

**THE LEGISLATIVE COUNCIL SELECT COMMITTEE ON THE IMPACTS OF GAMING MACHINES MET IN COMMITTEE ROOM 2, PARLIAMENT HOUSE, HOBART ON TUESDAY 16 APRIL 2002.**

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**Ms SUE STRUGNELL**, GENERAL SECRETARY, COMMUNITY AND PUBLIC SECTOR UNION, WAS CALLED, MADE THE STATUTORY DECLARATION AND WAS EXAMINED.

**CHAIR** (Mrs Silvia Smith) - Thank you very much, Sue, for coming along this morning and giving up your time and also thank you very much for your letter of submission. We look forward to you expanding on some of the comments you have made. As you can see, I have made some notes there. I am hopeful that I will get the answers to those. I will hand it to you to make your comments and if you are quite happy and comfortable with it, if anyone has a question and we intervene along the way it might be easier to deal with them in that process.

**Ms STRUGNELL** - As you would be aware, I am the General Secretary of Community and Public Sector Union and we represent the employees who work in the gaming inspectorate at the casinos and also have charge of regulation of gaming machines in all other venues. I would particularly like to concentrate my very brief submission today in relation to concerns that have been expressed, firstly in relation to the independence of the Gaming Commission and secondly, to the matter of the resourcing of compliance which is a huge concern for our members.

As you are aware, the Tasmanian Gaming Commission is an independent body and it is responsible for the regulation of gaming in Tasmania. It is intended to be independent from both government and the gaming industry. The three members of that commission at the moment are Mr Don Challen who is the chairperson, Professor Kate Warner and Mr Clive Eastoe. Mr Challen is also Secretary for the Department of Treasury and Finance.

The functions of the commission are many and varied and they are described by the Gaming Control Act 1993. But some of those functions include the regulation and control of gambling; the approval of controls, procedures, rules and conditions relating to gaming activities; the investigation of matters relating to gaming and of persons involved in conducting gaming; investigating and resolving complaints related to gaming. The commission meets on an average of once a month.

The functions of a head of agency or a secretary are also many and varied and are dictated by the State Service Act 2000. These include, ensuring that the agency is operated in an effective and efficient and economical way as much as practicable; to determine the duties of the employees employed by that agency and classification of those duties; and to ensure that the services of employees in the agency are used as effectively and efficiently as possible.

The objectives of the Department of Treasury and Finance as taken from their own web site includes 'to ensure a sound Tasmanian public sector financial position consistent with the Government's strategies and priorities. To ensure an efficient, effective and equitable revenue collection system and the regulation of the gaming industry to ensure high standards of probity and equity'.

How can the head of Treasury properly separate the responsibility of the role of head of an agency with that of chairperson of the Tasmanian Gaming Commission? Is it realistically possible for one person to regulate and control gambling as prescribed by the Gaming Control Act in a capacity of commissioner, to ensure that the services of employees in an agency are used in an effective and efficient way in the capacity of a head of agency and also to achieve an objective of that agency in ensuring the sound Tasmanian public sector financial position again in the capacity of a head of agency but also as head of Treasury? It is our submission that in just looking at those three individual requirements it does demonstrate potential for possible conflict of interest.

Public policy at a Federal and State level strongly emphasises the separation of regulatory functions from other stakeholders and industry functions. This is especially true when the industry involved is subject to community debate. For example, the Forest Practices Board is deliberately removed from Forestry Tasmania. Forestry Tasmania is a player in the industry and also has a brief to promote the industry. It is considered inappropriate for an organisation actively involved in the conduct or promotion of forestry to also act as the umpire or the regulator in that industry.

The reforms of the Tasmanian racing industry are predicated on the separation of steward functions from the promotion and conduct of racing. Acceptances in races et cetera have been devolved from Racing Tasmania to individual clubs. However, the steward and regulatory functions are deliberately separated from the other aspects and their independent status has been strengthened.

The Electricity Regulator is not responsible administratively to the Hydro, to Transend or to Aurora.

We have provided statistics in our submission on the increase in gaming facilities between June 1992 and June 2000. Coupled with that are some indications of staffing levels with that increase, particularly where it is related to the employees charged with the responsibility of compliance. I must add here that since preparing our original submission in December the staffing situation at Wrest Point Casino in the inspectorate has improved marginally with the addition of several new temporary positions. But along with the very real increase in gaming in Tasmania there has been, of course, a relative increase in the number of incidents requiring investigation.

Statistics may be put before this inquiry to demonstrate the number of actions taken against venue operators in such areas as fines or other forms of disciplinary action. But those statistics we say are not reflective of the amount of compliancy work which is undertaken. For each reportable breach to the commission there will normally have been two breaches prior to that. It is a three strikes and you're out philosophy. So it's our submission that the picture does not properly represent reality.

There are investigations that are required to be undertaken as a preliminary course of action. There are warnings which are issued to venue operators. If those warnings are not heeded then there is the issue of infringement notices which then need to be followed up. After all of the above have been completed the breaches are finally referred to the commission if they haven't been resolved or if the infringements are repeated unless, of course, it is a particularly big issue which is immediately referred to the commission. So that demonstrates that there is a lot behind the scenes that goes on prior to the statistics being released by the commission in relation to the number of breaches that have been dealt with by that particular body.

**CHAIR** - And those breaches are initiated by the inspectors?

**Ms STRUGNELL** - That is correct, yes indeed. And the range of issues include the use of unlicensed staff in venues, venues operating out of hours, leaving venues unattended. There was an example where a venue was left with the machines ticking over and nobody on the premises. The venue operator had popped up to the bank, so that is a major breach in terms of needing some investigation. There are problems with problem gamblers or persons excluded from venues, and that is particularly in relation to the provision of cash for gambling, and that is a very big issue that needs to be dealt with by the inspectorate staff. It is our submission that the gaming inspectorate is under-resourced, despite the marginal increase in Hobart, but can the commission, as a commission, look at this issue in a totally independent and realistic light, or is it overshadowed by a head of agency who has to consider his agency budget?

Let us look, for example, at the commission's ruling regarding the placing of EFTPOS facilities in gambling venues, or more closely, should I say, at the provision of cash for gambling in some venues. The regulation applies some quite strict rules in regard to the cashing of cheques for the purpose of gambling and for the provision of cash via EFTPOS for the same purpose. We have no argument with the intention of the regulation. Our submission more deals with our concerns as to whether or not it is being adequately regulated. The rule of thumb is for one purchase of cash per employee, so you can go to an employee and that person can only issue you with cash via EFTPOS once, but the reality is that in many venues it is possible for patrons to have access to a number of transactions. This could occur in some cases without it being seen necessarily that the venue operator is breaching the regulations.

**Mr SQUIBB** - I did not realise it was per employee.

**Ms STRUGNELL** - That is correct.

**CHAIR** - No, as soon as you said that, I thought, I did not realise that.

**Ms STRUGNELL** - That is what is then used. The intention is that a punter should only be able to use the EFTPOS facility once in the venue.

**Mr SQUIBB** - Once a night, or in a session.

**Ms STRUGNELL** - Yes, that is right. But in reality in one of the larger venues, for instance, you have change of staff after meal times, you have other facilities which are attached to the venue, such as bottle shops, where gamblers can have access to more than one

purchase of cash per venue. And there was one recently reported incident that showed that a known problem gambler had been provided with cash for gambling via EFTPOS twelve times in one day at the same venue. It is a big issue and, as I said, it is one that does cause a lot of concern to our inspectorate staff.

Finally it is our submission that the members of this select committee should be endeavouring to satisfy themselves as to the extent of the responsibility of duty of care to addicted gamblers. We are aware of the funding support to gamblers and their families provided through the community support levy and, yes, we are aware that addicted gamblers have options regarding they themselves being able to bar or restrict themselves from gambling venues, but it is our submission this does not go far enough. Concerns are expressed by those involved in this area that there is a degree of lip service paid and that the legislation should provide the ability for more active intervention where it is known that problem gamblers are on the premises or that there is a potential for somebody developing into a problem gambler. And just to use an example of the frustrations that are caused by this and how far the inspectorate staff can actually go in terms of intervention, there was a young person on the north-west coast who was addicted to gambling. Some time ago this person barred herself from gambling venues. Some time later she gained access to her parents' visa card and she was going to one venue on the north-west coast with up to \$4 000 a day in cash and using it for the purpose of gambling. The only intervention that was made in relation to that obvious case of gambling addiction was the venue operator making an inquiry through the inspectorate, through the proper channels as to whether the self-imposed bar still existed for this person. He was informed that the bar had expired and that was all he was satisfied in finding out. The person continued after taking \$4 000 from ATMs or banks elsewhere to visit that one venue on a daily basis, and was investing up to \$4 000 a day. She was 22 years of age. That is an extreme example.

This is where the frustration is for the inspectorate staff seeing that they do not have a more appropriate power of intervention when they are really the ones who have these problems referred to them in a way that may be just the venue operator inquiring about an existing bar or not. Also, in terms of the number of venues that they visit on a daily basis and having these sorts of circumstances identified to them where they are powerless to do very much about it.

Our submission has really only served to pose a number of questions rather than being able to supply the answers. We do think that this is an important opportunity to delve a little more into the question of the smoke and the mirrors and the reality of the situation with gambling. Particularly where it comes to the compliance area and particularly where it comes to looking at that balance that one person, who after all is only a human being, is making between his three roles, two roles but a third one in terms of meeting the objectives of his department, as to whether it is appropriate that there should be the involvement in both those roles and whether in fact it is effective in terms of looking realistically at the other issues of the resourcing of compliance and trying to separate out that revenue raising that gambling provides to the State.

One of the other points of revenue raising and gambling is that it is said that the four per cent that is retrieved from each dollar, the four cents in every dollar that is retrieved that goes to government coffers as a revenue-raising exercise, it is stated that that is four cents out of every dollar which the gambler plays, puts into the machine but in fact it is

four cents out of every dollar that is played. That adds an enormous amount if you consider somebody putting a dollar into a machine and four cents of that goes to government revenue. If that person wins \$5 dollars, even if they do not take it out of the machine and reinsert the dollars, every dollar that they play that they have won also rates the four cents in every dollar. It is a big revenue raiser. It constitutes an enormous amount of this State's budget on an annual basis.

It comes back again, as far as our submission is concerned, as to whether it is appropriate that the revenue-raising agency should in fact have their head also being the chairperson of the Gaming Commission.

**Mr SQUIBB** - You are probably aware that dual role was only supposed to be an interim move but eight or nine years down the track -

**Ms STRUGNELL** - About eight or nine years and renewed every four years, I understand.

**Mr SQUIBB** - Well, it was not supposed to be. I do not know if it is written into the legislation but it was certainly a commitment given that it would only be an interim move.

**Ms STRUGNELL** - That is not what has occurred.

**Mr SQUIBB** - No.

**CHAIR** - It would be interesting to know, you mentioned the four years, and I have heard comment on that as well, where this four-year term is at at this point of time. If there is a four-year appointment, where is it at at this point of time with the three people that you've mentioned?

**Ms STRUGNELL** - That's interesting. I believe that one of the people - I think Professor Warner - has only just replaced a previous commissioner, Jean Trethewey, is that right?

**CHAIR** - I'm not too sure who was -

**Mr SQUIBB** - Yes, that's only fairly recent. And I think Clive Eastoe is only fairly recent - certainly not original.

**CHAIR** - No, no definitely not.

**Ms STRUGNELL** - But in terms of this being the act, if we were looking say at the appointment in 1993, for instance, when the act became legislation - what are we looking at, 1997, 2001, it could be said just on that calculation that the appointment of the chairperson has only recently been renewed.

**CHAIR** - That's something we will have to look at, the four-year appointment system.

**Mrs SUE SMITH** - Sue, you spoke about the necessity of more appropriate powers of intervention for the inspectors. Could you expand on that and give us some idea of what you mean? What sort of powers would you like to see?

**Ms STRUGNELL** - Well, I think it's more if the inspector becomes aware, such as through that request from the venue operator, that there is a young person there obviously with a lot of money there should be the ability somehow for some approach to be made in terms of the actions that she was carrying out. It's a very delicate field I know -

**CHAIR** - Because it's the onus on the operator.

**Ms STRUGNELL** - because of invasion of privacy and all sorts of things but I don't have the answers to that and I don't think the inspector would do. It's just at the moment their hands are tied in terms of where they know that there is a problem with the regulation, where they know that there is the potential for someone to develop more towards problem gambling that they are powerless to really be able to do anything about it, even in terms of a reporting system which may then provide some professional intervention in some way. But, again, as I said, it is a tricky area because you need to recognise that there would be invasion of privacy -

**CHAIR** - That's right.

**Ms STRUGNELL** - and all sorts of things that would have to be considered.

**CHAIR** - You mentioned that you considered the inspectorate were under-resourced.

**Ms STRUGNELL** - Indeed.

**CHAIR** - What numbers are we looking at now and what would you presume would be a good coverage?

**Ms STRUGNELL** - At the moment as a result of the June 2000 report we were looking at seven inspectors in Launceston and six inspectors in Hobart, one of whom was part-time. I am aware that there have been two temporary positions filled at Wrest Point since that time. I'm also aware that another one of their inspectors has undertaken part-time work as from this week, I understand. So they would be looking probably at an additional six or seven inspectors in each of the casinos bearing in mind that they do have the responsibility for the external venues as well as the *Spirit of Tasmania* and those venues are increasing rapidly, as you can see from the statistics.

**Mrs SUE SMITH** - It's interesting you're quoting the 2000 report. We were given information yesterday about 106 external gaming outside of the *Spirit of Tasmania* and the casinos now 106 venues 2 023 machines so an increase of six venues and an increase of 621 machines since that reported statistic.

**Ms STRUGNELL** - That just goes to show just how quickly this industry is growing but the staffing is not growing.

**Mr SQUIBB** - Are the inspectors based primarily at the casinos and then they move out from the casinos to the external venues? Have you any idea how often they would visit external venues?

**Ms STRUGNELL** - Well, they're out visiting external venues on a daily basis -

**Mr SQUIBB** - But how often do they get to each -

**Ms STRUGNELL** - How often each venue is visited no, I can't help you with that. I don't know.

**CHAIR** - The inspectors, I would presume, have to undergo specific training to the role that they have to operate and what they have to operate under.

**Ms STRUGNELL** - They do indeed, yes. They are currently employed under an agreement. They are classified as administrative and clerical employees. But they do undertake specific training to undertake their role. Plus of course there is ongoing training on a constant basis in regard to the knowledge of the rules of the gambling games. That is an ongoing because new games are being introduced all the time. So that occupies also a large part of their time, being that they need to be the ones who know every rule in the book as far as gambling games are concerned. So it is not just going out and visiting venues and ensuring that breaches are not under way in those venues or whatever. Their days are also taken up with training, particularly in relation to the rules of games.

**Mr SQUIBB** - You make mention in your submission of the hours of operation. Obviously for the training part, that is fairly straightforward but from the point of view of the actual inspectorial roles and need to be there when the venues are at the greatest time of business, do you have anything further to comment?

**Ms STRUGNELL** - Yes, I would like to say that really was mentioned as another issue in relation to the current moves by Treasury to amalgamate licensing and gaming and the inspectors see a real - whilst that is an amalgamation although the new structure has been put on the backburner a bit. It fell over a bit I believe in January when the person employed to come in and oversight that amalgamation left virtually within three weeks of his employment beginning. But to the concerns that are really being highlighted there, the fact that should there be that amalgamation of licensing and gaming, that there have been suggestions that the gaming hours or the hours worked by the inspectorate particularly, for them to align with the licensing hours which is a 9 a.m. to 5 p.m. Monday to Friday regime. What we are pointing out there is should this amalgamation go ahead? There are good reasons why perhaps it should and they are not adverse to the amalgamation. Just that these sort of things need to be kept very much in mind, that you cannot turn the gaming inspectorate into a nine to five Monday to Friday job. Obviously weekends would be a time when they would need very much to be available and at night. At the moment of course they are shift workers and they do cover the hours be it all very thinly.

So that really in terms of the nine to five issue, the hours issue was really an expression of concern that should the amalgamation go ahead, there should not be a question that gaming fall in line with licensing.

**Mr SQUIBB** - Another example of conflict or possible conflict of interest.

**Ms STRUGNELL** - Indeed so.

**CHAIR** - They would not be able to fulfil their job or their role in any way, shape or form.

**Ms STRUGNELL** - No. I would say some of their busiest times would be after 5 p.m. of a night and at weekends.

**CHAIR** - Yes. You commented a couple of times about the increases in gaming and you comment in your submission that the increases in gaming have shown a need for more, the potential for more people to be involved in the inspecting role. You have given us some details of some numbers there. How much more do you think we need to expand that role or not only the role but the numbers? I think you were alluding more to numbers.

**Ms STRUGNELL** - Yes, that is exactly right. I think the role itself, apart from the frustrations that I have voiced in terms of there being some proactive intervention if there is a role there for the inspectorate indeed. We are concentrating more on the numbers. We have had the evidence in terms of just what the increase in machines and venues has been in less than 12 months - in fact more than that; in about two years, I beg your pardon. Less than two years. But the numbers themselves, the numbers that we have cited in our submission here that stood at June 2000 have not moved at all, I would say, since about 1996.

**CHAIR** - They have not moved?

**Ms STRUGNELL** - No, and I am just recalling now because I used to represent the inspectors back in 1996. But those same numbers would have been existing then, so we have not had any increase at all in that particular area, that inspectorate, in about six years, and when you measure that against the marked increase in the number of venues and the number of machines, bearing in mind that these machines take up a lot of time too in terms of calibrations and all sorts of things -

**CHAIR** - And the inspectors oversee that operation, do they?

**Ms STRUGNELL** - They do indeed.

**CHAIR** - Hence the need for understanding.

**Ms STRUGNELL** - Yes. They have a very extensive role already in terms of what they do, but they need more numbers on the ground in order to be able to do it adequately. And the impact of the work that is required now from the number that are employed is having quite an impact in terms of people's health.

**CHAIR** - Yes, you comment that the resources are not available because of illness and you are not getting extra people on the ground.

**Ms STRUGNELL** - That is right. It is a highly stressful job, and when you couple that with the fact that it is shift work as well, it has enormous impacts on family life and on people's ability to be able to just keep going, and the frustrations that go with knowing they do not have enough people to cover the venues as often as they should. Even though I cannot answer your question in terms of how often, as often as they feel that they should.

**CHAIR** - It is interesting your brief comment on the role of an inspector. It is so broad-ranging. It is almost as if it is a job more for a couple more people on each inspector.

**Ms STRUGNELL** - Oh, well and truly. Yes indeed. I have just thrown a figure into the air of almost doubling the inspectorate, but whether indeed as time goes on that would even be adequate, I do not know.

**Mr SQUIBB** - Are you the proper or correct person to ask or would this question be more appropriately asked of the department in relation to the regularity of their inspection of the various premises?

**Ms STRUGNELL** - I would say that would be better asked, yes, of the department, or whether or not there is a requirement through the commission itself as to how often the venues should be inspected, bearing in mind I think that I did cite - yes, I was just looking at the functions of the commission of the ones that I have cited, and in looking at the approval of controls, procedures, rules and conditions relating to gambling probably the frequency of venue visits may well come under the auspices of the commission itself as a requirement under the Gaming Act.

**CHAIR** - I would just like to dwell a little bit more on the role of the inspector, in particular with your comment on the active intervention with problem gamblers. Not only how appropriate, but how often is that a role, because I mean you have so few on the ground? How can it be feasibly possible for these inspectors to actually intervene? With the numbers that we are being told are out there as problem gamblers, it must be very limited, and does that reflect the percentage figure of problem gamblers that we get in statistics?

**Ms STRUGNELL** - It is a vicious circle.

**CHAIR** - It is a vicious circle there, and I am just trying to get a handle on their role in this and the end result that we see with the percentage numbers of perceived problem gamblers.

**Ms STRUGNELL** - At the moment, as I have stated, they do not have an intervention role. There is no way, if one could feasibly be developed, that that role could be undertaken with the number that are currently available.

**CHAIR** - On the ground.

**Ms STRUGNELL** - Yes. I know when I was preparing this submission that the phrase, there are statistics and statistics, kept running through my mind because, as we all know, statistics are there to say what -

**CHAIR** - Say what you want them to say.

*Laughter.*

**Ms STRUGNELL** - Yes indeed. Any statistics that currently go to problem gamblers, depending on how that is being reported, whether it is just knowledge through the

commission or through the casinos themselves or through the Department of Treasury and Finance, may well not be a true reflection of the depth of problem gambling simply because there are not the people with the role to identify it. So it may be a bit of hit and miss in terms of how it is estimated at the moment.

**CHAIR** - So I must have misunderstood at that point what you were commenting on. An inspector does not have an intervention role.

**Ms STRUGNELL** - Does not have intervention role. That is where the frustration is at the moment. They are on the premises but they do not have that.

**CHAIR** - Do they think they should have an intervention role?

**Ms STRUGNELL** - They think there should be more ability for more proactive intervention. Whether that be via the inspectorate themselves or whether because of the nature of the problem, the delicacy of how you would handle it, whether it would be via another arm, I do not know.

**Mr SQUIBB** - They would probably have an indirect role from the point of view of if the problem gambler was abusing the number of times that they could gain access to cash.

**Ms STRUGNELL** - Oh yes, indeed so. Where there is a breach by a problem gambler then there is an intervention role and that would be mainly through the venue operator in ensuring that the issue of cash or people who are barred entering premises or whatever, that that does not occur. But I think the main concern that is being stated here is the frustration of being in a position to be able to identify where there is a potential problem that is starting to emerge, particularly with young people. I do not know that age makes any difference but where they can see, as they visit the venues, they know the venue operators, they hear the stories of Joe Blow or Mary Bloggs or whatever who are developing into problem gamblers. But unless they breach the legislation there is no power really to intervene at that stage.

**CHAIR** - There is no protection either.

**Ms STRUGNELL** - Or unless they bar themselves.

**CHAIR** - Yes.

**Mr SQUIBB** - I guess under their current work practices as we understand it, that is more likely to occur at the two casinos because of their permanent presence there -

**Ms STRUGNELL** - That is correct.

**Mr SQUIBB** - than what we understand to be infrequent visits to the off-casino sites.

**Ms STRUGNELL** - That is right and the two examples I cited today ironically both have been from external venues, not from the casino. So yes, there probably is more opportunity where it is occurring or would be seen to be occurring in casinos. But it is the external venues where it could be seen, could be the breeding ground for potential problem gamblers.

**CHAIR** - I am just looking at my highlighted areas; I think you have covered them particularly well. I think I have come to a conclusion that one of your main concerns is the role of the head of the Gaming Commission.

**Ms STRUGNELL** - Yes.

**CHAIR** - The second one would be the lack of numbers of inspectors to properly police -

**Ms STRUGNELL** - That is right.

**Mr SQUIBB** - The increase has not been commensurate with the increase in venues.

**Ms STRUGNELL** - Not at all, and really our initial submission was just to set the background for adding to that today.

**CHAIR** - Yes, you have added to that today, that is certainly right.

**Mr SQUIBB** - One of the first submissions to address those terms of reference further down the list, number wise, not important wise, but number wise. I have really appreciated the opportunity.

**CHAIR** - I know we are certainly running very early with this. But I think perhaps it will give you an opportunity in conclusion if you would like to personally round up your concerns in a nutshell for us which would be very useful and if you have any suggestions I would be appreciative if you would add those into your concluding remarks.

**Ms STRUGNELL** - One of our major concerns is, as I've stated, by looking at the responsibility of the Gaming Commission, the responsibility for the functions of the head of agency and the objectives of the Department of Treasury and Finance. We have concerns that there is potential for conflict of interest with the chairperson of the commission also being the head of Treasury and the head of an agency and we feel that in light of the examples of separation of power in other areas for the very reasons that we have concerns where the Forest Practices Board is separate from Forestry Tasmania, the steward functions is separate from Racing Tasmania and the Electricity Regulator is not answerable to Hydro, Transend or Aurora, similarly the Gaming Commission should be more independent from the Department of Treasury and Finance.

Secondly, in light of the big industry that gambling is developing into, the increase in external venues particularly, without there being a relative increase in the resourcing of the inspectorate staff we think that the incidents of breaches of gambling are set to increase simply because there are not enough people able to be properly on site to ensure that those breaches don't occur.

I have cited the sort of breaches that the inspectorate staff start off with initially in terms of the use of unlicensed staff in venues, the operation of venues out of hours and leaving venues unattended, the sort of work that they do before the statistics are actually produced by the commission that says there may have only been 12 or 13 or 14 breaches this year, that those statistics are not properly reflective of what goes before it finally becomes a reportable statistic by the commission. That then is connected again to the

need for additional resourcing in the inspectorate staff when you understand what goes on behind the scenes in terms of properly ensuring that venue operators are complying with the legislation.

**CHAIR** - Would you suggest that all those minor breaches before the final breach submission goes to the commission should be part of the statistical gathering?

**Ms STRUGNELL** - I think most definitely that in order for everyone involved to get a better picture of the sort of incidents, the number of breaches in the gambling industry that those statistics most certainly should be there and be a reportable statistic as part of a report. Most definitely, otherwise you're only seeing a third of the iceberg.

**CHAIR** - It would give a truer picture, wouldn't it?

**Ms STRUGNELL** - That's right.

My suggestion in relation to the chairperson of the commission is that there is an appointment of somebody who's not connected with Treasury as the chairperson and in fact I don't think that Treasury should have any place on the Gaming Commission. It should be a totally independent and separate entity.

In terms of the increasing role of the inspectorate, we've discussed the delicacy of how that could be approached and it may be of value to possibly talk to the people involved in relation to whether or not they can offer the suggestion in terms of what would be appropriate intervention. Because only they are the ones who know -

**CHAIR** - They've been on the ground, haven't they?

**Ms STRUGNELL** - how it comes to them, how they become aware of it and all of that would need to be taken into consideration before putting in that layer or becoming more proactive in the intervention to ensure that breaches of confidentiality, privacy and all of that sort of thing are properly accounted for in any proactive intervention role.

In terms of the resourcing, I say quite simply that these statistics speak for themselves and I think there should be a recommendation that the inspectorate staffing is most definitely increased in line with the increase in venues that have been highlighted in the submission.

**CHAIR** - All right then. Thank you very much for all that. That is very worthwhile information and, as Mr Squibb said, has given us a few other issues to consider in this whole matter. If any of the members of the committee come up with any more questions I am sure that you would be able to give us those sorts of advice and answers.

**Ms STRUGNELL** - Indeed so. Thank you for the opportunity.

**CHAIR** - Thank you, Sue.

**THE WITNESS WITHDREW.**