

RESPONSIBLE GAMBLING POLICY GAMING PLAN OF MANAGEMENT

DECEMBER 2023

Engadine
Bowling Club



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Introduction

Engadine Bowling & Recreation Club Ltd (the “Club”) Board of Directors and Management are committed to providing a safe and responsible venue for all patrons in the delivery of gambling products. We acknowledge our role to ensure that our patrons’ well-being is paramount in the conduct of our operations.

This Responsible Gambling Policy shall outline the initiatives taken by the Club to be a responsible leader within our community. The Club is focused on its commitment to the Clubs NSW Gaming Code of Practice, harm minimisation and reducing the impact that gambling related products can have on individuals and the wider community.

The Club is located in the Sutherland Shire Local Government Area and the Engadine SA2, which is a Band 1 SA2 at the date of this policy’s acceptance.

Venue Operating Procedures

Gaming Shutdown Period

The Club has a gaming shutdown period between 2.00am and 8.00am, and a shutdown period between 4.00am and 10.00am on Public Holidays.

Gaming Machine Location

The Club's gaming machines are located within a designated Gaming Room. Signage is displayed at each entrance to the Gaming Room advising that the area is restricted to persons of or above the age of 18 years.

A copy of the Club's 'Premises Plan' and associated ATM and CRT locations is attached as Appendix 1.

The gaming machines that are authorised to be kept at the Club are connected to a Central Monitoring System (CMS), which regularly monitors the gaming machines. The Manager on duty will check the monitor daily and ensure all gaming machines are connected.

All gaming machines shall be checked weekly and documented that they display approved artwork, labels, compliance plates and signage.

Each gaming machine has a clock displayed on the monitor and system screen, and automatically adjusts for daylight saving.

If a gaming machine is faulty, the machine is to be switched off and an 'out of order' sign placed on it.

The gaming machines are to be kept locked to prevent all unauthorised access. The keys to the gaming machines are to be in the possession of the approved gaming employee.

Gaming Prizes

All employees involved in the operation of the Club's gaming machines will be instructed on the required gaming procedures on the commencement of their employment.

Payment of prizes over the amount of \$5,000 must be made by cheque with 'prize winning cheque - cashing rules apply' endorsed on it, or by EFT to a nominated account, of the person playing the gaming machine at the time.

Prizes under the amount of \$5,000 can be paid by cash, or by cheque or EFT upon request.

Only the Manager on duty is authorised to process large prize-winning payouts. They shall ensure that the appropriate paperwork and any KYC requirements are completed prior to the payment of the prize money.

Gaming Signage

Weekly checks are undertaken and documented by employees to ensure all gaming compliance signage is up to date and maintained. Management audits are also undertaken yearly at the club to ensure we are meeting legislative requirements.

All approved signage that is required to be displayed by Liquor & Gaming NSW will be affixed in prominent locations throughout the Club, including 6G “Help is close at hand”, 1G “What’s gambling really costing you?”, 3G “A million to one” and 2L “Under 18’s not permitted” at each entry point to the Club’s gaming room.

The Problem Gambling Counselling Service signage will be located within the Gaming Room.

Sign 2 “Help is close at hand” self-exclusion contact cards securely attached to each bank of gaming machines in a card holder, so they can be clearly seen when playing a gaming machine or when approaching the bank of gaming machines.

Each gaming machine has the 4G “Help is close at hand” stickers on the front display of the machine within eyesight from a seated position, as does each ATM and CRT.

Brochure 1, “Info about the odds - betting on Gaming Machines” are located in the Gaming Room and available in other languages upon request.

If at any time the required signage is not in place as required, the employee noting the absence of the sign are to immediately replace the sign and notify the Responsible Gambling Officer and/or the Manager on duty.

Use of Technology

The Club is currently investigating the introduction of facial recognition technology that will be linked to the MVSE system, so that Management could be alerted should a self-excluded patron enter the venue.

Self-excluded patrons are flagged in the Clubs membership program and Visitor Management software so that when they enter the venue, employees are alerted, and appropriate monitoring or action can be taken.

Keno & Tab Operations & Prizes

The Club offers Keno & Tab facilities for its patrons, and the terminals are operated by appropriately trained employees.

It is the Club's policy to ensure that the details of a prize winner remain confidential and will not to be publicised or displayed within the Club or released to a third party.

The rules and regulations for playing of Keno together with the instructions on how to play, pamphlets and booklets issued by L&GNSW outlining the odds of betting on lotteries, as well as information regarding problem gambling are displayed at the point of sale for Keno.

The maximum cash payment of a Keno prize is \$2,000. A prize greater than \$2,000, will be paid to the customer either by cheque with 'prize winning cheque - cashing rules apply' endorsed on it, or by EFT to a nominated account. Larger jackpot prizes will be paid directly by Keno after sufficient time to verify the win and issue the prize. Keno jackpot winners will be required to supply the Club with their full name, address and approved identification for KYC verification for Keno.

Tab operators follow the required Large Transaction Reporting and Suspicious Matters Reporting procedures.

No credit betting is allowed in venue. The Club only accepts cash payments for Keno and Tab transactions.

Training & Education

Employee Training

All employees will be trained in the procedures contained in this Responsible Gambling Policy prior to commencing their employment. Ongoing training with harm minimisation practices adopted at the Club is provided at team meetings on a regular and ongoing basis.

Employees will be trained and be provided with the necessary resources to allow the identification of signs of at-risk and problematic gambling behaviour by patrons utilising the gaming room. Employees will also be provided with training on communication skills to assist in approaching patrons identified as exhibiting at-risk tendencies as part of the welfare checks to be conducted at the Club.

The Club requires employees to be proactive for signs of problem gambling. If unsure of signs being exhibited by a patron, the Responsible Gambling Officer or a member of the Club's management team is to be approached to discuss the manner of attending to these requirements.

Employees will be notified of any updates to the Responsible Gambling Policy or practices at regular team meetings.

All employees will complete the following training.

- Responsible Service of Alcohol
- Responsible Conduct of Gambling
- Anti Money Laundering & Counter Terrorism Financing Awareness Training

All management employees will complete the following additional training.

- Advanced Responsible Conduct of Gambling
- Anti Money Laundering & Counter Terrorism Financing Oversight Training

The Responsible Gambling Officer and one other person shall complete the Responsible Gambling Officer training course.

Director Training

All Directors will complete Responsible Gambling Oversight Training and the Anti Money Laundering & Counter Terrorism Financing Oversight Training.

Responsible Gambling Officer (Gambling Contact Officer)

- 1) The Licensee shall ensure that one Responsible Gambling Officer (Gambling Contact Officer), being a dedicated staff member who holds a current RCG certificate, is on duty and monitoring the gaming machines of the venue whenever gaming machines are operating all hours.
- 2) The Officer's primary duties are to:
 - a) maintain the gambling incident register;
 - b) make reasonable efforts to identify gaming machine players who display or engage in problematic gambling behaviour;
 - c) if any gaming machine player displays or engages in multiple problematic gambling behaviour as outlined in the Authority's Guideline, during a single trading day, then the Officer must (at least once during that trading day):
 - i) request that the player take a break from gaming machine play until the close of trade on that day or night (noting that a player who complies with a request to take a break may remain on the premises and consume other goods and services);
 - ii) provide information about the self-exclusion scheme offered at the premises (being the scheme available pursuant to s. 49 of the Gaming Machines Act 2001) and ask whether the player wishes to participate in that scheme;
 - iii) provide information about and access to problem gambling counselling.
- 3) This condition is not breached by:
 - a) a Responsible Gambling Officer (Gambling Contact Officer) undertaking minor additional gaming duties, so long as such duties do not detract from the Officer's primary duties; or
 - b) the temporary absence of the Officer from the gaming machine areas, where such absence occurs in the ordinary course of their primary duties (for example, to engage with a gaming machine player in a private space) or is by way of a routine break from work (such as a meal break or a bathroom break).
- 4) At all times, the Duty Manager or other senior manager responsible for gaming machine operations will assist the Responsible Gambling Officer (Gambling Contact Officer) in carrying out the duties described in this condition.

In their role as the Responsible Gambling Host, the employee can undertake additional gaming duties so long that they do not detract from their primary role. This can include, but not limited to;

- Infrequent or sporadic servicing of gaming machines

- Infrequent or sporadic drink service
- Cleaning of glasses and ashtrays, or the straightening of chairs
- Processing payments of an infrequent nature (as the Club operates cash redemption terminals)

Customers

Self-Exclusion

The ClubSAFE Multi-Venue Self-Exclusion (MVSE) Program is an online system designed to enable people with a gambling problem to self-exclude from our venue as well as multiple venues around where they live, work, and socialise. The Club will initiate self-exclusion when requested by a patron at any time during its trading hours.

The ClubSAFE MVSE Program removes barriers for people with a gambling problem such as the requirement to visit multiple venues or the embarrassment of visiting their local club to place the exclusion and makes the process easier for a person with a gambling problem.

A patron can self-exclude by speaking to the Manager on duty or the Responsible Gambling Host at the Club, or by contacting a gambling help counsellor.

The patron can choose to self-exclude from the entire venue, where they will be unable to enter the venue for any purpose, or a partial self-exclusion. A partial self-exclusion allows the patron to choose to self-exclude from the gaming room, TAB & Keno, or all gambling activities, but they are still able to utilise the club for food, beverage, and social activities.

The minimum period for self-exclusion is six months. Once a patron agrees to stay away from the club for a specific time, our Club has processes in place to help them honour that commitment. The Management Team have access to a regularly updated list of persons who are self-excluded from the venue, including name, date of birth, and photo, allowing prompt action should anyone enter the venue or gaming room from which they are excluded. This is also shared with appropriately trained gaming room employees. They will also be flagged within the membership database and visitor management software.

If a patron breaches their self-exclusion, it is reported through the MVSE program for assessment by trained counsellors.

Player Welfare Checks

The Club aims to ensure all our patrons have a positive experience; this includes undertaking welfare checks on any guests who may be at risk of problem gambling.

Strong indications of problem gambling can include, but not limited to;

- seeking credit for gambling
- seeking to borrow money for gambling
- seeking assistance or advice about controlling the person's gambling
- admitting to borrowing or stealing money to gamble
- enquiring about self-exclusion
- showing a significant decline in personal grooming and/or appearance over several days
- showing obvious or repeated signs of distress (e.g. shaking, swearing to themselves, crying after a loss, or outburst towards employees or machine)
- friends or family raise concerns about the person's gambling
- leaving a minor unattended while playing gaming machines

Our management and gaming team are vigilant in monitoring our patrons undertaking any gambling activity. If they are showing signs of problem gambling, extended play (three or more hours continuously) or distress, the Manager on duty or Responsible Gambling Host will conduct a welfare check to gauge their mood, stress level and awareness of time and surrounds. The welfare check will encourage them to take a break, explain self-exclusion or counselling service options, or ask them if they would like to leave the environment.

All encounters are recorded in the Gambling Incident Register and emailed within the management team.

Indirect interactions such as daily announcements are made over the Clubs PA system to encourage customers to take breaks from gaming machines. Such announcements are regarding other events, promotions or services (such as courtesy bus departures) that are underway within the Club.

The Club trades past midnight on Friday and Saturday nights, with a closing time of 12.30am. Our team will speak with gaming players offering them options to take the Courtesy Bus home, and increase their welfare checks up to, and after midnight.

Player Activity Statements

Our Club is required by law, to present members with a Player Activity Statement free of charge, should they request it. A Player Activity Statement shows in a chosen period, the player's total amount of turnover, total wins and net expenditure, the total points earned and redeemed through the club's rewards program as a result of playing gaming machines, the entire length of time the player's card was inserted into gaming machines, and gambling help information.

Anyone wishing to receive their player activity statement should speak to the Manager on duty or the Responsible Gambling Host.

Members Rewards Program

The Club offers a Member Rewards Program that allows members to accrue reward points every time they spend money within our Club. These can be redeemed within the Club to purchase goods and services.

Our tiered loyalty program is determined by the purchase and use of eligible goods and services. Tiering points are accumulated and determines a member's eligibility for rewards tiers within the program. Full details are available in the rewards program brochure, including how to achieve rewards, terms & conditions, and how to opt-out. Brochures are available at Reception or from any team member upon request.

Gambling Incident Register & Complaints

Gambling Incident Register

The Club will keep and maintain a Gambling Incident Register. The Gambling Incident Register will record:

- 1) The licensee must keep and maintain a gambling incident register.
- 2) The gambling incident register must record:
 - a) any incident in which a patron of the venue displays or engages in problematic gambling behaviour of the kind specified in the 'Signs of risky and problem gambling behaviour: Know the signs and how to act' factsheet published on the L&GNSW website as amended from time to time.
 - b) the time, location and machine number(s) and brief description (or identity, if known) of any gaming machine player identified displaying or engaging in that behaviour
 - c) any proposed or implemented self or third-party exclusions of gaming machine players (specifying the player's name (where provided or known), membership number (if applicable) and duration of any exclusion) and the patron's response to the same.
 - d) Any breach or attempted breach of a self or third party exclusion
- 3) The gambling incident register must also record details of the action taken in response to the incidents, applications and other matters recorded in the register.
- 4) The licensee must review the gambling incident register at least on a monthly basis and must consider whether an exclusion order is appropriate for any person who has been asked to self-exclude but has declined to do so.
- 5) The information recorded in a gambling incident register must be retained for at least 3 years from when the record was made.
- 6) The licensee must, at the request of a police officer or L&GNSW inspector, make any gambling incident register available for inspection.

The Responsible Gambling Officer shall review the Gambling Incident Register on a weekly basis, and report to the Board of Directors quarterly of any gambling related incidents, associated activities, and outcomes of reviews. No personal details will be shared with Directors.

The Gambling Incident Register shall be made available to the NSW Police or Liquor & Gaming NSW upon request.

Complaints

Employees are to ensure any complaints received from a patron concerning the operation of any form of gambling at the Club is recorded in the Gambling Incident Register on the receipt of the complaint (by the employee receiving the complaints no later than end of the shift the complaint is received).

The following details are to be obtained from the person making a complaint;

- i. Time and date of complaint;
- ii. Name;
- iii. Address;
- iv. Contact Number;
- v. Full details of complaint and the remedies the person requests; and
- vi. The details of the employee accepting the complaint.

On receipt of a complaint, the employee must record this complaint within the Register. The complaint is to be brought to the attention of the Responsible Gambling Host or Manager on duty prior to the end of the employee's rostered shift, who will report this incident to the Responsible Gambling Officer. Complaints will be investigated by the Responsible Gambling Officer in a timely manner to ascertain the veracity of the complaint, and determine what, if any amendments are to be made to the operation of the Club to ensure that further complaints are not experienced.

A report to the complainant on the outcome of the investigations that resulted in the complaint will be provided.

Legislative Requirements

Minors/Persons under 18 years

The Club is a licensed venue and any person under the age of 18 is not permitted to enter the Club's Gaming Room, and only permitted into the Club under the supervision of a responsible adult or guardian. Signage is prominently displayed at the Club entry, and each entrance to the Gaming Room to this effect.

Gambling by minors is prohibited, as is knowingly allowing a minor to enter the gaming room. Failure to adhere to this will result in both the minor and responsible adult or guardian being asked to leave the premises.

The Gaming Room is monitored by CCTV cameras and always overseen by employees.

Should an employee have concerns regarding the age of a patron, in the Gaming Room or elsewhere in the Club, that employee shall request the person to produce an approved form of identification to establish they are of or above the age of 18 years.

The approved and acceptable forms of identification are:

- A current Drivers Licence or permit that has been issued by an Australian State or Territory or any foreign country
- A NSW Digital Drivers Licence
- A passport issued by Australia or other foreign country
- NSW Photo Card
- Proof of age card issued by a public authority of the Commonwealth or of another State or Territory for the purpose of attesting to a person's identity and age
- Keypass (over-18) identity card issued by Australia Post

If the patron is unable to supply suitable identification, that person will be requested to leave the Club's premises immediately.

An entry will be made in the Club's incident register if the person is removed from the Club.

Community Contribution

All licensed venues in NSW who earn over \$1 million in gaming machine profits per year, are required by law to contribute a minimum of 2.25% of all gambling profits to their local community. Our Club contributes above the required amount each year, through the Local Club Grants committee and community donations.

Promotions & Advertisements

All advertising and promotions related to gaming undertaken within our club comply with the Liquor & Gaming NSW advertising guidelines. The Club conducts a self-audit annually to ensure that all compliance measures are being met. The Club does not advertise gambling related advertisements externally and conducts weekly checks that Gambling related advertisements cannot be seen outside of the venue.

The Club includes responsible gambling messages on its website, internal information screens, its newsletters and loyalty program marketing.

Cash Advances, Cashing of Cheques and EFTPOS

Cash withdrawals from a credit card account are prohibited from any of the EFTPOS terminals within the Club.

The cashing of cheques and cash advances is prohibited at the Club.

Review & Contact Information

Review

This Responsible Gambling Policy is reviewed annually, when the Club's gambling operations change, or when legislation or guidelines are varied. These reviews will be conducted by the Senior Management team and approved by the Board of Directors to ensure that its operation remains relevant to the Club's commitment to reducing gambling harm. Changes are subject to final approval by the Authority.

The Responsible Gambling Policy is available upon request at Reception and is accessible via the Club's website www.engadinebowling.com.au.

Feedback

All patrons and employees are welcome to provide feedback at any time by;

MAIL

General Manager
Engadine Bowling & Recreation Club
P.O. Box 62
Engadine NSW 2233

EMAIL

ATTN: General Manager
info@engadinebowling.com.au

ONLINE

www.engadinebowling.com.au/contact/

Local Licensing Police Contact Information

Sutherland Shire Police Area Command Licensing is based out of Cronulla Police Station.
Address: 34 Kingsway, Cronulla NSW 2230
Phone: (02) 9527 8154
Mobile: 0400 336 834
Licensing Sergeant: Mr. Darrin Thompson

Appendix

Appendix 1 – Premises Plan

APPENDIX 1



