

Responsible Gambling Code of Practice Policy

Club Scotts acknowledges the responsibility and privilege of holding a license to operate gaming machines and other forms of gambling within the state of New South Wales. Our venue encourages the responsible use of gambling facilities within the club and abides by the ClubsNSW Responsible Gambling Code of Practice.

Policy Statement

The Board of Club Scotts have formally adopted the following policy statement and will always:

- Ensure the provision and use of gambling products occur in a safe and enjoyable manner.
- Club Scotts will prioritise customer welfare and sustainable gambling activities.
- Club Scotts will adopt responsible gambling and harm minimisation measures in accordance with the ClubsNSW Responsible Gambling Code of Practice; and
- Club Scotts will promote the social and economic benefits of responsible gambling and the gaming industry.

Background

Club Name & Liquor License	Club Scotts LIQC300240002
Gaming Shut Down Period	4:00am-10:00am Monday to Sunday and Public Holidays
Number of Gaming Machines	20
LGA Classification	Country – Nambucca Shire Council

2021 Census data from the Australian Bureau of Statistics (ABS) identifies that Club Scotts in the Nambucca Valley Local Government Area (LGA) with a population of 20,407 people. The ABS classes it as a regional town compared with other areas of Australia.

In Nambucca, Aboriginal and Torres Strait Islanders comprise 8% of the population.

In Nambucca Valley LGA, there are several Liquor and Gaming License holders including 9 Registered Clubs and 7 Hotels.

Contacts

Company	Contact	Phone	Email
Club Scotts	Vanessa Barbour	02 6569 8613	manager@clubscotts.com.au
ClubSAFE		1800 997 766	clubsafe@clubsnsw.com.au
GambleAWARE NSW		1800 858 858	gambleaware.nsw.gov.au
Lifeline North Coast NSW		02 6651 4093	AH - 1800 808 488
Licensing Police		02 6691 0799	

Responsible Gambling Officer

Club Scotts has approved the following staff member as a suitably qualified Responsible Gambling Officer. **Vanessa Barbour**

The Responsible Gambling Officer is responsible for overseeing the compliance with this code of practice implementation plan and will be responsible for the entire venue (in the case of a group of venues, responsible for the group.) They will:

- Record and report on relevant matters as required by the code; and
- Act as the contact point for correspondence with the code adjudication panel.

Training

The board and Chief Executive Officer will ensure at least 2 directors (within 12 months of appointment) have complete the Responsible Gambling Oversight Training.

The Responsible Gambling Officer has undertaken approved Responsible Gambling Officer Training and regularly undertakes refresher training to ensure compliance with the Code.

Duty Managers / Supervisors have undertaken the approved Advanced Responsible Gambling Training with 12 months of their appointment.

Gaming staff members involved in the service of gaming machines with the club are trained in the Responsible Conduct of Gambling (RCG) and hold a valid RCG competency card.

Non-gaming staff members have undertaken approved Staff Induction Training on responsible gambling upon commencement of employment.

Staff and board members will undertake relevant responsible gambling refresher training each 5 years or when relevant legislation is amended.

Our venue also undertakes mandatory Anti-Money Laundering and Counter Terrorism Financing (AML/CTF) training as required under the *AML/CTF Act 2006*.

In addition to Mandatory training requirements, the club undertakes regular in-house customer service training to provide staff with a variety of skills and knowledge to identify and assist patrons to reduce gambling related harm.

Customer Interactions - Identifying gambling related harm.

Staff undertake training to identify indicators of patron problem gambling such as:

- Seeking credit to gamble
- Seeking to borrow money for gambling.
- Seeking assistance or advice about controlling their gambling
- Admitting to borrowing or stealing money to gamble
- Enquiring about self-exclusion
- Showing a significant decline in personal hygiene, grooming or appearance
- Showing obvious or repeated signs of distress (shaking, swearing, crying or outbursts of anger)
- Friends or family raising concerns about a person's gambling.
- Leaving a minor unattended whilst playing gaming machines

Player Welfare Checks

Staff will perform a player welfare check in the following circumstances.

- Where staff observe a player displaying strong indicators of problem gambling; or
- A family member raises concerns about a player's gambling; or
- A player reaches any voluntary pre-commitment limit set; or staff observe a player gambling for three (3) or more hours continuously.

When performing a welfare check, a Duty Manager or the Responsible Gambling Officer will enquire about the player's welfare; Example "How's your night? Can I get you anything?" and if player reports any level of distress or hardship, the staff member will:

- Offer counselling or self-exclusion; (i.e., Responsible Gambling Brochures, Gamble AWARE contact cards)
- Ask the player to take a break from gambling for a period of 24 hours or more; and
- Make a record of the interaction in the club's gambling incident register (record of conversation).

Counselling & Support Services

Club Scotts will make available to all players, information about gambling counselling and support services.

As part of our adherence to the code, a club representative will attend all locally held club and counselling service provider forums organised by ClubsNSW or the NSW Office of Responsible Gambling.

Where required Club Scotts will allow GambleAWARE counsellors and support service providers to conduct outreach activities within the club.

Exclusions

Club Scotts participates in the ClubSAFE Multi Venue Self-Exclusion Scheme and allows for Self-exclusion, family-initiated exclusion, or club-initiated exclusion where:

- An individual can partially exclude or exclude from the entire venue(s) for a period of between six (6) months and four (4) years.
- A family-initiated exclusion - where a family member may:
 - Provide the full name and contact details of the family member.
 - Provide evidence of family harm due to the gambling behaviour
 - Provide evidence that the player has refused to undertake a self-exclusion.
 - Be endorsed by a qualified gambling counsellor as being necessary to protect the family from experiencing serious gambling-related harm; and
 - Seeks an exclusion period of at least twelve (12) months.

Club Scotts will ensure that a registered gambling counselling provider will contact the player and provide them with an opportunity to respond to the application. At all times, Club Scotts will ensure the privacy of the family member making the application and will not disclose their identity without the family member's consent.

- Our club may also initiate an exclusion where a player is found:
 - Seeking credit for gambling
 - Borrowing money to gamble
 - Admitting to borrowing or stealing money to gamble; or
 - Leaving a minor unattended to play gaming machines.

Club Scotts will change a partial (gaming-only) exclusion to an entire club exclusion if a player is found to be breaching or attempting to breach their exclusion on two (2) or more occasions.

Club Scotts will ensure that gambling advertising or promotional material will not be sent to excluded players.

Exclusion Detection & Revocation

Club Scotts will have in place an electronic detection system linked to the Multi-Venue Exclusion System (MVSE) for the purpose of identifying excluded players. Until then reception will be manned at all times the club is open to assist with identity checks.

If a player is detected breaching their exclusion, our venue will notify the ClubSAFE MVSE team of the exclusion breach as well as complete a record in the gaming incident register.

If a player requests a revocation of their exclusion, Club Scotts will contact the ClubSAFE team where information regarding the revocation process will be advised.

AML-CTF Banning Orders

Club Scotts may ban a player who is suspected of money laundering or spending proceeds of crime. If our venue identifies this behaviour and the player is a member, we will:

- Remove the player from the club.
- Take steps to ban the player for conduct unbecoming of a member; and
- Report the player to local Police.

If the player is not a member, we will:

- Remove the player from the club.
- Issue the player with a notice that they are no longer permitted to enter the club; and
- Report the player to local Police.

Any person suspected of money laundering or spending proceeds of crime will also have a Suspicious Matter Report completed and lodged with the Australian Transaction Reports & Analysis Centre ('AUSTRAC')

Gambling Incident Register

This venue records any gaming related incidents into a Gaming Incident Register and is reviewed by the club's responsible gambling officer on a weekly basis. Incidents may include:

- Self-Exclusion, Venue-initiated exclusion, or family -initiated exclusion requests or breaches
- Player welfare checks where the player shows any level of distress, hardship, or aggression.
- Complaints in relation to our venue's compliance with its responsible gambling practices.

Harm Minimisation Practices

Our venue ensures compliance with the *Gaming Machines Regulation 2019* and the *Registered Clubs Act* by:

- Not providing credit or cash advances that could reasonably be used for the purpose of gambling.
- Where practical, our automatic teller machines are located away from (and cannot be viewed by) a seated player whilst in the gaming machine area.
- Providing player responsible gambling brochures within gaming areas
- Displaying mandatory signage preventing minors from accessing gaming machine areas
- Only promoting gaming advertising within the premises and that it:
 - Is not deceptive or misleading.
 - Is not directed at minors.
 - Does not give the impression that gambling is a reasonable strategy for financial betterment or misrepresents the probability or chance of winning.
 - Does not provide gambling advertising to excluded patrons.
 - Includes the required responsible gambling message; and
 - Is reviewed and approved by the Responsible Gambling Officer
- Not redeeming Player Reward Points within our venue for:
 - Cash or instruments that can be exchanged for cash.
 - Prizes totalling more than \$1,000 in value in any 24-hour period.
 - Credit card / utility bill payments
 - Rent or mortgage bill payments.
 - Knives, firearms, or ammunition
 - Tobacco products
- Not offering any benefit, prize or reward to a gaming machine player that is not part of the publicised reward scheme such as:
 - Priority parking
 - Event tickets
 - Food or beverage discounts
 - Liquor discounts and promotions

Minors in gaming areas

Club Scotts Ltd complies with Section 52 of the Gaming Machines Act 2001 (NSW) which prohibits minors from being in any restricted areas of the Club.

Club Scotts Ltd displays the appropriate signage concerning persons under 18 outside of any gaming or restricted area of the Club.

If a person under 18 years of age is observed in a gaming or restricted area of Club Scotts Ltd, staff are aware that the minor must be removed immediately. If a person is suspected of being under 18 years of age, such person may be requested to produce documentary evidence of age.

Club Scotts Ltd will ensure that all staff induction and training provides information about which areas of the Club are restricted areas (TAB & Gaming room) and all relevant procedures if a person suspected of being under 18 years of age is observed in these areas.

Access to Cash

Club Scotts will ensure all staff adhere to the following policy in relation to access to money that complies with legislation and the requirements outlined in the Club Gaming Code of Practice.

- All Automatic Teller Machines (“ATMs”) are not visible whilst seated in the club’s gaming areas or are screened, where possible.
- EFTPOS transactions can be conducted at the main bar.
- Any cash dispensing facility installed in any part of the club is not capable of providing cash from a credit account.
- No cash advances are provided to any patron.
- All ATMs display the appropriate Liquor and Gaming NSW gambling notice which can be clearly seen while using the ATM.
- Only cheques made payable to Club Scotts will be exchanged for cash.
- No cheque may be cashed for more than \$400 in cash nor can a patron exchange more than one cheque per day. Cheques can be cashed at change box and signed off by management.

Monitoring Compliance

Our venue Responsible Gambling Officer will review the club's compliance with the code on an annual basis.

We will also engage an external independent auditor (Lighthouse Safety and Compliance) every three (3) years to assess:

- The extent to which this Code Implementation Plan is sufficient to ensure the code requirements are met.
- The extent to which this Code Implementation Plan is being put into practice and utilised by relevant staff and management.
- Compliance with the specific provisions of the Code.

Any independent audit results will be presented to the board and if necessary, a remediation plan will be developed to ensure continued compliance with the code.

Approval & Review Details

APPROVED BY:	Vanessa Barbour Secretary Manager	DATE:	11 th October 2023
REVIEW DATE:	1 st July 2024		