
- ongoing monitoring of associates
- Appeal body for applicants for special employee licences refused by the Director
- Power to approve and remove persons listed on the Roll of Recognised Manufacturers and Suppliers of Gaming Machines and Restricted Components
- Regulatory powers and functions, such as approval and testing of electronic monitoring systems and games and powers of inspection
- Taxing powers
- Power to prosecute for offences

Gaming No 2 Act 1997

- Power to issue bingo centre licences
- Disciplinary powers in relation to bingo centre and employee licences
- ongoing monitoring of associates
- declaration of organisations to be community or charitable organisations
- Appeal body for applicants for bingo employee licences and permits refused by the Director

Club Keno Act 1993

- Regulatory powers and functions in relation to the game of club keno