

# Corporate plan

Victorian Gambling and Casino Control Commission 2024–25

## ACKNOWLEDGEMENT OF COUNTRY

THE VICTORIAN GAMBLING AND CASINO CONTROL COMMISSION ACKNOWLEDGES ABORIGINAL PEOPLE AS THE TRADITIONAL CUSTODIANS OF THE LANDS, WATERS AND SKIES OF VICTORIA, AND ACKNOWLEDGES AND PAYS RESPECT TO THEIR ELDERS, PAST AND PRESENT.

WE RESPECT THE CONTRIBUTIONS ABORIGINAL AND TORRES STRAIT ISLANDER INDIVIDUALS AND COMMUNITY GROUPS HAVE MADE AND CONTINUE TO MAKE TO OUR SOCIETY AND RECOGNISE ONGOING CONNECTION TO, AND CARE FOR, COUNTRY.

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VGCCC Corporate Plan 2024-25

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# Foreword



As Victoria's independent gambling regulator, we are clear on our commitment to ensuring the industry complies with its regulatory obligations and operates safely, fairly, and free from criminal influence. Ensuring integrity, safety and fairness for all has been our Purpose from the very start. It remains as relevant as ever and will continue to guide the decisions we make every day.

Our Purpose can only be brought to life when it is paired with Strategic Ambitions that provide clarity on the long-term outcomes we are aiming for. *Our Strategy*, released in 2022, set out our 3 overarching Ambitions that guide the activation of our Purpose – to be renowned for regulatory excellence, provide an exceptional employee experience, and have a fit-for-purpose operating model.

The 2024-25 Corporate Plan sets out what we want to achieve during the current financial year to further progress our Purpose and achieve our Strategic Ambitions.

While there continues to be key government reforms and projects we must implement and support, the 4 Enterprise Priorities outlined in this Plan remain critical areas of focus.

**OUR ACHIEVEMENTS HAVE BEEN NOTICED – BY GOVERNMENT AND VICTORIANS. WE ARE DETERMINED TO REMAIN FOCUSED ON REALISING THEIR EXPECTATIONS FOR MORE EFFECTIVE REGULATORY OVERSIGHT OF VICTORIA'S GAMBLING INDUSTRY.**

One of those Priorities is to continue the transformation and embedment of our risk-based and intelligence-led Regulatory Approach. This will:

- allow us to use strategic, data-driven methods to target our regulatory efforts and resources on those activities, practices or issues that pose the highest risks or threats to community safety or to the integrity and fairness of the gambling industry
- continue to improve our overall effectiveness as a regulator and ensure that our regulatory efforts are both proactive and responsive.

We have made significant progress in delivering on our Purpose and achieving our Strategic Ambitions since our inception.

Our achievements have been noticed – by government and Victorians. We are determined to remain focused on realising their expectations for more effective regulatory oversight of Victoria's gambling industry.

As the VGCCC continues to transform and become a world-class regulator, this Corporate Plan will ensure we stay on course. I am confident the professionalism and dedication of our staff will enable us to deliver on these Priorities.

**Annette Kimmitt AM**  
Chief Executive Officer

December 2024

# Purpose

Our Purpose is to ensure integrity, safety and fairness for all

This is our call to action – what we want to achieve for Victorians. It’s why we exist, and it guides how we work and the decisions we make.



## INTEGRITY

We want Victorians to have confidence that the gambling industry is well regulated. That it’s being run honestly, free from criminal influence and exploitation. And that we hold operators to account on both their legal and social licences to operate.



## SAFETY

We keep a close watch on gambling operators through a lens of monitoring and minimising gambling harm. We boldly apply and direct our powers to those who are not keeping people as safe as possible.



## FAIRNESS

We will not allow people – especially those vulnerable to gambling harm – to be unfairly targeted, whether that’s through addictive play features, uneven playing odds or high concentrations of gaming machines. And we want the community to be informed so they can make responsible choices.

# Values

Our Values reflect our commitment to work, how we act, make decisions and behave as an organisation and regulator – these are our shared beliefs about what we do and how we do it.



Act with courage



Make it happen



Work together



Respect other people



Act with integrity

# Strategic Ambitions

## We will be renowned for regulatory excellence in:

- Protecting people from being harmed by gambling.
- Ensuring a fairer gambling industry and better-informed consumers.
- Keeping the industry free from criminal influence and exploitation.
- Enabling and holding accountable those we regulate to deliver on both their legal and social contracts with the community.
- Continuously improving gambling regulation.
- Decision making that is grounded in independence from those we regulate and a deep understanding of the gambling industry.
- Providing clear expectations and acting with fairness and responsiveness to those we regulate.

## We will be renowned for providing an exceptional employee experience built on:

- Enabling each person to derive a deep sense of purpose in their work, and that they are making a meaningful contribution towards ensuring the integrity, safety and fairness of the gambling industry.
- Supporting wellbeing, psychological and physical safety, through an inclusive and values-driven culture.
- Encouraging career progression and providing clarity on the skills and capabilities needed to succeed.
- Delivering highly effective learning and development through on-the-job experiences, coaching, mentoring, and formal learning that creates a sense of achievement.
- Ensuring people feel valued for their contribution.

## We will have a fit-for-purpose operating model, which encompasses:

- Developing a sustainable funding model that ensures sufficient resources to regulate effectively, the ability to continually develop our people, and the ability to harness technology and data to improve systems and processes.
- Working together in cross-functional multi-disciplinary teams, enabled through technology, data and intelligence to drive innovation, efficiency and effectiveness in our regulatory approach.
- Forming deep strategic relationships and alliances that turbo-charge our ability to achieve our Purpose.
- Understanding and managing our risk in line with our risk appetite in ways that optimise our performance.

# Minister's expectations of VGCCC

## Statement of Expectations

The Statement of Expectations (SOE) for the Victorian Gambling and Casino Control Commission (VGCCC) sets out the Minister's expectations of our contribution to the government's priorities as well as the Minister's expectations for improvements in our performance.

On 27 June 2024, the Minister issued the VGCCC with a 2-year Statement of Expectations containing 10 initiatives that apply until 30 June 2026. The expectations listed in the following table are far reaching and reflect the complex nature of gambling regulation.

The table shows the high-level expectations outlined in the Minister's SOE and illustrates how the VGCCC is acquitting each expectation as an organisation. The Minister's full SOE is available on the VGCCC website. We will report on our progress against these expectations in our annual report.

Minister's Expectation	Expectation met by:
Towards best practice	<p>VGCCC has addressed all 10 principles of Better Regulation Victoria's recently published guide for regulators, Towards Best Practice: A guide for regulators.</p> <p>Design of our new Regulatory Approach has been developed with reference to the 10 principles.</p>
Building strong, collaborative relationships	<p>VGCCC will continue to engage with a range of stakeholders including:</p> <ul style="list-style-type: none"> <li>• The Department of Justice and Community Safety on policy and legislative matters, emerging issues and new major licensing processes.</li> <li>• Knowledge, Research and Evaluation branch of the department on gambling research.</li> <li>• Harm reduction bodies and individuals on our approach to harm minimisation.</li> <li>• Technical Reference Group (run by the department) on operationalising core gambling reforms.</li> <li>• Industry peak bodies on emerging issues and intelligence, systemic compliance issues, reform implementation and other regulatory changes.</li> <li>• Crown Melbourne on its ongoing transformation.</li> <li>• AUSTRAC and Victoria Police to share intelligence.</li> <li>• Racing Victoria and the Victorian Bookmakers Association on patron complaints against bookmakers.</li> <li>• Responsible Wagering Australia and wagering providers on their ongoing compliance obligations, including to implement the prohibition on betting on minors.</li> <li>• Tabcorp on emerging issues and implementation of its VGCCC-directed transformation and regulatory compliance uplift.</li> <li>• the Monitoring licensee on the delivery and maintenance of the Central Monitoring and Control System for EGMs and the state-wide pre-commitment scheme, YourPlay, ensuring the timely provision of information on system issues and data to support both venues and the VGCCC in undertaking our regulatory activities.</li> <li>• Other major licence holders on emerging issues and intelligence, compliance issues, reform implementation and other regulatory changes.</li> </ul> <p>In 2024-25 VGCCC will commence development of a licensee management framework for major licensees to manage our relationships with licensees and peak bodies and improve the regulatory maturity of those entities.</p>

<b>Building a robust and modern industry through a risk-based approach to regulation</b>	<p>VGCCC will continue its Regulatory Transformation that will deliver a new Regulatory Approach that is risk-based and intelligence-led, whereby our regulatory efforts are directed toward detecting and preventing activities or practices that pose the highest risks or threats to community safety or to the integrity or fairness of the gambling industry.</p> <p>In 2024-25, amongst other things, we are:</p> <ul style="list-style-type: none"> <li>Operationalising our new Intelligence Strategy to improve data capture, environmental scanning, relationship building, dissemination of intelligence, and feedback loops.</li> <li>Delivering an Enterprise Data Platform for all data used by the VGCCC with tools that enable analysis and the application of AI/machine learning across the data to identify emerging trends, threats or compliance issues.</li> <li>Implementing a single cloud-based technology solution (Compass) to enable regulatory processes and manage all regulatory matters.</li> <li>Developing a licensee management framework to improve the regulatory maturity of industry.</li> </ul> <p>VGCCC will continue to be mindful of the impact of regulation on the industry and work with government to ensure regulation is as streamlined as possible and encourages appropriate industry growth.</p>
<b>Continued rigour in regulation of the Casino</b>	<p>The VGCCC has commenced a 3-year project to monitor and report on Crown's implementation of the Melbourne Transformation Plan (MTP). In 2024-25 we will:</p> <ul style="list-style-type: none"> <li>Establish a dedicated Casino Audit Team to oversight Crown's implementation of the MTP.</li> <li>Establish the VGCCC's audit methodology for the MTP.</li> <li>Monitor Crown's implementation of the MTP, including testing and validating the completion of MTP programs and initiatives.</li> </ul> <p>Other business as usual work will continue to ensure we maintain our rigorous oversight of the Melbourne casino.</p>
<b>Ensuring compliance and preventing criminal activities</b>	<p>Under our Intelligence Strategy we will significantly elevate our relationships with Victoria Police and AUSTRAC, enabling mutually beneficial arrangements for data/intelligence sharing and transfer. Following identification of information gaps, we will leverage our relationships to seek additional data sets or law enforcement relationships necessary to fill those gaps.</p>

<b>Harm Minimisation</b>	<p>The Commission released its Position Statement on Gambling Harm in June 2023 which set out our intention to embed a harm minimisation focus into every element of our regulatory approach. Our Harm Minimisation Strategy 2023-25 has also been delivered.</p> <p>In 2024-25 we will deliver and embed:</p> <ul style="list-style-type: none"> <li>A Harm Minimisation Action Plan.</li> <li>A 5-year strategy to transform community and industry attitudes about gambling harm.</li> <li>Harm minimisation activities across our regulatory activities.</li> <li>a new VGCCC website to better meet the needs of the industry and the community.</li> <li>An Enforcement Framework that aims to deliver regulatory action proportionate to the risks posed and harm caused by non-compliance.</li> </ul> <p>VGCCC will participate in a Gambling Harm Interdepartmental Committee to enable the ongoing coordination of gambling harm prevention and response functions.</p>
<b>Educating industry to improve compliance</b>	<ul style="list-style-type: none"> <li>We will continue to deliver our 3-year Education Strategy through providing education resources, information sessions, stakeholder engagement, education campaigns and monthly newsletters. We reinforce these through our website, venue visits, social media, direct emails and correspondence.</li> <li>In 2025 we will develop and release publicly our monitoring priorities, to support industry-led regulatory compliance.</li> <li>In 2024 we will deliver our first strategic inquiry which has been designed to explore what the VGCCC can be doing to deliver better-informed regulatory responses and to inform the evolution of our Regulatory Approach. We have consulted key stakeholders including industry as part of the inquiry. We will also commence our second strategic inquiry in 2025.</li> </ul>
<b>Gambling harm prevention and campaigns</b>	<p>In 2024-25 VGCCC will commence development of a 5-year strategy to transform community and industry attitudes about gambling harm.</p>
<b>Advising the Minister</b>	<p>In 2024-25 VGCCC will develop and activate a regulatory reform strategy and plan. We are also preparing our position on the effectiveness and future needs of the Gambling Regulations.</p>
<b>Reporting and business planning</b>	<p>In 2024-25 VGCCC will commence development of a public reporting framework to provide transparency about VGCCC's performance and impact. The reporting framework will be designed to ensure we meet the 10 principles for good regulatory practice outlined in <i>Towards Best Practice: A guide for regulators framework</i> and the Minister's Statement of Expectations.</p>

# Enterprise Priorities for 2024–25

Our Enterprise Priorities define what we aim to deliver or achieve each year to make significant progress towards our Strategic Ambitions. In 2024-25 we have 4 high-level Enterprise Priorities:

- Embed the new Regulatory Approach
- Culture and capabilities uplift

- Realise the benefits of past operating model changes to our enabling functions
- Improve our approach to managing critical governance and risks matters

Each Enterprise Priority comprises various programs of work and projects and specifies the outcomes we aim to achieve through that Priority as shown in the table below.

1. Embed the new Regulatory Approach		2. Cultural and capabilities uplift		3. Realise the benefits of our past operating model changes to our enabling functions		4. Improve our approach to managing critical governance and risk matters	
Programs and Projects	Outcome	Programs and Projects	Outcome	Programs and Projects	Outcome	Programs and Projects	Outcome
Complete design work of our frameworks, processes, and standard operating procedures (SOPs).	A documented and standardised set of frameworks, processes and SOPs that will ensure consistent and contemporary practice across all elements of our Regulatory Approach.	Rapid interventions to 'wire in' as core competencies: <ul style="list-style-type: none"> <li>• Time and workflow management, and project planning and execution.</li> <li>• Critical thinking, structuring papers for an audience, and plain English writing.</li> </ul>	A significant uplift in our ability to: <ul style="list-style-type: none"> <li>• Deliver programs and projects on time, to budget and to quality expectations.</li> <li>• Proactively manage extenuating circumstances to mitigate delays and quality issues in our work.</li> </ul>	Finance and Business Services Division.	Transformed ways of working to deliver more efficient and effective services to the organisation. A fully compliant procurement model.	Embed frameworks, processes and standard operating procedures for properly managing VGCCC's compliance obligations and operational risks.	All VGCCC strategic and operational risks and compliance obligations identified and properly controlled.
Technology-enable the processes and standard operating procedures.	All VGCCC staff operating on a single, cloud-based regulatory technology platform – Compass (with some exceptions). A single, cloud-based enterprise data platform providing a single source of truth for all data.	Reframing cultural behaviours for all Values	Greater clarity for all staff on the acceptable behaviours of our target culture and improved performance management against those behaviours.	People and Culture Division.	Transformed ways of working to deliver more efficient and effective services to the organisation.	Agree and embed an approach to public reporting that provides transparency about VGCCC's performance and impact.	Improved public transparency over VGCCC's performance and impact.
Progressively embed the new Regulatory Approach.	Embedded and operationalised Intelligence Strategy and Enforcement Framework. Uplifting of staff understanding and capability for operating in accordance with the Regulatory Framework.			Legal, Policy and Compliance Division.	Transformed ways of working to deliver more efficient and effective services to the organisation and the Commission, including delivery of Tribunal support to the Commission.	Agree, activate and embed a 2-year Harm Minimisation Action Plan aligned with the overarching Harm Minimisation Strategy, and put in place related oversight, reporting and evaluation arrangements.	Significant uplift in the: <ul style="list-style-type: none"> <li>• Integration and prioritisation of harm prevention in all aspects of our Regulatory Approach and policy reform efforts.</li> <li>• Governance, transparency and impact of our harm prevention efforts.</li> </ul>
Transform the regulatory operating model and capabilities to deliver the new Regulatory Approach.	Clear and documented understanding of the regulatory and technical competencies required of our regulatory practitioners. Operating model redesign for Regulatory Operations divisions. Alignment of ways of working with the redesigned Regulatory Approach underway.			Information and Digital Enablement Division.	Significant uplift in the organisation's digital maturity.		
Develop and pilot a licensee management framework.	A tested framework and methodology for major licensee management to deliver improved compliance, using an evidence-based maturity model.						

# Divisional Priorities for 2024–25

Our Divisional Priorities are activities at a divisional level over and above our 'business as usual' activities, that are linked to government-directed regulatory reforms, are critical risk-mitigation priorities, or are critical enablers of the Enterprise Priorities.

Regulatory Operations	
Casino	Non-Casino Gambling
<ul style="list-style-type: none"> <li>Execute Crown Melbourne Transformation Plan Auditing Program</li> <li>Monitor compliance with PlaySafe Code of Conduct</li> <li>Monitor Crown's independence</li> <li>Develop framework for 7<sup>th</sup> periodic investigation</li> <li>Deliver government casino reforms, including mandatory carded play on table games</li> </ul>	<ul style="list-style-type: none"> <li>Complete 1<sup>st</sup> Strategic Inquiry</li> <li>New licence preparations for the Monitoring Licence and other major licences</li> <li>Deliver government non-casino reforms, including mandatory closure periods and mandatory carded play</li> <li>Technical implementations:               <ul style="list-style-type: none"> <li>Scope and implement removal of legacy VLC poker machines from hotels/clubs</li> <li>Wagering and Betting System Transition to new licence</li> <li>Poker machine protocol assessments and possible uplifts in preparation for Monitoring Licence renewal</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>Transform community and industry attitudes about gambling harm (5-year strategy)</li> <li>Technical implementations:           <ul style="list-style-type: none"> <li>Scoping predictive play intelligence/harm analysis systems</li> <li>Revamp gambling/expenditure data model to improve the quality of information and insight provided to the community</li> </ul> </li> </ul>	

Office of the Chief Executive Officer	Information and Digital Enablement	Legal, Policy and Compliance	Finance and Business Services
External website transformation	Security uplift	Develop and activate regulatory reform strategy and plan	Office relocation
Redesign non-casino cost recovery charge models	HR System upgrade (Chris21)	Develop and embed Integrated Risk Management system	
	Network upgrade	Implement evidence management system to support enforcement actions	
	Move on-premise applications to Azure		
	ServiceNow Optimisation		

# To ensure integrity, safety and fairness for all

## STRATEGIC AMBITIONS

### We will be renowned for regulatory excellence in:

- + Protecting people from being harmed by gambling
- + Ensuring a fairer gambling industry and better-informed consumers
- + Keeping the industry free from criminal influence and exploitation
- + Enabling and holding accountable those we regulate to deliver on both their legal and social contracts with the community
- + Continuously improving gambling regulation
- + Decision making that is grounded in independence from those we regulate and a deep understanding of the gambling industry
- + Providing clear expectations and acting with fairness and responsiveness to those we regulate.

### We will be renowned for providing an exceptional employee experience built on:

- + Enabling each person to derive a deep sense of purpose in their work, and in particular that they are making a meaningful contribution towards ensuring the integrity, safety and fairness of the gambling industry
- + Supporting wellbeing, psychological and physical safety, through an inclusive and values-driven culture
- + Encouraging career progression and providing clarity on the skills and capabilities needed to succeed
- + Delivering highly effective learning and development through on-the-job experiences, coaching, mentoring, and formal learning that creates a sense of achievement
- + Ensuring people feel valued for their contribution.

### We will have a fit-for-purpose operating model, which encompasses:

- + Developing a sustainable funding model that ensures sufficient resources to regulate effectively, the ability to continually develop our people, and the ability to harness technology and data to improve systems and processes
- + Working together in cross-functional multi-disciplinary teams, enabled through technology, data and intelligence to drive innovation, efficiency and effectiveness in our regulatory approach
- + Forming deep strategic relationships and alliances that turbo-charge our ability to achieve our Purpose
- + Understanding and managing our risk in line with our risk appetite in ways that optimise our performance.

## FY25 ENTERPRISE PRIORITIES

### Embed the new Regulatory Approach

- + Complete design work of our Frameworks, Processes and Standard Operating Procedure (SOPs)
- + Technology enable the processes and SOPs
- + Transform the regulatory operating model and capabilities to deliver the new Regulatory Approach
- + Progressively embed the new Regulatory Approach
- + Develop and pilot a licensee management framework.

### Culture and capabilities uplift

- + Rapid interventions to 'wire in' as core competencies:
  - + Time and workflow management, and project planning and execution
  - + Critical thinking, structuring papers for an audience, and plain English writing.
- + Reframing cultural behaviours for all Values.

### Realise the benefits of our past operating model changes to our enabling functions

- + Finance and Business Services Division
- + People and Culture Division
- + Legal, Policy and Compliance Division (including how to better support the Commission, both in Tribunal and as a Governance Body)
- + Information and Digital Enablement Division.

### Improve our approach to managing critical governance and risk matters

- + Embed frameworks processes and SOPs for properly managing VGCCC's compliance obligations and operational risks.
- + Agree and embed an approach to public reporting that provides transparency about VGCCC's performance and impact.
- + Agree, activate and embed a 2-year Harm Minimisation Action Plan aligned with the overarching Harm Minimisation Strategy, and put in place related oversight, reporting and evaluation arrangements.

## WHAT WE EXPECT FROM INDUSTRY

We expect industry participants to conduct themselves and operate in ways that go beyond their strict legal obligations, being mindful of both the legal and social contracts they have with Victorians. These expectations are essential foundations to the industry's ability to deliver sustainable benefits to Victoria.

### To ensure the integrity of the gambling industry, we expect industry participants to:

- + Act with integrity and be honest, trustworthy and transparent
- + Be accountable and cooperative
- + Understand their regulatory obligations and ask us if they're unsure

### + Comply with and uphold the spirit, not just the letter, of the law

- + Actively prevent and operate free from criminal influence or exploitation.

### To minimise the harmful impacts of gambling:

- + We expect industry participants to actively protect the community from potentially harmful impacts of gambling
- + This includes players/customers/patrons, employees and the whole community.

## REGULATORY POSTURE - WHAT INDUSTRY CAN EXPECT FROM US

### Licensing and other approvals

- + We help applicants to understand these expectations and obligations.
- + We evaluate applicants' ability and willingness to meet these expectations and obligations, using a combination of risk-based and targeted considerations.
- + We use and analyse intelligence, data and other forms of information, including consultations with a wide variety of stakeholders, to inform our decisions.
- + We conduct ourselves throughout the evaluation process professionally and are transparent in making clear the reasons for our decisions. We proactively work to reduce 'red tape' and conduct ourselves as efficiently as possible.

### Education and engagement

- + We help industry participants to deepen their understanding of these expectations and obligations through education, guidance and other resources.
- + We also inform and educate the community about our regulatory objectives, our expectations of the Victorian gambling industry and our regulatory approach and posture.

### Monitoring

- + We actively monitor industry participants' ability and willingness to meet these expectations and obligations, using a combination of risk-based and targeted approaches to encourage compliance and to detect non-compliance.
- + We use and analyse intelligence, data and other forms of information to inform and target our regulatory responses and decisions.
- + We are forward looking, continuously monitoring and analysing future and emerging issues and trends with the potential to impact the gambling industry and/or the prevalence of gambling harm. We work with industry participants to deepen our understanding of those emerging issues and trends, and with both industry participants and policymakers to ensure the Victorian gambling industry is responding appropriately.

### Enforcement

- + We conduct ourselves in our investigative processes and the resolution of enforcement matters efficiently and professionally, and are transparent in making clear the reasons for our responses.
- + We ensure that our regulatory responses are proportionate to the risks posed and harm caused by industry participants' failure to meet their obligations, taking into account the conduct of those participants. That includes their level of cooperation, their compliance history, and the extent to which they have proactively taken steps to rectify or remedy issues.
- + We support those who do the right thing.
- + We actively pursue and have zero tolerance for those who opportunistically or deliberately contravene their obligations and the law.

## SHAPING OUR CULTURE

Act with courage

Make it happen

Work together

Respect other people

Act with integrity



