



Dorset Gardens Hotel Compliance Report

Onyx Gaming Pty Ltd

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1. QUALIFICATIONS OF EXPERT

- I am the Compliance Officer for Onyx Gaming Pty Ltd, a position I have held since December 2024. Prior to this, I was the Senior Compliance Manager at Crown Casino. I have 22 years of experience in the gaming industry with a strong focus on best practices for the provision of Responsible Gaming.
- I am responsible for conducting audits on venue's provision of the Responsible Service of Gambling, ensuring that they are not only fully compliant with all legislation but that they also align with the industry's best practice.
- Additionally, I provide training to venue staff in Responsible Gaming legislation and procedures, I conduct this training across the state, adjusting the sessions to the needs of individual venues.
- In my role at Onyx Gaming, I conduct Anti Money Laundering and Counter-Terrorism Financing (AML/CTF) Program independent reviews for venues, ensuring full adherence to the AML/CTF Act.
- Whilst employed at Crown, I was the key liaison with the Victorian Gambling and Casino Control Commission (VGCCC), reporting incidents and breaches and assisting them with their investigations.
- Additionally, I played a key role in the implementation of Crown's AML/CTF Program, being the Project Manager for the initiative.

2. INSTRUCTIONS

- I have been engaged by DG Hotel Pty Ltd (**the client**), the operator of Dorset Gardens Hotel (**the Venue**) to review the proposal to introduce an additional eight (8) Electronic Gaming Machines (EGMs) at the Venue.
- To ascertain what potential impact the additional 8 EGMs might have on the community, I have reviewed the Venue's Responsible Service of Gaming (RSG) and AML/CTF practices, interviewed staff and reviewed the Venue and proposed renovation plans.
- I visited the Venue on Five (5) different occasions Tuesday 19 August¹, Friday 22 August², Sunday 24 August³, Wednesday 27 August⁴ and Thursday 28 August⁵. This allowed me to observe customers and Venue staff across various peak and off-peak times.

¹ 10:00 – 11:00 am

² 20:11 – 21:12 pm

³ 15:36 – 16:02 pm

⁴ 13:00 – 14:00 pm

⁵ 10:00 – 12:00 am

3. FINDINGS – EXISTING VENUE

3.1. LOCATION

- The Venue is located at 335 Dorset Road in Croydon, Victoria and is part of the Maroondah Local Government Area (LGA)
- The Venue is in a mostly residential area with very little foot traffic

The maximum number of permissible Gaming Machine Entitlements for the Maroondah LGA is 759, 640 of which are allocated.

- The current density of gaming machines per 1000 adults in the Maroondah LGA is 6.9. If the Venue is successful in their application this rate will remain the same.

3.2. RESPONSIBLE GAMBLING POLICIES, DOCUMENTATION AND SYSTEMS

- I conducted an audit of the Venues Responsible Gambling practices, policies and documentation on Thursday 28 August. Additionally, I covertly observed the Venue staffs RSG on Friday 22 August from 20:11 to 21:12 and Sunday 24 August from 15:36 to 16:02.
- The Venue has adopted the Leigh Barrett & Associates Code of Conduct and the Australian Hotels Association (Victoria) Self Exclusion Program.
- Copies of the code in a variety of languages were on display at the cashier. The code is also available online on the Venue's website.
- The Venue also receives regular Responsible Gaming audits and training from Leigh Barrett & Associates.
- The Venue's Responsible Gaming Register had multiple entries for each day containing full details of all incidents and interactions.
- All other registers including Key logs and unclaimed winnings were filled in fully and correctly.
- The Venue displayed Responsible Gaming signage throughout the gaming room and bathrooms and brochures were available at the cashier, entrances and through the room.
- The Venue has implemented an hourly checklist that requires a signoff acknowledgment of RG interactions and Transaction Monitoring.
- The Venue has a draft Harm Minimisation policy that has not yet been finalised. The Venue Owner estimates that 75-80% of the policy has been implemented at the Venue, with the remainder to be implemented upon finalisation of the policy.

3.3. AML/CTF Program, Independent reviews, Annual compliance reports

- The Venue has an AML/CTF Program supplied by Leigh Barrett and Associates. It was last updated September 2023.
- The Venue's risk assessment was last updated August 2024 and rates the Venue as 'Medium- High'.
- The program was last independently reviewed in March 2025. The review found that 'The program reflects and complies with the current rules.' And 'The program is being implemented as required to ensure an effective and compliant program'.
- Monthly and six-monthly Anti-money Laundering (AML) Compliance reports are sent to senior management. These reports include details of Suspicious Matter Reports (SMR) completed YourPlay checklist, completed Victorian Gambling and Casino Commission (VGCCC) Venue checklist, staff acknowledgments of their understanding of the AML/CTF requirements and details of multiple cheques issued.
- During my time at the Venue, I was able to witness the process for a cheque issued under \$10k. The Venue Manager conducted proper Due Diligence including a review of CCTV to ensure verification of play.
- Additionally, I reviewed various Know Your Customer (KYC) and Enhanced Customer Due Diligence (ECDD) documentation. The Venue records relevant information about customers that receive ten (10) or more cheques in a month including occupation and details of any recent changes in behaviour.
- The Venue does not currently have anyone on their High-Risk Register. A review of multiple cheque recipients, large wins and other documentation did not reveal any potential High-risk customers.

3.4. STAFF TRAINING & KNOWLEDGE

- Training is provided by both Leigh Barrett and Associates and the Gambler's Help Venue Support Worker.
- I reviewed the training records and confirmed that all staff are up to date with Responsible service of Alcohol, Responsible Service of Gaming, Anti-money Laundering and YourPlay training.
- Floor staff interviewed had a very good understanding of the Yourplay Program and how to assist customers.
- Through my covert observations I witnessed the staff interacting with customers on the gaming floor and looking for signs of Gambling Harm.
- I was instructed that the Venue always operates with a minimum of two licensed staff on the gaming floor with additional staff during peak times. During my visits to the venue, I observed a minimum of three licenced staff within the gaming floor

- At least one of the staff is rostered to patrol the gaming floor, interacting with and assisting customers and looking for signs of gambling harm.

3.5. FACILITIES

- The gaming room makes up only a small part of the Venue's footprint which offers a wide range of non-gaming entertainment options. These options can provide customers with break in play away from the gaming room.
- The Venue has a Bistro that seats 350 people and currently serves approximately 7,400 meals per week.
- Additionally, the Venue has a function centre, Sports bar, beer garden, nightclub and a 45 room Motel.
- The Venue provides a variety of entertainment with live acts every Friday night, monthly morning melodies and weekly trivia, pool and poker competitions.
- The Venue contains multiple lounge areas where customers can take a break from gaming.
- The location of the gaming room is sufficiently separated from the Hotel's non-gaming related entertainment areas so that customers need to make a conscious choice to use the gaming facilities.
- The main entrance to the gaming room is monitored by a receptionist, the sports bar entrance is monitored by a security guard during peak times, and the Bingo entrance is monitored by the licenced staff member assigned to the cashier position.
- This level of monitoring greatly mitigates the risk of minors, self-excluded or undesirables from entering the gaming area.
- The Venue runs a loyalty program where customers can get discounts on food and beverages and earn entries into draws from visitations. The loyalty program does not allow for points accrual from Gaming.
- The Venue has a designated bar service area for customers to obtain refreshments; this creates an environment where customers can step away from the EGM and take a break. The Venue staff then call them when their food is ready. This not only allows for a physical and mental pause from continuous gaming but also encourages greater interaction with Venue staff.
- From my review of the Dorset Gardens Hotel practices in the Responsible Service of Alcohol and Responsible Service of Gaming, I am confident that the RSG obligations of the Gaming Room would be met. In particular:
 - Management commitment to always going above and beyond the industry expectations.
 - Thoroughness of record keeping and maintenance of the RG Incident Register.

- Developing strong relationships with regular customers and a genuine care for their wellbeing.
- The Venue's commitment of engaging with new customers and building rapport.

3.6. CUSTOMER ENGAGEMENT

- The Venue has a strong philosophy of customer engagement and endeavour to ensure that all customers are greeted upon entry or when seated. Staff are also instructed to interact with customers at least once a day, letting them know about the Food and Beverage options available.
- The Venue has at least one licenced employee rostered to the gaming floor each shift, this employee is expected to engage with every customer as well as monitor for signs of gambling harm and to intervene where necessary. The employee will also encourage regular breaks in play for any customers that have extended play sessions.
- The Gaming Manager reports that any changes in behaviour for regular customers are recorded and escalated where necessary. During my review of AML/CTF documents, I was able to witness a report related to a multiple cheque recipient that included an attestation from staff that no changes in behaviour had been noticed.

3.7. POSITION OF EGM AND CASHIER/BAR

- The bar/cashier area in the gaming room is well situated with a clear view of the two main entrances.
- The Greenline covers all the bar area allowing for Venue staff to serve customers without leaving it. This aligns with industry best practice.
- EFTPOS facilities are available for customers to get cash out; these are activated by the reception staff and are located near the reception area, outside of the Greenline as per legislation

3.8. LIGHTING (ARTIFICIAL AND NATURAL)

- There is a good amount of natural light coming through the windows and entrances. The use of frosting and screening reduces the ability for customers to see the EGMs from outside the Venue.
- The natural light is supplemented by additional lighting to ensure lux levels are met and that the Venue is brightly lit at all times.

3.9. CAMERAS – CCTV AND FACIAL RECOGNITION

- The current CCTV system has clear coverage of all gaming machines ensuring that all incidents are covered, any disputes can be resolved, and verification of winnings can be completed.
- The Venue is in the process of testing different Facial Recognition providers to ensure the best system is implemented. The Venue owner intends to place facial recognition cameras at all entrances to the gaming floor.

4. FINDINGS – PROPOSED RENOVATIONS

4.1. CHANGES TO GAMING FLOOR PLAN

- I have reviewed the renovation plans for the Venue and note that most additional machines will be in sight of the cashier/bar area.
- The Venue owner has stated that CCTV coverage for the additional machines will be provided by a combination of repointing existing cameras and adding new ones.
- The renovation plans include the addition of enhanced sound proofing to further reduce the sounds of gaming in non-gaming areas in line with current best practice
- The renovation plans also include an expansion to the bistro area to increase the seating to 450. As well as a new café area near the main entrance. They have committed 6.7 million to the renovations, with the modernisation of the interior and improved accessibility likely to attract more patronage to the food and beverage and function spaces.

5. INTERVIEWS

5.1. Venue Owner

- An interview with the Venue Owner, Joesph Scerri, revealed that he has a 'hands-on' philosophy with a strong emphasis on being present on the floor, not just in the office, to personally see "warts and all" and ensure RG obligations are lived in practice.
- He sees RG as ensuring entertainment is safe, responsible, and in an environment where customers feel monitored and supported if they cross into risky behaviour.
- He has a philosophy of going above and beyond industry best practice to ensure his Venues are ahead of current obligations and was able to give examples of practices that were implemented years before they became an industry requirement. An example of this is the Venue's practice of checking the YourPlay readers each morning. Not only did they commence these years before it was a state-wide expectation, but they go a step further by requiring their staff to encode a new casual YourPlay card in order to conduct the check. This not only ensures that all YourPlay readers are functioning but also ensures that there is an adequate supply of encoded cards, that the card printing equipment is working and that staff are proficient in the encoding process.
- The Venue Owner takes a whole-of-Venue approach (not just gaming), ensuring even vending machines and ancillary services have checks to prevent misuse. He sees AML compliance as a "day-to-day occurrence" in hospitality, treating it as normal business rather than a burden while acknowledging that AML risks will never be fully eliminated and continuous adaption is required.
- The Venue Owner spoke to ensuring sufficient staff levels so that staff can be present on the floor rather than over stretched, which allows for proactive RG and AML monitoring. He also employs more security than required, framing it as a preventative layer that supports RG/AML outcomes.

- My impression of the Venue Owner is that he is a visible, hands-on leader. He described how he spends his time in Venue, working in the kitchen, bar and gaming room to directly observe issues. This visibility reinforces to staff that compliance is a lived in priority, not abstract policy. He believes in education from the top and is willing to exclude problematic customers, even if it conflicts with commercial outcomes, showing staff that integrity comes before profit. He is adaptable and recognises that mistakes will occur but understands the importance of responding quickly and learning. This shows a commitment to resilience and continuous improvement.
- I believe the Venue Owner sees the Venue as an entertainment facility that offers gaming as a small part of its business instead of a gaming facility that also has other offerings.

5.2. Group Compliance Officer

- An interview with the Group Compliance Officer (GCO) revealed that she recognises that RG expectations had grown significantly over recent years and she sees RG as central to modern gaming operations. She balances profitability with customer protection, explicitly acknowledging that both must be managed together.
- The GCO believes staff should build rapport with customers so that conversation about gambling behaviour feels natural and effective. This also allows the staff to identify subtle changes in behaviour with regular customers.
- The GCO detailed the additional training provided to her staff, including how to deal with drug or alcohol effected customers and how to hold difficult conversations. She believes in ensuring her staff are adequately equipped to manage interactions responsibly and, in the customer's, best interest.
- The GCO notes that AML requirements were minimal earlier in her career but is now a major focus of her role. She explicitly rejects association with illicit funds, showing awareness of the broader community harm caused by money laundering. She believes that AML is not just a regulatory requirement but is a Venue's responsibility to prevent supporting unethical or illegal activity.
- The GCO has implemented a transaction monitoring process that combines RG and AML checks, evidencing an integrated approach and is investing in developing compliance software and structured checklists to keep track of obligations and staff training.
- My impressions of the GCO are that she is a proactive leader that is dedicated to compliance. The GCO created her role within the broader hotel group, when she saw a gap, showing initiative and ownership. The GCO has a strong ethical commitment and frames both RG and AML as protecting the customers and community, not just meeting minimum obligations.

5.3. Gaming Manager

- The interview with the Gaming Manager gave evidence of a strong culture of going above and beyond and ensuring that gambling is not negatively impacting lives.

- The Gaming Manager believes in knowing customer's habits and changes in behaviour is essential to identifying risks. They explained that new staff are immediately introduced to RG expectations from day one, particularly customer interactions.
- The Gaming Manager wants customers to leave the Venue happy, even if they do not win, reinforcing focus on a positive and safe experience. She sees the Venue as a comfortable place for customers to access support and for staff to have 'tricky' but important conversations.
- The Gaming Manager credits ongoing AML training as the reason staff can recognise suspicious behaviour and understands the importance of distinguishing between genuine suspicious behaviour and harmless customer preferences i.e. preferring to receive winnings via cheque even if it is below the \$2.000 threshold.
- The Gaming Manager acknowledged that it can feel "overwhelming" in a busy Venue but stressed the need to stay on top of monitoring.
- The Gaming Manager said that she feels well supported by upper management, citing good communication and collaboration. She finds expectations transparent, which helps her manager and lead her team effectively.

6.CONCLUSION AND RECOMMENDATIONS

6.1. LIKELY IMPACTS

- Following a thorough review of the proposal, it is my view that if the application for the introduction of an additional 8 EGMs at Dorset Gardens Hotel is successful, in terms of harm minimisation it will have negligible impact on the prevalence of problem gambling in the local area. and any risks that arise would be managed responsibly and in accordance with the law.
- I base this on:
 - The presence of a broad and significant range of other activities for customers at the Venue, monitoring of the gaming room entrances and good visibility of the gaming area from the cashier.
 - The commitment of the director to his RSG obligations as evidenced by interviews and the effort already expended in the development of policies, checklists and RSG plans. The Dorset Garden's Hotel track record of a commitment to compliance as evidenced by my site visits and interviews with key personnel.

The strong culture of customer/staff interactions, building rapport and monitoring for observable signs and changes in behaviour.

6.2. RECOMMENDATIONS

- To ensure that the Venue is a leader in the field of RSG, I recommend the draft Harm Minimisation Policy created by Leigh Barrett and Associates be updated and fully implemented prior to the commencement of the renovations.

- I recommend that the updated Harm Minimisation Policy include;
 - A clause stating the minimum staffing levels for the gaming floor will be no less than two (2) licenced staff within the gaming area during off-peak times and no less than three (3) licenced staff within the gaming area during peak times;
 - A clause stating that all staff will receive annual YourPlay training; and
 - A clause stating that any breaches of the Harm Minimisation Policy will be recorded in a register and made available to the Regulator upon request.

I recommend that the Harm Minimisation Policy be made available on the Venue's website once finalised and implemented.

6.3. SUMMARY

- The review has highlighted that the proposed operator is committed to a best practice approach to responsible gambling, harm minimisation and customer care. A culture of not just compliance, but of best practice is well embedded with in attitudes and values of upper management to be commended.
- I am confident that if the operator is successful in obtaining a license to operate the additional 8 EGMs, the Venue's management have the experience and expertise to mitigate any RSG issues that may arise, and that gambling at the hotel would occur in a safe and responsible manner.



Elizabeth Mackintosh
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29 August 2025