

**IN THE MATTER OF A ROYAL COMMISSION INTO  
THE PERTH CASINO**

**WITNESS STATEMENT OF KATIE HODSON-THOMAS**

**Date of Document:** 7 May 2021

**Filed on behalf of:** The Gaming and Wagering Commission of  
Western Australia

**Prepared by:**

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**I KATIE HODSON-THOMAS of**

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say as follows:

- 1 This statement is provided in response to the witness summons to give evidence, dated 23 April 2021 and issued pursuant to section 9 of the *Royal Commissions Act 1968* (WA), which is directed to me by the Perth Casino Royal Commission. This statement addresses the matters set out in Schedule 1 to the summons.
- 2 I am a member of the Gaming and Wagering Commission of Western Australia (GWC).

- 3 This statement is true and correct to the best of my knowledge and belief. The views I express in this statement are from my own knowledge, except where I indicate otherwise.

## **QUALIFICATIONS AND EXPERIENCE**

- 4 I qualified as a Justice of the Peace on 29 July 1997.
- 5 I have completed the following training and courses:
- 5.1 In 2011, I completed Governance Training with the Australian Institute of Management.
  - 5.2 I hold a Certificate IV Workplace Training and Assessment from Hobart Technology which I obtained in 2012.
  - 5.3 I hold a Graduate Certificate of Applied Finance from Kaplan which I obtained in 2018.
  - 5.4 I attended the Associations Forum's Directors Governance Workshop in 2018.
  - 5.5 In November 2019, I completed the Company Directors course at the Australian Institute of Company Directors.
  - 5.6 I obtained a Certificate of Accomplishment for Justice of the Peace studies from Edith Cowan University in 1999.
- 6 I have held various roles during my career. For example:
- 6.1 I was a Member of the Legislative Assembly as the Member for Carine between 14 December 1996 to September 2008. In that role:

- 6.1.1 I served as a Parliamentary Secretary to the Minister for Health from December 1999 to February 2001;
  - 6.1.2 I was the Shadow Minister for Tourism from 28 June 2006 to 24 January 2008 during which I was involved in developing policy with respect to tourism in Western Australia;
  - 6.1.3 I also held shadow portfolio responsibilities for transport, small business, environment, and road safety; and
  - 6.1.4 I was Deputy Chair of the Community Development and Justice Standing Committee.
- 6.2 From November 2008 to November 2009 I worked as a consultant at Hawker Britton. Hawker Britton is a lobbying and political consulting firm, headquartered in Australia. In this role, I represented the interests of a diverse range of clients from the private sector to both the Government and Opposition in areas such as infrastructure projects. I also provided advice to companies on communication strategies and client/stakeholder engagement.
- 6.3 I was appointed as Special Counsel – Government Relations and Policy at the Australian Hotels Association of Western Australia between October 2008 and December 2010. In that role, I was involved in policy development for liquor licensing and tourism. It was my responsibility to monitor State Parliament, Hansard, Parliamentary Standing Committees, Government Gazettes, Annual Reports, and media monitoring. In addition, I was required to engage with Government when necessary on matters of interest to the membership base, and undertake industry

briefings with Ministers and Members of Parliament both Government and Opposition. I was also responsible for drafting Ministerial correspondence, briefing papers, policy and strategy documents.

- 6.4 From January 2011 until May 2011, I was the Corporate Affairs Manager at the Tourism Council of Western Australia. In that role, I was involved in policy development and advocacy on issues relevant to the tourism industry. I was responsible for establishing effective communications and relationships with State and Federal Government politicians and Local Government organisations. I also provided advice and assistance to:

6.4.1 members on specific industry related issues; and

6.4.2 Tourism Council of Western Australia staff and board members on the operational functions of state and federal government.

As part of my role, I also participated in Accreditation Programs.

- 6.5 I was appointed as Chief Executive Officer of the Caravan Industry Association of Western Australia from June 2011 to May 2012. In that role, I was involved in policy development for tourism and caravanning in Western Australia. I was responsible for reviewing, developing and implementing the association's strategic plan, business plan, marketing plan and communication strategy. Coordination of policy, projects, promotions and events. I was also responsible for:

6.5.1 developing and maintaining strategic alliances with key industry stakeholders and decision makers;

6.5.2 advancing the profile of the association as the peak industry body;

- 6.5.3 providing input into other relevant industry related reviews and reports;
- 6.5.4 developing and implementing effective communication strategies with State Government Ministers, Members of Parliament and Opposition spokespersons and Local Government;
- 6.5.5 development and management of the annual operating budget of the Association;
- 6.5.6 managing the recording, production and distribution of board minutes and reports for all Standing Committees;
- 6.5.7 managing the Perth Caravan & Camping Show and all other activities;
- 6.5.8 managing Annual General Meeting, Special General Meeting, Board Meetings; and
- 6.5.9 developing a model of sound corporate governance.

7 Since November 2012, I have been a Director in the Strategic Communications practice of FTI Consulting. In my current role, I provide advice and consulting services relating to corporate communications, public affairs, and reputation management to clients. I work with clients in the resource and energy sector as well as healthcare industry. A list of the clients I work with in my role with FTI Consulting from time to time are listed on the:

- 7.1 Western Australian Government Lobbyist Register which can be accessed via the following website:  
<https://lobbyists.wa.gov.au/lobbyist/57322/view>; and

- 7.2 Federal Government Lobbyist Register which can be accessed via the following website: <https://lobbyists.ag.gov.au/organisation/c2cc18ba-3825-eb11-8145-0050569d617d/profile>.
- 8 In addition to my work experience, I have been appointed to a number of Boards and committees. For example:
- 8.1 I have been appointed a non-executive director and a member of the People and Culture Committee of the Fisheries Research and Development Corporation for the term from 12 October 2018 to 31 August 2021;
- 8.2 In February 2020, I was appointed as a member of the Gaming Community Trust. I currently hold this role.
- 8.3 I held the position of Independent Chair of the Western Australian Fishing Industry Council from October 2017 until November 2018.
- 8.4 I have been the Treasurer of the WA Parliamentary Former Members Association since 2017.
- 9 A copy of my curriculum vitae is annexed to my statement and marked [GWC.0003.0001.0014](#).
- 10 I do not have any qualifications or experience specifically in relation to the regulation and oversight of casinos and casino gambling apart from the experience I have gained from my role as a member of the GWC (discussed below).

## GAMING AND WAGERING COMMISSION

### Appointment

- 11 I was appointed as a member of the GWC on 21 July 2011 for a term expiring on 30 June 2014 (**First Appointment**). A copy of my appointment letter and the Western Australian Government Gazette dated 26 July 2011 is annexed to my statement and marked GWC.0003.0001.0009 and GWC.0003.0001.0010, respectively.
- 12 During the First Appointment, I took up a role with FTI Consulting as a Senior Consultant in November 2012. That role required me to register on the State Lobbyist Register.
- 13 In or about November 2012, I notified the then *ex officio* chair of the Gaming and Wagering Commission, Mr Barry Sargeant, that I had taken up a role with FTI Consulting that required me to register on the State Government Lobbyist Register. Mr Sargeant and I discussed whether any perceived conflicts might arise from my position as a registered lobbyist with my position as a member of the GWC. Based on my conversation with Mr Sargeant, I decided to resign from my position as a member of the GWC. Accordingly, on 23 November 2012, I tendered my resignation from my position as a member of the GWC. A copy of my resignation letter is annexed to my statement and marked GWC.0003.0001.0011.
- 14 In late 2017, I received an email from Alannah Maurice, Senior Policy Adviser in the office of the Hon. Paul Papalia CSC MLA, the then Minister of Tourism, seeking my interest in being appointed as a member of the GWC.

- 15 Upon receipt of Ms Maurice's email, I telephoned Ms Maurice to express my interest in being appointed as a member of the GWC. I recall during my discussions with Ms Maurice that I had raised my previous appointment and that I had resigned from that role to avoid any perceived conflicts of interest arising from my registration as a lobbyist. I recall that Ms Maurice reassured me that my position as a registered lobbyist was known to the Hon. Paul Papalia CSC MLA and it did not raise any conflicts of interest.
- 16 I recall prior to my appointment, I do not recall precisely when, I had a discussion with Ms Maurice with respect to putting in place a confidentiality and management plan to address any potential conflicts of interest arising from my position as a registered lobbyist.
- 17 At about the same time as my call with Ms Maurice in relation to my interest to be appointed as a member of the GWC, I provided the Minister's office with my curriculum vitae and referees.
- 18 On 9 January 2018, I received a letter from the Hon. Paul Papalia informing me that I had been appointed as a member of the GWC for a term commencing 1 January 2018 and expiring 31 December 2020 (**Second Appointment**). A copy of that letter is annexed to my statement and marked GWC.0003.0001.0012.
- 19 On 18 November 2020, I received a letter from the Hon. Paul Papalia informing me that I had been reappointed as a member of the GWC for the term from 1 January 2021 to 31 December 2023. A copy of that letter is annexed to my statement and marked GWC.0003.0001.0013.



## GWC Training

20 Upon my First Appointment in July 2011, I attended an induction meeting with Mr Steve Spallarossa, a member of staff of the then Department of Racing, Gaming and Liquor during which:

20.1 I was provided with a lever arch folder of materials. I no longer have that lever arch folder, however I recall that it included the applicable legislation administered by the GWC;

20.2 Mr Spallarossa provided me with a comprehensive explanation of:

20.2.1 the applicable legislation including taking me through the lever arch folder of materials; and

20.2.2 the roles and responsibilities of the GWC with respect to the oversight of gambling and revenue collection in Western Australia.

21 Upon my Second Appointment, on 24 January 2018, I received a letter from Jocelyne Stephens, Policy Officer with the Department of Local Government, Sport and Cultural Industries (**DLGSC**), with respect to my appointment to the GWC (**January 2018 Letter**). A copy of that letter and its annexures are annexed to my statement and marked [GWC.0003.0001.0001](#), [GWC.0003.0001.0002](#), [GWC.0003.0001.0003](#), [GWC.0003.0001.0004](#), [GWC.0003.0001.0005](#), [GWC.0003.0001.0006](#), [GWC.0003.0001.0007](#), and [GWC.0003.0001.0008](#).

22 In the January 2018 Letter, it was explained to me that:

22.1 the GWC was established to *“regulate both gambling and wagering activities in Western Australia and is responsible for regulating casino*

*and community gaming activities, the wagering activities of Racing and Wagering Western Australia and activities permitted under the Betting Control Act 1954”;*

- 22.2 I would be provided with an iPad and charger to view the GWC’s meeting dates, agendas and supporting papers and that training on iAnnotate would be provided.
- 23 Accompanying the January 2018 Letter was a copy of, amongst other things:
- 23.1 Declaration of Confidentiality and Management Plan of Potential Conflict of Interest which was consistent with my discussions with Ms Maurice referred to in paragraph 16 above;
- 23.2 Gaming and Wagering Commission Annual Report 2016/17;
- 23.3 Board Essentials, published by Public Sector Commission, December 2016; and
- 23.4 links to relevant legislation.
- 24 I executed the Declaration of Confidentiality and Management Plan of Potential Conflict of Interest on 25 January 2018 and returned it to the DLGSC. A copy of that declaration is annexed to my statement and marked GWC.0003.0001.0016.
- 25 On 20 February 2018, I attended an induction with Kellie Pemberton (Acting Senior Legislation and Strategy Officer). During that induction, Ms Pemberton provided me with an iPad, and a hard copy of the GWC Code of Conduct and Public Commission Board Essentials. Ms Pemberton explained that:

25.1 the iPad contained materials which were relevant to my role as a member of the GWC. In particular, the iPad had the following documents uploaded to it:

25.1.1 100 km radius Burswood Casino;

25.1.2 Automatic teller machine at Crown Casino;

25.1.3 Casino Gaming on Cruise Ships;

25.1.4 Electronic Gaming Machines (EGM) return to player policies;

25.1.5 Electronic Gaming Machines;

25.1.6 How to conduct Trade Promotion Lotteries;

25.1.7 Licensing of Security Officers at Crown Perth (Casino Operator);

25.1.8 Probity Assessment Policy;

25.1.9 Two-Up;

25.1.10 Video Lottery Terminals Policy;

25.1.11 WA Race fields;

25.2 materials for Board meetings would be uploaded to the iPad ahead of meetings of the GWC; and

25.3 minutes from the meetings of the GWC that I had attended would be made available on the iPad following those meetings.

26 Prior to my first Commission meeting of my Second Appointment on 27 February 2018, I reviewed and saved the materials from the links to my computer for my records and referral.

27 After my Second Appointment, I was also provided with practical training with respect to the following matters:

27.1 Electronic Gaming Machines – On 13 April 2018, I attended Crown Casino with Mick Connolly and Robert Bovell for the purpose of attending a demonstration of how Electronic Gaming Machines operated. During that demonstration, Crown Staff showed us an inactive Electronic Gaming Machine and explained the various components of Electronic Gaming Machines. I advised GWC that I had attended a demonstration during the GWC meeting held on 30 April 2019.

27.2 Responsible Service of Gambling – In or about the first quarter of 2019, I recall a discussion regarding GWC's roles and responsibilities with respect to responsible gambling. Following the discussion, Mick Connolly organised with Crown for me to attend the Gaming Training Course at Crown Casino. The Gaming Training Course is a course that is provided to Crown staff with respect to responsible gambling. During that course, Crown staff provided me with a briefing on the processes which were in place to assist problem gamblers at Crown Casino and intervention initiatives. I provided the GWC with an overview of the course and my key takeaways in general business at the GWC meeting on 30 April 2019.

## **ROLE ON THE COMMISSION**

28 I am a member of the GWC. I do not have any areas of specific responsibility on the Commission as distinct from other members.

29 However, I have on occasion represented the GWC at certain meetings where it was not feasible for all of the members of the GWC to attend. For example, I was asked to represent the GWC as an observer at a meeting with the proponents of the TAB (Disposal) Bill 2019 on 24 February 2020. I was asked by Mark Beecroft from DLGSC if I would be available to attend the meeting as the Director General, Duncan Ord, was unable to attend. Also in attendance on behalf of the Commission was Mick Connolly, Sandy Del Prete and Mark Beecroft. The purpose of the meeting was to provide the selected respondent an opportunity to ask questions in relation to the ongoing regulatory framework of the WA TAB business and the relationship between the Commission and Licensee, including the approval processes to be followed.

## REMUNERATION

- 30 I am paid a fortnightly fee for my role as a member of the GWC.
- 31 In the 2017/18 financial years, I was paid a total of \$8,208.
- 32 In the 2018/19 financial year, I was paid a total of \$15,910.52.
- 33 In the 2019/20 financial year, I was paid a total of \$16,688 as per my tax return, however the GWC annual report discloses that I was paid \$16,546.92 and \$1,571.96 superannuation.
- 34 I am currently paid \$494.42 (net) fortnightly.
- 35 I am not currently provided with any further remunerations, whether monetary or otherwise, as part of my role.

### **Time Commitment**

- 36 The time I spend as part of my role as a member of the GWC is variable from month to month, and is dependent on a number of factors including:
- 36.1 the agenda for the meeting;
  - 36.2 the quantity and quality of materials provided by the DLGSC in the board pack for a particular meeting; and
  - 36.3 whether I am required to do any of my own research with respect to the matters to be addressed at the meeting.
- 37 Prior to the Independent Liquor and Gaming Authority's (ILGA) investigation into Crown Sydney, I estimate that I would spend at least 2 days per month reading the Agenda materials and attending the GWC's meetings.
- 38 The duration of GWC meetings also varies depending on the agenda for that meeting. Typically, meetings are conducted for as long as required to address all of the agenda items, anywhere between 2 to 6 hours.
- 39 Since the ILGA inquiry and the Royal Commission in Crown Perth commenced, the time I would spend on my role as a member of the GWC has significantly increased to allow me to keep abreast of the issues arising from that inquiry. In particular, I have spent more time monitoring and reviewing all media and publication, reviewing the Bergin Report and attending to matters for the purpose of the Royal Commission.

### **POWERS, DUTIES AND OBLIGATIONS OF COMMISSION**

- 40 I have set out above in paragraphs 20 to 24 the information I was provided upon my appointment to the GWC. I was aware from my review of those materials,

and in particular my review of the *Gaming and Wagering Commission Act 1987* (GWC Act), that the Commission has the duties outlined in section 7 of the GWC Act, and the powers outlined in section 8 of the GWC Act.

41 After my appointment, information in relation to the GWC's powers and responsibilities under the various Acts was provided to me in the Agenda papers from time to time as they related to matters to be addressed in the GWC's monthly meetings. For example, if a particular resolution or approval was required to be made or given by the GWC, the Agenda papers would typically include in the background section the legislative framework in which that decision or resolution was to be made.

42 I was not provided with any information with respect to my duties and powers as a member of the GWC as distinct from the powers, responsibilities and obligations of the GWC. While I was aware that the Commission has the duties outlined in section 7 of the GWC Act, and the powers outlined in section 8 of the GWC Act, practically the GWC was, and is, concerned with the material brought forward to it in Agenda papers prepared by the DGLSC and the relevant application of the statutory framework described in the Agenda papers.

## **EXERCISE OF POWERS**

43 Since I have been a member of the GWC:

43.1 the GWC has not been obstructed in the exercise of its powers and discharge of its responsibilities and obligations; and

43.2 I have not been obstructed in the performance of my duties or exercise of my powers as a member of the Commission,

in the sense that the GWC and, consequently, I were not prevented in fulfilling our roles during GWC meetings in considering the matters in the Agenda papers, making enquiries of the matters put before the GWC and making requisite decisions or deferring matters pending further information.

## **POLICIES AND PROCEDURES**

44 It is my understanding that the GWC has a number of policies and procedures in place with respect to various aspects of the regulation and oversight of the Perth Casino. For example, I am aware that the GWC has policies with respect to:

44.1 Automatic Teller Machines at Crown Perth;

44.2 Casino Gaming on Cruise Ships;

44.3 Probity Assessments;

44.4 Licensing of Security Officers at Crown Perth (Casino Operator);

44.5 Gambling Advertising and Inducements – Guideline.

45 These policies are located on the iPad and are part of the induction materials as referred to in paragraph 24 above.

46 I am also aware from my attendance at GWC meetings that there are procedures in place whereby powers have been delegated to the Chief Casino Officer and DLGSC staff to ensure the exercise of some of the powers and discharge of some of the responsibilities and obligation in respect of regulation and oversight of the Perth Casino. For example, it is my understanding from the materials that I have received as part of the Agenda papers that pursuant to the delegations of power, the Chief Casino Officer and DLGSC staff conduct audits and inspections at the



Casino. The outcomes of those inspections are reported to the GWC in an audit and inspections report.

47 I am not aware of any policies and procedures of the GWC with respect to the regulation and oversight of the risks associated with junket operations, money laundering, cash and electronic transaction at the Perth Casino and criminals infiltrating casino operations. It is my understanding based on the Agenda papers provided to me and from the discussions during the GWC meetings that:

47.1 the GWC does not have any powers in relation to monitoring or regulating anti-money laundering or criminal reputation of players, and

47.2 Federal border protection agencies are responsible for processing and approving the issue of visas to overseas players, AUSTRAC is responsible for administering anti-money laundering legislation and State and Federal law enforcement agencies are responsible for the investigation and prosecution of criminal activities that may take place at the Perth Casino.

## **SUPPORT FROM THE DEPARTMENT**

48 The GWC does not have its own staff or resources. It is required to make arrangements with the DLGSC to utilise the services of officers and employees of the DLGSC, and to make use of any facilities of the DLGSC.

49 Accordingly, the GWC is completely dependent on the DLGSC to allocate officers and employees to undertake the work required for the GWC, and to provide it with requisite facilities to fulfil its functions. In this regard, the DLGSC provides the GWC with personnel to fulfil the roles of Chief Casino Officer, inspectors, executives and other staff.

- 50 As explained above in paragraph 46, I am aware that there are procedures in place whereby certain operational powers and functions have been delegated to the Chief Casino Officer and DLGSC staff to account for the fact that the GWC does not have its own staff or resources. Those delegations extend to the day-to-day operational activities relating to the regulation and oversight of the Perth Casino and other regulatory and oversight functions of the GWC (e.g. racing). Those activities are reported to the GWC in the Agenda papers for the GWC's oversight and to inform the GWC's decisions.
- 51 While the DLGSC staff regularly report to the Commission about regulation and oversight of the Perth Casino at GWC meetings, I am not aware of any formal policy or procedure for the DLGSC to report to the GWC about their day-to-day operational activities in the regulation and oversight of the Perth Casino.

### **Briefing papers**

- 52 I am provided with briefing papers (which I have referred to as Agenda papers in this statement) from the DLGSC ahead of each GWC meeting.
- 53 I am generally provided with the briefing papers 5 to 7 days prior to the relevant meeting by either Dropbox link or by accessing the documents on the iPad that was provided to me by the DLGSC upon my appointment.
- 54 The briefing papers are typically structured with the agenda for the upcoming meeting supported by detailed papers explaining the agenda item, the relevant background, any supporting materials or evidence, and the purpose of the paper (for example, for noting, approval or consideration by the GWC).
- 55 Members of the GWC are able to make comments and ask questions on the briefing papers prior to or during the GWC meetings. Those comments and

questions are usually addressed during the meetings. However, to the extent a question or comment is not addressed, that matter would be added to matters to be actioned list and deferred to the following meeting.

56 To date, I have found the briefing papers to be adequate in that they:

56.1 inform the GWC about the regulation of Perth Casino and other GWC matters; and

56.2 provide sufficient information to the GWC to make an informed decision with respect to the matters put before the GWC or to ask further questions.

### **Adequacy of Support**

57 While I consider the quality of the support provided by the DLGSC to the GWC has been adequate, I do not consider that the quantity of the support has been adequate.

58 DLGSC staff that provide support to the GWC are also allocated work relating to the other responsibilities of the DLGSC, being local government, sport and cultural industries.

59 I have observed since my Second Appointment that as a result of larger scope of responsibility, the DLGSC is under resourced such that there have been instances where insufficient resources have been allocated to the GWC to address all of the matters arising from the monthly meetings in a timely fashion. This has resulted in certain action items either being deferred or not addressed. For example:

59.1 From at least February 2020, members of the GWC raised concerns in GWC meetings that the KPIs had not been reviewed for appropriateness and updated. It had been agreed during those meetings that a review

would be undertaken as a priority in 2020 in order for the 2020/21 KPIs to be adjusted if needed. That review was not undertaken in 2020 and is still not complete.

59.2 I recall that there was discussion during the GWC meeting in 2020 that the Deputy Director General would prepare a submission to the ILGA Inquiry and that the draft submission would be circulated to the members prior to submission. The GWC was not provided with any draft submissions and I am not aware of any submissions being made to the ILGA Inquiry from the GWC.

60 I have also observed since my Second Appointment that as a result of the decrease in the number of staff, the concentration of corporate knowledge relating to the GWC appears to me to sit with key individuals who themselves have been placed under the enormous pressure of a larger workload. This appears to me to have also contributed to the delay in addressing GWC matters in a timely manner.

## **CONFLICT OF INTERESTS**

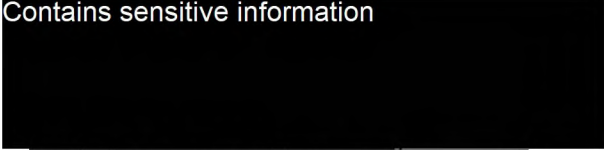
61 As explained above in paragraph 24, upon my Second Appointment, I was provided with a copy of the Code of Conduct and the Public Commission Board Essentials and was required to complete a Declaration of Confidentiality and Management Plan of Potential Conflict of Interest, which I signed on 25 January 2018 and returned to the GWC.

62 I also signed a copy of the Declaration of Confidentiality and Management Plan of Potential Conflict of Interest on 19 April 2021 and returned it to the GWC with respect to my Second Appointment. A copy of that declaration is annexed to my statement and marked GWC.0003.0001.0015.

- 63 As part of my role as a member of the GWC, I am required to complete, and have completed, an annual declaration of interests.
- 64 During my appointment, "disclosure of any interests" has been a standing agenda item for all GWC meetings. I have understood that any actual or perceived conflicts of interests are to be declared at the beginning of each meeting under that agenda item.
- 65 I was provided with materials in the Agenda papers for the 23 March 2021 GWC meeting with a paper on the new process that had been developed to record conflicts of interest declared by the Commission members. The new process includes a standing register of all declared interests, a form for declaring conflicts that is to be submitted to the Chair and an update of the Code of Conduct.
- 66 I was not provided with any specific information to avoid conflicts of interest by my family, friends and business associates with the Perth Casino and its staff. However, from my previous experience and training, I understand how to avoid and manage actual or perceived conflicts of interest.
- 67 I do not have and have not had any conflicts of interest in relation to my role as a member of the GWC, including any conflicts through my family, friends or business associates. While I am a registered lobbyist I have never worked with any clients or companies associated with gaming such that it would raise an actual or perceived conflict of interest.
- 68 I am not aware of a GWC conflict of interest policy for staff and other persons carrying out duties on behalf of the GWC. It is my understanding that the DLGSC

has a separate conflict of interest policy which applies to staff and other persons carrying out duties on behalf of the GWC.

Contains sensitive information



**KATIE HODSON-THOMAS**