

SHELLY BEACH GOLF CLUB

GAMING PLAN OF MANAGEMENT

REVIEWED: MAY 2024

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1. INTRODUCTION

Shelly Beach Golf Club is committed to responsible gambling and as such have developed a plan of management in consultation with Shelly Beach Golf Club board and management team to promote responsible service and delivery of gambling products.

This plan highlights our current initiatives and support services that are available to our customers and team to improve the overall standard of customer care and encourages a responsible gambling culture.

This Gaming Plan of Management has been adopted at:

Shelly Beach Golf Club (LIQC300236161)
Shelly Beach Road, Shelly Beach NSW 2261

A copy of this document can be found on the Club website and in-house upon request at reception or cashier station.

Shelly Beach Golf Club is located in the SA2 of The Entrance, which at the time of updating is a Band 3 and is licenced to operate 34 gaming machines.

For more information, please email gm@sbgc.com.au

2. ClubSAFE MEMBER

Shelly Beach Golf Club are a member of ClubSAFE 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.

3. OUR VENUE

Shelly Beach Golf Club has an electronic gaming system installed which allows for the reporting of meters in fifteen minutes increments and gives management visibility of activity occurring on each gaming machine throughout the day.

Shelly Beach Golf Club has CCTV cameras located at the entrance to the venue, the entrances to the gaming floor and throughout the gaming floor.

Shelly Beach Golf Club offers a loyalty rewards program in-venue. This rewards program allows members to earn points for purchases in all areas of the Club as well as for gaming machine play.

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.

Shelly Beach Golf Club 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.

Shelly Beach Golf Club 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. Shelly Beach Golf Club 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.

ClubSAFE also offers self-facilitated self-exclusion. Self-facilitated self-exclusion allows patrons to exclude themselves without having to attend a gaming venue or waiting to meet with a 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. Shelly Beach Golf Club is considering procuring facial recognition technology to assist in identifying self-excluded patrons entering the premises.

Shelly Beach Golf Club has an electronic sign in system at reception which assists with identifying and preventing breaches of self-exclusion.

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.

ClubSAFE also offers self-facilitated self-exclusion. Self-facilitated self-exclusion allows patrons to exclude themselves without having to attend a gaming venue or waiting to meet with a 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 process 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, Shelly Beach Golf Club 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. Shelly Beach Golf Club will display information about local support services in strategic locations, on the gaming floor and on digital displays where appropriate.

4.4 Welfare Checks

Shelly Beach Golf Club 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. 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.

All encounters are recorded in our gaming incident register.

After midnight, welfare checks as well as direct and indirect interactions with customers will be increased to provide more opportunities for breaks in play and assessing the welfare of the patrons engaging in gambling activities after midnight.

4.5 Signs of Problem Gambling

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

GENERAL WARNING SIGNS		WHAT TO DO
<p><i>Length of play</i></p> <ul style="list-style-type: none"> Starts gambling when the venue is opening, or only stops when the venue is closing <p>Gambles most days</p> <p><i>Behaviour during play</i></p> <ul style="list-style-type: none"> Gambles on more than one machine at once Rushes from one machine to another Significant increase in spending pattern Complains to staff about losing, or blames venue or machines for losing Rituals or superstitious behaviours (rubbing or talking to machine) 	<p><i>Money</i></p> <ul style="list-style-type: none"> Asks to change large notes before gambling Uses coin machine at least four times 	<p>On their own, these may be early warning signs. A patron showing several of these signs could be experiencing problems with gambling.</p> <ul style="list-style-type: none"> Monitor the patron's behaviour. If you notice a patron who is showing two or more of these signs, record what you have noticed and tell your manager.
PROBABLE WARNING SIGNS		WHAT TO DO
<p><i>Length of play</i></p> <ul style="list-style-type: none"> Finds it difficult to stop gambling at closing time <p><i>Behaviour during play</i></p> <ul style="list-style-type: none"> Often gambles for long periods (three or more hours) without a proper break Plays very fast Gambles intently without reacting to what's going on around them 	<p><i>Money</i></p> <ul style="list-style-type: none"> Gets cash out more than once through ATM or EFTPOS Avoids cashier, and only uses cash facilities Puts large wins back into the machine EFTPOS repeatedly declined <p><i>Social behaviours</i></p> <ul style="list-style-type: none"> Becomes angry or stands over others if someone takes their favourite machine/spot 	<p>A patron showing any of these signs is much more likely to be experiencing problems with gambling.</p> <ul style="list-style-type: none"> Monitor the patron's behaviour. Record what you have noticed and tell your manager, who will speak with the patron. If a patron shows two or more of these warning signs, follow the steps for strong warning signs (below).
STRONG WARNING SIGNS		WHAT TO DO
<p><i>Length of play</i></p> <ul style="list-style-type: none"> Gambles from opening to closing <p><i>Behaviour during play</i></p> <ul style="list-style-type: none"> Shows obvious signs of distress or anger (crying, holding head in hands, shaking, outburst towards staff or machine) 	<p><i>Money</i></p> <ul style="list-style-type: none"> Tries to borrow money from other patrons or staff <p><i>Social behaviours</i></p> <ul style="list-style-type: none"> Tells staff that gambling is causing them problems Significant decline in personal grooming and/or appearance over several days Friends or family raise concerns Tries to hide their presence at the venue (doesn't answer mobile phone, asks staff not to let others know they are there) 	<p>A patron showing any of these warning signs is probably experiencing problems with gambling.</p> <ul style="list-style-type: none"> Monitor the patron's behaviour Record what you have noticed, and tell your manager, who will speak with the patron, refer them to support and counselling services, offer them the opportunity to self-exclude, or recommend an exclusion order if the patron is at risk of harm or at risk of causing harm to others.

5 OUR TEAM

Shelly Beach Golf Club are committed to facilitating staff training so that we can continue to improve the way we provide a responsible environment for gambling and customer care. Our staff regularly undertake in-house training and refreshers on our policies and procedures.

5.1 Staff Training and Awareness

Shelly Beach Golf Club employees undergo regular Responsible Conduct of Gambling (RCG) training to equip them with the skills and knowledge to identify the signs of risky and problematic gambling behaviour and assist problem gamblers.

In addition to the mandatory RCG training, team members undergo training sessions appropriate to their role:

- Multi Venue Self- Exclusion**
- Advanced Responsible Gambling Training**
- Compliance Officer Training**

These training sessions are vital in keeping our team up to date with industry updates, legislation and most importantly methods to ensure we are adhering to customer care and making it clear to staff that patron welfare is of the utmost importance.

Such training sessions give our team the forum to discuss and establish appropriate policies, procedures and lines of responsibility to provide customer care. These include house policies, clear accountability, reporting mechanisms and follow up procedures for dealing with responsible gambling issues.

Non-gaming staff are required to complete induction to RCG training to ensure that every staff member in the venue is trained to respond appropriately to any customer seeking help or displaying signs of gambling harm.

The Board of Directors are required to complete RCG Oversight training to ensure that there is a structured top down approach to harm minimisation.

The Licensee, Responsible Gaming Officers and any staff employed to undertake the management of gaming machines are required to participate in Advanced RCG training.

Harm minimisation is discussed at all staff meetings, encouraging and recognising staff who are being proactive in recognising at-risk customers, ensuring that all staff understand that patron welfare is of the utmost importance.

Any additional information pertaining to harm minimisation on a daily basis, outside of information recorded in the gambling incident register, is communicated via internal team communications such as shift reporting, emails and online meetings. This ensures that any relevant handover information is passed on to the next person coming onto shift.

5.2 Responsible Gambling Officer

5.2.1 The Licensee shall ensure that one Responsible Gambling Officer, being a staff member who holds a current RCG Certificate and Advanced RCG Certificate, is on duty and monitoring the gaming machines of the venue whenever gaming machines are operating.

5.2.2 The Licensee shall ensure that one Nominated Responsible Gambling Officer, being a dedicated staff member who holds a current RCG Certificate and Advanced RCG Certificate, is on duty and monitoring the gaming machines of the venue at any time that the gaming machines are operating between the hours of midnight and 8am. Nominated RGO's are permitted to perform gaming-related tasks that allow them to interact with, and monitor, gaming patrons.

5.2.3 The Responsible Gambling Officer's duties include:

- (i) Proactively check-in on and engage with patrons where the RGO suspects they may be experiencing gambling harm
- (i) Record gambling Incidents in the Gambling Incident Register
- (ii) Escalate serious instances of gambling harm to senior management
- (iii) Facilitate the provision of gambling help information and requests for self-exclusion

5.2.4 At all times, the Duty Manager or other senior manager responsible for gaming machine operations will assist the Responsible Gambling Officer in carrying out the duties described in this condition.

5.3 Gambling Incident Register

5.3.1 The licensee must keep and maintain a gambling incident register.

5.3.2 The gambling incident register must record:

- (a) any incident in which a patron of the venue displays or engages in problematic gambling behaviour of the kind specified in the 'Signs of risky and problem gambling behaviour: Know the signs and how to act' factsheet published on the L&GNSW website as amended from time to time.
- (b) the time, location and machine number(s) and brief description (or identity, if known) of any gaming machine player identified displaying or engaging in that behaviour
- (c) any proposed or implemented self or third-party exclusions of gaming machine players (specifying the player's name (where provided or known), membership number (if applicable) and duration of any exclusion) and the patron's response to the same.
- (d) Any breach or attempted breach of a self or third party exclusion

5.3.3 The gambling incident register must also record details of the action taken in response to the incidents, applications and other matters recorded in the register.

5.3.4 The licensee must review the gambling incident register at least on a monthly basis and must consider whether an exclusion order is appropriate for any person who has been asked to self-exclude but has declined to do so.

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

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

5.4 Staff Gambling Policy

Shelly Beach Golf Club have a staff gambling policy in place. The main objectives of this policy are:

- To foster a healthy environment for people who could be at risk of developing gambling problems or are recovering from gambling addictions;
- To assure patrons and guests that gambling operations of the Club are conducted in a fair and equitable manner; and
- To ensure the Club complies with its legal obligations

Employees are not permitted to participate in any form of gambling on the Club's premises at any time, regardless of whether employees are members of the Club or not.

Shelly Beach Golf Club are 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 fosters healthy outcomes and advance diverse, inclusive, safe and responsible working environments.

6 NSW LEGISLATION

6.1 Minors/Persons Under 18 Years

Shelly Beach Golf Club 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 Shelly Beach Golf Club 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.

6.2 Financial Transactions

Shelly Beach Golf Club adhere to the strict rules and regulations relating to the positioning of ATM and EFTPOS Terminals around the gaming floor.

Shelly Beach Golf Club does not cash cheques for customers.

Winnings \$5,000 and below can be claimed in either cash, cheque 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.

The Cash Redemption Terminals (CRTs) are set up with a limit of \$5,000 per payment. All winnings over this amount need to be paid via the cashier with staff interaction.

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.

Appendix A provides a floor plan indicating the positioning of all ATMs and CRTs located within the venue.

6.3 Venue Gambling Signage and Information

Quarterly internal signage checks are undertaken by our team at Shelly Beach Golf Club using the Liquor & Gaming Self-Audit Checklist to ensure all gaming compliance signage is up to date and maintained.

All advertising and promotions related to gaming undertaken within our Club comply with the Liquor & Gaming NSW advertising guidelines.

Shelly Beach Golf Club includes and promotes responsible gambling messages on its website, in its newsletters, via electronic displays throughout the venue and over the public address system.

Shelly Beach Golf Club promotes gambling awareness campaigns in venue and in marketing campaigns to members, including promotion of local support services.

Shelly Beach Golf Club is committed to promoting and assisting with gambling awareness events during relevant awareness weeks.

6.4 Player Activity Statements

Shelly Beach Golf Club is required by law, to present members with a Player Activity Statement free of charge, should they request it. A Player Activity Statement show in a chosen month 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. If you wish to request a player activity statement, please speak to a Duty Manager.

6.5 Gaming Floor Shut Down

All venues are required by law to shut down their gaming floor operations for a minimum of 6 hours per 24-hour period, to facilitate machine audits and cleaning. Shelly Beach Golf Club gaming machine shut down hours are identified below, meaning that gaming machines will not be operated within the times specified:

Day	Start Time	End Time
Monday	04:00 AM	- 10:00 AM
Tuesday	04:00 AM	- 10:00 AM
Wednesday	04:00 AM	- 10:00 AM
Thursday	04:00 AM	- 10:00 AM
Friday	04:00 AM	- 10:00 AM
Saturday	04:00 AM	- 10:00 AM
Sunday	04:00 AM	- 10:00 AM
Public holiday	04:00 AM	- 10:00 AM

6.6 Community Contributions

All licensed venues in NSW are required by law to return a minimum 2.25% percentage of all gambling profits which exceed one million dollars, to the community.

Shelly Beach Golf Club contributes the required amount or above every year, through ClubGRANTS and community contributions.

6.7 Venue Layout

A current plan of Shelly Beach Golf Club showing the gaming machine areas and surrounding areas is attached as Appendix A.

The plan indicates 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:

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

6.8 Review of Shelly Beach Golf Club’s Gaming Plan of Management

This Gaming Plan of Management will be available to customers on the website and at reception or the cashier.

This Gaming Plan of Management will be available to all staff via internal email, on the staff noticeboard and at the cashier station.

The operation and effectiveness of this strategy is reviewed regularly. The review process includes an opportunity for feedback from all relevant stakeholders including venue staff, customers and problem gambling support services.

Shelly Beach Golf Club welcome feedback at any time, by writing to:

Mail: Jeffrey Tomlinson
Shelly Beach Golf Club
Shelly Beach Road
Shelly Beach NSW 2261
Email: gm@sbgc.com.au

This plan of management will be reviewed and updated annually to ensure all sections are current with the latest legislative requirements and/or any changes to venue operations or personnel.

Outside of the scheduled review period, this plan of management will be updated for the following reasons:

- When there are changes to regulations which require immediate updating of the plan of management
- Upon advice from the regulator
- If there are operational changes which require immediate updating
- If there are increased risk factors (internally or externally) which trigger an update

6.9 Local Liquor Licensing Police Contact Details

Name: Rachael Johanson
Contact Number: (02) 4356 6231
Station Name: Tuggerah Lakes Police Station
Station Address: 22 Hely Street Wyong NSW 2259
Station Telephone Number: (02) 4390 1299
Email: tllicensing@police.nsw.gov.au

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

7 APPENDIX A – FLOOR PLAN

