



Casino Regulatory Authority
10th Anniversary Commemorative

CELEBRATING



YEARS
of Regulatory Excellence

Celebrating

10 YEARS OF REGULATORY EXCELLENCE

Casino Regulatory Authority
10th Anniversary Commemorative



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Foreword by CHAIRMAN

The Casino Regulatory Authority of Singapore (CRA) was formed on 2 April 2008 to regulate the two casinos within the Integrated Resorts (IRs) in Singapore.

CRA is expected to carry out its Mission to:

- A. ensure that the management and operation of a casino is carried out by persons who are suitable, and remains free from criminal influence or exploitation;
- B. ensure that gaming in a casino is conducted honestly;
- C. contain and control the potential of a casino to cause harm to minors, vulnerable persons and society at large.

In 2005, when the decision on having IRs with casinos in Singapore was made, there were many concerns as to how the casinos would affect law and order and the reputation of Singapore. There were also significant concerns about the harm that the casinos would cause to the society, stemmed from increased problem gambling.

Many steps had been taken to minimise the potential harm that casinos might bring, and the formation of a dedicated and independent casino regulator in the form of CRA was a key one.

10 years on, CRA has progressed from a new regulator of an emerging casino industry to a respected regulator keeping watch over two casinos that generate more than S\$4 billion of gaming revenue a year. This has been done quietly and without much fanfare, in a professional manner.

This book aims to provide a glimpse into the CRA journey over these 10 years, of how the various stakeholders and CRA came together to put in place the regulatory regime, systems and processes to effectively fulfil its Mission.

I must acknowledge the many people that played their part in this journey. Among them were members of the Board, CRA officers, and partners of CRA, including other government agencies.

Significant assistance was provided by many experienced international regulators who were generous in sharing their knowledge and insights, and who were willing to spend their time to help. CRA continues to maintain strong ties



with these regulators in working together to address the regulatory challenges of an international industry.

In particular, I note the dedication and commitment of many pioneers in CRA, including Board members who provided guidance and direction over the years. The support of the Ministry of Home Affairs (MHA) was invaluable. Most of all, I would like to congratulate the officers of CRA for their commitment to our Mission and for upholding the trust of the public and stakeholders.

CRA needs to remain focused on future challenges in a changing environment, and strive for continued excellence. This book can mark the journey and motivate us for the future.

On the occasion of the 10th anniversary, I would like to offer my best wishes to CRA and its officers for the journey ahead. I hope that all will enjoy this book.

Mr Lee Tzu Yang
Chairman
March 2018

Message by CHIEF EXECUTIVE

CRA celebrates our 10th anniversary as a statutory board on 2 April 2018. Formed as the primary regulator of the casinos, which are part of the IRs in Singapore, CRA has come a long way since its formative years when our officers travelled around the world to learn about casino regulation and to put in place a robust regulatory regime.

Since the opening of both IRs in 2010, they have provided a significant boost to the tourism industry and generated positive spin-offs such as the creation of jobs for Singaporeans. At the same time, casino-linked crimes and the problem gambling situation arising from casino gambling in Singapore appeared to be under control.

This was made possible by the close collaborations of various agencies within the Government, such as MHA, Ministry of Trade and Industry (MTI), Ministry of Social and Family Development (MSF), Singapore Police Force (SPF), Singapore Tourism Board (STB), CRA and many others.

We have built a robust regulatory regime that has allowed oversight and supervision of the casinos over the past decade. It is no mean feat that over a short period of 10 years, CRA has grown from an organisation that just started learning about casino regulation to a credible regulator that is now well regarded in the international community. We are grateful for the support and assistance from our international partners over the years. We look forward to fostering stronger relationships and making our own meaningful contributions back to the community.

I would like to pay tribute to our Chairmen and Board members, for generously sharing their wisdom, advice and time over the years. They have guided CRA in putting in place robust yet practical regulatory measures and ensured a strong governance structure. Both CRA and our officers have benefitted immensely from their insights and work over the past 10 years.

I would also like to acknowledge our CRA officers who have been key to CRA's success. The accomplishments of CRA today belong to our officers, past and present, who have been dedicated to CRA's cause. Our officers are serious-minded individuals who are committed to CRA's Mission. I have witnessed the dedication and professionalism of our officers in carrying out their duties and during interactions



with stakeholders. CRA's management team has been a pillar of strength in providing strong leadership to our officers on the ground, constantly striving for excellence and building the correct culture for CRA.

This commemorative book gives a glimpse of the CRA story by providing some insights on the journey over the past decade. It shares our efforts in working with our partners and also building the spirit of CRA.

Even as we reflect on the journey that CRA has taken and celebrate the successes achieved thus far, we will continue to look ahead and keep faith with the CRA Mission as we strive to achieve our vision of being a Trusted Casino Regulator.

Mr Jerry See
Chief Executive
March 2018

CRA'S MISSION, VISION & VALUES

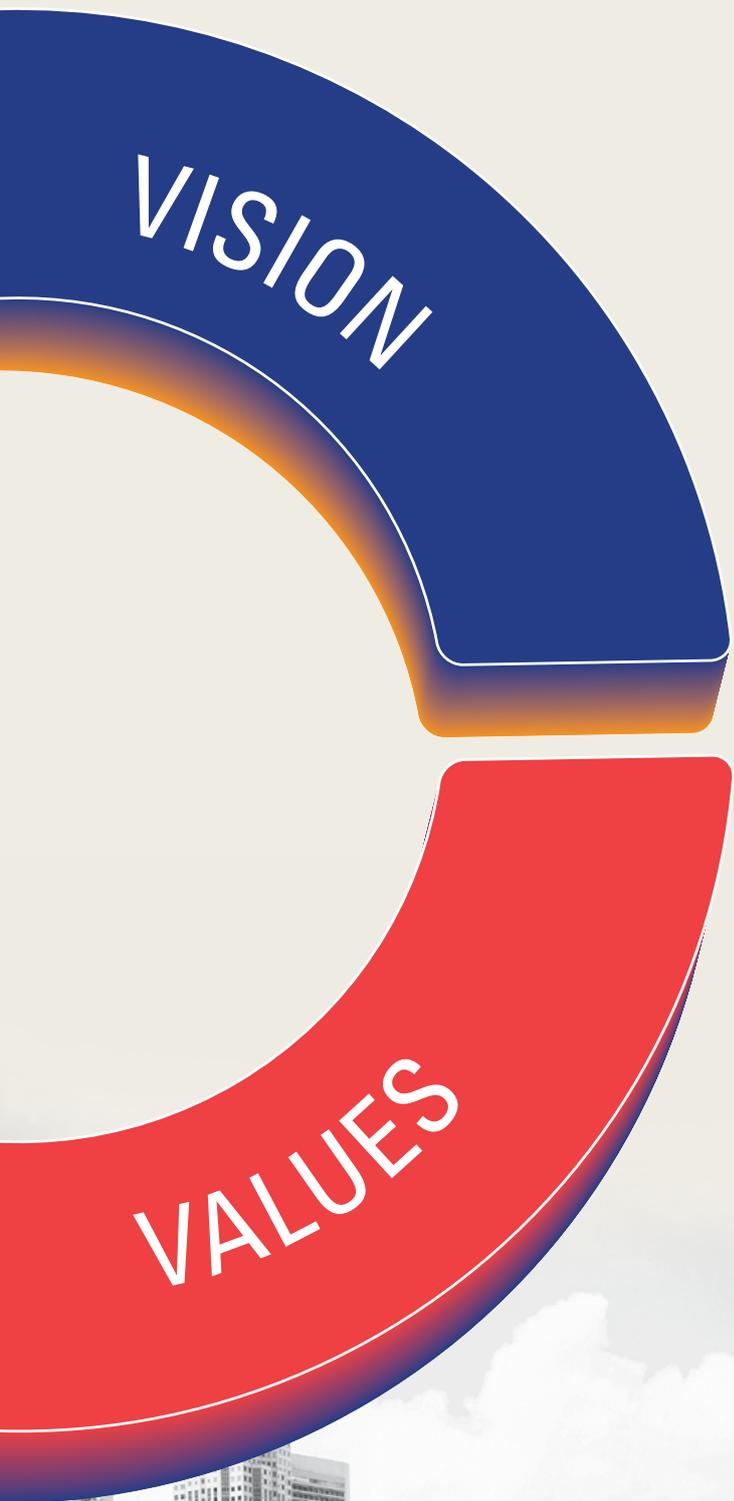


Ensuring that the management and operation of a casino is carried out by persons who are suitable, and remains free from criminal influence or exploitation.

Ensuring that gaming in a casino is conducted honestly.

Containing and controlling the potential of a casino to cause harm to minors, vulnerable persons and society at large.





VISION



To be the Trusted Casino
Regulator, Advancing
Our Mission with Pride
and Integrity for a Safe
Singapore

VALUES

- 
- Integrity
 - Care
 - Professionalism
 - Pioneering Spirit
 - Teamwork

OUR JOURNEY THROUGH THE YEARS





Chapter One:

THE CRA STORY

HOW CRA BEGAN

In December 2004, our government initiated a Request-For-Concept (RFC) to assess the viability of an IR project in Singapore.

Under the RFC, potential investors were invited to submit their concept proposals to develop and operate an IR, and the RFC was intended to assist the government in making a decision on whether to proceed with the development of an IR in Singapore. The RFC eventually closed in February 2005 and attracted 19 proposals.

After evaluating the proposals carefully and considering all the views expressed, the government decided to proceed with the IR project and to call for firm proposals to develop two IRs. In light of Singapore's declining tourism numbers, the government had recognised the potential for the IRs to be a viable proposal in reinventing Singapore into a vibrant destination of choice. In particular, the government held the view that IRs would rejuvenate our economy through the creation of many new job opportunities for Singaporeans, amongst other economic spin-offs. Notwithstanding the economic benefits, the government was also acutely aware of the potential law and order and social issues that could come with having casinos in Singapore and had, right from the beginning, promised to put in place a robust regime to limit their impact.

The government's decision to allow for IRs with casinos paved the way for a casino regulator to be established. CRA's roots can be traced as early as June 2005 when the Casino Regulation Division (CRD) was formed under MHA, and was charged with the responsibility of building up our capabilities to regulate the two casinos in Singapore.

Setting foot into the unknown, our journey towards becoming who we are today encompasses a massive learning effort. With no knowledge and expertise, CRD recognised that a useful starting point would be to start learning from established jurisdictions and industry experts and professionals.

Through CRD's own research, CRD came across the International Association of Gaming Regulators (IAGR) and realised that this was an important platform for CRD officers to learn the art of casino regulation. Hence, CRD proactively



Former CE CRA Mr T. Raja Kumar with former Chairman of IAGR Mr David Ford

reached out to IAGR, which warmly accepted Singapore into the tightly-knitted regulatory community, and this kick-started Singapore's active participation in IAGR over the years. Outside of our IAGR engagements, CRD officers also embarked on training attachments and study trips to well-regarded casino regulators in jurisdictions such as Australia and the United States to learn about their regulatory approaches.

One of the earliest and most important tasks for CRD was to develop the relevant legislation to ensure the proper supervision and control of the upcoming casinos. This was not done alone. Months of relentless research and hard work by officers in multiple ministries and agencies finally culminated in the achievement of our first major milestone on 14 February 2006 with the passing of the Casino Control Bill which, amongst other requirements, had provided for the establishment of CRA. As the casino regulator, CRA



"Casino laws balance controls, flexibility", The Straits Times, 15 February 2006



“Statutory board for regulating casinos starts work”, The Straits Times, 2 April 2008

would be a full-fledged agency and would be provided with the powers to play the multiple roles of rule-maker, licensor, inspector, enforcer, auditor and adjudicator.

CRA was formally established on 2 April 2008 with the Mission of ensuring that the management and operation of a casino is carried out by persons who are suitable, and remains free from criminal influence or exploitation; ensuring that gaming in a casino is conducted honestly; and containing and controlling the potential of a casino to cause harm to minors, vulnerable persons and society at large. CRA’s founding Chairman Mr Richard Magnus reflected on his experience of being tasked with setting up CRA as a new statutory board from scratch, “We needed to maintain not just policy credibility, but also ensure legitimacy in regulating an industry that we had no experience in. By putting in place a credible and legitimate regime, we managed to build up social confidence, both for our citizens as well as the casino operators.”

PRE-CASINO OPENING: 2008 TO 2010

Much had to be done and much was achieved during the pre-casino opening period.

Carrying on from the experience of the CRD days, CRA continued to forge close partnerships with our overseas regulatory counterparts to learn from their regulatory experiences and approaches. This learning journey was an important one as through these experiences, we adapted the best practices and incorporated them into our regulatory regime according to Singapore’s unique needs and circumstances. CRA’s first Chief Executive Mr T. Raja Kumar shared on our learning journey in the early years, “One of the things that we always impressed on our people right from

“By putting in place a credible and legitimate regime, we managed to build up social confidence, both for our citizens as well as the casino operators.”

THE CRA BOARD

The CRA Board provides strategic guidance on issues relating to regulations and corporate governance. It also provides strategic directions to the management of CRA in achieving its objectives.

To assist the CRA Board in carrying out its function, various committees have been formed to advise the Board and make recommendations pertaining to the following matters:

- Audit and risk management;
- Financial management;
- Human resource;
- Regulatory framework;
- Technology; and
- Disciplinary action against CRA’s licensees.

Over the last 10 years, more than 30 distinguished and experienced individuals have been appointed by the Minister for Home Affairs to the CRA Board. In ensuring a good mix of varied expertise, each Board comprises members with experience in various fields such as accounting, finance, legal, technology, corporate and public service.

The CRA Board has contributed immensely to the development of the CRA. Leveraging on the collective wisdom of the Board, it has put in place various policies and frameworks to strengthen CRA’s corporate governance and the robustness of our operational processes.

The CRA Board also played an instrumental role in guiding CRA in putting in place properly calibrated regulatory levers and processes. An example is the disciplinary action process instituted by CRA. One of the key powers of CRA is the ability to impose disciplinary action against CRA licensees for contravening a relevant provision of the CCA. As part of CRA’s Disciplinary Action Framework, the Disciplinary Committee plays a role in reviewing and considering cases for disciplinary actions to be taken. To ensure the integrity of the disciplinary action process, a deliberate decision was taken to appoint both Board and independent non-Board members, with wide experience, to the Disciplinary Committee.

In carrying out their duties, CRA Board members have keenly shared their expertise and perspectives on countless occasions to ensure that proposed policy positions were well-rounded and thoroughly examined. These valuable insights have benefited our officers immensely and made a lasting impact on CRA’s work.

The leadership and dedication of the CRA Board has been a key part of the success of CRA.

the start was to find out not just what worked, but what didn't work, and what mistakes the other regulators made that we could learn from. For this, we are very appreciative to the regulators who we were learning from for being very candid with the sharing of their mistakes, which really helped us avoid some of the mistakes that they made."

As an important aspect of our regulatory regime, we sought to build a strong licensing framework to address one of our key regulatory concerns that only suitable casino operators and persons are allowed to manage and operate the casinos in Singapore. Prior to the granting of any CRA licence, CRA would conduct stringent probity investigations to assess, amongst other requirements, whether the applicant is of good repute having regard to character, honesty and integrity, and if the applicant has a sound and stable financial background. Besides ensuring suitability prior to licensure, our licensing regime also provides for ongoing monitoring on our licensees to ensure that the licensees continue to remain suitable to hold the licences issued by CRA.

Besides building up the licensing framework, another focus of our regulatory regime is to ensure the integrity of casino operations. In this aspect, CRA had promulgated the Casino Control Regulations on areas such as casino and special employee licences (SELs), gaming equipment, casino contracts, and social safeguards, to supplement the Casino Control Act (CCA) and strengthen our regime with more regulatory levers. Besides these legislative instruments, CRA also operationalised our requirements and provided guidance on our regulatory expectations to the casino operators through the issuance of Directions, Codes, Standards and Notices.

One of the key processes established under the CCA and the Casino Control Regulations was the requirement for casino operators to obtain CRA's regulatory approval on critical areas of casino operations such as casino games, gaming equipment, surveillance system, entry levy system and the casino operators' system of internal controls for casino operations. Through the regulatory approval framework, CRA officers were able to better understand the casino operators' operating processes and systems, which in turn allowed us to sharpen our thinking when refining our measures and policies to strengthen our regime.

Besides learning from established jurisdictions, it was essential for CRA to also forge close collaborations with our local partners right from the beginning as part of the development of our regime. To effectively discharge our duty of containing and controlling the potential of the casinos to cause harm to minors and vulnerable persons, CRA worked closely with MSF and National Council on Problem Gambling (NCPG) to implement various social safeguards measures, such as the entry levy system and exclusion orders for vulnerable groups.

Being fellow members of the Home Team, there were many opportunities for close cooperation between CRA and SPF to advance the Home Team's Mission of maintaining safety and security for Singapore. One of our earliest collaborations was when CRA and the Criminal Investigation Department (CID) co-organised the inaugural CRA-CID Joint Training Symposium in 2009, where more than 150 officers from CRA, CID and other local government agencies had the opportunity to learn from experienced overseas regulatory and law enforcement agencies on casino regulation and enforcement efforts in their jurisdictions through workshops conducted during the training.

In the midst of developing the casino regulatory framework that anchored on the CCA, CRA had to prepare for the opening of the casinos. In the lead up to the issuance of the casino licences and the opening of the casinos in 2010, CRA conducted extensive suitability investigations on the casino licence applicants and their associates, and assessed and approved key systems. The extensive preparations undertaken by CRA were reflected in the number of regulatory approvals granted. In particular, CRA assessed and issued more than 6,000 SELs to casino employees deployed in licensable functions in the two casinos. During the period, CRA also assessed and approved the deployment of more than 2,200 electronic gaming machines (EGMs) and 35 types of gaming equipment in the casinos, and conducted on-site verification on them.



CRA officers assessing RWS staff during a mock casino simulation exercise in 2010



CRA officers assessing MBS staff during a mock casino simulation exercise in 2010

“As part of the work performed during the inspections, our officers interviewed key employees and process owners to first “walk-through” the casino operators’ operating procedures to better understand the process before deciding on the appropriate test steps to be performed.”

While the regulatory approval process provided CRA officers with the requisite knowledge on the capabilities of the casino operators’ systems and robustness of their operating processes, CRA still had to verify that the casino operators were able to properly implement these systems and processes in an actual operating environment, before allowing the casinos to commence operations. To obtain this assurance, CRA subjected both casino operators to a series of mock casino and test sessions in the final months leading up to opening where the casino operators simulated the conduct of casino operations in real-time. During these sessions, the casino operators and their employees were assessed on their operational readiness and compliance with the regulatory requirements. In particular, CRA officers had brainstormed on a number of challenging “surprise scenarios” to test the reactions and follow-up actions of employees deployed on the ground to ensure that they were well-prepared and would remain compliant to regulatory requirements when dealing with contingencies.

POST-CASINO OPENING: 2010 TO 2013

The casinos opened in February and April 2010 after CRA assessed during mock casino and test sessions that the casino operators had put in place adequate systems and processes to comply with our regulatory requirements. Following the opening of the two casinos, as part of our supervisory checks, CRA officers were deployed on the ground to provide regular oversight over the daily conduct of casino operations. This regulatory supervision was intensified in January 2012, when CRA launched a full-scope inspection of the casinos more than one year after the commencement of their operations in Singapore. As part of the full-scope inspection, detailed on-site inspection of casino operations were carried out to ensure compliance with CRA’s regulatory requirements.

The inspection, which had involved more than 30 CRA officers from our various divisions over the course of several months, was a rigorous effort by CRA to dive deep to examine the various aspects of casino operations, ranging from patron-facing activities such as table games, EGMs and cage operations to back-of-house activities such as surveillance and count procedures, so that we have a better understanding and assurance of the integrity of the operations of the two casinos. The full-scope inspection covered a broad swathe of casino operations, with each officer assigned to at least two to three inspection areas. Besides the opportunity to work with officers across different divisions, this approach was also highly beneficial in increasing our officers’ exposure to the different aspects of casino operations.

As part of the work performed during the inspections, our officers interviewed key employees and process owners to first “walk-through” the casino operators’ operating procedures to better understand the process before

THE CASINO OPENING

The lead-up to the opening of the two casinos had involved extensive preparations across the various CRA divisions to ensure that the necessary systems were in place.

For CRA's Licensing Division, the challenge was to manage the applications for the SELs as they made up the largest proportion of the applications received due to the nature and structure of the casino businesses. Having completed the necessary due diligence checks on all licence applicants to ensure that they met the criteria laid out in the CCA, CRA's Licensing Division issued more than 6,000 SELs over the period of January to April 2010.

At the same time, officers from CRA's Inspection and Compliance Division had to ensure that both casino operators were prepared to deal with any casino opening and operational issues and challenges efficiently and effectively. In particular, one area which needed an initial run-through was ascertaining if the casino operators were able to demonstrate their regulatory compliance in a real-time environment. This led CRA to put up a pre-opening framework, which consisted of table-top exercises and multiple simulation sessions.

Ms Yao Siying (Inspection and Compliance division) recalled, "To simulate actual casino operations and to test the casino operators' readiness, we had the casino operators create a mock casino environment to demonstrate their operations

and illustrate how their processes would comply with our requirements."

Following the mock casino sessions, CRA held the subsequent test sessions at the casino premises. "It was indeed an interesting experience. I remembered not getting any telecommunications signals at the newly-constructed casinos, hence we had to improvise and made use of walkie-talkies instead to communicate with one another. At that time, there was also no Whatsapp to share any kind of status updates or photos. I would imagine that if the test sessions were conducted in this day and age, it would have been an extremely different experience," shared Ms Er Pei Yun (who was then from the Inspection and Compliance Division).

During the test sessions, the casino operators were tested with surprise injects from CRA officers to assess how the ground staff would respond to situational changes and to assess their readiness. After being given the green light by CRA, the first casino opened its doors on 14 February 2010, an occasion that marked another chapter of our regulatory journey.

"The day RWS opened, we were teamed up in pairs and deployed to the casino on a shift basis. I was both anxious and excited. Our training proved to be really valuable and all that time spent on roleplaying came in handy as we dealt with anticipated situations with confidence," said Ms Yao.



(Left) "Sentosa's big new draw", The Straits Times, 16 February 2010



(Right) "MBS obtains casino licence, opens at 3.18pm today", The Straits Times, 27 April 2010

deciding on the appropriate test steps to be performed. With a better understanding of the operating procedures, our officers were able to craft more appropriate test steps to ensure that our inspection objective for the particular process was achieved.

The need to develop and maintain a robust regulatory regime is critical to ensure that CRA can achieve our Mission. A short two years after the casino opening, CRA completed a major review and amendments of the CCA and its subsidiary Regulations in 2012 to ensure that our laws remain robust and effective even as the casino landscape changes. This took into account lessons learnt and experiences gained from regulating the casinos.

In particular, the social safeguards regime was enhanced

with the introduction of the Casino Visit Limits regime and requirements requiring the casino operators to implement an approved Responsible Gambling programme which meets prescribed requirements such as regular reviews and comparisons with good practices in other jurisdictions. In terms of enforcement levers, CRA's existing powers to take disciplinary action against the casino operators were enhanced through the increase in the maximum quantum for financial penalties from \$1 million to 10% of a casino's annual gross gaming revenue for serious breaches.

On the partnership front, the opening of the two casinos provided CRA with further meaningful engagement with IAGR and our regulatory counterparts. In 2012, we hosted the IAGR conference in Singapore, which was the first time an IAGR conference was held in Asia. The successful

INSPECTING FOR COMPLIANCE

At CRA's third Workplan Seminar (WPS) in June 2011, our first Chairman Mr Richard Magnus announced that CRA would be conducting a full-scope inspection of the casinos to check for compliance with CRA's regulatory requirements.

The inspection, which commenced in 2012, encompassed detailed on-site inspections of various aspects of casino operations and involved more than 30 CRA officers from various divisions.

Recalling the experience, Ms Joelle Lim (Policy and Communications Division) said, "The walkthrough sessions with the casino operators were very important in understanding the operating procedures as thereafter, we would devise the necessary test steps in line with our inspection methodology. In particular, the same area of casino operations might require different test steps across the two operators as their operating procedures might differ."

The outcome of the inspections showed that both the casinos had put in place the necessary systems and processes, and where gaps were found, the casino operators displayed a commitment to improving the specific areas.

Reflecting on the completion of the inspection, Ms Joanne Koh (Inspection and Compliance Division) said, "We felt an immense sense of achievement and satisfaction upon completion of the inspections. It was a very trying period for all the officers involved as we really had to manage our time properly in view of the scope of inspection work to be performed, on top of our usual operational duties and work."

Having "camped" at the casinos for many months, CRA officers developed a strong bond and camaraderie, and



Former Chairman CRA Mr Richard Magnus announced the commencement of a full-scope inspection during WPS 2011

fostered close communication with one another, including officers from other divisions. "Although I was in CRA's ICT Division then, I was roped in to assist in the inspection of the casino operators' ICT systems and infrastructure. This broadened my knowledge and perspectives," Mr Jason Chng (who was then from the Info-Communications and Technology Division) said. "The pace of inspection was hectic, but working closely together meant that we were also able to discuss issues expeditiously as teammates and supervisors were similarly stationed on-site," he added.

hosting of the IAGR conference drew wide acclaim from IAGR members and it represented a significant milestone for CRA and Singapore. It placed Singapore's two IRs and our casino regulatory regime squarely and firmly in the minds of gaming regulators across the world. CRA's former Chief Executive Mr Lau Peet Meng reflected on how the successful conference brought the whole CRA closer, "I remember the feedback from CRA staff that they really enjoyed working across divisions to put the event together, even though it was tough work. The conference also made many regulators recognise CRA as a robust regulator and many said glowing things about Singapore and our casino regime, which affirmed the work of our people."

Leveraging on the expansion and emergence of the casino industry in Asia, CRA and SPF took the opportunity to rebrand the CRA-CID Training Symposium from an internal training forum into the Singapore Symposium on Casino Regulation and Crime - a platform to further engage the Asian regulatory and law enforcement community on the sharing of best regulatory practices and key challenges facing the casino industry.

Preparing for the IAGR conference and Singapore Symposiums provided our officers with the opportunity to interact and learn about the evolving practices and regulatory principles of international regulators, which reflected CRA's strong belief in continually investing in the development of all our officers.

Besides developing our people, CRA is also adamant that our officers not only possess the right qualifications, but also share the same set of values and beliefs of the organisation. This conviction was evident in the organisation-wide Re-Visioning Exercise in 2012 where every staff in CRA was consulted to craft a vision that would resonate with all of us, and provide an unwavering focus and purpose for CRA - "To Be the Trusted Casino Regulator, Advancing Our Mission with Pride and Integrity for a Safe Singapore".

Following the unveiling of the new Vision statement, CRA staff once again came together to revisit our CRA Values which would closely guide our officers in the course of our

“ Besides developing our people, CRA is also adamant that our officers not only possess the right qualifications, but also share the same set of values and beliefs of the organisation.”

work. Following months of lively discussions among our officers, the CRA values were updated in 2013 and are succinctly captured in a single statement, "I Care about My Professional and Pioneering Team", reflecting the cherished values of Integrity, Care, Professionalism, Pioneering Spirit and Teamwork.

THE JOURNEY TOWARDS REGULATORY EXCELLENCE: 2014 TO PRESENT

In our formative years, CRA had focused on building knowledge and sharpening capabilities to build a strong regulatory regime. As part of CRA's continued development, the next phase of our journey entails the pursuit of regulatory excellence.

An important aspect in our pursuit of regulatory excellence is to enhance our ability to make sense of, understand and anticipate what is happening or likely to happen in the casino industry. In this regard, CRA has embarked on the research into notable trends and emerging issues that may impact on our regulatory work, and seek to understand the law and order, operational and social implications of these developments to ensure that such developments do not derail us from fulfilling our Mission.

CRA's operating environment is constantly evolving. To ensure that we stay relevant, we need to continue to transform to become more agile to better meet future regulatory challenges. One of our latest efforts was to strengthen the requirements under the Casino Control (Prevention of Money Laundering and Terrorism Financing) Regulations. Following a comprehensive study of the revised recommendations set out by the Financial Action Task Force (FATF), we imposed requirements on the casino operators to put in place more stringent measures to mitigate money laundering and terrorism financing risks in 2015.

Agile regulation also requires the availability of relevant, reliable and timely information on the operating and business environment of the casino operators. As part of our journey of pursuing regulatory excellence, CRA has leveraged on technology to get more value from data and is strengthening our capabilities to collect, process, integrate, analyse and draw richer insights from data to support our regulatory objectives. For instance, CRA had launched the Contracts Application System in 2016 to facilitate the monitoring of casino contracts and to enhance data analysis and sense-making. As we invest in technology, CRA will also continue to develop the capabilities of our officers to allow us to better understand and harness such technology.

Building on the strong response for the Singapore Symposium on Casino Regulation and Crime in 2013, the 4th edition of the conference in 2016 saw more than 170 participants, including 35 foreign delegates and speakers



4TH SINGAPORE SYMPOSIUM ON CASINO REGULATION AND CRIME 2016

28 - 29 July 2016

Guest-of-Honour
Mr Lee Tzu Yang
Chairman, Casino Regulatory Authority



Panel discussion at the 4th Singapore Symposium on Casino Regulation and Crime in 2016

from 16 regulatory and enforcement agencies across 11 jurisdictions. CRA was able to draw on our strong ties with the international regulatory community and local partners and tapped on well-respected experts in regulatory and law enforcement agencies to share their knowledge and wisdom with participants. In particular, the event had further evolved to include a closed-door roundtable discussion for Asian regulators to freely share on key developments within their own jurisdictions.

LOOKING TO THE FUTURE

Since CRA's formation in 2008, we have been guided by our Mission to keep the casinos free from criminal influence or exploitation, ensure gaming in the casinos are conducted honestly, and contain the potential of the casinos to cause harm to society.

Our work will continue to increase in complexity and diversity as new challenges surface in view of the continuing changes to our operating landscape. We will remain agile and committed in sharpening our capabilities

and working together as one CRA, to stay true to our Mission and regulatory objectives.

CRA's success to date would not have been possible without the dedication of our staff and the strong support of our partners. We look forward to continue building on this strong foundation of trust, confidence and goodwill, as we rise to the challenge of being the trusted casino regulator, advancing our Mission with pride and integrity for a safe Singapore.

“CRA's success to date would not have been possible without the dedication of our staff and the strong support of our partners.”

Key MILESTONES

THE YEAR OF 2006

FEB

The Casino Control Bill was passed in Parliament on 14 February.

THE YEAR OF 2008

APR

On 2 April, CRA was established as a statutory board under MHA. Mr Richard Magnus and Mr T. Raja Kumar were appointed as the Chairman and Chief Executive of CRA respectively.

JUL

CCA became fully operational on 1 July.

THE YEAR OF 2009

JAN

The inaugural CRA Gaming Technology Forum was held on 8 January, with CRA issuing its Technical Standards for EGMs and the Slot Management System on 15 January.

APR

The inaugural CRA WPS was held to mark CRA's first anniversary and to officially launch CRA's Mission, Vision and Values on 17 April.



Guests of the inaugural WPS 2009

CRA and CID officers and guests at the inaugural CRA-CID Joint Training Symposium



JUL

CRA and CID co-organised the inaugural Joint Training Symposium from 1–2 July.

THE YEAR OF 2010

FEB

CRA issued the casino licence to Resorts World at Sentosa Pte. Ltd. (RWS) on 6 February and RWS casino commenced operations on 14 February.



CRA issuing the casino licence to RWS

JUN

CRA partnered the Singapore Accreditation Council to officially launch the Accreditation Programme ISO17025 for Gaming Testing Laboratories.

OCT -DEC

CRA granted the Singapore Recognised Testing Laboratory (SRTL) status to three independent testing laboratories to certify their compliance with the Singapore Technical Standards.

APR

CRA issued the casino licence to Marina Bay Sands Pte. Ltd. (MBS) on 26 April and MBS casino commenced operations on 27 April.



CRA issuing the casino licence to MBS

THE YEAR OF 2011

JAN

A Memorandum of Understanding (MOU) was signed between CRA and the National University of Singapore (NUS) Department of Mathematics and Department of Statistics and Applied Probability.

MAY

CRA signed an MOU with Nevada Gaming Control Board (NGCB), its first MOU signed with an international regulator.

JUN

Mr Lau Peet Meng took over the helm of CRA from Mr T. Raja Kumar as Chief Executive on 15 June.



Mr T. Raja Kumar handing over the leadership of CRA to Mr Lau Peet Meng

THE YEAR OF 2012

JAN

CRA commenced full-scope inspections on casino operations.

MAR

CRA awarded its first two International Market Agent (IMA) licences on 22 March.

OCT

CRA hosted the IAGR Annual Conference, which was held in Asia for the first time, from 21–24 October.



CRA officers at the IAGR Conference 2012

THE YEAR OF 2013

JAN

The CCA amendments that were made to further strengthen the regulatory regime came into operation on 31 January.

FEB

CRA renewed the casino licence of RWS for another three years with effect from 6 February.

APR

CRA renewed the casino licence of MBS for another three years with effect from 26 April.

OCT

Chief Executive CRA Mr Lau Peet Meng took over the helm as the President of IAGR.

NOV

CRA jointly organised the 3rd Singapore Symposium on Casino Regulation and Crime with SPF, which was themed "Upping the Ante, Looking Out for Eastern Tides." This was the first time the Symposium involved international regulators and law enforcement agencies.

THE YEAR OF 2014

JAN

Mr Jerry See took over the helm of CRA from Mr Lau Peet Meng as Chief Executive on 6 January.



Mr Lau Peet Meng handing over the leadership of CRA to Mr Jerry See



CRA and SPF officers and guests at the 3rd Singapore Symposium on Casino Regulation and Crime

THE YEAR OF 2014

FEB

CRA's technical standards for EGMs were revised to incorporate additional player protection requirements as part of our responsible gambling efforts.

OCT

All service providers under the previous SRTL framework successfully transited to the new Approved Test Service Providers (ATSP) regime.

THE YEAR OF 2015

MAR

CRA introduced a new performance monitoring framework for CRA's Approved Manufacturers and Approved Suppliers (AMAS), and ATSP, which allows CRA to assess an AMAS or ATSP on its ability to satisfy our performance requirements.

APR

Mr Lee Tzu Yang took over Mr Richard Magnus as Chairman CRA on 2 April.

JUN

CRA promulgated amendments to the Casino Control (Prevention of Money Laundering and Terrorism Financing) Regulations 2009 to strengthen controls to combat money laundering and terrorism financing.



CE CRA Mr Jerry See presenting a token of appreciation to outgoing Chairman Mr Richard Magnus



Chairman CRA Mr Lee Tzu Yang giving his opening address during WPS 2015

THE YEAR OF 2016

THE YEAR OF 2017

NOV

CRA undertook extensive preparations for the FATF Mutual Evaluation where Singapore was evaluated on the effectiveness of its anti-money laundering and counter financing of terrorism measures.

FEB

CRA renewed the casino licence of RWS for another three years with effect from 6 February.

APR

CRA renewed the casino licence of MBS for another three years with effect from 26 April.

JUL

CRA held the 4th Singapore Symposium on Casino Regulation and Crime in Singapore from 28–29 July where regulators came together to discuss topics such as regulatory enforcement and supervision, technological developments within the casino industry, casino crime and social safeguards.

JUN

CRA signed an MOU with the Casino Regulatory Division of the Jeju Special Self-Governing Province, South Korea, its first MOU signed with a fellow Asian gaming regulator.



MOU signing ceremony between CRA and the Casino Regulatory Division of the Jeju Special Self-Governing Province, South Korea



CRA officers and guests during the 4th Singapore Symposium on Casino Regulation and Crime 2016

A GLIMPSE INTO OUR WORK





Chapter Two: BUILDING A STRONG REGULATORY REGIME



CRA officers from the Licensing Division operating the AFIS machine which is used to capture the fingerprints of applicants

“CRA and our partners reviewed the regulatory regime and identified areas for refinement, taking into account the latest developments and evolving practices in other jurisdictions.”

Developing and enforcing a robust regulatory regime is crucial to advancing CRA's Mission.

Before the two IRs were established, Singapore did not have any experience with regulating casinos. As such, we set out to learn from other experienced regulators in order to develop our legislative framework and regulatory regime. The requirements within our regime, as encapsulated in the CCA, were referenced from best practices and adapted to our circumstances and needs.

To ensure that our regime continues to meet the challenges posed by a dynamic casino industry, we could not remain constant. Hence, in 2012, following two years of practical experience of regulating the casinos, CRA and our partners reviewed the regulatory regime and identified areas for refinement, taking into account the latest developments and evolving practices in other jurisdictions. The subsequent amendments to the CCA strengthened our regime in five areas: (i) enhanced the provisions for effective gaming regulation; (ii) strengthened law enforcement levers to deal with casino-related crime; (iii) broadened the framework of social safeguards; (iv) put in place measures to ensure that the broader tourism and economic objectives are consistently achieved; and (v) improved casino tax administration.

Beyond 10 years, we will continue to review and fine-tune our regime, and keep an eye on the emerging trends and developments in the industry, region and around the world, so as to ensure that CRA's regulatory regime remains effective and relevant.

CRA AS GATEKEEPERS TO ENSURE SUITABILITY OF PERSONS

A key tenet of our regime is to ensure that only suitable persons can operate and work in casinos in Singapore. This fundamental objective is enshrined in CRA's licensing framework where CRA acts as the gatekeeper to conduct comprehensive probity checks before licences can be granted. When the licensing framework was first developed, such checks and practices were adapted from other countries to ensure that our regime measured up to the standards of respected casino jurisdictions around the world.

Our licensing framework covered the following parties:

- A. Casino operator:** CRA would assess if a casino licence applicant and each of its associates is a suitable person to be concerned in or associated with the management and operation of a casino. The considerations of suitability include whether the applicant is of good repute having regard to character, honesty and integrity, and has a sound and stable financial background. To assess applicants' suitability, CRA has the powers to require the applicants to provide a great deal of personal, corporate, financial and other types of relevant information and records.
- B. International Market Agents (IMAs):** While the term "junket promoters" is traditionally used in other jurisdictions, we had revised the term to IMAs as part of the amendments to the CCA in 2012, to more accurately describe these middlemen's role - that they bring international high-rollers to the casinos, provide them with VIP treatment in return for a commission and functions as the middleman between the casino and the high rollers, buying and encashing casino chips on behalf of the high rollers. Given the large sums of money involved, it is important for IMAs to be properly regulated to ensure that the IMAs do not provide a cover for crime syndicates to engage in criminal activities such as money laundering.
- C. Special employees:** These individuals either work in casino-related functions or make decisions on casino operations. CRA's considerations of suitability include aspects such as the integrity, responsibility, personal background and financial stability of the applicant and general reputation having regard to character, honesty and integrity.

As part of the due diligence checks conducted by CRA during the assessment of the above licence applications, CRA may require applicants to provide detailed information so that our investigators can conduct background checks on the applicants. Checks may be conducted with law enforcement agencies, or relevant authorities to verify information. There may also be investigations into the financial situation of applicants. In addition, even after the granting of licences, CRA conducts ongoing monitoring to ensure that all licensees (casino operators, IMAs and special employees) remain suitable throughout the validity period of the licence. Some methods of monitoring could be through checks on litigations, cooperation with law enforcement agencies or checks on news of the licensees.

Beyond our licensing regime and the ongoing monitoring of licensees, CRA also reviews activities relating to shareholders and business associates of casino operators, as we recognised that these groups are also avenues for criminal influence and infiltration of casino operations:

- A. Shareholders:** Approval from the Minister for Home Affairs is required for a person to take a stake in a corporation with a casino licence above specified thresholds. The application may be approved only if the Minister is satisfied that (i) the person is a suitable person to be concerned in or associated with the management and operation of a casino; (ii) the corporation will or will continue to conduct its business prudently and comply with the provisions of the CCA; and (iii) it is in the public interest to do so.
- B. Business associates:** Our casino contracts regime requires that a casino operator seeks approval to enter into or be a party to a contract that exceeds a prescribed value or pertains to "controlled matters", which includes matters related to gaming equipment, financial matters, matters related to casino operations and revenue. This is to ensure that there is no undesirable influence on the integrity of the casino operations through these contracts.

“CRA conducts ongoing monitoring to ensure that all licensees (casino operators, IMAs and special employees) remain suitable throughout the validity period of the licence.”

ENSURING INTEGRITY OF CASINO OPERATIONS AND CASINO GAMES

Apart from the licensing regime, there were other levers such as regulatory approvals where CRA had to design the processes and operationalise such levers. CRA's approval is required for matters ranging from critical systems such as the casino operators' surveillance systems, to gaming-related matters such as gaming machines, gaming equipment and game rules. These ensure that the integrity of casino operations and casino games are not easily compromised.

In this regard, CRA had, prior to the opening of the casinos, developed internal controls and technical requirements that casino operators are required to implement.

CRA's internal controls on casino operations covered a range of areas, including gaming machines, gaming equipment, cage operations, table games operations and surveillance. In developing these internal controls, we studied the requirements of established regulators from the United States and Australia. In addition, where there were international standards, we referenced them to ensure that our regime is aligned. For example, our Prevention of Money Laundering and Terrorism Financing (PMLTF) requirements are benchmarked against the FATF Recommendations; while our requirements on casino IT systems were in line with the Committee of Sponsoring Organisations of the Treadway Commission (COSO) and Control Objectives for Information and Related Technologies (COBIT) frameworks.

Before the casino operators were allowed to commence operations, they had to establish and implement a system of internal controls for casino operations that met CRA's internal controls requirements, which gave CRA the assurance that the casino operators are committed to and can demonstrate compliance. Under this process, the casino operators were required to submit a description of how their processes would fulfil certain desired outcomes. For instance, the casino operators were expected to implement measures to ensure the proper segregation of duties among their employees and also ensure that their employees are accountable for ensuring the security of casino operations. The casino operators' systems of internal controls are frequently reviewed and inspected by CRA to ensure that they are properly implemented and that the casino operators remain in compliance with our regulatory requirements.

Another aspect of casino operations which CRA exercises control and supervision over is the gaming machines and gaming equipment that are used in the casinos. To date, CRA has issued technical standards and notices to regulate gaming machines, gaming equipment and casino systems such as the slot management system and cashless wagering system. These technical standards were the culmination of extensive research by our officers and consultations with our partners and industry players, and covered hardware, software, system, and display requirements. To ensure that our technical standards remained relevant in an environment of rapid technological changes, we considered that it was neither practical nor desirable to be overly prescriptive in our standards so as not to place unnecessary roadblocks in the face of technical innovation. As part of the approval process,



A CRA officer from the Gaming Technology Division assessing an EGM

gaming machines and gaming equipment are tested and reviewed by ATSPs and CRA to ensure that they comply with the technical standards prior to deployment. Post deployment, the gaming machines and gaming equipment are also subjected to frequent inspections by CRA.

Beyond regulatory approvals, CRA also recognises the need to observe the casino operators' operating procedures to obtain assurance that they are ready to commence operations. To this end, in the months leading up to casino opening, a series of mock casino and test sessions were conducted as part of our pre-opening framework to assess and test the operational readiness of the two

casino operators. As part of these sessions, the two casino operators were required to simulate the conduct of their casino operations in real-time, to allow CRA officers to assess whether the casino operators have operationalised their systems and processes in accordance with our regulatory requirements. To ensure the robustness of these sessions, "surprise scenarios" which were not disclosed to the casino operators beforehand were introduced by CRA officers during the sessions, to test the casino employees on their familiarity and knowledge with their internal procedures and CRA's regulatory requirements when dealing with contingency situations.

MITIGATING MONEY LAUNDERING RISKS

The high volumes of cash transactions taking place 24/7 in the casinos expose casinos to a higher level of inherent risks of money laundering and terrorism financing. In addition, the reliance of the two casinos on foreign patronage (which is in line with our Government's intent that Singapore Citizens and Permanent Residents (SCPRs) are not the target market for the casino operators) may give rise to high cross-border cash exposure, which adds to the assessment that the casino sector is deemed to be of high inherent risk.

To mitigate the risks of the casinos being used as conduits for such money laundering and terrorism financing activities, CRA has put in place a number of controls and measures, some of which are elaborated below.

Customer Due Diligence (CDD) Checks

As part of the casino operators' "know your customer" requirements, the casino operators are required to perform CDD checks on their patrons in circumstances as prescribed under Section 139 of the CCA. Some examples of these circumstances are:

- i. When the casino operator opens a patron account;
- ii. When the casino operator enters into a cash transaction with a patron involving \$10,000 or more in a single transaction; and
- iii. When the casino operator receives a sum of \$5,000 or more in a single transaction to be deposited into a deposit account.

In particular, a casino operator is not allowed to proceed with any transaction if the casino operator is unable to complete the applicable CDD checks for any reason.

Filing of cash transaction reports (CTRs)

Casino operators are required to file a CTR to the Suspicious Transaction Reporting Office (STRO) of the Commercial Affairs Department (CAD) for every cash transaction with a

patron involving either cash in or cash out of \$10,000 or more in a single transaction; or multiple cash transactions which the casino operator knows are entered into by or on behalf of a patron, the aggregate of which is either cash in or cash out of \$10,000 or more in any gaming day.

Filing of suspicious transaction reports (STRs)

Perpetuators of illicit activities may attempt to deliberately go under the radar and avoid scrutiny by structuring their transactions to be below the prescribed CDD thresholds. In such instances, the casino operators may file a STR to STRO, if they have reasonable grounds to suspect that their patrons are involved in illicit activities.

In particular, the casino operators are required to develop and implement a Suspicious Transaction Reporting Framework, which amongst other requirements, cover the policies, controls and procedures for the detection of unusual or suspicious applications or transactions, and for the filing of STRs. The casino operators are also required to ensure that the Suspicious Transaction Reporting Framework is communicated to its employees and that the framework is reviewed at least once a year to assess its effectiveness.

Casino AML well policed in Singapore: FATF

Sep 28, 2016. Newsdesk Latest News, Singapore, Top of the deck

Singapore's casinos are "well supervised" but more could be done in general by the city-state to combat the global threats of money laundering and the financing of terrorism, says a new report by the Paris-based Financial Action Task Force (FATF).

The Intergovernmental body was originally set up in 1989 by the Group of 7 – also known as the G7 – to combat a perceived growing global risk posed by money laundering. The G7 is a club of developed nations consisting of Canada, France, Germany, Italy, Japan, the United Kingdom, and the United States.

The FATF said in its "Mutual Evaluation Report" on Singapore, published on Tuesday: "Singapore maintains one of the lowest domestic crime rates in the world and therefore the bulk of Singapore's exposure to money laundering risks arises from offences committed overseas."

The on-site visit on which the review is based was conducted from November 17 to December 3, 2015. Since that time, Singapore has launched inquiries into alleged money laundering offences linked to Malaysian state investment fund 1Malaysia Development Bhd, a body also known as 1MDB.

"Casino AML well policed in Singapore: FATF", GGRAsia, 28 September 2016

“When it comes to social safeguards and their impact on society, the government has to take the lead. Hence, we have to work closely with MSF and NCPG to clearly identify potential issues and properly rationalise the solutions before communicating these issues to the casino operators.”

ENSURING TIGHT AND EFFECTIVE SOCIAL SAFEGUARDS

Whilst recognising the economic benefits of the IRs, the Government had acknowledged the potential social costs and impact, namely an increase in problem gambling and an erosion of values, such as thrift and hard work, in our society that the casinos may bring. Hence, a robust set of safeguards were put in place in the CCA, along with the setting up of a national framework to address problem gambling. The NCPG, made up of members with expertise in psychiatry, psychology, social services, counselling, legal, rehabilitative and religious services, was set up in August 2005 as one of the key pillars of this framework.

Over the years, CRA has worked closely with MSF and NCPG to put in place a strong regime in the area of social safeguards. Key safeguards, some of which were unique to Singapore, included:

A. Entry restrictions

To underscore the message that gambling is an expense and not a means to make a living, all SCPRs who wish to enter the casinos have to pay an entry levy. Minors below the age of 21 years are not allowed to enter the casinos, and the Casino Exclusion regime was put in place to protect vulnerable individuals by prohibiting them from entering the casinos.

B. Exclusion Orders

The CCA provides NCPG with the statutory powers to execute the Casino Exclusion regime through the assessment of the financial vulnerability of at-risk problem gamblers and imposition of appropriate restrictive orders. Other types of exclusions are:

1. Self-exclusion: A person may apply to NCPG to voluntarily exclude himself from the casinos.

- 2. Family exclusion:** This regime permits a family member who has been adversely affected by a problem gambler to apply to NCPG to exclude the person from the casinos.
- 3. Automatic exclusion by law:** A person who is under financial difficulties is prevented from entering the casinos. Under this regime, undischarged bankrupts, recipients of financial or legal aid assistance and HDB flat tenants paying subsidised rents with rental arrears of six months or more are automatically excluded from the casinos.

C. Harm minimisation measures

Measures to control or minimise the risk of harm that casino gambling can cause include restrictions or barriers to obtaining funds such as the prohibition of automated teller machines within the casinos and restrictions on the extension of credit to SCPRs. In addition, casino operators are not allowed to advertise or promote the playing of casino games or visiting the casinos, or engage third parties to do the same, without prior approval.

Chairman CRA Mr Lee Tzu Yang emphasised the approach that CRA takes with regard to social safeguards, “When it comes to social safeguards and their impact on society, the government has to take the lead. Hence, we have to work closely with MSF and NCPG to clearly identify potential issues and properly rationalise the solutions before communicating these issues to the casino operators.” CRA has worked with NCPG and MSF to develop the processes and systems that the casino operators must minimally have to ensure that our social safeguards were properly implemented and executed by the casino operators. In particular, on the area of entry levy, the casino operators worked with CRA when developing their entry systems and work processes to ensure that the requisite checks were built into their workflow. For instance, when designing the entrances and exits to the casinos, the casino operators had to factor for the segregation of SCPRs and non-residents so that the relevant Identification Document checks could be incorporated at the appropriate lanes to verify that each SCPR has entered the casino with a valid entry levy.

Besides entry levy checks, we also required casino operators to conduct checks on individuals at the casino entrances on their age, nationality and exclusion status prior to entry into the casinos, and any attempts to enter or entries in contravention of the safeguards were reported to CRA and, in certain instances, SPF.

ENSURING AND FOSTERING REGULATORY COMPLIANCE: SUPERVISION AND ENFORCEMENT

Having developed a robust set of regulatory requirements,



“Regulators to inspect casinos by year-end”, The Business Times Weekend, 18-19 June 2011

CRA had to also ensure that casino operators had complied with and had fully implemented the regime on the ground.

Two of the primary supervisory tools that were put in place right from the start to ensure compliance were inspections and ground checks on casino operations through the deployment of CRA Inspectors at the casinos. As part of CRA’s supervision, we not only assessed the extent of compliance to regulatory requirements, but also assessed the casino operators’ state of compliance and strength of the compliance culture and mindset amongst casino employees.

More than a year after the casinos opened, CRA commenced a full-scope inspection in January 2012 on both casino operators. This inspection covered more than 15 areas of casino operations. CRA’s founding Chairman Mr Richard Magnus, who announced the full-scope inspection during the CRA WPS in 2011, shared, “It was the first three years of our regulation and we wanted to ensure independently that the casino operators had complied with what we wanted them to do. The only way to do so, was to do an audit.” Such a wide-scale and in-depth inspection was necessary to obtain a holistic assessment on whether casino operators had implemented the systems of internal controls as approved by CRA. In carrying out the full-scope inspection, an Inspection Framework, comprising the inspection tools and programmes was developed. Coupled with other levers such as directions and notices, CRA developed a range of regulatory tools to be utilised appropriately to foster regulatory compliance, allowing us to detect and address regulatory non-compliances and breaches.

KEY REVIEW OF CRA’S REGIME

The complexity and dynamism of the casino industry meant that CRA and our partners had to continually monitor developments, anticipate trends and seize opportunities in order to ensure that our casino regulatory regime stayed effective and relevant.

RESOLVING PATRON DISPUTES

One of the key roles of CRA is to ensure that gaming in the casinos is conducted honestly. Apart from ensuring that gaming equipment, games and their game rules are approved before they are used for gaming within the casinos, CRA also ensures that patrons are provided with an avenue for the fair resolution of any gaming dispute. Under the CCA, where a casino operator and a patron are unable to resolve to the satisfaction of the patron, any dispute as to the alleged winnings, alleged losses or the manner in which a game has been conducted, the casino operator is required to immediately notify a CRA Inspector of the dispute, and to also inform the patron of his right to request that a CRA Inspector conducts an investigation into the dispute. Thereafter, a patron who wishes to request a CRA Inspector to conduct an investigation is required to complete and submit a Patron Dispute Report Form to CRA, not later than seven days after the date he was informed of his right.

A CRA Inspector will subsequently investigate into the dispute and determine whether payment should be made. As part of the investigations, the CRA Inspector will perform the necessary investigative work such as reviewing the applicable set of approved game rules and the surveillance footage of the incident, to arrive at his decision.

If the patron or casino operator is dissatisfied with the decision of the CRA Inspector, the patron or casino operator may appeal to the Patron Dispute Committee (PDC) by submitting a Reconsideration Form to the PDC Secretariat. The PDC will reconsider the decision of the CRA Inspector and determine whether to confirm, vary or reverse the decision of the CRA Inspector. The public is assured of the independence of the patron dispute resolution process as the PDC regulates its own procedures and is made up of individuals who are independent of CRA.

In the event that the patron or casino operator is still dissatisfied with the decision of the PDC, the patron or casino operator may make another appeal by completing and submitting an Appeal Form to the CRA Board, whose decision is final.

Govt set to beef up Casino Control Act

IRs' licence renewal may be conditional on their performance as tourist destinations

By Grace Leong
gleong@sph.com.sg
Singapore

MORE must be done to discourage low-income gamblers from frequenting the casinos, fight casino crime and hold the two integrated resort (IR) operators to their agreement to provide sustained economic benefits to Singapore.

To that end, the government is proposing several amendments to the Casino Control Act that will, among other things, condition the renewal of the IRs' casino licences on their performance in terms of their attractiveness as tourist destinations.

pointed by the Minister of Trade and Industry to give its opinion to the Casino Regulatory Authority (CRA), which processes gaming licence renewals, on how the IRs' non-gaming attractions measure against international standards, and their contribution to tourism growth.

"What will be the composition, size and KPIs (key performance indicators) or the elements that will go into the evaluation – these are some of the things we will want to flesh out through the consultation process," Mr Iswaran said.

"We have to make sure that any assessment that is made is done in a holistic manner and



MR ISWARAN
Says that things to flesh out include the IRs' composition, size and key performance indicators

"Govt set to beef up Casino Control Act", The Business Times, 7 July 2012

After the casinos opened in 2010, a series of enhancements were made to the regime. In particular, comprehensive and extensive changes were made when the CCA was amended and took effect in 2013. Key changes to the legislation then included:

A. Raised financial penalties for serious breaches

To provide CRA with sufficient levers to deal with serious breaches, the maximum financial penalties for serious breaches were raised from \$1 million to 10% of a casino's annual gross gaming revenue. This enhanced CRA's existing powers to take disciplinary action on breaches that severely affect the integrity of casino operations or gaming, or which severely undermine social safeguards.

B. Tightening legislation to deal with casino crime

Whilst the crime situation in the casinos had largely been under control at that time, we continued to be mindful of the vulnerability of casinos to criminal infiltration. Thus, Home Team agencies such as SPF and CRA tightened the law to make the CCA a more comprehensive piece of legislation to deal with the range of common crimes in the casinos, including counterfeit chips, collusion and unlawful interference with gaming equipment.

C. Introduction of Casino Visit Limit regime

To address an area of concern where problem gamblers were found to have the propensity to gamble more frequently (which the then latest NCPG Gambling Participation Survey in 2011 had shown), a new Casino Visit Limit regime was introduced. Similar to the existing Casino Exclusion regime, individuals and families can apply for voluntary self-imposed visit limits and family visit limits respectively. In addition, for financially vulnerable locals who are visiting the

casinos frequently, an NCPG Committee of Assessors can evaluate, amongst other considerations, the individual's frequency of casino visits in relation to his financial record, before determining if a third party visit limit should be imposed on him. For severe cases, NCPG may impose an exclusion order instead of a visit limit on the individual.

D. Requirement for casino operators to implement Responsible Gambling programme

To improve the efficacy and visibility of Responsible Gambling (RG) at the casinos, the CCA was amended for casino operators to implement an approved RG programme that meets prescribed requirements such as regular reviews and comparisons with good practices in other jurisdictions. In addition, the RG programme must contain procedures and guidelines to identify players with suspected or known gambling-related problems, and for players to set limits on their gambling expenditure or length of play.

E. Appointment of Evaluation Panel

To put in place a framework to ensure that the broader tourism and economic objectives were consistently attained in relation to the IRs, amendments to the CCA were made for CRA to take into account the

“The maximum financial penalties for serious breaches were raised from \$1 million to 10% of a casino's annual gross gaming revenue.”

IRs' ability to maintain, promote and develop the IRs as compelling tourist destinations during the licence application or renewal process. An Evaluation Panel, appointed by the Minister for Trade and Industry, would provide an independent opinion on whether the IRs have continued to maintain their tourism appeal. CRA will have to consider the opinion of the Evaluation Panel when considering the licences of the casinos.

ENHANCEMENTS TO RE-CALIBRATE AND STRENGTHEN REGULATORY REGIME

Apart from wide-ranging improvements to CRA's regulatory regime in 2013, several other enhancements were made post-casino opening to re-calibrate and fine-tune our regime for greater effectiveness and relevance.

The pervasiveness of money laundering and the growing threats of terrorism financing remains a pertinent issue that confronts the world. As highlighted in the National Risk Assessment Report that was published in 2013, the cash-intensive nature of casino operations exposes casinos to a higher risk of being associated with money laundering and terrorism financing activities. As such, CRA worked to put in place strong controls to mitigate the risks of the casinos being used as conduits for such illicit activities. Over the years, CRA had taken steps to strengthen our PMLTF regime by benchmarking our PMLTF requirements against international best practices (i.e. FATF Recommendations), increasing the frequency of our supervision over this area and conducting regular engagement with the industry to provide guidance and best practices. The requirement to conduct CDD measures was incorporated into the CCA to emphasise the importance of performing CDD, and it demonstrates CRA's commitment to preventing money laundering and terrorism financing in the casinos.

“Over the years, CRA had taken steps to strengthen our PMLTF regime by benchmarking our PMLTF requirements against international best practices (i.e. FATF Recommendations), increasing the frequency of our supervision over this area and conducting regular engagement with the industry to provide guidance and best practices.”

Preparations for the fourth round of the FATF Mutual Evaluation of Singapore, which eventually took place in November/December 2015, commenced as early as 2013. CRA worked closely with the other law enforcement agencies and sectoral supervisors, e.g. CAD, Monetary Authority of Singapore, and conducted regular inspections and engagements with the casino operators. Through these preparations, both CRA and the casino operators gained a better understanding of the industry-related risks while the casino operators tightened and improved on the implementation of PMLTF measures on the ground. Our efforts paid off when the FATF assessed that Singapore's casinos were “well supervised”.

Whilst we regulate the technological aspect of gaming machines, we have been committed to containing and controlling the potential harm of casino gambling. CRA has leveraged on technology to introduce additional player protection mechanisms over the years. Specifically, in 2014, we amended our technical standards to prohibit the “auto play” options on gaming machines to reduce the intensity of gaming, and dictated that the gaming machines cannot provide players with any illusion of control if the game prizes had already been pre-determined by the game software. We also worked closely with the casino operators and gaming machine manufacturers to ensure that the gaming machines displayed the odds of winning to highlight the difficulty of achieving specific winning combinations, so as to discourage excessive gambling.

SHARPENING CRA'S REGULATORY APPROACH

Improvements to our regime extended beyond legislative and technical amendments. We continually found ways to sharpen our regulatory approach and processes so that our actions are calibrated and appropriate. After experiencing the intensity of the full-scope inspection, we reviewed our approach and adopted a differentiated approach in our supervision of the casino operators based on our risk assessment. Having acquired a greater understanding of the casino operations, we were able to



“All slot machines must display winning odds”, The Straits Times, 25 October 2012

resources to conduct enhanced identification checks to deter and detect persons using a third party's identification document.

CRA'S CONTINUAL JOURNEY IN REGULATORY EXCELLENCE

As CRA's operating landscape continues to change, we must be prepared to consider how our regulatory regime needs to evolve to keep pace to remain effective and relevant. To reflect the changing needs of the industry, we have concluded reviews of the Licensing of Special Employees and Casino Contracts Regulations in early 2018. The Casino Contracts regime will be enhanced to ensure that the casino contracts are screened in an efficient manner, to meet our objective of preventing criminal infiltration and ensuring the suitability of the business partners that the casino operators enter into contracts with.

Through the changes that have taken place to CRA's regulatory regime over the last 10 years, we remain committed to bettering our domain knowledge and our technologies, and sharpening our systems, processes and framework while continuing our pursuit of regulatory excellence.

“ We remain committed to bettering our domain knowledge and our technologies, and sharpening our systems, processes and framework while continuing our pursuit of regulatory excellence.”

MINIMISING POTENTIAL HARMS OF CASINO GAMBLING

To mitigate the concerns of problem gambling, CRA and MSF have instituted a slew of measures and safeguards over the years.

The casino entry levy is one of the key social safeguard measures put in place to protect SCPRs. It is meant to remind SCPRs that gambling is an expense and not a way to make a living and to restrict admission into the casinos.

All SCPRs who wish to enter the casinos are required to either purchase a day levy which is valid for a consecutive 24 hours or an annual levy which is valid for a consecutive period of 12 months. It is an offence for SCPRs to not purchase an entry levy before entering a casino in Singapore. With effect from 31 January 2013, it is also an offence for SCPRs to over-stay in a casino without paying the additional levy for the over-stay period before leaving the casinos.

Besides the casino entry levy, other key social safeguards include the prohibition of minors and excluded persons from entering the casinos, casino visit limits, restrictions on the extension of credit to SCPRs and the prohibition of automated teller machines within the casino premises.

Regarding casino advertising and responsible gambling, CRA had promulgated Casino Control Regulations on both areas which set out the regulatory requirements imposed. For instance, the casino operators are not allowed to advertise or promote the playing of casino games or visiting the casinos without approval, and are required to implement their respective approved responsible gambling programmes and measures.

Casino visit curbs may turn into bans

Govt considering exclusion orders for the vulnerable who gamble more

By NG XAI LING

FIRST, their visits to the casinos could be cramped if a key proposed amendment to the casino law is passed.

Now, these "financially vulnerable" punters could even be barred from entering the casinos if they are found to gamble even more because of the limits placed on their visits.

The Government is currently considering the further measure to protect such punters from the ills of gambling.

It follows public concern that the proposed visit limit could drive punters to wager higher stakes or stay longer in the casinos to make the most of the number of visits allowed.

Last month, the Government proposed, among other things, that a visit limit be imposed on the financially vulnerable.

A month-long consultation exercise was launched and about 40 letters were sent to the feedback portal Reach. Four dialogue sessions were also held by the

National Council on Problem Gambling (NCPG).

Responding to public concerns, the Government yesterday said that people whose gambling habits intensified would be reassessed by the NCPG. "If individuals intensify their gambling while on a visit limit, NCPG's Committee of Assessors will reassess and impose casino exclusion orders if warranted," said Mr Chan Chai Sing, Acting Minister for Community Development, Youth and Sports in a press statement.

But the number of people who could be excluded is expected to be small.

While the proposed amendments cut across various aspects such as casino-related crime and the need to maintain the integrated resorts (IRs) as tourism products, most of the feedback was on measures to keep problem gambling to a minimum.

Many urged the Government to look into imposing similar measures for other forms of gambling, such as betting on horses

or jackpots in private clubs.

Some also suggested including mandatory counselling for all those placed under casino exclusion or visit limit.

The public also asked that the casino operators play a bigger role and suggested that casinos have counselling booths or "cooling-off" rooms.

In response, NCPG chairman Lim Hock San said the council would work towards having regular forums where community leaders and operators involved in all forms of gambling could look into ways to ensure responsible gambling.

The NCPG is also providing legal and financial advice at three of its family centres.

On the subject of crime, the Government reiterated that law and order had not been affected since the casinos opened in 2010.

In 2010 and last year, casino-related crime - mostly theft cases - made up less than 1 per cent of overall crime.

Instances of unlicensed money-lending activity also fell by about 20 per cent from 16,934 cases in 2010 to 33,542 cases last year because of an increase in enforcement.

The idea of an evaluation panel to assess the overall performance of the integrated resorts was also well received.

Many who responded on the portal said that the resorts need to constantly develop and promote their non-gaming components to remain attractive to tourists.

In response to public feedback asking the Government to ensure that Singaporeans benefit from jobs at the IRs, the Government pointed out that Singaporeans and permanent residents comprise the bulk of the IRs' 22,000 employees.

The Government said it would consider all feedback when finalising changes. Its target is to table the amended Bill in Parliament at the end of the year.

By xai@spk.com.sg

Key changes proposed

AMENDMENTS proposed for the Casino Control Act include these:

- SOCIAL**
 - Visit limits will be set for "financially vulnerable" local residents who go often to the casinos.
 - It will be an offence to evade the casino entry levy or stay beyond 24 hours for those who pay the daily levy.
- ECONOMIC**
 - IRs' economic obligations will be made clear.
 - New evaluation panel to give input to regulator for renewal of casino licence.
- CRIME**
 - Bets placed after results are known will be a crime.
- GAMING**
 - Operators can be fined up to 10 per cent of their gross gaming revenue.

"Casino visit curbs may turn into bans", The Straits Times, 18 August 2012

Chapter Three:

BUILDING STRATEGIC PARTNERSHIPS



CRA and NUS signed an MOU during the 2nd Gaming Technology Forum in 2011

“It was clear from the onset that the development of IRs in Singapore cannot be achieved through the efforts of any one agency alone.”

It was clear from the onset that the development of IRs in Singapore cannot be achieved through the efforts of any one agency alone. Even before CRA was established, CRD had to work with multiple agencies to figure out what would enable the IRs and casinos to succeed, and what would allow the harms and risks associated with casinos to be kept at bay. The tight coordination of all agencies culminated in the first set of Request for Proposal (RFP) that was issued in November 2005 to develop an IR at Marina Bay.

Soon after the RFP for Marina Bay was issued, all agencies had to come together quickly to tackle yet another challenge – to develop and draft the CCA that would set out the regulatory parameters for the operation of casinos. One of the complexities that came with the legislation was the number of Ministries and agencies that were responsible for different parts of the legislation – besides MHA and CRA, MSF is the policy owner of social safeguards, while the Inland Revenue Authority of Singapore (IRAS) oversees the tax revenue dimension.

It most certainly helped that all agencies involved had a common vision and objective, and were thus able to, within a short period of time, pull together a robust piece of legislative document that till today forms the backbone of CRA's regulatory regime.

FOSTERING LOCAL PARTNERSHIPS

The inter-agency milestones achieved during the RFP stage and drafting of the CCA showed that a Whole-of-Government (WOG) collaborative approach was a critical success factor for Singapore's IRs and casinos. As such, agencies organised themselves and formed an inter-agency steering committee and various working groups to apprise one another of major IR/casino developments, agencies' internal positions and agency-specific discussions with the two successful bidders of the IRs – MBS and RWS.

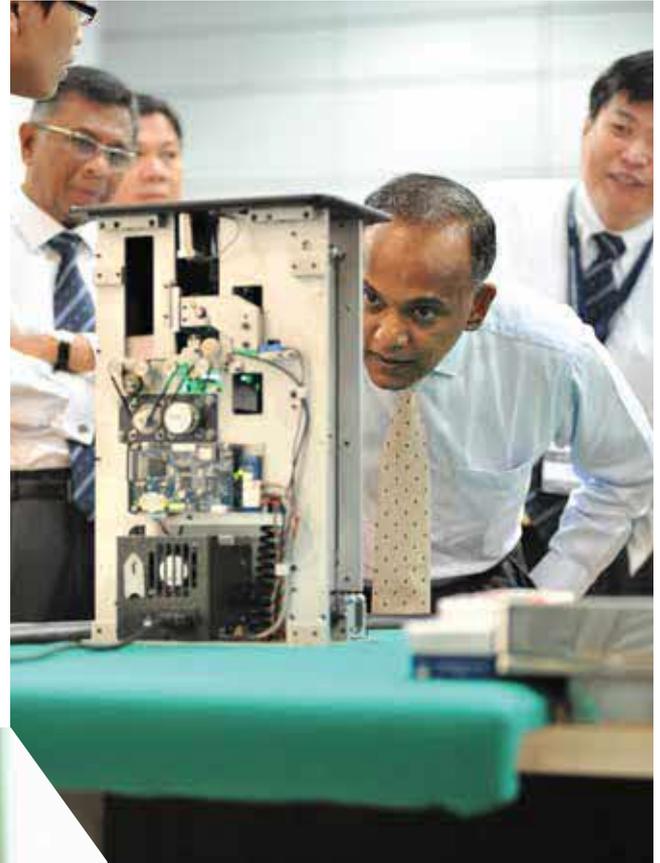
As many as six Ministries and agencies, including CRA, were represented in the committee and working groups, underscoring the complexity of IR and casino-related issues. CRA officers who participated in these inter-agency forums appreciated the rich discussions and multi-disciplinary perspectives that allowed our officers to be more enriched and informed about how CRA's work and Mission contribute to the larger WOG objectives.

Continuing with the ties and partnerships that we have established during the pre-CRA days, CRA reached out to various local agencies to put in place and operationalise key regulatory requirements.

SPF counts as one of CRA's long-standing partners in addressing and mitigating law and order risks, and our partnership with SPF can even be traced back to the days before the establishment of CRA. Armed with only an inkling of the law and order risks faced by overseas

regulators and law enforcement agencies at that time, CRD and SPF conducted joint study visits to countries such as United States and Macau and worked together to develop controls and measures that the casino operators will be required to put in place to prevent and detect the potential occurrence of criminal activities in the casinos.

When CRA developed its licensing regime for employees working in the casinos, we worked with SPF to put in place stringent background checks on our licence applicants and formed workgroups with SPF to regularly



Guest-of-Honour Mr K Shanmugam touring the exhibition during the inaugural CRA-CID joint training symposium in 2009



Guest-of-Honour Mr K Shanmugam giving the opening address during the inaugural CRA-CID joint training symposium in 2009

“ The inter-agency milestones achieved during the RFP stage and drafting of the CCA showed that a Whole-of-Government (WOG) collaborative approach was a critical success factor for Singapore's IRs and casinos.”

share our processes and exchange various information.

What also helped to keep these engagements warm and well-oiled were the SPF officers who were seconded to CRD (and later CRA) to set up key enforcement functions such as licensing and investigations. These seconded officers helped to foster a close working relationship between CRD/CRA and the rest of the Home Team agencies, which have lasted for more than a decade and counting.

At present, CRA officers continue to regularly meet SPF officers to share their knowledge on casino-related crime cases and in turn, CRA would provide our expertise in the areas of gaming machines and equipment, such as assisting in SPF's investigations of counterfeit chip scams. With the advancement of technology used by criminals to facilitate illegal activities, it is imperative that CRA and SPF continue to keep each other apprised of the potential law and order concerns posed by such emerging trends.

Another valued partner within the Home Team which we have been working in close collaboration with is CAD. Due to the cash-intensive nature of the casino business, the casino industry is typically viewed as an industry which is at higher risk for money laundering and terrorism financing activities. CRA had thus been working in tandem with CAD to institute a robust set of measures for the casino operators to counter these threats. Our relationship with CAD was further enhanced in the lead-up to the FATF Mutual Evaluation in 2015 when CRA and CAD officers contributed significantly in demonstrating our robust regulatory regime and addressing the queries raised by the FATF assessors.



Director of the Gambling Safeguards Division, MSF Ms Audrey Seah speaking at the 4th Singapore Symposium on Casino Regulation and Crime in 2016

Beyond the Home Team, CRA also values our significant working partnerships with social agencies such as MSF and NCPG, and financial and economic agencies such as the Ministry of Finance, IRAS, MTI and STB.

In the early days, CRA and IRAS conducted joint study visits and attachments to jurisdictions such as Nevada and New South Wales as we recognised that both CRA and IRAS wanted to develop supervisory frameworks to check for regulatory compliance with internal controls and tax requirements.

“We were not known as CRA or IRAS officers during the trips. To the foreign regulators, we were simply known as the Singapore regulators. Due to the sheer amount of information that they were sharing with us, we ended up taking notes for every area and shared notes amongst ourselves thereafter. These trips were the starting point of a strong bond that developed between CRA and IRAS,” shared Ms Ginggi Choy, who was then part of the Inspection and Compliance Division and had participated in the joint study trips.

One of the most important and trusted partnerships that we have built up over the years is with MSF and NCPG. For many CRA officers, there is a deep sense of purpose and co-ownership as CRA and MSF/NCPG officers freely give frank feedback and engage in open discussions to improve our decision-making processes and operating procedures so that our social safeguards are rigorously implemented and can achieve their intended objectives. Regular meet-ups, involving all levels of officers right up to the senior management in each agency, are a signal of the close attention that we give to social safeguard matters, while collaborative projects and activities are continually planned to bring both agencies together for a consistent understanding of the risks, concerns and opportunities that arise in the course of protecting the young and vulnerable.

While there was common ground with social and financial agencies, there appeared to be less obvious commonalities with the economic agencies as CRA's mandate was unlike MTI's and STB's objectives.

“To the foreign regulators, we were simply known as the Singapore regulators. Due to the sheer amount of information that they were sharing with us, we ended up taking notes for every area and shared notes amongst ourselves thereafter.”



Former CE CRA Mr T. Raja Kumar and CRA officers with the Macau Gaming Inspection and Coordination Bureau regulators in 2008



CRA officers attending a training session by a trainer from the New South Wales Casino, Liquor and Gaming Control Authority in 2009



CRA and Nevada Gaming Control Board officers during a training attachment to Nevada in 2009

“Nonetheless, CRA officers must always remember why the Singapore Government allowed for IRs (with casinos) more than a decade ago. An IR is intended to help us attain broader tourism and economic objectives, and an IR operator’s ability to develop, maintain and promote the IR (of which the casino is a part of) as a compelling tourist destination is not at odds with CRA’s objective to ensure that the casino operator is suitable to upkeep the IR,” reminded Ms Rebecca Lee, Policy and Communications Division. With this in mind, CRA and MTI/STB officers put on their WOG caps to institutionalise the Evaluation Panel framework and for the Evaluation Panel assessment on IRs’ visitor appeal and contribution to the tourism industry, amongst other factors, to be integrated into CRA’s casino licensing framework.

Recognising that we have much to learn from others and that the whole is greater than the sum of its parts, CRA will endeavour to strengthen the partnerships that were established since pre-CRA days so that, collectively, CRA and our valued partners can achieve much more for Singapore and Singaporeans.

ESTABLISHING INTERNATIONAL RELATIONS

Being an entirely new entity in the casino regulatory industry also meant that CRA had to quickly learn the fundamentals of the industry from others who had the relevant experiences and know-how. We began to reach out to foreign regulators to learn about their regimes and the ropes of casino regulation.

Much to our delight, the foreign regulators warmly received and accepted CRA into the international regulatory community and were extremely forthcoming in sharing their knowledge and experiences with us. In fact, as we started talking to other regulators around the world, we realised that the effectiveness of regulators depended, to a large extent, on how closely-knit and cooperative the regulators are in sharing information, best

practices and knowledge. This is because each jurisdiction often deals with similar business entities and shares similar concerns such as criminal influence, transnational crime and money laundering.

Additionally, industry and regulatory developments in one region or country can have significant implications for others. Therefore, in this interconnected landscape, regulators often cooperate, share information and engage one another to ensure that they are able to do their jobs more effectively and efficiently.

Over the past decade, CRA had been able to forge strong partnerships with overseas regulators, many of which preceded CRA's establishment.

CRD first reached out to the former Chairman of IAGR Mr David Ford, in 2005, who then kindly introduced us to IAGR and the rest of the international regulatory community.

Recognising that being part of the IAGR community would bring more opportunities to reach out to a wider group of regulators and to gain more exposure on an international platform, we became a member of IAGR and further took up the opportunity to join the IAGR Steering Committee in 2006.

As part of the IAGR Steering Committee, CRA played an active role in the development of the governance framework for an independent IAGR by drafting the by-laws to govern IAGR, introducing provisions such as having term limits for members of the Board of Trustees and instituting processes for appointment and removal of office-holders. These by-laws were adopted in 2011 and continue to govern IAGR to date.

Over the years, CRA had actively encouraged more



CRA officers interacting with delegates during the IAGR Conference 2012

Asian jurisdictions to attend the IAGR conferences as we recognise the value of regulators, especially those from emerging jurisdictions, being plugged into an international network.

In 2012, CRA hosted the IAGR conference in Singapore, which was the first time that the conference was held in Asia.

Organising the IAGR conference gave us the opportunity to showcase Singapore's casino regulatory framework. During the conference, speakers from CRA and CAD presented on the opportunities and challenges posed by the growth of Asian gaming jurisdictions and Singapore's experiences in establishing a preventative Anti-Money Laundering and



Panel discussion at the IAGR Conference 2012

Countering the Financing of Terrorism (AML/CFT) regime in the casino sector, which allowed foreign regulators to gain a deeper understanding of Singapore's regime and operating landscape. Ms Pauline Wan (who was then part of the Investigations Division) had headed the Programme Team for the IAGR Conference 2012 and described the experience as a truly memorable one:

"Looking back, it was an exciting journey for us, given that we were a young agency hosting many regulators. It was also heartening to see every single CRA officer come together. In the end, I believe that everybody was proud that we had delivered a great conference, which was well received by the participants. If I had to name one takeaway from the event, it was the 'can-do' spirit – once we set ourselves the goal, and the ability to deliver it with aplomb."

Our ties with IAGR were further strengthened when our then Chief Executive Mr Lau Peet Meng was elected to become its President in 2013. During this time, CRA headed both the Multi-Jurisdictional Business Form (MJBFB) sub-committee and the Technical Standards sub-committee, where we spearheaded an initiative to standardise and streamline the types of information provided by businesses to regulators through the use of the MJBFB and developed a common set of technical standards for EGMs – the first set of technical standards issued by IAGR. The MJBFB had also been well-received and implemented by fellow regulators such as the Queensland Office of Liquor and Gaming Regulation, New Zealand's Department of Internal Affairs, the Great Britain Gambling Commission and Nevada Gaming Control Board (NGCB).

CRA's involvement with IAGR for more than a decade presented us with multiple opportunities to engage its members regularly. Taking on a leadership role in the

“Over the years, we maintained an active presence in the international community by speaking at and facilitating plenary sessions at major gaming events such as Global Gaming Expo (G2E), IAGR and ICE conferences.”

international gaming regulatory community over the decade also allowed CRA to play a part in shaping the global thinking and standards in casino regulation, which would otherwise not have been possible.

The IAGR also opened up doors for us as we very quickly became acquainted with other international regulators whom we remain on good terms with till today. In particular, the interactions with the Australian regulators led to an invitation for us to attend the Australasian Casino and Gaming Regulators' Conference, the annual gathering of the Australia and New Zealand gaming regulators, and jump-started CRA's important relationships with the Victoria, New South Wales and Queensland regulators that helped us to secure attachments for our officers starting from 2008.

Over the years, we maintained an active presence in the international community by speaking at and facilitating plenary sessions at major gaming events such as Global Gaming Expo (G2E), IAGR and ICE conferences. Through such platforms, CRA officers not only widened our horizons and gained deeper insights as we exchanged views with



CE CRA Mr Jerry See participating in a panel discussion at the ICE Conference 2018

other speakers and conference participants, but this also enabled the international community to better understand Singapore's perspectives and regulatory landscape through our sharing. This partnership with the international community is something that our officers treasure immensely.

Our desire to grow and strengthen our network of international partners never stops. After the casinos opened in 2010, we continue to send our officers to international gaming conferences and seek opportunities to keep in touch with our partners and to establish new relations.

In 2013, Asia was then a key driver and source of growth for the casino industry, with major casino developments planned or underway. Asian regulators were keen to study the regulatory models and approaches adopted by other jurisdictions and to examine how best to deal with the law and order, and social risks posed



Guest-of-Honour Mr S Iswaran touring the exhibition at the 3rd Singapore Symposium on Casino Regulation and Crime in 2013



by casinos. CRA and SPF thus made a concerted effort to invite regional regulators and law enforcement agencies to attend the 3rd Singapore Symposium on Casino Regulation and Crime.

Themed upon Asia's changing casino landscape, the 3rd Singapore Symposium evolved from what was an internal training platform to a key engagement platform tailored for regional gaming regulators. The Singapore Symposium brought together established international regulators and law enforcers, subject matter experts, and industry professionals and provided CRA with the opportunity to share our regulatory practices with regional regulators, and to expand and strengthen our international partnerships.

For the 4th Singapore Symposium in 2016, CRA introduced a roundtable discussion for Asian regulators. This closed-door session was well-received as regulators were able to openly share on key developments in the legislative and regulatory fronts and to forge closer ties as one Asian regulatory community.

MOVING FORWARD TOGETHER

The passage of our partnership journey has been one that has provided CRA with ample learning opportunities from our established partners in the regulatory community as well as allowed us to reach out and share our experiences with others.

We have had the privilege and opportunity of learning from some of the best regulatory practices in the world. For that, CRA is appreciative of our partners for helping to shape our regulatory regime. In return, we continue to actively reach out to the international community and regional regulators through speaking opportunities at major conferences and platforms such as the Singapore Symposium.

We look forward to contributing back to the international community and forging impactful collaborations and ties with all our valued partners.



CRA officers hosting a visit by the Casino Regulatory Division of the Jeju Self-Governing Province, South Korea in 2016

IAGR CONFERENCE 2012: A MISSION OF SUCCESS

The opportunity arose for CRA to host the IAGR conference in 2012, approximately two years after the opening of the IRs.

Held for the first time in Asia, this large-scale international conference was undoubtedly a challenge for us but at the same time, gave CRA the chance to come together and work towards a common purpose – to ensure that we ran a successful conference that would put Singapore and CRA on the world stage.

“It was about putting together strong conference content and bringing regulators together to facilitate conversations and collaborative engagements in regulatory work,” Ms Ho Ser Hian (who was then from the Policy and Planning Division), explained.

Armed with clear objectives, the organising committee and sub-committees helmed by the CRA Management and made up of CRA officers from various divisions were formed to manage various aspects of the conference, including liaison, conference programme, transport, administration and support, among others.

The experience was filled with countless adrenaline-charged moments and circumstances that distinctly illustrated our officers’ commitment and dedication.

Ms Cheryl Foo (who was then from the Policy and Planning Division), a member of the IAGR Conference 2012 organising committee, shared:

“All CRA staff devoted additional time from our daily work to assist with the conference planning, sitting through early morning teleconferences with the IAGR Board of Trustees

(comprising members from different time-zones) to discuss on conference topics, late-night Committee meetings to brainstorm ideas and some even worked into the wee hours to print materials, coordinate conference registration, reply to queries from conference participants and many others.”

CRA officers intensified our spirits and resoluteness throughout the days nearing the actual event. Ms Foo recalled, “It was four days of continuous hectic activities as we roped in more staff to help out and we saw how the whole CRA came together to make the IAGR Conference 2012 a memorable experience for conference participants.”

Pulling off such extensive efforts were proven worthwhile when the IAGR Conference 2012 received the highest number of attendance for an IAGR conference at that time, comprising more than 200 delegates from over 30 jurisdictions.

Ms Ho added, “We also received much affirmation and thank you letters, messages and emails from the foreign regulators who came to Singapore to attend the conference.”

The success of the event exhibited how far CRA has come in our journey as a regulator within just a short span of time, from learning and referencing key jurisdictions to now being able to share with the international community our regulatory model, one which we have developed based on our unique needs.

The success of the IAGR Conference 2012 remains in the minds of CRA officers and participants alike today and serves as a source of motivation as we constantly remind ourselves to always do better and emulate our past achievements.

Chapter Four: CREATING A STRONG SENSE OF PURPOSE



CRA officers during WPS 2017

“ Starting from a staff strength of only about 30 officers on 2 April 2008, CRA today has grown to more than 160 officers.”

CRA could not have come so far without one essential element – its people. Starting from a staff strength of only about 30 officers on 2 April 2008, CRA today has grown to more than 160 officers. From ages 21 years old to more than 70 years old, our officers came from both the private and public sector, or straight after completing their studies. Whilst our backgrounds and experiences were diverse, we shared one common goal – a desire to be pioneers in the casino regulatory arena, and to contribute to a well-regulated casino industry in Singapore.

LIFELONG LEARNING

As the casino industry was a nascent one in Singapore, one of CRA's priorities in the early years was to equip all officers with the necessary skills and know-how on the nuts and bolts of casino operations in order to regulate the casinos effectively.

Stepping into an unknown realm of casino regulation, we developed a strong sense of perseverance as we scoured the world for the best practices and knocked on doors to engage, connect and learn.

From as early as 2007 when CRA was yet to be established, our officers who were then with CRD were sent for training attachments, gaming conferences and study trips to learn the ropes of casino regulation from our more experienced counterparts in overseas jurisdictions such as Nevada, New Jersey and New South Wales.

Recounting her experience, Ms Esther Loh, one of the CRA pioneers who had transited over from CRD, said, "When we met our overseas counterparts, many regulators, who had been regulating casinos for decades, were surprised at how new we were. In the face of the deluge of questions we had for them, they selflessly imparted their experiences, including what had not worked for them, and shared with us their manuals and documentation of their regulatory practices. We were pleasantly surprised with both the amount of information downloaded on us and their enthusiasm in sharing their "secrets of regulation" with us, whom they were meeting for the first time!"

The journey of learning continued subsequent to CRA's formation. To obtain first-hand experiences, our officers were attached to overseas enforcement and compliance officers who were deployed onsite at the casinos to deal with issues such as regulatory non-compliances and patron disputes.

"The NGCB officers were deployed across three shifts a day. Additionally, to maximise our learning and to get a well-rounded experience of how the work was like across the different hours, we covered as many shifts as possible. This meant that we had to adjust from doing the graveyard shift (9:30pm to 7:30am) to the morning shift in a short span. Although it was tiring, we were able to observe many interesting aspects of the casino operations and regulatory checks by the NGCB officers. The experience was especially useful when we started our own deployment work after the casinos opened," said Mr Amrit Jassal, who was then part of the team from the Inspection and Compliance Division which was attached with NGCB in 2009.

Besides learning to ask the right questions and making sense of the huge influx of information, our officers had to design a regime that was suited to Singapore's needs. This gave us a deep sense of purpose as we recognised how important such learning trips were in achieving CRA's desired outcomes and objectives.

But that was not all to building up our capabilities in the initial years. We worked with experienced law enforcers to train our officers in investigation and interview techniques,



CRA officers attending a training session on interview skills and techniques

which proved invaluable later on when we had to deal with more than 6,000 special employees and numerous associates prior to casino opening. Workshops were also conducted by foreign regulators for both CRA and CID officers on how popular casino games were played and the common breaches and fraudulent practices that foreign regulators have encountered.

Over the years, our quest for a deeper understanding of other areas of work such as gaming technology and responsible gambling saw our officers establishing relations and friendships beyond the regulatory community to include academics and industry players such as testing laboratories and gaming machine manufacturers. This kept our officers constantly excited and updated about the industry developments, and advancements in technology and products in the casinos.

Even after the casinos had operated for close to eight years, we never stopped learning. Newly-recruited officers were exposed to international practices and regimes by attending gaming conferences, and sharing their newly-acquired knowledge with other CRA officers. More experienced officers, having had some regulatory experience by then, could engage our partners at a deeper level to distil the learning points from their regulatory approaches.

Mr Chia Yun Chuan (who was then from the Licensing Division) revealed that, during his attachment to Great Britain Gambling Commission (GBGC) in 2014, he had gained useful knowledge about GBGC's licensing framework and how GBGC operationalises a risk-based supervision and inspection regime. Till today, even after he was posted out of the Licensing Division, he continues to find the learning points from the attachment useful for his current role in the Inspection and Compliance Division.

After the dust had settled on our start-up efforts to learn from others, CRA continued to invest in our officers through the development of the CRA Learning Framework to close knowledge gaps and nurture a sustainable healthy learning environment. As part of the framework, we identified relevant courses in core, functional and general development areas, and introduced the individual learning plan for our officers in 2013 to empower our officers in charting out and planning for training and development needs in these three learning areas annually.

To meet the growing demand for our niche training and development needs within the organisation, we also invested in in-house resources to develop a comprehensive training curriculum that leverages on the knowledge that exists within CRA. Harnessing the wisdom and experiences of our very own officers, training modules on the art of casino regulation were developed.



CRA officers during the in-house Casino Regulation 101 Programme (Casino Operations)

In September 2017, we rolled out our first in-house training programme, Casino Regulation 101 Programme (Casino Operations), with a curriculum that was developed entirely by our officers. This was an important milestone as it marked the institutionalisation of knowledge that would be passed down moving forward. The training programme was a result of the hard work of officers who took pride in sharing how we shaped the regime and our experiences from regulating the casinos.

Building and sharpening the capabilities of our officers is a lifelong journey as it is our strong belief that continuous learning and development of our officers is essential for CRA to remain effective and to stay ahead of the game. We will continue to build on our in-house training curriculum and ensure that it is kept relevant and up-to-date, and will implement various training interventions to enhance our officers' competencies.

“ To meet the growing demand for our niche training and development needs within the organisation, we also invested in in-house resources to develop a comprehensive training curriculum that leverages on the knowledge that exists within CRA.”

“ We have embraced and embodied our value of teamwork through strong working rapport with one another, harnessing knowledge and skillsets, nurturing innovative minds while envisioning a common end goal.”



Former CE CRA Mr Lau Peet Meng, Guest-of-Honour Mr S Iswaran and former Chairman CRA Mr Richard Magnus launching the new CRA Vision statement at WPS 2012

THE VALUES THAT BIND

Having unveiled a new Vision statement in 2012, we recognised that it was also important that our actions can be firmly anchored on a set of values that would guide us in the course of our work. Collectively, we came together to refresh our CRA Values and following months of lively discussions, we decided on five core values of Integrity, Care, Professionalism, Pioneering Spirit and Teamwork.

These values reflect the strong commitment of our officers to uphold the Mission that has been entrusted to us and to perform our roles to the best of our abilities. The “mantra” that was created to reinforce the Values – “I Care for my Professional and Pioneering Team” clearly espouses the values that we hold deep in us, and that binds all CRA officers in our thoughts and actions.

Integrity – This forms the bedrock of our values as it represents our resolve to do things right, and uphold the trust that the public has placed in us.

Care – Being a part of the Home Team, we care about Singapore, our team and our Mission.

Professionalism – Having come from diverse backgrounds, our officers leverage on each other’s strengths and rich experiences to fulfil our Mission and exemplify professionalism in our daily work.

Pioneering Spirit – With our vision of becoming the trusted casino regulator advancing our Mission with pride and integrity for a safe Singapore, our officers who are pioneers of the casino regulation industry in Singapore embrace each challenge that we meet as an opportunity to learn, improve and innovate.

Teamwork – Throughout our journey in the past decade, our officers have worked together to brainstorm, shape and implement many of the policies, frameworks and systems that have helped CRA to fulfil its Mission.

Ms Josephine Kok (Policy and Communications Division) shared how we have embraced and embodied our value of teamwork through strong working rapport with one another, harnessing knowledge and skillsets, nurturing innovative minds while envisioning a common end goal:

“Although teamwork is a value that is commonly embraced in other organisations, putting it into action is one of the hardest things as it requires everyone to adopt a consistent organisational position even when each person may hold a different view. However, it is how everyone puts their personal views and preferences aside and work towards the common goal of achieving an outcome for the greater good of CRA and the public service.”

LEVERAGING ON TECHNOLOGY

To facilitate our officers in performing their work more effectively, we recognised that it was important to leverage on technology as a key enabler. In keeping up with advancing technology and IT systems, CRA stays ever-prepared to invest in our officers to equip us with sufficient depth and breadth of technical knowledge to ensure that CRA can effectively harness technology. We are cognisant that enhancing our IT systems and technological infrastructures will only be worthwhile if our officers are adept at utilising these resources.

Through the years, CRA has developed and enhanced numerous technological innovations and systems such as the Casino Licence Application System (CLAS) in 2008, Contracts Application System (CAS) and Probity,

Regulatory Offences and Breaches System (PROBES) in 2015, and Gaming Equipment System (GAMES) in 2017. These systems allowed us to streamline our work processes and conduct our work efficiently, and were capable of analysing vast amounts of information for us to sense-make and identify areas of concern early. In particular, our officers played a key role in identifying the deliverables of the system with the developers to ensure that the needs of the system users were fulfilled.

With CLAS, our officers were able to better manage the processing and approval of casino-related licences and casino operators were able to submit online licence applications, thus enabling our officers to reap efficiency gains without compromising on information security. The development of CLAS was undeniably an uphill task as it was the first of its kind to be used by a casino regulator within the Asia Pacific.

“There was a lack of reference points in developing the CLAS because of its uniqueness. CLAS was developed to retrieve and segregate information provided in the applicant’s Adobe smartform, which is the Personal History Disclosure Form (PHDF). As the PHDFs were submitted by the casino operators on behalf of the applicant, our team had to overcome the challenge of ensuring that the applicant’s information contained in the PHDF would remain confidential and yet could only be unlocked for review by CRA after they are uploaded in CLAS,” shared Mr Tan Wee Lee, who was then with the Licensing Division and part of our CLAS development team.

In the long run, the CLAS proved to be a huge value-add to CRA and our officers. It has since become the cornerstone of CRA’s Special Employee Licence regime since it was operationalised in late 2008.

Besides CLAS, our officers were forthcoming in sharing their experiences for CASY, PROBES and GAMES, which in turn motivated officers to seek new ways to enhance the systems. To ensure that our officers were well equipped



Former CE CRA Mr Lau Peet Meng with CRA officers at a townhall session in 2011

to utilise the systems that have been put in place, regular training sessions were conducted to ensure that our officers were able to benefit fully from these technological innovations, and the systems were also kept up to date to keep up with changing business needs of the organisation.

WORKING AND PLAYING HARD TOGETHER

Building a common identity as CRA officers would go a long way in fostering a sense of belonging and camaraderie that would reflect in how our officers go about their daily work.

We believe that for our officers to excel in their areas of expertise, it is first and foremost important that they are able to develop synergy with one another and bond well as a team. Apart from ensuring that our officers possess the right skillsets to be able to perform their roles competently, we also believe in connecting our officers at the personal level through various non-work related activities.

Putting our beliefs into action, the CRA Cohesion Committee (C³, or fondly known as CUBE) was formed in April 2012 to organise cohesion activities for CRA officers. CUBE’s activities and initiatives helped to foster a sense of belonging among all our staff, and created opportunities for officers from across CRA to come together to build the CRA spirit.

More than being just a place for work, CRA also fosters cohesion and unity amongst our officers by providing opportunities for our people to bond over common interests and to interact with one another outside of the usual work environment.

For Ms Catherine Tay (Corporate Development Division), who was asked to be part of the CRA Cohesion Committee in FY2016, it has been an exhilarating experience.

“In CUBE, I was not only able to learn about the event planning process, which was something different from my daily routine tasks, but I also felt gratified to be able to see the smiles from each individual officer when they have enjoyed the games and cohesion programmes I planned,” shared Ms Tay.

To further build up cross-divisional interactions, CRA officers are allocated to different “Houses” for various non-work related activities such as organising festive and themed events during the year. Special Interest Groups (SIGs) such as marathoners and soccer enthusiasts also began emerging within CRA, where like-minded individuals gather after work to partake in activities that they enjoy most.

“No one gets left behind, regardless of how fast or slow you are. That is the shared belief amongst the members of the Running SIG even as we push one another to achieve better timings week after week,” said Mr Tan Wee



CRA officers participating in the Yellow Ribbon Prison Run 2017

Lee (Inspection and Compliance Division), who initiated the formation of the Running SIG.

In line with our value of Care, CRA also started channelling our efforts and drive towards developing ourselves as socially responsible individuals through Corporate Social Responsibility (CSR) activities for beneficiaries of charitable organisations. These CSR activities, which were initiated as early as December 2008, served as a reminder to our officers to set aside time to care for the less fortunate and to give back to society.

Ms Kok recalled, "There was one time where our officers had to organise a games carnival for the elderly at the AMKFSC (Sengkang) Centre. Although all of us did not have any prior experience in planning for appropriate games for the elderly, our officers managed to work as a team to bring smiles to the elderly's faces. This was a real testament to how CRA officers portrayed both Care and excellent Teamwork."

As CRA continues our journey ahead, our people remain the fundamental driving force in pushing new limits, making innovative discoveries and crossing more boundaries each new day as we move onward to greater regulatory excellence. We recognise that it is important to continually



CRA officers interacting with participants during a carnival organised for residents of an eldercare centre

strengthen our "heartware", to develop the spirit, values and teamwork that make us proud to be a part of CRA.

Through the commitment of our people and a collaborative effort, each and every CRA officer strives to stay true to our core values of Integrity, Care, Professionalism, Pioneering Spirit and Teamwork.

EMBARKING ON A NEW CHAPTER



START POINT



Chapter Five: OUR JOURNEY CONTINUES



“Officers at CRA have taken this Mission to heart and strived to fulfil this to the best of our abilities over the past 10 years.”

When the decision was made to have the IRs with casinos in Singapore more than 10 years ago, the government made a commitment to put in the resources and measures to control and mitigate any law and order, as well as social impact that may result from the casinos.

The formation of CRA 10 years ago to regulate the casinos was one of those measures. We were tasked with the Mission to ensure that the casinos remain free from criminal influence, to ensure that gaming in the casinos are conducted honestly, and to contain and control the harm that the casinos may have on minors, vulnerable persons and society at large.

Officers at CRA have taken this Mission to heart and strived to fulfil this to the best of our abilities over the past 10 years. Starting off with very limited



“ CRA would not have achieved what it has today without the contributions and help of so many people.”

knowledge and experience, officers at CRA have learnt from others from around the world. Over the years, CRA had put in place a regulatory regime that met the unique circumstances of Singapore. This regulatory regime continues to evolve as we gain more experience and have a better understanding of the operating environment.

Singapore’s casino regulatory regime is now recognised by many around the world for being robust, with our own unique features. We are pleased that we can now also contribute to the international community by providing our perspectives and experiences. As we have been helped by many generous regulators in the past, we are paying it forward by sharing our knowledge with other jurisdictions.

CRA would not have achieved what it has today without the contributions and help of so many people. There were many overseas regulators who have helped us in the past and continue to work closely with us today. We would also like to acknowledge our local partners who worked hand in hand with us to ensure that the casinos are well-regulated and that we fulfil our Mission on a daily basis.

CRA is also grateful for the leadership of the Chairmen and Board members who had, over the years, worked hard with CRA officers to ensure proper governance and a robust casino regulatory regime. There was and continues to be

great support and guidance from our own parent ministry, MHA, that has allowed CRA to develop over the years.

Last but not least, we acknowledge all CRA officers, past and present, whose dedication and hard work have made what CRA is today.

Even as we look back on our achievements over the last 10 years, it is equally important for CRA to focus on how we can continue to build upon these achievements. The operating environment continues to evolve and new challenges will appear. Like many other industries, technological changes will inadvertently impact the casino industry, which will have to adapt. The two casino operators in Singapore will also have to address competition from other casinos being built across the world and in the region. All these mean that CRA will have to be vigilant and nimble in ensuring that our regulatory regime continues to evolve to remain relevant and effective.

CRA is proud of what we have achieved over the past 10 years, developing from an inexperienced regulator to one that is well-regarded by many. In the years ahead, we will continue to uphold the trust placed on us to carry out our Mission. We look forward to working with our overseas and local partners to accomplish this.

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PSA BUILDING

460 Alexandra Road #12-01, Singapore 119963

Tel: (+65) 6501 7000 | **Fax:** (+65) 6273 0917

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