

OFFICIAL



Doxa Community Club Incorporated

Harm Minimisation Policy and Procedures Manual

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**LEIGH BARRETT
ASSOCIATES**

GAMESURE
PROTECTING YOUR GAMING INVESTMENT

Doxa Community Club Incorporated

Harm Minimisation Policy and Procedures Manual

Table of Contents

1. Definitions.....	3
2. Purpose.....	4
3. Harm minimisation	4
4. Commitment to Gambling Harm Minimisation/Patron Care	7
5. Senior Management Oversight	7
6. Gaming Staff - Duties.....	8
7. Staff Training.....	9
8. Gambling Harm Information	11
9. Self-exclusion Program	12
10. Customer Loyalty Scheme	13
11. Pre-commitment Strategy	14
12. Responsible Advertising and Promotions.....	14
13. Interactions with Patrons.....	15
14. Prohibition of Gambling by Minors	21
15. Unattended Children	22
16. Machine Reservation	22
17. Employee Gambling Policy.....	23
18. The Gambling Environment – “Passage of Time”	23
19. Payment of Winnings.....	24
20. Review of Gaming Policy, Procedures and Manual.....	24
Appendix 1	25
Appendix 2	27
Appendix 3	31
Appendix 4	36

1. Definitions

- “Act” means the *Gambling Regulation Act 2003* (Vic) (current version);
- “AML/CTF” means Anti-Money Laundering/Counter-Terrorism Financing, including legislative and regulatory requirements prescribed and defined under the *AML/CTF Act 2006* (Cth);
- “Code” means the Club’s Responsible Gambling Code of Conduct;
- “Commission” means the Victorian Gambling and Casino Control Commission;
- “Club” and the terms “Operator” and “Venue Operator” are deemed to mean the Doxa Community Club Incorporated (Venue Operator Licence No. V9510030);
- “Duty Manager” means a permanent staff member responsible for staff, operations and service for a particular shift.
- “EGM” means electronic gaming machine;
- “EFT” means the electronic funds transfer facility potentially made available by the Club for EGM payouts;
- “Gaming Room” means a specified area within the Venue whereby EGMs can be located not accessible to Minors, as defined by the Venue’s ‘green line’ plan as approved by the Commission;
- “Group General Manager” means the person who has overall responsibility for the Club’s Venues, operations and compliance and reports directly to the Board of the Club;
- “ICRP” means the Independent Complaints Resolution Process;
- “Manual” means this Harm Minimisation Policies and Procedures Manual;
- “Ministerial Standards” means the mandated Responsible Gambling poster, signage and standards required by the Act;
- “Minor” means a person under the age of eighteen (18) years;
- “Patrons” means customers, members, and visitors of the Club;
- “PID” means the player information display on EGM screens;
- “Responsible Gambling Manager” means the staff member responsible for the administration of the Manual and ICRP at the Club at any time (**RGM**);
- “Responsible Gambling Officer” means a nominated staff member who has undertaken the necessary training to monitor the Gaming Room, maintain the EGMs and interact with Patrons to minimise gambling harm as and when required on a particular shift (**RGO**);
- “Responsible Gambling Register” means the register maintained by the Club in which the Club records the information required under the Manual and may simultaneously contain the Responsible Alcohol Incident Register;

- “The Regulations” means the *Gambling Regulations 2015* (Vic) (current version);
- “Venue” means Clocks at Flinders Street Station; and
- “Venue Manager” means a staff member responsible for the daily operations of the Venue, including operational, service and compliance matters. A Venue Manager may include an Assistant Venue Manager from time-to-time.
- “Venue Supervisor” means a staff member who is asked to perform higher duties for a particular shift.

2. Purpose

The Club recognises that, whilst EGM gambling is a legal activity in Victoria, EGM gambling operations are strongly associated with gambling harm to individuals who gamble, their families and the community in general.

Research has indicated that a person playing EGMs more than once per month has a 46% chance of experiencing harm. The Club accepts that it is not unreasonable to expect that distress caused by gambling harm will occur in any Venue with EGM gambling. The Club is committed to mitigating this harm through the implementation of the Manual. The policy and procedures contained within this Manual are designed to reduce the likelihood of distress and harm among Patrons, ensuring a safer and more supportive environment for all individuals who engage in gambling at our Venue.

The Manual responds to Condition 3 imposed upon the Club by the Commission on 22 March 2024 to approve an increase in the number of EGMs at the Venue to one-hundred and five (105), set out in section 3 below.

3. Harm minimisation

Gambling harm risk assessment and controls

3.1 Before the installation of the additional EGMs at the premises the Venue Operator must:

3.1.1 Undertake and document a gambling harm risk assessment for the premises’ EGM gambling activities, based on the Australian Standard AS/NZS ISO 31000 Risk Management (Risk Assessment), to be made available to the Commission;

3.1.2 Develop a Venue-specific Gambling Harm Risk Management Plan which responds to the risk assessment, detailing controls for each risk, including actions that can manage the likelihood of an event occurring, and actions that can manage the consequences of an event (Risk Management Plan), to be made available to the Commission; and

3.1.3 Submit to and have approved by the Commission a Harm Minimisation Policy and Procedures Manual (the HM Manual), which

gives effect to the gambling harm risk controls and operational practices specified in the Risk Management Plan.

3.2 The HM Manual must:

3.2.1 Include steps that the Venue Operator will take to minimise harm arising from EGM use (over and above any existing requirements detailed in the Premises' Code of Conduct, the current VGCCC Gambling Venue Checklist and harm minimisation strategies set out in the Gambling Regulation Act 2003 and/or relevant Regulations);

3.2.2 Include an obligation on the Venue Operator to communicate to adults with minors accompanying them on the premises that minors must:

3.2.2.1 Be monitored; and

3.2.2.2 Must not approach or enter the Gaming Room.

3.2.3 Prohibit the service of food and beverage to Patrons whilst using an EGM;

3.2.4 Confirm the Venue Operator's minimum EGM staffing levels as follows:

3.2.4.1 After 5.00 pm until 9:00 pm on Thursday, Friday and Saturday: a minimum of three (3) staff on duty in the Gaming Room at all times the Gaming Room is operational;

3.2.4.2 A minimum of two (2) staff on duty in the Gaming Room at all other times the Gaming Room is operational; and

3.2.4.3 From 9.00 am until close the following day on any day, one (1) security guard will be rostered on for duty at the main entrance on Swanston Street; and

3.2.4.4 After 10.00 pm until close on any day, one (1) RSG trained security guard will be rostered on for duty at the main entrance on Swanston Street.

3.2.5 Prohibit staff from using EGMs at the Venue at any time; and

3.2.6 Prohibit Patrons from reserving EGMs to use another EGM.

3.3 Submit the HM Manual for approval by the Commission. Following approval, the HM Manual may only be amended with the approval of the Commission.

3.4 Once approved by the Commission, the HM Manual is to be:

3.4.1 Implemented at the Premises to the satisfaction of the Commission; and

3.4.2 Provided to the Premises' Venue Support Worker; and

3.4.3 Made available to the Venue's customers, including by

3.4.3.1 Publication on the Venue's website; and

3.4.3.2 Display in the Gaming Room in a manner that invites public attention at all times the Gaming Room is open to the public.

3.5 The Venue Operator must confirm in writing to the Commission annually whether the Gaming Room is being operated in accordance with the HM Manual.

3.6 If the HM Manual is breached, the Venue Operator must keep a register of the breaches that must be made available to the Commission for inspection upon request. The Venue Operator must enter the nature of the breach together with steps to be taken to remedy each breach in the register.

3.7 If the Commission determines that the Venue Operator has not implemented or complied with the HM Manual, the Commission may direct the Venue Operator to cease operating any of the Additional EGMs at the Premises until:

3.7.1 Such failure to implement or comply with the HM Manual is rectified to the satisfaction of the Commission; and

3.7.2 The Commission is satisfied that the Venue Operator has adopted such practices, procedures, policies and systems as are necessary to prevent the breach of the HM Manual from occurring again.

3.8 The Venue Operator must implement and maintain Venue Management disciplines providing for the effective coordination and management of gambling related harms to support operation of the HM Manual, including specified meeting, record keeping and information sharing requirements;

3.8.1 Convening regular, monthly harm minimisation coordination meetings of staff who participate in EGM monitoring;

3.8.2 Ensuring that Responsible Gambling Officers and staff rostered for duty in the Gaming Room meet with the Venue's nominated Venue Support Worker at least once every six months;

3.8.3 Ensuring that all staff involved in Gaming Room operations are trained in and able to access and keep required records, including RG Register records; and

3.8.4 Ensuring that all staff involved in Gaming Room operations participate in arrangements to coordinate management of gambling harm risk, including between shifts.

(See https://www.vgccc.vic.gov.au/sites/default/files/2024-12/2024040_decision_and_reasons_for_decision_and_corrigendum.pdf)

The Manual provides a policy and procedures framework for management and staff at the Club to:

- a. Ensure compliance with all relevant gaming and liquor legislation and regulations; and
- b. Outline the Club's harm minimisation measures that effectively address and lower known risks associated with gambling harm.

The Club acknowledges that compliance with this policy is a condition of the Venue Operator's licence.

4. Commitment to Gambling Harm Minimisation/Patron Care

The Club has a strong commitment to caring for its Patrons, including maintaining strong responsible alcohol and responsible gambling policies and practices.

Consistent with this commitment, the Club strives for *best practice* (continuous improvement) in all its Patron care policies and procedures.

The Club will ensure sufficient resources are rostered / available to implement this Manual.

The purpose of this Manual is to provide a *practical guide* for all staff to discharge their duties in accordance with the Club's commitment to the highest standards of the government expectations regarding Patron care and responsible gambling.

5. Senior Management Oversight

The Club employs a full-time RGM to monitor and manage all of the Club's gambling activities, compliance requirements and training for all gaming staff. The RGM is the Club's nominated AML/CTF Compliance Officer.

The Venue Manager oversees gambling operations, on-floor AML/CTF and other compliance matters and reports any issues at least weekly to the RGM who, in turn, has daily contact with the Club's Group General Manager regarding any issues. A formal monthly report including gambling harm minimisation, compliance and AML/CTF matters is submitted and discussed at Board meetings.

The Board will formally review the report at each monthly meeting. Any feedback, actions or questions raised in relation to the report will be recorded in the minutes and assigned as action items for the Group General Manager to address. The Group General Manager will ensure any outcomes or follow-up actions are allocated to particular managers for completion, the status of such matters then reported back to the Board.

The Board provides feedback to the Group General Manager who, in turn, provides guidance and instructions to the Venue Managers and Responsible Gambling Manager as and when required.

6. Gaming Staff - Duties

Each gaming staff member has the capability to act as the nominated Responsible Gambling Officer (**RGO**) during their shifts.

The Club displays a sign in the Gaming Room advising Patrons that a “Responsible Gambling Officer is available for assistance at all times.” Responsible Gambling Officers and the Responsible Gambling Manager wear badges identifying them as an RGO.

The **RGM** is responsible for:

- Ensuring that all staff are aware of the Club’s Manual and the Code;
- Ensuring that all staff members rostered in the Gaming Room are trained in the ‘YourPlay’ pre-commitment program, can assist a Patron to enrol with ‘YourPlay’, and help set EGM time and spend pre-commitment settings for them;
- Ensuring that all staff members rostered in the Gaming Room participate in Venue management activities addressing gambling related harms, including monthly meetings, record keeping and information sharing practices; and
- Maintaining compliance with all responsible gambling regulatory and Code requirements, including Ministerial Standards and Directions.

The **RGOs** are available in the Gaming Room at all times EGMs are available for gaming and are responsible to:

- Respond to Patrons’ requests for information about gambling harm support services;
- Coordinate operation of the Venue’s self-exclusion program;
- Continuously monitor the Gaming Room for Patrons exhibiting gambling harm behaviour on and around EGMs including long play periods;
- Ensure that no Patron shows unacceptable signs of intoxication whilst playing EGMs;
- Coordinate implementation and maintenance of harm reduction measures and staff training; and
- Provide guidance to staff about how to manage problematic Patron behaviour including indicators of potential gambling harm.

Detailed duties of the RGM and RGO are listed at Appendix 1.

Non-gaming staff are required to refer every potential gambling harm and/or unacceptable behaviour matter to the RGM/RGO.

7. Staff Training

All gaming staff are required to complete the approved Responsible Service of Alcohol (RSA) course during their induction with the Club and Responsible Service of Gaming (RSG) Course Module 1 within one (1) month of commencing employment at the Club and to complete the RSG Module 2 within six (6) months of commencing employment at the Club.

Refresher training (RSG Module 3) is required to be completed within three (3) years of RSG Module 2, and RSG Module 4 within three (3) months of RSG Module 3.

The RGM is responsible for administering and facilitating this and any additional training as required.

The Club also requires all front-of-house staff to hold the RSA/RSG qualification.

The Club is committed to ensuring that all relevant staff have policies and procedures communicated to them, promoting Patron care, responsible gambling, and potential harm from gambling at the Club's Venues.

The Club also provides additional training for staff on a range of issues, including in Patron care and communication skills via the Club's managers,

7.1 AML/CTF Training and Awareness

All gaming staff are required to complete AML/CTF Risk Awareness training at induction and refresher training annually. The training will include identifying and responding to unusual or suspicious gambling patterns, with all concerns reported to the RGM for assessment.

In addition to Risk Awareness training, relevant managers are required to complete AML/CTF Management training; this extends to Board members.

The training equips staff with the ability to recognise behaviours pertaining to potential money laundering, including (but not limited to):

- Unusual transactions, such as little or no EGM play despite feeding in numerous notes;
- Patrons who seek to buy EGM tickets/cheques for cash;
- Reluctance to provide ID when asked;
- ID presented is identified as false/fake;
- Syndicate play/Patrons who act on instructions from a third party;
- Avoiding threshold reporting such as cashing out to avoid a cheque/EFT payment; and

- Patrons who may be lending or borrowing money from one another – in these cases, Patrons will be directed to immediately leave the Venue and, where appropriate, barred from returning for a specified period.

Matters deemed to be ‘suspicious’ within the definition of the AML/CTF Act shall be lodged as Suspicious Matter Reports (SMRs) accordingly by the RGM (or delegate AML/CTF Compliance Officer).

Any reasonable suspicion or evidence of such behaviour will be, documented in the Responsible Gambling Register (where appropriate) and reported through to the RGM for actioning.

7.2 Advanced Harm Minimisation staff training

The Club may seek the assistance of the Venue Support Worker and other specialist providers (including the RGM) to find appropriate advanced staff training in identifying and managing Patrons who may show signs of gambling harm. This training would be over and above the current VGCCC RSG training modules.

The RGM maintains a record of what, who and when training was completed.

7.3 Staff Meetings

The RGM and RGOs meet with a Venue Support worker at least once every six (6) months and details of the meetings are recorded in the Responsible Gambling Register. The RGM and RGOs undertake advanced training on a range of subjects, including:

- Managing problematic Patron behaviour;
- Interacting with Patrons;
- Handling Patron complaints;
- Communication skills; and
- Managing potential drug and alcohol issues in the Venue.

This training may be conducted by a Venue Support worker or, where more appropriate, a specialist qualified (who may be the RGM) to teach the subject matter with at least one of the above listed subjects being undertaken by the RGM and all RGOs every six (6) months. The training, including names of participants, is recorded in the Responsible Gambling Register.

The Club convenes regular meetings of staff who participate in EGM monitoring, for review of:

- Responsible Gambling Register records identifying problematic gambling incidents in the Venue;

- The status of any 'regular Patrons' who have been the subject of monitoring or intervention action in previous periods;
- Any EGMs, games, layout positions, ATM or EFTPOS facilities or other factors in the Venue associated with RG Register entries;
- Jackpots, which are monitored closely and adjustments made accordingly, including monitoring key/VIP players who play these particular EGMs, as well as reviewing other venue operators' products on a regular basis;
- Patrons who play EGMs regularly but who have not subscribed to YourPlay; or who have subscribed to YourPlay with prima-facie inappropriate settings (e.g. inappropriate time or spend limits);
- Intervention actions taken in the previous period;
- Intervention actions which are 'working,' and which are 'not working'; and/or
- Intervention action responses which may be appropriate for any Patron who has been approached but has declined offered help.

8. Gambling Harm Information

The Club provides information to assist Patrons to make informed and responsible decisions about their gambling activity and about support services that are available for Patrons who may experience harm from gambling.

The Club does so by:

- Regular Patron engagement by staff at the Venue;
- Displaying responsible gambling information at the Venue in a wide range of forms, including information brochures, posters and other information required by the Act and the Regulations;
- Having information brochures readily available at the Venue for Patrons to take away on their own initiative or upon request;
- Regularly displaying responsible gambling/gambling harm messages on television screens and PIDs within the Gaming Room of the Venue;
- Making regular announcements over the Venue's Public Address system promoting the Club's Code and the operation of YourPlay at the Venue,
- Making regular announcements that food and/or beverage is always available to order whilst the Gaming Room is in operation. Patrons will be encouraged to consume these away from an EGM; and
- Ensuring that staff participate in half-yearly training in conjunction with the relevant Gambler's Help Support Worker to provide responsible gambling/gambling harm information and respond to Patron queries.

The gambling harm point-of sale requirements are listed at Appendix 2.

A Gambling Harm Point-of-Sale Checklist can be found at Appendix 2 of this Manual. The RGM/RGO must ensure that the items listed are checked at least weekly. It is recommended that staff members take turns to complete the checklist to assist their knowledge of the requirements.

9. Self-exclusion Program

The Club has an EGM gaming self-exclusion program that is operated by Community Clubs Victoria. Additionally, the Club operates facial recognition technology at both of its Venues with gaming that identifies a person currently on the self-exclusion program immediately the person enters the Venue.

The Club ensures all gaming staff view the list of self-excluded Patrons before each shift and are trained on how to appropriately interact with and support Patrons under self-exclusion.

The Club ensures that deeds and photos are maintained in a secure location that can only be accessed by relevant staff (ensuring that non-relevant staff including trades persons, cleaners and other contractors entering the Venue cannot access it).

In any event, the Club has installed facial recognition technology *specifically* to identify any Patron that is self-excluded from the gaming room at the Venue upon the Patron's entry to the Venue.

All expired deeds of exclusion and accompanying photographs must be disposed of (shredded) in a timely and discreet manner.

If a Patron asks about the Club's Self-exclusion Program, they **must** be given the Self-exclusion brochure. If necessary, refer the Patron to the Responsible Gambling Officer on duty. The interaction **must** be recorded in the Responsible Gambling Register.

The design of the Venue ensures that a large 'buffer' zone is created in front of the entrance to the Gaming Room, enabling staff to better prevent self-excluded Patrons from entering the Gaming Room, including adequate lines of sight from the cashier.

If a self-excluded Patron is detected in the Gaming Room (or TAB where applicable), the following procedure applies:

- The Patron is approached by the RGM/RGO who discreetly asks for identification to verify the identity of the Patron;
- If the Patron is identified as being currently self-excluded from the Club's Gaming Room, he/she is discreetly requested to leave the Gaming Room;

- If the Patron claims not to be self-excluded, the RGM/RGO will take reasonable additional steps to verify the status of the Patron. If the Patron's claim cannot be substantiated, the Patron will be requested to leave the Gaming Room. The incident will be recorded in the Club's Responsible Gambling Incident Register;
- When the Patron leaves the Gaming Room the RGM/RGO, if deemed necessary, may provide the self-excluded Patron with information about local Gambler's Help support services;
- The RGM/RGO records the Incident in the Club's Responsible Gambling Incident Register;
- The Self-exclusion Program office is notified of the breach by the RGM/RGO at the earliest practical time; and
- If a potentially self-excluded Patron is unable to provide valid proof of identification the Patron will be requested to leave the Club.

In the event that an identified self-excluded Patron refuses to leave the Gaming Room when requested by a Club staff member, the following procedure applies:

- The RGM/RGO (or above) must advise the Patron that the "Deed of Self-exclusion" gives the Club permission to use reasonable force to remove the Patron from the Gaming Room;
- If security personnel are rostered on duty, the security personnel must act to remove the Patron from the Gaming Room;
- If security personnel are not rostered on duty, the Patron will be advised that the police will be called to have him/her removed; and
- The matter must be recorded in the Responsible Gambling Register.

10. Customer Loyalty Scheme

The Club operates a Customer Loyalty Scheme as defined by the Act and complies with all of the regulatory requirements of operating such a scheme. Patrons may sign-up to the Loyalty Scheme and be issued with a membership card.

Further, the Club actively promotes the Victorian 'YourPlay' Program to all registered members of the Loyalty Scheme which can be attached to a Patron's membership card.

As part of the Loyalty Scheme, Patrons are able to earn points from gaming and non-gaming, however, may only redeem those points on non-gaming items such as food and/or beverage.

If a Patron swipes their card at the kiosk and/or inserts their card into an EGM, alerts may be received by staff which assist with active monitoring of those Patrons, including regular and VIP Patrons.

11. Pre-commitment Strategy

The Club encourages Patrons who play EGMs to set a time and money limit according to their individual circumstances via the YourPlay technology attached to their membership card, or alternatively, using a stand-alone YourPlay card.

Responsible gambling signage and brochures in the Gaming Room encourage Patrons to make a pre-commitment decision in setting a limit and not exceeding that limit. The Venue has a nominated YourPlay Ambassador for each shift. At set times of the day/night the YourPlay Ambassador will make announcements via a public address system in the Gaming Room advising Patrons that the Club encourages Patrons to register with the YourPlay Program and set time and expenditure limits on their EGM play. The date and time of each announcement will be recorded in the Responsible Gambling Register.

RGOs will be available at all times to discuss how to access help in setting and keeping to limits and to access help to identify triggers which lead to overspending on gambling. This includes encouraging Patrons to enrol with the YourPlay Program. The annual gambling harm staff training includes scenarios for staff to practice discussing precommitment with Patrons.

Staff will record all Patron precommitment interactions in the Responsible Gambling Register.

12. Responsible Advertising and Promotions

All gambling-related signage displayed at the Venue is consistent with the *Gambling Regulations (Signage) Regulations 2012* (Vic).

A monitor such as a large plasma or LCD screen used to display the jackpot for a linked gaming system, or a progressive system is considered a gaming related sign. No such sign is located outside or close to the Venue or anywhere inside the Venue such that it can be seen from outside.

The Club does not publish any gaming machine advertising. This includes any advertising that gives publicity to or promotes participation in gambling activities involving gaming machines. This means that no advertising can take place on the radio, in the cinema, by video, on television, on any written advertising via the internet or other promotion, any advertising that appears in a gaming machine industry trade journal or in a publication for a trade convention involving gaming machines.

No details of EGM prize winners are advertised outside the Venue.

Further, the Club does not conduct promotions related to gambling.

Gambling harm related advertising within the Venue will include Gamblers Help messages including the Gamblers Help 1800 858 858 and/or gamblershelp.com.au

13. Interactions with Patrons

13.1 Venue Staffing Levels

The Club maintains that a key element of gambling harm minimisation is Patron surveillance by staff and staff/Patron interaction.

The Club confirms that the minimum EGM staffing levels are as follows:

- a) After 5.00pm until 9.00pm on Thursday, Friday and Saturday: a minimum of three (3) staff on duty in the Gaming Room at all times the Gaming Room is operational;
- b) A minimum of two (2) staff on duty in the Gaming Room at all other times the Gaming Room is operational;
- c) From 9.00am until close the following day on any day, one (1) security guard is rostered on for duty at the main entrance on Swanston Street; and
- d) After 10.00pm until close on any day, one (1) RSG trained security guard is rostered on for duty at the main entrance on Swanston Street.

The Club has also implemented a documented Patron interaction process whereby all Patrons are interacted with by staff on at least an hourly basis.

13.2 Communications with Patrons

Interaction between staff and Patrons is regarded by the Club as an essential and integral element in the promotion of Patron service, harm minimisation and Patron care. Interaction fosters a building of rapport between staff and Patrons.

The Club must ensure that communications with Patrons will not:

- a) Induce a Patron to enter or remain in the Gaming Room;
- b) Induce EGM play;
- c) Reinforce or encourage fallacies or misconceptions about EGMs, including but not limited to:
 - i. Telling a person that he or she can make money playing an EGM;
 - ii. Telling a person that an EGM or an EGM jackpot has or has not “paid”, or that it is due to “pay” winnings;
 - iii. Discussing luck or superstitions;
 - iv. Telling a person that a “near miss” means the EGM is about to pay winnings;
 - v. Suggesting or encouraging the belief that a spin on an EGM is not independent of another spin on that EGM;
 - vi. Encourage or induce a person to engage in intensive or prolonged gaming machine play;

- vii. Suggesting or encouraging the belief that there are strategies that a person can use to win when playing a gaming machine (for example, increasing or decreasing the amount bet per line or number of lines on which a bet is made); and
 - viii. Telling a person that he or she deserves to win.
- d) In line with this Manual, the Club does not induce nor encourage a Patron to:
- i. Withdraw money, or withdraw more money, from a cash facility (EFTPos): or
 - ii. Leave the Venue to obtain money, or obtain more money, to enable that Patron to play, or continue to play, an EGM.
- e) Notwithstanding d) above, the Venue provides EFTPos signage and responds to Patrons' queries about the location of EFTPos facilities when asked; and
- f) EFTPos is available and located away from the Gaming Room but is strictly limited to \$200 per transaction and a total of \$500 per card per day.

The Club regularly tests gaming staff at the Venue regarding their knowledge of the features on each EGM in order to respond to Patron enquiries about game features, return-to-player rates and the chances of winning.

The Club takes all reasonable steps to ensure that communications and interactions with Patrons discourage intensive and prolonged EGM play without suitable breaks from play.

The Club has a documented procedure to ensure that every Patron in the Venue is interacted with by staff on at least an hourly basis.

Although the Club actively encourages Patrons to access the self-serve tea/coffee station for non-alcoholic refreshments, staff will, at set times of the day, approach Patrons in the Gaming Room to offer snacks, non-alcoholic beverages as part of an interaction to discuss the Club's commitment to responsible gambling, encourage Patrons to join the YourPlay Program or encourage the taking of breaks from EGM play.

All approaches to Patrons by staff where indicators of gambling harm are identified by staff will be recorded in the Responsible Gambling Register.

All staff must be aware of and strictly abide by these policies.

13.3 Encouraging Patron Breaks in Play

As stated throughout this Manual, the Club is committed to minimise the potential for gambling harm to occur from the playing of EGMs. This includes staff actively interacting with Patrons regularly to encourage Patrons to take regular breaks from EGM play. This will also

take the form of regular announcements and/or face-to-face discussions and include:

- a) Information about the total Venue offer, including non-gaming activities;
- b) The promotion of light refreshments and bistro mealtimes (including the current time where this information is delivered by announcement); and gambling harm support services including Gambler's Help.

To encourage breaks in play, food and/or beverage will be available to order at all times the Gaming Room is in operation. The cashier's desk in the Gaming Room must not at any time be used for the sale, supply or service of food or drinks.

Patrons who wish to order food and/or beverages will be directed to step away from their EGM and approach the bar to place and collect their order. Whilst they may bring their items back to an EGM, staff should encourage Patrons to take a break away from the EGM to consume their order. Staff are strictly prohibited from taking orders for food and/or beverage from a Patron who is actively playing an EGM.

In the event of a Patron with impaired mobility requesting food and/or beverages whilst seated at an EGM must still leave their EGM to order, but may be assisted, where required, by staff to bring those items back to their EGM. Where this occurs, staff will record this event in the Responsible Gambling Register.

Signage is displayed in the Venue to encourage Patron use of the breakout recreational areas, including outdoor areas.

13.4 Inducements to Gamble

The Club does not offer any inducements to Patrons to engage in gambling activities at the Venue. This includes a strict policy to not:

- a) Offer a promotional prize in cash linked to EGM play;
- b) Supplying free or discounted alcoholic drinks as a direct reward from gambling;
- c) Providing free EGM credits; and
- d) Offer any other direct inducement to engage in EGM play.

13.5 Signs of Distress and Unacceptable Behaviour/Red Flags

All staff members are aware of the identity of the RGM and the RGO for each shift and a sign is displayed at the Cashier's station advising Patrons that: "A Responsible Gambling Officer is available for assistance at all times".

Any Patron, who approaches a staff member for information about gambling harm services, shows any signs of having a problem with their gambling or experiencing gambling harm must be directed to the RGO on duty for personal assistance and any necessary action.

Any Patron displaying signs of distress or unacceptable behaviour will be approached by the RGM/RGO who will offer any assistance in a helpful manner and in strict confidence.

“Signs of Distress and Unacceptable behaviour/Red Flags” includes (but is not limited to):

- Aggression:
 - o Hitting a machine/button with undue force;
 - o Shouting at the machine or other people in the Gaming Room;
 - o Abusing staff and/or other Patrons; and
 - o Behaving in a threatening manner.
- Emotion:
 - o Crying anywhere in the Venue, including at an EGM;
 - o Appearing extremely sad or depressed in the Venue;
 - o Sweating abnormally whilst playing an EGM;
 - o Appearing very agitated in the Venue; and
 - o Continually complaining to staff.
- Withdrawn:
 - o Not responding to interaction by staff;
 - o Not responding to occurrences in the Venue that would normally attract a Patron’s attention; and
 - o Avoiding contact with staff or other Patrons.
- Appearance:
 - o Attempting to wear a disguise in order not to be recognised; and
 - o General reduction in hygiene/self-care over time.
- Intensive/extended gambling:
 - o Playing EGMS at the Venue every day;
 - o Playing EGMs continuously for more than three (3) hours without a break;
 - o Rushing from one EGM to another;
 - o Playing more than one EGM simultaneously; and
 - o Not wanting to leave when the Venue is closing.
- Asking for money to gamble:
 - o Asking staff for the loan of money (for any purpose);
 - o Asking other Patrons for the loan of money (for any purpose); and
 - o Attempting to sell goods or services in the Venue.

Staff are provided with extensive training around these behaviours/red flags during their official RSG training with the Venue Support Workers with regular refreshers provided outside the six-monthly RGO meetings.

The process for interacting with such Patrons includes measured assistance depending on case-by-case assessment by the RGM/RGO on duty although all identified behaviours will attract certain staff responses.

This interaction must take the form of:

1. Demonstrating concern and display respect for the Patron.
2. Referring the Patron to the RGO. The RGO approaches Patron and does the following:
 - a) Discussing the issue and asks if they would like to contact the Gambling Help service to make a free counselling appointment:
 - i. If the Patron agrees, providing them with the contact details for the Gambling Help service and offer them the use of a phone and a quiet location within the Venue. Supervisor/Manager advises the Patron about their right to self-exclude from your Venue.
 - ii. If the Patron does not agree, provide the Patron with contact details for the Gambler's Help service to take home with them. Supervisor/Manager advises the Patron about their right to self-exclude from your Venue.
 - b) Contacts with Patrons by the RGM/RGO must be recorded in the RGR and include details of action taken by the RGM/RGO.
 - c) Details to be included in the RGR include:
 - i. The date and time of the matter;
 - ii. The name(s) of the staff member(s) involved;
 - iii. The name of the Patron involved (if available or appropriate);
 - iv. An outline or overview of the incident or matter;
 - v. Action taken by staff (e.g. the provision of gambling support services / Self Exclusion information); and
 - vi. Date and time the entry was recorded in the RGR.
 - d) The Club also complies with the laws and regulations regarding the responsible service of alcohol, including where a Patron is showing unacceptable signs of intoxication in the Gaming Room, who must be asked to leave the Gaming Room promptly when directed by staff.

13.6 Patron Complaints

The Club subscribes to an Independent Complaints Resolution Process (ICRP).

The Club makes available to Patrons' information about the ICRP including:

- How to make a complaint;

- The process for resolution of a complaint;
- The independent review of decisions made by the Club about Patron complaints;
- How information about complaints will be collected and retained; and
- How the Club will be assisted to monitor compliance with the complaints process.

A Patron with a complaint about compliance with and/or the operation of this Manual should make it in writing directly to the Club Management. The Club provides physical Complaint Forms at conspicuous locations around the Venue and an electronic complaint form accessed through the Club's website.

All complaints will be checked by the Venue Manager to make sure it relates to the operation of this Manual. In any event, all recorded complaints will be available for perusal by police or the VGCCC.

Complaints will be investigated sensitively and resolved as soon as possible in the following way:

- All complaints will be acknowledged promptly;
- If it is decided not to investigate the complaint as it does not relate to the operation of this Manual, the Patron will be informed accordingly;
- During the investigation of the complaint, the Venue Manager may seek information from the staff member/s concerned regarding the complaint, and inform the RGM, who in turn will, if required, inform the Group General Manager;
- The Venue Manager will seek to establish whether the Patron has been treated reasonably and in accordance with the Manual;
- If the complaint is substantiated, the Venue Manager and/or RGM (or above) will detail the action that is to be taken to remedy the issue;
- The Patron will always be informed of the outcome of the complaint;
- Complaint details that relate to gaming will be noted in the Responsible Gambling Register; and
- Information about the complaints will be provided to VGCCC if requested.

If a complaint cannot be resolved at the Club level, it will be put for resolution before the Institute of Arbitrators and Mediators Australia (IAMA). Either party involved in the complaint may contact the IAMA.

To initiate a complaint either party can go to IAMA's website (www.iama.org.au), download a Dispute Resolver form, and then submit this completed form with the relevant fee to the IAMA.

Documentation regarding all complaints relating to the Manual must be maintained internally by the Venue Manager and/or RGM and noted in the Responsible Gambling Register, for access by the VGCCC as required.

14. Prohibition of Gambling by Minors

Gambling by Minors is strictly prohibited and Minors, regardless of age (i.e. infants or toddlers), are not permitted to enter or remain in the Gaming Room at any time.

The Club ensures that signs are located at every entrance to the Gaming Room advising that all Minors are prohibited from entering the Gaming Room. The design of the Venue ensures that a large 'buffer' zone is created in front of the entrance to the Gaming Room, enabling staff to better prevent Minors from entering the Gaming Room, including adequate lines of sight from the cashier.

The Venue also has a facial recognition system that is able to assist in the identification of potential underage Patrons.

As all Venue staff have the responsibility for seeking proof of age, the Club requires that front-of-house employees ask for verification of age if they are uncertain whether a Patron or associated person in the Venue appears to be below twenty-five (25) years old. Staff will conduct an ID check in the Gaming Room from time to time and record the checks in the RSG register where an anomaly occurs (for example, fake/false ID).

For the purpose of verification of age, the following (current) original documents are acceptable:

- Proof of age card;
- Driver's licence;
- Victorian learners' permit;
- Australian or foreign passport; or
- Victorian marine licence.

If relevant verification of age cannot be produced, the Patron will be required to leave the Venue.

If a person is unable to provide adequate identification, he/she must be politely asked to leave and told that he/she is welcome at the Venue when able to produce the satisfactory proof of identity required by law.

In the event that an adult is identified as having a child in the Gaming Room, the adult must be approached and requested that they take the child out of the Gaming Room immediately. If they refuse, notify the RGM/RGO immediately:

- If, after the RGM/RGO intervention, the adult will not leave the Gaming Room with the child, then the police must be contacted; and

- Details of the event must be recorded in the Club's Responsible Gambling Register.

15. Unattended Children

It is unacceptable and **not tolerated** by the Club for children to be left unattended anywhere within the Venue or outside the Venue's entrances. Children **anywhere** in the Venue must be supervised at all times by a responsible adult (not staff).

The Club ensures that signs are located at every entrance to the Venue that minors must be under the supervision of a responsible adult at all times that they are on the premises and must not approach the Gaming Room.

If an unattended/unsupervised child is detected anywhere in the Venue (whether by physical or CCTV observation), the Venue Manager/RGO or Security **must be notified immediately**. The Venue Manager/RGO or Security will endeavour to locate and identify the adult responsible for the child. When located, the adult will be warned that any future instance of the child being left unsupervised in the Venue will result in the adult being barred from the Venue.

In the event that an unattended/unsupervised child is detected outside any entrance to the Venue, the child must be escorted to a safe location within the Venue and the Venue Manager/RGO notified immediately. The Venue Manager/RGO or Security will endeavour to locate and identify the adult responsible for the child. When located, the adult will be warned that any future instance of the child being left unsupervised outside the entrances to the Venue will result in the adult being barred from the Venue.

If the adult cannot be found the Venue Manager or Security will contact the Police.

16. Machine Reservation

The Club has a gaming machine reservation policy designed to encourage Patrons to have a break from EGM play and then resume playing on the machine of their choice.

A Patron may reserve a gaming machine at the Venue for a maximum period of ten (10) minutes. To reserve the machine the Patron must place a "Reserved" sign over the screen on the machine.

During the ten-minute period, only the reserving Patron or a staff member may remove the "Reserved" sign. If the period of reservation exceeds ten (10) minutes the sign may be removed by a staff member with or without a request from another Patron and the machine made available for play by other Patrons. If there are credits remaining on the EGM, the staff member must cash out and (if possible) locate the Patron to which the credits belong, or otherwise, prepare the monies to be registered as unclaimed monies.

The Club does not allow Patrons to play more than one (1) EGM at a time or reserve an EGM whilst playing another EGM. A Patron who is observed to either be playing more than one (1) EGM consecutively or has reserved one (1) EGM to play on another, will be approached and informed of this policy.

If the Patron refuses to comply with a reasonable direction from a gaming staff member to refrain from playing or reserving more than one EGM at a time, the matter will be escalated to a Venue Supervisor (or above), after which continued non-compliance they may be asked to leave.

17. Employee Gambling Policy

The Club's responsibility is to ensure the safety of all employees and to maintain the integrity of the gambling products provided at the Club.

Staff at the Venue are not permitted to engage in any gambling activities at the Venue at any time.

Any staff member who indicates to another staff member or directly to the RGM/RGO that he/she may have a gambling problem will be provided with full counselling support and gambling harm information by the Club in a confidential manner. In determining what action is appropriate in any situation involving a staff member, the Club will ensure that every attempt is made to be discreet, and to draw as little attention as possible to the situation and to the staff member. The staff member will be encouraged to pursue non-gambling related duties wherever available in the Club.

Action taken in accordance with this clause will be recorded on the staff member's employment file, and not in the Responsible Gambling Register.

Information about gambling harm support services is included in the induction package/staff handbook provided to all employees on commencement of employment with the Venue.

If the Club adopts a different policy to that set out above the Club must advise the Commission in writing of the policy change.

18. The Gambling Environment – "Passage of Time"

Clocks showing the accurate time are in all major areas of the Venue so Patrons will be aware of the passage of time. Clocks showing the accurate time are also visible on the electronic display of every EGM.

Staff routinely mention the time when making announcements about Venue activities.

Patrons are encouraged to take regular breaks from EGM play. This encouragement will take the form of an announcement on the Venue's public address system and include:

- a) Announcing that morning tea/lunch/dinner is now available;
- b) Announcing a promotional draw; and/or
- c) Announcing the commencement of other non-gaming related Patron activities within the Venue.

Venue staff also monitor the activities of Patrons and interact as appropriate to discourage Patrons from engaging in extended and intensive gambling. This interaction takes the form of casual dialogue consistent with general hospitality initiated by staff towards Patrons, for example, relating to the availability of food and/or beverages at the Venue.

Club policy requires a gaming staff member to interact with Patrons during routine floor walks on at least an hourly basis, which shall be documented accordingly. The RGM will ensure this is included in monthly audits of the Responsible Gambling Register.

19. Payment of Winnings

The Club does not cash cheques. If a Patron seeks to cash a cheque, the staff member will advise the Patron that the Club does not cash cheques.

Under the Act, payment of winnings or accumulated credits on an EGM of \$2,000 or more must be paid in full by cheque not made payable to "Cash" and marked "Not Negotiable" or by EFT such that the money is not available for at least 24 hours after the payment is made.

Patrons may request that winnings and/or accumulated credits of less than \$2,000 from EGMs, and winnings and/or credits from other gambling products to be paid by cheque or EFT.

The Club maintains a prize payment register to record the payment of significant prizes on gambling products, including, but not limited to, cheque or EFT payments of \$2,000 or more. The prize payment register will be in the Gaming Room and be made available to Commission inspectors upon request.

Entries in the prize payment register may be subject to the *Privacy Act 1988* (Cth) and the Club will comply with the Australian Privacy Principles with respect to the prize payment register.

The provision of access to EGMs and wagering is subject to the AML/CTF Act. The Club has adopted an AML/CTF Program and ensures that all financial transactions comply with the Program.

The Venue displays information regarding the Club's policy on the cashing of cheques and how Patrons may have winnings paid by cheque.

The staff are encouraged to offer Patrons of winnings / accumulated credits of \$500 or more to take the payout in the form of a cheque / EFT transfer.

20. Review of Gaming Policy, Procedures and Manual

The Club will ensure this Manual is reviewed annually by a suitably qualified gambling harm advisor (including the RGM), to identify any improvements and changes in industry and gambling help practices.

The results of these reviews will be documented. Any identified changes will be addressed immediately, with corrective actions documented and implemented.

Appendix 1

RGM and RGO Duties

It is a requirement of the Club's Responsible Gambling Code of Conduct that a RGO be designated for any time that the Club is open for gaming and available in the Gaming Room. All staff must be aware of the designated RGO for any shift and the RGO must be aware of his/her duties and be available in the gaming machine area at all times gaming machines are available for gaming as per Ministerial Direction 1 March 2020.

The Club also has a primary RGM who has oversight of the Club's Responsible Gambling/Patron Care/Gambling Harm Program.

The duties of the RGM include, but are not limited to:

1. Ensuring that all staff are aware of and have read the Club's Responsible Gambling Code of Conduct;
2. Ensuring that all staff are aware of and have read the Club's Self-Exclusion Program Procedures (available in the Responsible Gambling Register);
3. Ensuring that all staff members rostered in the Gaming Room are trained in the 'YourPlay' pre-commitment program, can assist a Patron to enrol with 'YourPlay', and help them set EGM time and spend pre-commitment settings;
4. Ensuring that all staff members rostered in the Gaming Room participate in Venue management activities addressing gambling related harms, including monthly meetings, record keeping and information sharing practices; and
5. Maintaining compliance with all responsible gambling regulatory and code requirements, including Ministerial Directions.
6. Ensuring a process is in place to have the Responsible Gambling Point-of-Sale checklist monitored;
7. Checking that all such interactions have been recorded into the Responsible Gambling Register;
8. Ensuring that all necessary entries are recorded correctly in the Responsible Gambling Register and undertake audits to ensure quality and quantity of interactions are maintained at a reasonable level; and
9. Liaising with the Club's Self-exclusion Program provider where necessary to maintain compliance with the Program's requirements.

The duties of the RGO include, but are not limited to:

1. Monitoring the EGM area and ensure compliance with the Act, Regulations and the Club's Manual;
2. Ensuring that staff record responsible gambling incidents and interventions in the Responsible Gambling Register;
3. Respond to Patrons' requests for information about gambling harm support services;
4. Interact with Patrons where signs of unacceptable or problematic Patron behaviour are identified by staff;
5. Coordinating operation of the Venue's self-exclusion program;
6. Coordinating implementation and maintenance of harm reduction measures and staff training;

7. Providing guidance to staff about how to manage problematic Patron behaviour including indicators of potential gambling harm;
8. Observing Patrons who display behaviour that is consistent with gambling harm and provide assistance as necessary;
9. Providing advice to staff about gambling harm and how to respond to signs of gambling harm;
10. Responding to Patron enquiries and complaints about the supply of gambling in the Club;
11. Ensuring that all relevant staff look over the collection of photos of the Club's self-excluded Patrons during every work shift. This is necessary as new self-excluded Patrons may be added at any time;
12. Interacting with Patrons who self-identify as having gambling harm issues as outlined in the Club's Manual;
13. Interacting with any Patron displaying unacceptable behaviour as outlined in the Club's Manual;
14. Interacting with self-excluded Patrons who are detected breaching their Self-exclusion Deeds;
15. Ensuring that all relevant staff record gambling harm interactions in the Responsible Gambling Incident Register; and
16. Ensuring that all relevant staff record detected breaches of self-exclusion in the Responsible Gambling Register and file a report with the Club's Self-exclusion Operator.

Appendix 2

Responsible Gambling Regulatory/Code of Conduct Requirements List

Item	Description	Mandatory/Recommended
Responsible Gambling Register	A Responsible Gambling Register is required to be located in the Gaming Room (preferably at the cashier's station). The register must include details of: • Club contacts with Gambler's Help services; • Patron Care incidents that may have been gambling harm related, including Patron breaches of the Self-exclusion program; • Instances of strong Patron care/responsible gambling practices by Club staff; • Patron Care/Responsible Gambling professional development sessions for staff; and Patron and staff complaints against the operation of the Plan at the Club.	Mandatory
Responsible Gambling Message Sign/ display	Display of the printed statement of the Club's commitment to responsible gambling "Responsible Gambling Message" (refer to Appendix 4). The sign must be displayed at the entrance to the Gaming Room and/or at the cashier's station.	Mandatory
Responsible Gambling Officer sign	"A Responsible Gambling Officer is available for assistance at all times" sign must be displayed at the cashier's station. (Appendix 3, #12).	Mandatory
"Code Available on Request" sign	A sign stating the Code is available upon request to be displayed at Gaming Room entrance or cashier's station.	Mandatory
Copy of Code Available	A written copy of the Plans, including copies in major community languages must be available for Patrons if requested – preferably at cashier's station.	Mandatory
Code Available on Website	Where a Club has a website the Codes, including in major community languages, must be displayed on the website or links to the website where the Codes can be accessed must be available on the Club's website.	Mandatory

“Playing the Pokies – Know the Facts” brochures	The brochures must be displayed at the cashier’s station (minimum quantity being 20) . The number of brochures available around the Gaming Room must be at least equal to the number of gaming machines in the Gaming Room (Appendix 3, #1)	Mandatory
YourPlay Brochures Available	Purple, Blue and Green YourPlay brochures must be displayed at the cashier’s station (minimum quantity being 20) . The number of brochures available around the Gaming Room must be at least equal to the number of gaming machines in the Gaming Room (Appendix 3) .	Mandatory
Responsible Gambling Posters	Responsible Gambling Your Play posters (Framed A2) must be displayed in Gaming Room at a ratio of 1 poster per 15 machines or part thereof . Posters must be placed such that a poster is visible by a person seated at any machine in the Gaming Room (Appendix 3) .	Mandatory
Casual YourPlay Cards	Casual YourPlay cards must be displayed at the cashier’s station (minimum quantity being 20) . The number of cards available around the Gaming Room must be at least equal to the number of gaming machines in the Gaming Room .	Mandatory
Responsible Gambling YOURPLAY A2 Poster	A responsible gambling YourPlay A2 poster must be displayed outside each internal entrance to the Gaming Room (Appendix 3, #4) .	Mandatory
Responsible Gambling Machine YOURPLAY A5 Green & Blue Talkers	Every gaming machine in operation must display a Responsible Gambling YourPlay machine talker, in even quantities of blue & green (Appendix 3) .	Mandatory
YourPlay Function Operational on EGMs	The YourPlay functionality must be operational on each EGM that is available for game play .	Mandatory
Player Information brochures	Player Information brochures must be displayed in the Gaming Room (Appendix 3) .	Mandatory
Gamblers Help brochures	Brochures promoting the availability of Gamblers Help support services must be displayed in the Club (preferably in the Gaming Room) (Appendix 3) .	Mandatory
“Payment of Winnings Policy” sign	A sign stating that “All winnings or accumulated credits of \$2,000 or more must be paid in full by cheque” must be displayed in the Gaming Room (preferably at the cashier’s station) (Appendix 3) .	Mandatory

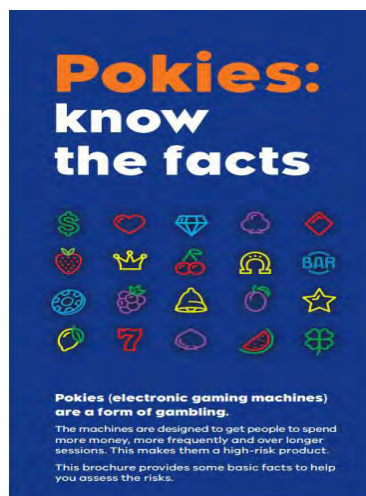
Budgeting & Responsible Gambling Information	A sign referring Patrons to the federal government's MONEYSMART www.moneysmart.gov.au website must be displayed in the Gaming Room. If a Club has a website, the above website links must also be displayed & connecting. (Appendix 3, #10)	Mandatory
"Conditions of Play" Poster	An EGM "Conditions of Play" poster should be displayed at a place in the Gaming Room where it can be read by Patrons.	Recommended
"Prohibition on the Provision of credit for Gambling" sign	A sign stating that the Club's provision of credit to a Patron for gambling is prohibited must be displayed in the Gaming Room. (Appendix 3).	Mandatory
Self-exclusion Information brochures	Brochures about the Club's self-exclusion program must be displayed in the Club (preferably in the Gaming Room). (Appendix 3).	Mandatory
Self-exclusion Incidents	All Self-exclusion incidents are required to be documented in the Club's Responsible Gambling Register, which is required to be located in the Gaming Room (preferably at the cashier's station). This register must include details of all detected breaches of self-exclusion by Patrons self-excluded from the Club and the action taken by staff following detection of the breach.	Mandatory
Player Information Displays (PIDS)	Player Information Displays on EGMs (accessed by pushing the "I" button) must be accessible. These should be checked regularly. (Appendix 3).	Mandatory
"Gambling by Minors Prohibited" signage	Signage stating that "Gambling by Minors is prohibited. It is illegal for a person under 18 years of age to enter or remain in a Gaming Room and/or to play a gaming machine" must be located at every internal entrance to the Gaming Room. The signage must be fixed so that it cannot be easily moved/removed.	Mandatory
"Constant Video Surveillance" sign	Signage stating that the area is under constant video surveillance must be displayed at every internal entrance to the Gaming Room as well as at every entrance to the Club.	Mandatory
Commission Rules Available	A sign stating that the Victorian Gambling and Casino Control Commission Rules are available for inspection upon request must be located at the cashier's station in the Gaming Room.	Mandatory

Reservation of Gaming Machine Policy	A sign stating the Club's Machine Reservation Policy to be displayed in the Gaming Room. (Appendix 3).	Recommended
Responsible Gambling A4 Poster and Business Cards	A Responsible gambling A4 poster and business cards should be in the toilets nearest the Gaming Room.	Recommended
Gambler's Anonymous Poster	A Gambler's Anonymous poster should be displayed at a convenient location in the Club.	Recommended
Child Safety Stickers	Child Safety Stickers should be positioned at all external entrances through which Patrons can gain entry to the Gaming Room.	Recommended
Child Safety Signs	Child Safety Signs should be prominently positioned in all car parks owned or controlled by the Club.	Recommended
RSG Training Certificates	Any person with regular duties in the Gaming Room <u>must</u> have a current Responsible Service of Gaming (RSG) certificate and the Club must be able to produce it upon request by the Commission.	Mandatory

Appendix 3

Responsible Gambling Materials Information

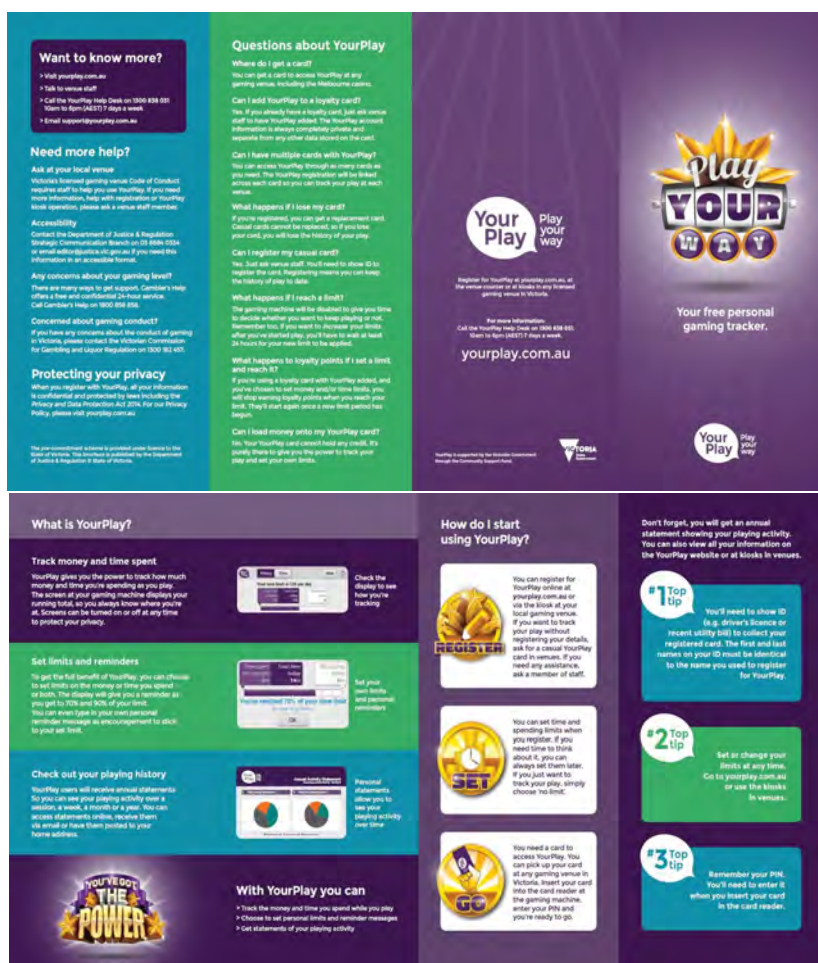
(1) Playing The Pokies- Know the Facts



1800 599 759
Victorian Gambling and Casino Control
Commission
Level 4, 12 Shelley St, Richmond VIC 3121
Email: contact@vgccc.vic.gov.au
Website: www.vgccc.vic.gov.au



(2) Your Play Brochures



(3) Player Information Display Brochures



(4) A2 Your Play Poster and A5 Machine Talkers



(5) Gamblers Help support services Brochure



(6) Payment of Winnings

By law, all winnings, or accumulated credits of \$2,000 or more,
must be paid in full by cheque that is not made out to cash.

These winnings cannot be provided as machine credits.

This Club recommends winnings greater than \$500 be paid by cheque.

By being issued a cheque, Patrons agree that personal information may be disclosed to the Commission, law enforcement and other regulatory bodies as required.

(7) Prohibition on the Provision of Credit for Gambling Purposes

The Act

prohibits this Club from
providing credit to Patrons for
playing gaming machines.

(8) Self-exclusion Program



(9) Reservation of Gaming Machine Policy

Reservation of Gaming Machine Policy

This Club allows a Patron to “reserve” a gaming machine for a period of 10 minutes by placing a “Reserved” sign over the screen of the machine.

During the 10-minute period, only the person who reserved the machine, or a staff member, may remove the Reserved sign and make the machine available for play by another person.

Playing two or more EGMs at the same time is strictly prohibited. This includes reserving one gaming machine whilst playing on another.

For further information on our “Reservation” Policy, please ask the Manager on duty.

(10) MoneySmart & Responsible Gambling cashier’s & website information links

As part of our commitment to responsible gambling, this Club provides Patrons with further information regarding responsible gambling, including:

*How to access the Commonwealth Government’s website “MoneySmart” –

www.moneysmart.gov.au

Gambler’s Help: www.gamblershelp.com.au or call 1800 858 858.

(11) Player Information Display

The rules for each Electronic Gaming Machine (EGM) game, including the chances of winning, are available by going to the Player Information Display (PID) screens on each gaming machine.

Patrons should be shown how to access the PID screens and to view the information and/or be given the Player Information Display (PID) brochure, available within the Gaming Room.



(12) Responsible Gambling Officer Available

**A Responsible
Gambling Officer is
available for assistance
at all times**

LEIGH  ARRETT
ASSOCIATES

Appendix 4

Throughout a visit to Doxa Community Club gaming machine area, we will check in on you from time to time.

Breaks in play are encouraged and if your visit spans 3 hours, we will ask you to take a 15-minute break.