

Gaming Code of Practice

Policy & Implementation plan



Adopted June 2023

Contents

Responsible Gambling Officer	4
Advanced Responsible Gambling Training Dates	4
Audit Dates	5
AML/CTF Training Dates	5
Access to information and learning commitments.	6
Player Welfare Checks	6
Customer Interaction.....	7
Family Initiated Self Exclusions	7
Club Initiated Self Exclusions.....	8
Gaming Incident Register	8
Identification & Action.....	9

Policy Statement

Club Maitland City sets a standard by complying with the Gaming Code of Practice as issued by ClubsNSW in 2023. In complying with the code the club will

- Ensure the provision and use of gambling products occur in a safe and enjoyable manner
- Prioritise customer welfare and sustainable gambling activities
- Adopt responsible gambling and harm minimisation measures in accordance with the code
- Promote the social and economic benefits of responsible gambling and the gaming industry

Company	Contact	Phone	Email
Responsible gambling provider	CLUB SAFE	1800 997 766	clubsafe@clubsnsw.com.au
Gamble AWARE NSW		1800 858 858	
Local Counselling Service	Catholic Care Social Services	1800 497 065	gambleaware@catholiccare.org.au
Licensing Police	Cameron Murray	4934 0200	



Key Positions and Dates

Responsible Gambling Officer

Name: Hayley Eveleigh

Appointed: 01/07/2023

The RGO is responsible for

- overseeing compliance with the Code of Practice
- recording, reviewing and reporting on relevant matters as required by the Code; and
- acting as the contact point for correspondence with the Code Administrator or delegates and the Code Adjudication Panel.

Advanced Responsible Gambling Training Dates

Management names: _____

Date trained: _____

Review date: _____

Director names: _____

Date trained: _____

Review date: _____



Audit Dates

12 monthly Audit completed on: _____

3 year external audit completed on: _____

Audit report submitted to the board: _____

AML/CTF Training Dates

Management

names: _____

Date trained: _____

Review date: _____

Director

names: _____

Date trained: _____

Review date: _____

Key Commitments

Access to information and learning commitments.

- Self-exclusion will ALWAYS be available
- Player activity statements will always be available upon request
- A player may request a player activity statement online (website) to the RGO. A direct email button will be contained in the appropriate area of the website
- The RGO will attend any locally held counselling forums
- The club where practical (authorised by the board upon request) will allow gamble aware counsellors and support services providers to conduct outreach within the club

Player Welfare Checks

A Player Welfare Check is an interaction between the staff member and patron, which may be in response to:

- Staff observing a Player displaying strong indicators of problem gambling; or
- A family member raising concerns about a player's gambling; or
- A player reaching any voluntary pre-commitment limit; or
- Staff observing a player gambling for three (3) or more hours continuously.

Process

1. Staff who witness any strong indicators of problem gambling or above triggers must inform their duty manager or equivalent on shift to escalate the matter.
2. Duty managers must perform the following process:
 - Enquire as to the Player's welfare; Example: "How's your night? Can I get you anything?"
 - If the player reports any level of distress or hardship, the duty manager must:
 - a) Offer the Player information about counselling and self-exclusion (i.e. Responsible Gambling Brochures, Gamble Aware contact cards etc.)
 - b) Ask the Player to take a break from gambling for a period of not less than 24 hours (this break does not require the Player to cease using other Club facilities); and
 - c) Make a record of the interaction in the Club's Gambling Incident Register*

Customer Interaction

Staff are encouraged and empowered to monitor customers for any actions that may indicate a gambling problem. These could include:

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

In the event of an action such as this occurring, the staff member is to bring it to the attention of the RGO or senior staff member immediately in a private manner for next steps. These next steps will likely include welfare checks, the outcome of which will determine the logical next step.

Any recognised breach is to be recorded in the gambling incident register.

Family Initiated Self Exclusions

Club Maitland City in accordance with the code must allow a Family Member of a person to make an application to the Club's gambling counselling service provider (e.g. ClubSAFE or Bet Safe) to have that Player excluded from the gaming machine areas at multiple Club venues.

Club Maitland City is a member of ClubsSAFE who's details are available in the table just under the Policy Statement.

Club Maitland City is obliged and therefore must provide information about the family initiated self-exclusion process to a family member if a concern is raised about a player's gambling behaviour.

If an application is made it must:

- a) provide the full name, address, date of birth and contact details of the Player to whom the application relates;
- b) provide evidence that the family is being harmed by the Player's gambling;
- c) provide evidence that the Player has refused to undertake a self-exclusion;
- d) be endorsed by a qualified gambling counsellor as being necessary to protect the family from experiencing serious gambling-related harm; and
- e) seek an exclusion period of at least 12 months

Note: These applications are not completed by the club, they are completed by ClubSAFE and the outcome is then given as a directive to the Club.

Club Initiated Self Exclusions

A Club may initiate a Multi-Venue Exclusion for a Player if it is of the opinion that it is necessary to prevent that Player from experiencing serious gambling-related harm. ClubsNSW may prepare a relevant procedure from time to time.

A Club must initiate a Multi-Venue Exclusion if a Player displays any of the following problem gambling behaviours:

- seeking credit for gambling;
- seeking to borrow money for gambling;
- admitting to borrowing or stealing money to gamble; or
- leaving a minor unattended while playing gaming machines.

In the event of a Club initiated self-exclusion, the RGO and managers responsible for the report should as good practice bring the case to the executive management team for notification and advice. Any exclusion must be processed through the multi venue exclusion scheme and for a minimum of 12 months.

Actions should be report to the board at the next available time.

Gaming Incident Register

A Club must maintain a Gambling Incident Register recording at least the following events:

- Player welfare checks where the Player reports any level of distress or hardship and outcomes;
- requests for self-exclusions and outcomes;
- third-party exclusion requests and outcomes;
- breaches or attempted breaches of an exclusion; and
- complaints in relation to the Club's compliance with its responsible gambling practices.

The Responsible Gambling Officer must review the Gambling Incident Register at least weekly and report to the board quarterly. The weekly review is conducted for the following purposes:

- Identify any shortcomings or opportunities for improvement in the handling of gambling-related events; and
- determine if feedback or additional training is required for Staff involved in the handling of gambling-related events; and
- consider whether a Club-Initiated Exclusion is appropriate for any Player who has been involved in one or more gambling-related events.

AML/CTF

Club Maitland City is committed to ensuring a safe and legally compliant gambling environment which includes the minimum protections for anti-money laundering and counter terrorism financing (AML/CTF)

Identification & Action

A Player engaging in money laundering may exhibit the following behaviours:

- offering to pay cash to a legitimate player who has accumulated credits or has winning tickets; or
- regularly inserting large amounts of cash or credits into gaming machines or multi-terminal gaming machines and engaging in minimal or no gameplay, before cashing out, without a valid explanation; or
- presenting false identification when claiming a gaming machine payout.

If this occurs the Club must:

- if the Player is a member of the club
 - remove the Player from the club;
 - take steps to ban the Player from the club for conduct unbecoming of a member; and
 - report the relevant details of that Player to Australian Transaction Reports & Analysis Centre ('AUSTRAC') and NSW Police.
- if the Player is not a member of the club
 - remove the Player from the club;
 - issue the Player a notice that they are no longer permitted to enter the club; and
 - report the relevant details of that Player to AUSTRAC and NSW Police.
- If the regulator or NSW Police request a ban be placed on a suspected money launderer then the club must comply and take steps to exclude membership and prevent access to the club

Any action that is identified must be notified to the senior management of the club for assessment of a Suspicious matter report (SMR). Matters of AML/CTF could be sensitive that will prohibit them from being recorded in the gaming incident register.

Further Information

Further information regarding responsible gambling and AML/CTF can be obtained from ClubsNSW, the Chief Executive Officer or Operations Manager. If you have any significant concerns for the welfare of a customer or the legality of a customer's actions, please bring this to the attention of you manager on duty as soon as possible in a private manner.

Appendix

1. ClubsNSW Code of Practice