

**Harm Prevention and Regulation**

# Office of Liquor and Gaming Regulation

**2024-25 Regulator Performance Report**

## Introduction

This report has been prepared to meet the Office of Liquor and Gaming Regulation's (OLGR) reporting obligations under the Queensland Government's Regulator Performance Framework and the Queensland Audit Office's Good Regulatory Practices Framework.

Regulation plays an important role in keeping Queenslanders safe by ensuring businesses and individuals act in a way that is consistent with legislative and community expectations. Excessive regulation, however, can be an impediment to business growth and innovation, especially where the regulatory burden is not proportionate to the issues that regulation is trying to address.

Our balanced and fair approach to regulation reduces harm by targeting high-risk licensee behaviours without imposing unfair regulations. Our regulatory framework is not fixed in time. It changes to meet emerging risks. A core set of principles underpins our approach:

- Transparency: we share our priorities, decisions and performance.
- Proportionality: our action considers differing levels of risk.
- Fairness and consistency: we act with integrity and do what we say we'll do.
- Respect: we value and invite the insights of our partners and industry.
- Excellence: we work with passion, pride and purpose, taking accountability for our actions.

# Model practice 1: Ensure regulatory activity is proportionate to risk and minimises unnecessary burden

## Supporting principles:

- a proportionate approach is applied to compliance activities, engagement and regulatory enforcement actions.
- regulations do not unnecessarily impose on regulated entities.
- regulatory approaches are updated and informed by intelligence gathering so that effort is focused on risk.

## Evidence to support alignment with regulator model practice

As a modern regulator, we understand that best practice regulation is risk-based, where limited resources are targeted to the highest risks and to initiatives most likely to prevent and/or reduce liquor and gambling harm. Across 2024-25, we actively engaged with industry and our customers as part of our commitment to continuously improve our processes to achieve the Queensland Government's policy objectives.

Our risk-based approach included the following activities:

- we incorporated risk assessments into our processes for licensing application and approval, probity, compliance, and enforcement. Our annual compliance audit plan (see below) and venue control plans were risk-based.
- our Compliance and Enforcement Policy included a risk-based compliance posture and associated hierarchy of escalating interventions that are proportionate to the risk posed by licensees.
- we adopted a behavioural change approach, where we recognise that the compliance of licensees is a function of several factors. We helped licensees to move toward full compliance through a tailored suite of interventions from education and advice to enforceable undertakings and legal prosecutions.
- our Technical Unit adopted a risk-based approach to gaming equipment evaluations and accepts self-certification for lower-risk evaluations to remove unnecessary burden.
- we implemented reduced requirements for extended-hour permits for licensees.

The foundation of our compliance approach is educating, and engaging with, licensees to ensure a shared understanding of roles and obligations that drive a culture of sustainable, prosperous, ethical business practice.

We liaised with industry, licensees, applicants, peak bodies, and members of the community who have experienced, or supported those vulnerable to experiencing, harm from gaming. We looked at better ways to communicate so that our customers understand government requirements. We collaborated closely with co-regulators and other government agencies for a multi-faceted approach to mitigating potential risks to the community.

We commenced identification and prioritisation of regulated venues presenting a higher risk of gambling harm for compliance activities, through a multi-factor assessment considering:

- number of electronic gaming machines.
- number of excluded patrons.
- compliance and harm minimisation history.
- socio-economic disadvantage.
- gaming machine activity.

The 2024 Queensland Gambling Survey provided up-to-date data on the gambling behaviours of Queenslanders, including participation and levels of harm. We used the data to inform and target programs based on risk.

We continued to improve licensing processes and services, particularly application processing times, without unduly detracting from our role in minimising harm, the impact on amenity, and ensuring the integrity of gaming.

In 2025 we concluded an internal review of licence transfer requirements and implemented improvements in processing effectiveness. As a result of these improvements, as of 30 June 2025, we have reduced licence transfer process timeframes to a median of 22 business days, compared to 34 days in the same period in 2023-24.

We are focused on further streamlining licensing processes, making it easier for businesses to thrive in Queensland. This is evidenced in the introduction of BPoint, a flexible and secure payment method for licensees, which allows for immediate online payment where previously phone contact was required.

Licensing decisions were informed by research, data and legislative requirements. For example, decisions on applications for late-night gaming were made based on updated research which concluded that the later into the evening and early morning a person gambles on gaming machines, the higher the risk of problem gambling.

Our strengthened Casino and Gaming Regulatory Framework involved a focus on the opening of The Star Brisbane casino through the uplift of approved controls, ensuring casino operations were conducted in proportion to the risk posed by the activity. Over an eight-week period we undertook targeted compliance and inspection activities at The Star Brisbane through a Preliminary Compliance Program, which focussed on harm minimisation assessments, regulated equipment and systems, operational activities and training and access. This delivered monitoring and guidance across areas of highest risk during the opening period to ensure more stringent measures were implemented to minimise adverse impact to the integrity of gaming and harm to the community.

In 2025, OLGR approved significant uplifts to The Star's Internal Control Manual (ICM) including new controls for more stringent regulation of anti-money laundering, counter-terrorism financing, and safer gambling risks.

The new controls included:

- approved a significant number of technical and operational submissions allowing for the opening of The Star Brisbane on time.
- supported the closing/decommissioning of the former Treasury Casino.
- continued to monitor the conduct and ongoing suitability of Chow Tai Fook Enterprises and expect it to remain cooperative and to fully disclose all relevant information.
- progressed regulatory and probity approvals required under legislation relating to the ownership and management of The Star casino in Queensland ensuring to maintain the suitability of those associated with casino operations.
- supported introduction of first new lotto draw for a number of years, the Weekday Windfall.

## Model practice 2: Consult and engage meaningfully with stakeholders

### Supporting principles

- Formal and informal consultation and engagement mechanisms are in place to allow for the full range of stakeholder input and Government decision making circumstances.
- Engagement is undertaken in ways that help regulators develop a genuine understanding of the operating environment of regulated entities.
- Cooperative and collaborative relationships are established with stakeholders, including other regulators, to promote trust and improve the efficiency and effectiveness of the regulatory framework.

### Evidence to support alignment with regulator model practice

Consultation and engagement with industry stakeholders, cross-government and inter-jurisdictional partners is a core principle underpinning OLGR's business model and operating framework.

As a modern regulator, we strategically liaised with co-regulators to strengthen cross-jurisdictional relationships, ensuring communication and information sharing opportunities are identified and maintained. We proactively engaged with a wide range of stakeholders to ensure our systems, processes and practices are fit-for-purpose, relevant, contemporary, and effective. Our stakeholders include:

- licensees, permit holders and their staff.
- licence and permit applicants.
- liquor and gaming industry associations.
- not-for-profit organisations.
- community groups and individuals affected by the sale and supply of liquor and gambling activities, including inviting Queensland community to comment on advertised license applications.
- other government and regulatory control bodies.

In 2024-25, our regulatory governance activities included participating on internal corporate governance committees and on external consultative groups.

Our proactive and reactive compliance audit programs saw our inspectors visiting, engaging, and educating licensees, providing invaluable and genuine insight into the operating context of regulated entities. Our programs included audits and desktop reviews of online Wagering Service Providers, and involved collaboration with other state, territory, and commonwealth agencies to ensure a consistent approach to National Consumer Protection Framework compliance, and to resolve any cross-jurisdictional issues.

We worked closely with government stakeholders, shire councils in discreet First Nations communities, and key stakeholder groups to collaboratively address issues and risks in remote communities. In reviewing and updating restrictions for alcohol in several remote communities, OLGR consulted with local communities and stakeholders to develop a clear understanding of community expectations on the regulatory framework for alcohol restrictions and limits.

Our collaborations included:

- working with The Star to uplift their controls related to the enforcement of time play limits on electronic gaming machines. The revised controls give effect to recommendations made by the Honourable Robert Gotterson AO KC, to minimise harm by ensuring patrons take a 15 min break after three hours of play, and are prevented from gambling for 12 hours in any 24-hour period.
- working with Queensland Police Service on relevant licence applications to ensure approvals do not place a great risk to the community such as extended trading hours applications.
- consulting with Australian gaming regulators and industry bodies to implement new gaming products or regulation across jurisdictional borders e.g., National Consumer Protection Framework for online wagering measures.
- consulting with industry stakeholders in April and December 2024, including all Registered Training Organisations (RTOs) and industry peak bodies to review the Responsible Management of Licenced Venues (RMLV) training material which has laid the groundwork to deliver updated manuals in late 2025.

- consulting with licensed gaming machine manufacturers (GMMs), Licensed Monitoring Operators (LMOs), and other key industry stakeholders, for the implementation and monitoring of gaming machines regarding QCOM3, which has laid the groundwork to approve LMO QCOM3 systems in Q1 and Q2 of 2025-26.
- participating in national liquor and gambling regulator forums that bring together state, federal and international regulators and relevant industry bodies to consider best practice regulatory models and a consistent interjurisdictional approach to industry regulation.
- consulting with the Special Manager Group, The Star and NSW Liquor and Gaming in relation to the Internal Control System uplift at The Star casino properties in Queensland.
- Safe Night Precinct (SNP) local boards that manage and plan to address community safety and amenity issues, and can raise funds and apply for grants from local, state, and federal governments.
- Liquor Accords made up of industry, government and in some instances community stakeholders, are active in implementing place-based management initiatives to minimise alcohol-related impacts in and around licensed premises.
- supporting the Safer Gambling Advisory Committee, a non-statutory Ministerial advisory committee that provides advice to Government on policies, strategies and regulatory arrangements for gambling harm and is forum for community, industry and government to work together to develop ethical and safer approaches to gambling.
- chairing the working group made up of industry, community and government stakeholders supporting the implementation of the Gambling Harm Minimisation Plan for Queensland 2021-25.
- support to develop and adopt an industry-led Multi-Venue Self Exclusion database system for pubs and clubs that aims to provide a mechanism to support venues to assist patrons that may be experiencing, or at risk of experiencing, harm from gambling.
- establishing a First Nations Gambling Harm Steering Group to guide and inform First Nations gambling harm initiatives. The group consists of a range of community representatives from across the State, and government stakeholders such as the Department of Treaty, Aboriginal and Torres Strait Islander Partnerships, Communities and the Arts.
- establishing a consultative mechanism to engage people with lived experience of gambling harm to inform policy and program development. OLGR worked with Relationships Australia Queensland and the Queensland Mental Health Commission to develop principles for safe and meaningful engagement and a guideline to set out the process of ongoing engagement.
- chairing several working groups with other Australian gaming regulators to discuss the issues and potential harms of regulated wagering and lottery products and systems that are proposed to operate across jurisdictional borders.
- The Commissioner for Liquor and Gaming and Assistant Director-General OLGR and other key decision makers met regularly with industry representatives, Safe Night Precincts, and local licensees around the state to directly hear and understand their concerns.
- working closely with industry, government, and community organisations to ensure public events involving the service of liquor are conducted in a manner that minimises the risk of alcohol related harm and violence.
- During 2024-25, we worked in conjunction with licensees, Queensland Police Service and community stakeholders and undertook 322 onsite inspections over the course of 36 major public events around Queensland, including Schoolies activities.

## Model practice 3: Provide appropriate information and support to assist compliance

### Supporting principles:

- Clear and timely guidance and support is accessible to stakeholders and tailored to meet the needs of the target audience.
- Advice is consistent and, where appropriate, decisions are communicated in a manner that clearly articulates what is required to achieve compliance.
- Where appropriate, regulatory approaches are tailored to ensure compliance activities do not proportionately burden particular stakeholders e.g., small business, or require specialist advice.

### Evidence to support alignment with regulator model practice

As a modern regulator, we understand the importance of voluntary compliance for best practice regulation. We provide information, guidance and support to licence applicants, licensees, peak bodies, and the community to operate within legislative requirements, and maintain compliance, to prevent and reduce alcohol and gaming harm.

In 2025 we commenced a process to review the effectiveness of our website information on liquor licence transfer applications, including interim authorities. The review identified several opportunities to improve the way we communicate government and license requirements to applicants. In addition, the review identified opportunities to provide better quality information and support where applicants and licensees seek advice from us.

We updated our website to include information on responsible service of alcohol and gambling harm minimisation materials for venue safety. Resources were carefully tailored to meeting industry needs and provide clear and practical messaging advice. Further publications and stakeholder communications included:

- Casino Suitability Investigation Pack.
- information on the use of FRT.
- various news and updates to MTRs e.g. Jackpot systems, fully automated table games.
- a new guide for new gaming licensees.
- industry newsletters.
- Minimum Technical Requirements to assist gaming manufacturers and operators, and approved ID scanner operators, to meet the standards set for approved gaming equipment in Queensland.

We contributed to the development of gambling harm minimisation reforms to the Australia New Zealand Gaming Machine National Standards that provides guidance to the gaming machine industry, which has laid the groundwork to deliver an updated Standard in Q1 2025.

OLGR's uplifted gambling harm minimisation programs are tailored to assess and uplift strengths around leadership and culture, patron management and due diligence, management and operation of electronic gaming machines, and Gambling Help service relationships.

We developed consistent community education and training materials, including industry-focused materials, for delivery by Queensland's Government-funded Gambling Help services.

We worked closely with licensees through initiatives and programs to address and manage patron safety and amenity issues to minimise the impact and occurrence of alcohol related harm in and around licensed premises.

One of these initiatives was the Venue Controls Program (VCP). Venue controls help venue staff perform their roles to protect patrons and the community. OLGR identified that when licensees actively observe, monitor, and enhance venue controls they are likely to experience fewer incidents in or around their venues.



OLGR's venue controls program (VCP) supports licensees to develop the best strategies and to maintain controls that:

- provide a safe environment that minimises the risk of alcohol-fuelled violence.
- manage disorderly or inappropriate behaviour.
- minimise negative impacts of the venue on the surrounding area.

OLGR conducted 27 VCP engagements with licensees during 2024-2025.

Another initiative involved OLGR's dedicated team of officers analysing and risk assessing QPS liquor incident reports to help guide OLGR compliance officers in determining when and how to engage with venues.



## Model practice 4: Commit to continuous improvement

### Supporting principles:

- regular review of the approach to regulatory activities, including collaboration with stakeholders and other regulators to ensure it is appropriately risk-based, leverages technological innovation and remains the best approach to achieving policy outcomes.
- to the extent possible, reform of regulatory activities is prioritised on the basis of impact on stakeholders and the community.
- staff have the necessary training and support to effectively, efficiently and consistently perform their duties.

### Evidence to support alignment with regulator model practice

As a modern regulator, we understand the importance of continuous improvement to achieving best practice regulation. In 2024-25, we progressed a wide range of improvements to internal processes and practices to improve the effectiveness and the efficiency of our services and reduce red tape for businesses.

As part of our improvement efforts, we conducted internal quality assurance (QA) reviews at several levels in our operations including a deep dive QA review of our liquor licence transfer and interim authority processes.

Improvements to internal supports for regional offices have been introduced following a survey which highlighted a need for access to materials relating to processing licence applications that could be shared with applicants to understand criteria assessment requirements. The aim is to provide a consistent and informed approach to processing licence applications within Queensland and these improvements have supported that objective.

We maintained a focus on modernising processes through technology advancement, without compromising regulatory objectives. This includes investing in a 'digital first' approach to provide easy access, simplified pathways and 24/7 accessibility for clients. Industry has been consulted to understand their needs and expectations, as a new system processing platform is developed. A primary focus of the platform will be to significantly improve customer experience turnaround times for licensing applications.

In 2025 improvements made included:

- identifying and implementing internal administrative changes to licensing processes to create efficiencies and promote a consistent approach.
- maintained our National Association of Testing Authorities accreditation to perform testing and evaluation services for gaming products and systems in the gaming industry. We maintain best practice collaborations and training so we can be informed of new technology trends, analysing potential for advancements, and risks associated with these trends.
- developed an 'Outcomes Framework' to better measure and monitor outcomes from efforts to minimise gambling-related harm.

Annual and outcome-based periodic reviews of compliance programs are undertaken to support continuous improvement, and ensure risks are being targeted in the most effective contemporary manner.

Our Liquor and Gambling Regulation Strategy clearly details our future course of regulatory activity, making clear the priorities and commitments we have to evidence-based regulation, continuous improvement, and supporting industry in a dynamic and ever-changing liquor and gambling environment.

OLGR's new Case Assessment and Management (CAM) Framework was developed and implemented in March 2025. The CAM framework adopts a principle risk-based approach when assessing cases and aligns with and supports OLGR adopting contemporary best practice as a modern, transparent, and agile Regulator.

Reform work was also undertaken on OLGR's compliance inspection programs to ensure they aligned with OLGR's key organisational priorities and strategic objectives. The modernised inspection program which is to commence in August 2025 will ensure OLGR's risk based compliance approach is more transparent and accountable while efficiently targeting 'big ticket items' of liquor and gambling harm. Importantly the program

reforms will address key industry concerns about OLGR's inconsistent compliance approach across the State and the impact of scheduling low risk administrative inspections during peak trading times at venues. These reforms reflect OLGR's commitment to supporting industry stakeholders while safeguarding the community from liquor- and gambling-related harm.

We have reviewed the role of the Complaint Services Unit, which was previously focused on triaging Brisbane-based liquor and gaming matters. This role has now been expanded and redefined as the Case Assessment and Response (CAR) team. The CAR team now serves as the primary point of contact, managing the state-wide triage and assessment of all enquiries and complaints related to OLGR.

With the development of the CAM Framework, CAR successfully streamlined processes and achieved significant operational improvements. Role clarity and productivity were enhanced through the creation of role-specific position descriptions and the redistribution of tasks, ensuring alignment with organisational objectives. This streamlined approach also identified resource gaps resulting from increased workloads, enabling management to address these challenges and ensure a smoother transition while avoiding bottlenecks. Additionally, a positive team culture was fostered through engagement, mentorship, and collaboration, which boosted morale and strengthened working relationships.

## Model practice 5: Be transparent and accountable in actions

### Supporting principles:

- where appropriate, regulatory frameworks and timeframes for making regulatory decisions are published to provide certainty to stakeholders.
- decisions are provided in a timely manner, clearly articulating expectations and the underlying reasons for decisions.
- indicators of regulatory performance are publicly available.

### Evidence to support alignment with regulator model practice

In 2024-25, we developed, refined, and applied performance indicators and measures to improve the effectiveness and efficiency of our internal processes and our services to our customers. We published performance data in several formats, including in our Service Delivery Statement.

Evidence of our transparency and accountability included:

- publication of relevant licensing applications on our website, including decisions and information notices providing reasons.
- our bi-annual licensing and compliance summary provided an overview of our licensing and compliance activities for liquor and gaming over the previous 6-month period.
- we published information about reviews and prosecutions of Queensland casinos on our website.
- we provided detailed billing information and regular statements to clients for technical evaluations and probity investigations.
- we improved the accountability and transparency of the implementation of the Gambling Harm Minimisation Plan for Queensland 2021-25 through the development of a revised governance framework.
- we provided regular updates on progress of the implementation of the Gambling Harm Minimisation Plan for Queensland 2021-25 to the Safer Gambling Advisory Committee and Gambling Harm Minimisation Plan Working Group.
- we maintained our extensive register of Commissioner Guidelines, Forms, and other information for applicants and licensees on our website.
- through the Liquor and Gambling Regulation Strategy, we shared our priorities with industry, our compliance monitoring and enforcement focus areas, and emphasised fairness, transparency, and accountability in accordance with natural justice principles. This includes a structured appeals process, allowing parties to contest decisions in a manner that upholds integrity and fosters public trust in regulatory outcomes.
- on our website we included more detailed information regarding matters such as noise complaints for the benefit of licensees and complainants.