

2 May 2008

The Executive Director
Office of Gaming and Racing
PO Box 18055
Melbourne VIC 8003

By email: GamingandRacingEnquiries@justice.vic.gov.au

Dear Sir/Madam

Bingo: Proposals for regulatory reform

In general terms, PilchConnect (PILCH's specialist legal service for community organisations, see below) supports the policy objectives behind the regulatory reforms to bingo proposed by the Office of Gaming and Racing. PilchConnect has consulted with the Council of the Ageing Victoria (**COTA**) as they have experience of the role bingo plays at a grassroots, community level.

In this context, PilchConnect supports the following proposals:

- 6: Payment of winnings over \$1,000 by cheque
- 7: No record of winners
- 8: No minor gaming permit unless prize over \$20,000
- 9: Private Bingo – but see comment below.

PilchConnect does not make any comment about proposals 1 or 3.

PilchConnect makes the following observations about the other proposals:

2: New rules

PilchConnect supports the removal of the rules from the *Gambling Regulation Regulations 2005* (Vic). PilchConnect also supports empowering the Victorian Commission for Gaming Regulation to make or approve bingo rules. However, PilchConnect suggests that amendments to the legislation expressly provide for community stakeholder consultation in the introduction or variation of Bingo Rules. In this way, we urge prior consultation with ethno-specific groups and organisations such as COTA.

4: Unlimited sessions per week

PilchConnect does not support unlimited sessions of bingo, and suggests that this measure has the potential to result in irresponsible service of gaming. While the existing condition of four sessions of bingo per week is restrictive, PilchConnect recommends that the limit be lifted, but it not be unrestricted.

5: Flexible prize determination

PilchConnect notes that the proposed new system will require increased financial management and compliance issues. This will add an extra regulatory burden on

community and charitable organisations, contrary to the spirit of the regulatory review. PilchConnect encourages the Office of Gaming and Racing to reduce, as far as practicable, the regulatory burden, and assist organisations to comply with their reporting obligations.

9. Private Bingo

Feedback from COTA is that bingo is dear to the hearts of many seniors, seniors clubs and other community groups. In fact bingo is one of the most multicultural of activities. As such, our joint concern is that these very small scale 'within the club' only games should be distinguished from larger 'public' bingo events run by charity or business. We are, therefore, strongly in support for proposal 9 but would be keen to see the exact wording of the new provision to ensure it does extend beyond nursing homes and aged care centres.

About PilchConnect

In 2008 PILCH responded to the need for free, accessible, up-to-date, legal information and advice that is tailored to the needs of not-for-profit community organisations by establishing a new service - PilchConnect. The mission of PilchConnect is to promote and support the highest standards of governance and practice by community organisations so that their important economic and social contribution to Australia is maximised.

This innovative new service will provide community organisations with free / low cost legal information, training and advice via a range of delivery methods including:

- access to comprehensive, plain language, web-based resources;
- training for both community organisations and lawyers (including an out-reach program);
- referral of complex legal enquires to members of the legal profession to provide pro bono services
- 'legal health check' materials;
- law reform work.

By the end of 2008 PilchConnect also plans to establish a free, Victorian-wide telephone advice service to assist with common not-for-profit legal issues (eg, fundraising, governance).

If you have any questions regarding the above please call me..

Yours sincerely

Sue Woodward
Manager – PilchConnect

cc. Ms Sue Hendy, Executive Director, COTA Vic.