

## **CLUB GUIDE TO IMPLEMENTING PART 4A PROVISIONS**

*This is not a comprehensive instruction but intended as a guide to develop a model to develop full compliance procedures.*

Part 1 - Guidelines provides a step by step guide.

Attachments A and B must be prepared by the club from various sources and will become annexes to various correspondence to the Board, Top Executives and Staff.

## GUIDELINES

Secretary to set an agenda item 'Introduction of Part 4A Accountability Provisions' for next Board meeting. Prior to the meeting the Secretary shall:

1. Request Payroll and HR Managers to:
  - i. Identify and list **top five paid employees**
  - ii. Identify and list employees who are **close relatives of the Board**
2. Request Accountant to:
  - i. Identify and list all **contractual relationships** the club has with a party to provide goods and services. Entitle the document Attachment A
  - ii. Identify and list all **affiliated bodies** of the Club. Entitle the document Attachment B
3. Secretary to circulate Attachment 1 to all Directors.
4. Secretary to circulate Attachment 2 to top five paid employees.
5. Secretary to circulate Attachment 3 to all staff.
6. Secretary to obtain all standard documents required to make and record disclosures and declarations.
7. Secretary to create a register of all disclosures and declarations.
8. At the next Board meeting the directors should:
  - i. Fully review Part 4A and set procedures for compliance
  - ii. Formally approve employment contracts of top executives
  - iii. Accept all disclosures by members of the Board and top executives
9. Secretary to ensure that the requirements to publicly exhibit all disclosures made at the Board meeting.
10. Secretary to ensure the Director of Liquor and Gaming is provided a copy of all disclosures, declarations and contracts.

...../...../2004

**IMPORTANT INFORMATION FOR DIRECTORS**

Dear .....

I write to you as a current member of the governing body of the Club.

Pursuant to the newly introduced Accountability Provisions of Part 4A of the Registered Clubs Act, I am obliged to request you attend to the following matters.

- i. Review Attachment A – List of Club Contractors
- ii. Review Attachment B – List of Club Affiliated Bodies

Section 41C of the Registered Clubs Act now requires you to disclose to the Board a material personal interest in a matter that relates to the affairs of the club, including personal interests in any club contract with the contractors listed in Attachment A at the next meeting of the Board.

Section 41D of the Registered Clubs Act now requires you to give written declaration of any financial interests in a hotel within NSW.

Additionally, Section 41F of the Registered Clubs Act now requires a member of the Board and a club employee to submit a written annual return to the Club detailing any gift in excess of \$500 in value received from a party to a contract with the Club listed in Attachment A.

Section 41E of the Registered Clubs Act now requires you to declare any gift in excess of \$500 in value you receive from Affiliated Bodies of the Club listed in Attachment B. Should you receive a gift from a listed body, you must report it to the Secretary within 14 days.

Finally, the legislation requires that as the Secretary, I maintain a register of all disclosures and reports and make it available for inspection by all members.

Thank you for cooperation.

**Secretary**

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## IMPORTANT INFORMATION FOR CLUB EXECUTIVES

Dear .....

I refer to the newly introduced Accountability Provisions of Part 4A of the Registered Clubs Act. This correspondence serves to formally advise you that as one of the top five highest paid employees of our Club you are now categorised as a *Top Executive*.

Registered clubs are now required to report certain details of a Top Executive in the next annual report.

I am obliged to request you attend to the following matters.

- i. Review Attachment A – List of Club Contractors
- ii. Review Attachment B – List of Club Affiliated Bodies

Section 41D of the Registered Clubs Act now requires you to give written declaration of any financial interests in a hotel within NSW.

Section 41E of the Registered Clubs Act now requires you to declare any gift you receive from Affiliated Bodies of the Club listed in Attachment B. Should you receive a gift in excess of \$500 in value from a listed body, you must report it to the Secretary within 14 days.

Section 41F of the Registered Clubs Act now requires a member of the Board and a club employee to submit a written annual return to the Club detailing any gift in excess of \$500 in value received from a party to a contract with the Club listed in Attachment A.

Thank you for cooperation.

**Secretary**

**MEMORANDUM**

**ALL STAFF**

March 2004

Pursuant to the newly introduced Accountability Provisions of Part 4A of the Registered Clubs Act, I am now obliged to request you to review *Attachment A – List of Club Contractors*.

Section 41F of the Registered Clubs Act now requires a member of the Board and a club employee to submit a written annual return to the Club detailing any individual gift or accumulated gifts from the same donor, in excess of \$500 in value received from a party to a contract with the Club listed in Attachment A.

Thank you for your cooperation in this matter.

**Secretary**