



GAMING PLAN OF MANAGEMENT

Update 01/07/2024

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LAST REVIEWED: 01/07/2024

Penshurst RSL – GAMING PLAN OF MANAGEMENT

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1. Introduction

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

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

This Gaming Plan of Management has been adopted at:
Penshurst RSL
(LICQ300229505) – 58A Penshurst Road Penshurst NSW 2222

A copy of this document can be found in-house and on our website.
As at the date of this Gaming Plan of Management Penshurst RSL is not located in a Band 2 SA2.

For more information, please email info@penshurstsl.com.au

2. ClubSAFE Premium Member

Penshurst RSL is a member of ClubSAFE Premium which is the club industry’s leading best practice and preferred responsible gaming program in NSW. It is based on a Multi-Venue Self-Exclusion (MVSE) program designed to assist people with a gambling problem by self-excluding them from multiple venues around which they live, work and socialise.

Penshurst RSL is currently trialing the use of facial recognition technology that will be linked to the MVSE system, so that Management is alerted should a self-excluded patron enter the venue.

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

3. Our Venue

3.1 Rewards Loyalty Program

Charmed Rewards loyalty program is offered at Penhurst RSL which allows members the opportunity to accumulate points for the purchase or use of eligible goods and services. The number of status points earned by members over a rolling 12 Months determines their eligibility for rewards tiers during the period of the membership of the program.

Upon becoming a member, patrons can request the following information about their respective rewards loyalty programs:

- The rules of the loyalty program including where bonus points can be accrued and redeemed;
- How rewards are achieved;
- How rewards expire;
- How to opt-out of the program

Members have the opportunity to ‘opt-out’ of the loyalty program at any time in writing or in person.

Our loyalty program is compliant with all responsible gambling legislation. Penshurst RSL is constantly reviewing our loyalty program on offer to ensure we continue to act responsibly whilst giving our members a great customer experience.

Full details are available in the rewards program brochure, including how to achieve rewards, terms & conditions, and how to opt-out. Brochures are available at Reception or from any team member upon request.

4. Our customers

The decision to gamble lies with the individual and represents a choice, and in order to properly make that choice individuals must have the opportunity to be informed. Penshurst RSL is committed to providing appropriate information to all individuals including those from different cultural and linguistic backgrounds, so they are able to make informed decisions consistent with their personal preferences and individual circumstances.

Penshurst RSL takes the issue of responsible gambling very seriously and actively promote the following initiatives to ensure all patrons to our club are aware of such services available to them.

4.1 Self-Exclusion

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

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

A patron can self-exclude by speaking to a duty manager at the club or by contacting a gambling help counsellor. The minimum period for a self-exclusion is six months. Once a patron agrees to stay away from the club for a specific time, our venues have processes in place to help them honour that commitment.

If a patron breaches their self-exclusion, it is reported through the MVSE program for assessment by trained counsellors. Penshurst RSL also has facial recognition technology to assist in identifying self-excluded patrons entering the premises.

4.2 Partial Self-Exclusion

A partial self-exclusion allows a patron to exclude themselves from gambling activities at the club such as TAB/KENO and/or gaming machines, but still allows them access to other club facilities including restaurants, bars and other entertainment.

A patron can self-exclude by speaking to a duty manager at the club or by contacting a gambling help counsellor. The minimum period for a self-exclusion is six months. Once a patron agrees to stay away from the gaming activities of the club for a specific time, our venues have processes in place to help them honour that commitment.

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

4.3 Counselling Services

As required by law, Penshurst RSL display problem gambling brochures at critical points within the venue and have a wide range of these brochures in many languages to help with our culturally diverse community. These brochures contain details about the ClubSAFE Counselling Service and Gambling Help Line:

**ClubSAFE Counselling Service – 1800 997 766,
GambleAware Helpline – 1800 858 858**

The management team at our venue are proactive in handing out the relevant information to patrons in need. Penshurst RSL will display information about local support services in strategic locations, like the bathroom and on rolling digital displays.

4.4 Welfare Checks

Penshurst RSL aims to ensure all our patrons have a positive experience this includes undertaking welfare checks on any guests who may be at risk of problem gambling. Our management and frontline team are vigilant in monitoring our patrons undertaking any gambling activity.

4.5 Problem Gambling

If they are showing signs of extended play or distress, a duty manager will conduct a welfare check to gauge their mood, stress level and assertiveness and if required undertake the steps necessary whether that be encouraging them to take a break, explaining our exclusion or counselling services or asking them to leave the environment.

5. Our Team

Penshurst RSL is committed to facilitate staff training so that we can continue to improve the way we provide a responsible environment for gambling and customer care. Our staff undertake annually in-house training and refreshers on our policies and procedures.

5.1 Staff Training and Awareness

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

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

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

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

All employees will complete the following training.

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

All management employees will complete the following additional training.

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

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

Director Training

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

5.2 Responsible Gambling Officer

The Duty Manager or supervisor, depending upon whom is on shift, will also act as the Responsible Gambling Officer (RGO).

The RGO must oversee the implementation of this Gaming Plan of Management.

The Duty Manager or supervisor, depending upon whom is on shift, will fulfil the role of RGO from midnight on any day of late trade and is required to hold a current Responsible Conduct of Gambling (ARCG) accreditation.

The role of the Duty Manager or supervisor as RGO will include:

- Recording and escalating responsible gambling related incidents, and the actions taken to address them, in the Gambling Incident Register, including third party complaints
- Conducting gambling conversations with patrons
- Processing and enforcing self-exclusions
- Offering practical assistance options to patrons, including information on counselling and support services
- Providing assistance as required with responsible gambling, including responsible gambling strategies and breaks in play
- Ensuring the Club's RCG compliance obligations are met, including signage, minors, payout requirements, etc.)
- Receiving and documenting responsible gambling complaints

- Ensuring that the Club's GPOM is being followed.

Penshurst RSL will also make available to patrons' information in its feedback on how to make a complaint to us about Penshurst RSL's approach to the Responsible Conduct of Gaming ("RCG")

Penshurst RSL will at all times maintain a robust customer feedback policy which includes specific arrangements for RCG related complaints (e.g., such complaints go to the CEO and Gaming Manager only to maintain confidentiality).

5.3 Gambling Incident Register

Penshurst RSL will keep and maintain a gambling incident register.

The gambling incident register will record:

- (a) any gambling related incident observed by the staff of Penshurst RSL and determined to be a strong sign that the individual may have a problem with their gambling as per ClubSafe Responsible Gambling training;
- (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;

And

- (d) Any breach or attempted breach of a self or third-party exclusion observed by Penshurst RSL. 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.

Penshurst RSL 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.

The information recorded in a gambling incident register will be retained for at least 3 years from when the record was made.

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

5.4 Staff Gambling Policy

Penshurst RSL staff are not permitted to use any gaming facilities at either venue, including Gaming Machines, TAB, Keno at any time.

Penshurst RSL is committed to supporting and advancing employee wellbeing through appropriate information and training, the provision of employee assistance programs and the implementation of a wellbeing initiative that foster healthy outcomes and advance diverse, inclusive, safe and responsible working environments.

6. NSW Legislation

6.1 Minors/Persons Under 18 Years

Penshurst RSL is a licensed venue, and as such, no person under the age of 18 is permitted entry into any part of the club, unless they are in the company of an adult or guardian.

Gambling by minors is prohibited. Failure to comply will result in the person being asked to leave.

Signs are displayed at all gaming room entrances banning minors from entering the room. All Penshurst RSL employees share the responsibility for asking for proof of age if they are uncertain whether a customer is at least 18.

If relevant verification cannot be produced, the customer will be asked to leave the gaming room.

6.2 Financial Transactions

Penshurst RSL adhere to the strict rules and regulations relating to the positioning of ATM and EFTPOS Terminals around the gaming floor.

Our club does not cash cheques from customers under any circumstance.

Winnings \$5,000 and below can be claimed in either cash or EFT. By law any winnings over \$5,000 will be issued as a cheque or EFT only. Winnings will only be issued to the person playing the machine at the time of the win.

Keno winnings up to \$5,000 will be issued in cash. Any winnings over \$5,000 are handled by Keno and the club will be contacted to arrange remaining payment to the player as per Keno terms and conditions.

TAB winnings are paid by cash or into the players account as per TAB terms and conditions.

6.3 Venue Gambling Signage and Information,

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

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

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

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

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

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

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

6.4 Gaming Floor Shut Down

All venues are required by law to shut down their gaming floor operations hours over a 24-hour period, to facilitate machine audits and cleaning.

Penshurst RSL has a gaming shutdown period between 4:00am and 10:00am, and a shutdown period between 06.00am and 09.00am on weekends, Public Holidays as per club liquor license attached.

PENSHURST RSL – GAMING PLAN OF MANAGEMENT NSW Legislation

6.5 Community Contributions.

All licensed venues in NSW are required by law to return a minimum 2.25% percentage of all gambling profits to the community.

Penshurst RSL contributes the required amount every year, through Club GRANTS and community contributions.

6.6 Venue Layout

A current plan of Penshurst RSL showing the gaming machine areas and the overall premises (“Premises Plan”) is attached as Appendix A. The Premises Plan indicate the location of the:

- gaming rooms
- current layout of gaming machines
- cash dispensing facilities (being ATM and CRT)

This Gaming Management Plan, for the avoidance of doubt, does not need to be updated if there is a change to:

- (i) the gaming machine layout within the gaming areas or CRT location within the club (subject to any applicable legislative requirements); or
- (ii) a change to the location of the ATM within the non-gaming areas of the of the Club (subject to any applicable legislative requirements).

6.7 Review of Penshurst RSL’s Gaming Plan of Management

This Gaming Plan of Management will be available at reception and duty managers office and available to all staff. The operation and effectiveness of this strategy is reviewed regularly.

6.8 Legislative Requirements,

All advertising and promotions related to gaming undertaken within our club comply with the Liquor & Gaming NSW advertising guidelines. Penshurst RSL includes responsible gambling messages on its website, and in its newsletters and loyalty program marketing.

6.9 Player Activity Statements,

Player Activity Statements Our Club is required by law, to present members with a Player Activity Statement free of charge, should they request it.

A Player Activity Statement shows in a chosen period, the player's total amount of turnover, total wins and net expenditure, the total points earned and redeemed through the club's rewards program as a result of playing gaming machines, the entire length of time the player's card was inserted into gaming machines, and gambling help information.

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

6.10 Local Liquor Licensing Police

Contact Details
Sergeant Dan Moylan
Licensing Coordinator
St George Police Area Command
Hurstville Police Station, 38 Ormonde Parade Hurstville
E: moyl1dan@police.nsw.gov.au
P: 9375 8560 E: 58560
M: 0448 091 931

This Gaming Plan of Management will be immediately produced for inspection upon request by NSW Police or L&GNSW inspectors.

6.11 Penshurst RSL welcomes feedback at any time, by writing to:

Mail: CEO
Penshurst RSL
58a Penshurst Street
Penshurst NSW 2222
Email: info@penshurstrsl.com.au
Online enquiry www.penshurstrsl.com.au

APPENDIX A

Plan 1—Ground Floor

Penshurst RSL Club Ltd

58A Penshurst Street, Penshurst 2222

Key/Legend

-  Existing Defined License Boundary
-  Proposed New License Boundary
-  Existing Non-Risk Rated Area
-  Proposed Non-Restricted Area
-  Existing Restricted Area
-  Proposed Restricted Area

