

THE ST GEORGE MOTORBOAT CLUB LIMITED
2 WELLINGTON STREET
SANS SOUCI NSW 2219

Gaming Plan of Management

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Introduction

The St George Motorboat Club Limited (the “Club”) takes its responsibility and obligations in relation to the NSW Gaming Legislation (Gaming Machines Act 2007 and Gaming Machines Regulation 2019) seriously, with patron welfare being a priority for the Club.

All staff members are instructed to be vigilant in applying their training under Responsible Conduct of Gaming when working at the Club. The impacts of problem gambling have profound adverse effects on both patrons and the local community.

All staff employed at the Club must hold a current and approved RSA/RCG Competency Card. It is the staff member's responsibility to have this Card with them during every shift to allow its production upon request. A staff member with those qualifications will be present in the Club's gaming room to monitor patrons for general behaviour and particularly for signs of problem gambling.

1. Staff Training

The Gaming Plan of Management (“GPOM”) that has been adopted will be maintained at the Club for future reference.

All staff will be trained in the procedures contained in this GPOM prior to commencing their first shift. Ongoing training with harm minimisation practices adopted at the Club is provided at staff meetings on a regular and ongoing basis.

Further, staff will be trained and be provided with the necessary resources to allow the identification of signs of at-risk and problematic gaming behaviour by patrons utilising the gaming room. Staff 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. These resources will be available throughout the operating hour and updated at each training events conducted by the Club. Staff members who demonstrate a commitment to harm minimisation will be duly recognised by management.

Patron welfare is paramount. All staff will be reminded of the complaint policy in place regarding responsible gambling related complaints, which are to be reported to the Responsible Gambling Officer for investigation by the Duty Manager.

The Club requires staff 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.

Staff will be encouraged to a commitment to harm minimisation and will be recognised by management for their demonstration of commitment. Any changes to the GPOM or practices in place at the Club will be notified to staff at the regular staff meetings. The GPOM will be reviewed (on an annual basis) to ensure that its operation and systems implemented at the Club are up to date with the Gaming Legislation.

2. Responsible Conduct of Gaming and operating procedures

The Club's gaming machines' shut down hours are 4.00am to 10.00am each day. The gaming machines will be shut down to ensure they cannot be played during this period that has been applied to the Club's licence.

No free gaming credits will be provided to any patrons.

Staff are encouraged to regularly engage with patrons. This time will be used to determine if any signs of at-risk or problem gambling are being exhibited. All staff members will report to and provide feedback to Responsible Gambling Officer when any issue is detected.

Signs of Problem Gambling

Some of the signs of problem gambling are listed below. Staff are to remain vigilant in detecting any of the indicators mentioned below whilst on duty. If uncertain whether a patron is exhibiting any of the indicia of problem gambling, staff member is encouraged to contact and speak to the duty manager and/or the Responsible Gambling Officer.

	Loss of Control	Tick
1	Tries obsessively to win on one machine	
2	Gambles right through normal meal times	
3	Finds it difficult to stop gambling at closing time	
4	Starts gambling when the venue is opening or only stops when venue is closing	
	Money Seeking	Tick
5	Gets cash out on 2 or more occasions through ATM or EFTPOS	
6	Avoids cashier and only uses cash facilities	
7	Uses coin machine at least 4 times	
8	Puts large wins back into the machine and keeps playing	
9	Has run out of all money when he/she leaves venue	
10	Leaves venue to find money to continue gambling	
11	Asks to change large notes at venue before gambling	
12	Rummages around in purse or wallet for additional money	
13	Witnessed or heard that a customer was trying to borrow money from other people at venue or asking for credit from venue	
	Intensity and Duration	Tick
14	Spends \$300 or more in a session	
15	Often gambles for long periods (3+ hours) without a proper break	
16	Bets \$2.50 or more per spin most of the time	
17	Plays very fast	
18	Gambles on 2 or more machines at once	
19	Gambles intensely without reacting to what's going on around him/her	
20	Gambles most days	
21	Rushes from 1 machine to another	
22	Significant increase in spending pattern	
	Irrational and Superstitious Behaviour	Tick
23	Complains to staff about losing, or blames venue or machines for losing	
24	Rituals or superstitious behaviours such as rubbing belly of machine or screen, talking to machine, spitting on machine, use of luck charms	
	Emotional Responses	Tick
25	Shows signs of distress after gambling (looks sad/depressed, crying, holding head in hands, nervous/edgy, shaking, sweating)	
26	Gets angry while gambling (kicking, hitting machines, swearing, grunting or groaning, playing roughly/aggressively)	
	Social Behaviour	Tick
27	Stays on to gamble when friends leave venue	
28	Is rude or impolite to venue staff	
29	Becomes angry or stands over others if someone takes their favourite machine/spot	
30	Avoids contact or conversation with others	
31	Generally poor hygiene, or, significant decline in personal grooming or appearance over several days (body odors, dirty or unchanged clothes, messy greasy hair)	
32	Conceals presence at venue (doesn't answer mobile phone, takes or makes calls outside venue, asks staff not to let others know they are there, people contact or visit venue looking for person)	

The checklist will be maintained to assist staff members to determine if the behaviour exhibited by a person, now or in the recent past, may be experiencing problem gambling.

Six different types of signs are usually exhibited which have been colour coded to indicate the level of risk associated with this type of behaviour.

- **PURPLE= gambling problems highly probable.** These behaviours are uncommon but if exhibited, it is likely to be exhibited by a problem gambler. If observing any purple flagged behaviour on more than one occasion, the duty manager or Responsible Gambling Officer is to be advised and an approach to be made to this patron.
- **RED= gambling problems probable.** These behaviours are more commonly observed than purple flagged behaviours. These behaviour patterns are likely to be exhibited by persons experiencing gambling problems and are good predictors of problem gambling.

Any person exhibiting any red flag behaviour pattern should be continually observed for a period of time. If several red indicators or a mix of other indicators are observed over the observation period, the person is likely to be experiencing problem gambling and an approach is to be made by the duty manager or Responsible Gambling Officer.

- **ORANGE= possible gambling problems.** These behaviour patterns are likely to be exhibited by problem gamblers. Someone displaying several of these behaviour patterns, across a number of areas, is likely to be experiencing some form of problem with their gambling habits.
- **YELLOW= early warning signs.** These behaviour patterns are likely to be exhibited by in higher risk gamblers (compared to low-risk gamblers). Any of these behaviour patterns may be an early warning sign that the gambling habits are becoming out of control.

Staff will be encouraged and trained to use the checklist to determine if a patron is exhibiting multiple signs of problem gambling. A completed checklist for a patron (which will identify the person on whom the checklist is being completed - by name or other identifying details) is to be kept as a record in the Club's Gambling Incident Register.

The completed checklists will be reviewed by the Club's Gaming Manager on a fortnightly basis to ensure any person perceived to have a problem is being properly assessed and staff are intervening appropriately. Where management notes multiple checklists have been completed on a person, the Club's management will arrange for the Responsible Gambling Officer or the Gaming Manager, on the next occasion the person is present at the Club, to discretely approach and speak to that person regarding the signs being exhibited. If considered appropriate after speaking with the person, they will be provided with a player information brochure for professional counselling services for their consideration.

The requirements relevant to the Responsible Conduct of Gaming will be discussed at each staff meeting to ensure that all staff are aware of this Plan and at hand over of shifts to ensure it is being actively implemented.

3. Creating a Strong Culture

The staff will be instructed to take initiative to implement harm minimisation at the Club to ensure that patrons' welfare is maintained. Welfare checks will be undertaken by staff members (particularly after midnight) on patrons exhibiting any sign of at-risk behaviour and encouraged to have a break in play or use alternative facilities provided by the Club.

The Club will not offer to patrons any incentive to gamble at the Club through providing free credits.

Staff are instructed to ensure that patron welfare is the utmost importance though the conduct of any gambling activity within the Club. Staff will be instructed at meetings and handovers of the harm minimisation procedures adopted at the Club. Increased monitoring of patrons in conjunction with welfare checks after midnight will be undertaken to encourage a break in play of gaming where it is considered necessary. Staff will also be requested to increase the monitoring of patrons and undertaking welfare checks after midnight to encourage the break in play if considered necessary.

At all times the Club is open, a Responsible Gambling Officer will be responsible for the support to staff members for the operation of the gambling facilities at the Club, which incorporates the gaming machines, Keno and TAB. This will result in a Responsible Gambling Officer being appointed to overview the operations of the Club's gaming machines.

A Gambling Incident Register will be implemented and maintained at the Club which is to record all gambling-related incidents, together with the actions taken to address those incidents.

This Register will be maintained by the Responsible Gambling Officer and regularly reviewed by the Gaming Manager to ensure that a report of all incidents have been addressed.

Signage will be displayed within the Gaming Room to allow patrons and staff to be made aware of their ability to report a breach in the gaming legislation and/or of any regulatory requirements to Liquor & Gaming NSW.

4. Gaming Self-exclusion

The Club will maintain a "Self-Exclusion Folder" that has up-to-date records (including photos) of all persons who have requested self-exclusion from the Club.

A self-exclusion program has been implemented to assist with initially addressing a person's gambling problem. Information and pamphlets relevant to the self-exclusion scheme, including counselling facilities, are displayed throughout the Gaming Room and on the Club's electronic displays located throughout the venue. Any person requiring to be included within the self-exclusion scheme will be offered counselling and other forms of assistance as required.

All staff members involved in the operation of the Club's gaming machines are to review the self-exclusion folder at the commencement of their shift to familiarise themselves with the self-excluded persons.

If a staff member suspects a patron is on the self-exclusion list, the staff member is to contact the Responsible Gambling Officer immediately who will require the patron to provide suitable identification. If the patron is confirmed to be on self-exclusion list, they will be requested to leave the Club (in accordance with the self-exclusion policy).

If a staff member observes a patron to be showing any signs of problem gambling, the staff member is to complete a checklist. The staff member shall ensure the checklist and the concerns are brought to the attention of the Responsible Gambling Officer who, if deemed necessary, will intervene and speak to the patron. Otherwise, the patron is to be discretely provided a player information brochure when collecting change or winnings and point out the gambling counselling information details if considered necessary and appropriate.

Should a patron approach a staff member for details on the operation of the self-exclusion scheme conducted at the Club, the staff member is to immediately contact the Responsible Gambling Officer

who will deal with and provide the patron with the relevant details in a professional and discreet manner.

The patron is to be provided with a self-exclusion form and provide the player information brochure which includes the professional counselling services that are available. Any approach for assistance regarding the Club's self-exclusion scheme is to be recorded in the Gambling Incident Register.

Local support services will be prominently displayed within the Gaming Room, on the electronic display monitors located within the Club and at other locations within the Club which allow gambling (e.g. the Keno terminal and TAB terminal).

Advertising relevant to the Club will include details of the local support services that are available to patrons using the Club's gambling facilities.

Gambling awareness will be regularly promoted at the Club through the electronic displays situated throughout the Club and also in marketing promotions to its members conducted by the Club to assist its members in minimising gambling harm.

5. ATM and EFTPOS terminal

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

All ATMs at the Club will be located outside of the Club's gaming room.

6. Customer Complaints

A Gambling Incident Register will be adopted and kept by the Club. Staff are to ensure any complaints received from a patron concerning the operation of any form of gaming at the Club is recorded in the Register on the receipt of the complaint (and to be entered 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. Name;
- II. Address;
- III. Full details of complaint and the remedies the person requests;
- IV. Time and Date complaint;

The details of the staff member accepting the complaint must also be recorded.

On receipt of a complaint, the staff member must record this complaint within the Register. The complaint is to be brought to the attention of the Responsible Gambling Officer prior to the end of the staff member's rostered shift, who will report this incident to the Duty Manager.

Complaints will be investigated by the Duty Manager in a timely manner to ascertain the veracity of the complaint, 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.

7. Minors

Any person under the age of 18 is not permitted to enter or to remain within the Club's Gaming Room. Signage is to be prominently displayed at each entrance to the Gaming Room to this effect.

The Gaming Room is monitored by CCTV cameras in conjunction with qualified staff members who are present at all times.

If a staff member has concerns regarding the age of a patron, in the Gaming Room or elsewhere in the Club, that staff member is to 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 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.

If the patron refuses to leave, the Responsible Gambling Officer will contact the Duty Manager to be advised of the situation. If the patron continues to refuse to leave the Club following a further request by the Duty Manager, the Police are to be contacted to assist in removing the patron from the Club.

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

8. Cash advances and cashing cheques

The cashing of cheques and cash advances are not permitted at the Club.

9. Gaming advertisement

All in-venue gaming related signage and advertising is to be displayed within the Gaming Room which are to be checked each day at the commencement of trade by the Duty Manager or the Responsible Gambling Officer. Arrangements are to be made to ensure these advertisements are unable to be seen from the exterior of the Club.

Responsible gambling messages are promoted throughout the Club on its electronic displays and through the Club's public address system.

10. Gaming Machines

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 Club's Duty Manager will check the monitor on a daily basis and ensure the gaming machines display approved artwork, labels, compliance plates and signage. Each gaming machine has a clock displayed on the machines monitor 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 at all times to prevent all unauthorised access. The keys to the gaming machines are to be in possession of the Duty Manager at all times.

11. 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 person of or above the age of 18 years.

12. Gaming Prizes

All staff members 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 \$5000 must be made by cheque or EFT to a nominated account.

Any cheque issued to the patron for payout of a prize must have '**prize winning cheque - cashing rules apply**' endorsed on the cheque, together with the name of the patron, the correct date and amount being issued.

Only a Duty Manager is authorised to process large prize-winning payouts (i.e. payouts greater than \$5,000 that require EFT transfers or a prize-winning crossed cheque to be issued). The Duty Manager is to ensure that the paperwork is completed prior to the payment of the prize money.

13. Keno/Tab Operation

A keno terminal is kept and maintained at the Club and serviced by a trained staff member.

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 \$5,000.00. A prize of \$5,000.00 or greater, will be paid by Keno after sufficient time to verify the win and issue the prize. All prize winnings of \$5,000.00 or greater will require the winner to provide their full name, address, signature and a copy of approved ID is to be recorded and kept for inspection to any relevant regulatory authority, if requested.

14. Gaming Signage

All approved signage that is required to be display by Liquor & Gaming NSW will be affixed in prominent

locations throughout the Club, including “Help is close at hand”, “What’s gambling really costing you?”, “A million to one” and “Under 18’s not permitted” at each entry point to the Club’s gaming room.

The Problem Gambling Counselling Service signage will be located at the entry point to the Gaming Room.

Sign 2G “Help is close at hand” will be located on every gaming machine within the Gaming Room.

Each gaming machine has the “Help is close at hand” stickers on the front display of the machine within eyesight from a seated position.

Sign 4G (e) “Help is close at hand”, will be located on the Club’s ATM.

Brochures “Information about the odds and 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 staff noting the absence of the sign are to immediately replace the sign and notify the Responsible Gambling Officer and/or the Duty Manager.

Local counselling pamphlets are also made available within the Gaming Room.

15. **Producing required information to Authorities**

The Duty Manager will provide any information that has been requested by a relevant regulatory authority on request.

The information to be produced may include, but is not limited to, the following:

- RSA/RCG competency cards;
- Unclaimed tickets registry book;
- Folder of large prize winnings (relevant to Keno/gaming machine payments),
- Gambling Incident Register.

16. **Gambling Incident Register**

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.

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- 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.

The licensee must, at the request of a police officer or L&GNSW inspector, make any gambling incident register available for inspection.

17. Responsible Gambling 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.
2. The Responsible Gambling Officer (Gambling Contact 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).