

# Gaming Code of Practice Implementation Plan

West Pennant Hills Sports Club board, management and staff make a commitment to deliver best practice responsible gambling for our members, guests and our industry by adhering to this Gaming Code of Practice (Code).

## [Responsible Gambling Policy](#) (Section 19 of the Code)

- The Responsible Gambling Policy was approved at a Board Meeting on 22<sup>nd</sup> November 2023
- The Responsible Gambling Policy is made available to members, staff and directors via the club website, <https://www.wphsportsclub.com.au/about-club-docs>

## [Responsible Gambling Officer \(RGO\)](#) (Sections 22-25 and 30 of the Code)

- The Responsible Gambling Officer (RGO) is Brendon Sacilotto
- ClubsNSW was notified of the contact details of the RGO on 10<sup>th</sup> November 2023
- The RGO completed training on 10<sup>th</sup> November 2023
- The club's provider of RGO Training is ClubSafe

## [Responsible Gambling Oversight Training](#) (Sections 26-29 of the Code)

(Secretary Manager/Director)

- The club's provider of Director Training is ClubSafe
- The club will maintain a register of Directors that have completed the Responsible Gambling Oversight Training.

## [Advanced Responsible Conduct of Gambling Training](#) (Section 31 of the Code)

- The Club's Chief Executive Officer has completed Advanced Responsible Conduct of Gaming Training.
- The club will maintain a register of employee's that have completed the Advanced RCG training.

## Responsible Gambling Staff Induction Training (Section 33 of the Code)

(Non-Gaming Staff)

- All non-gaming staff are offered access to the Responsible Gambling Staff Induction training via induction training.

## Refresher Training (Section 34 of the Code)

- Refresher training is required every 5 years.

## Player Welfare Checks (Sections 35-37 of the Code)

- Information outlining the player welfare check process is available to staff via the Player Welfare Check Process Policy

## Counselling and Support Services (Section 38 of the Code)

- The club's provider of counselling and support services is ClubSafe
- Counselling service information is made available to players via Posters, Contact Cards and on advertising screens in the Clubs gaming areas as well as generally throughout the Club.

## Forums and Outreach Programs (Sections 39-40 of the Code)

- The club allows outreach activities to occur with GambleAware counsellors as required.

## Exclusions (Sections 41-50 and 53 of the Code)

- The club's provider of a multi-venue exclusion scheme is ClubSafe MVSE
- Information on exclusions (including family-initiated exclusions) is provided to patrons via brochures, posters and contact cards from ClubSAFE in the gaming area as well as at the Clubs reception.
- Involuntary / family initiated exclusions can be initiated via the following:  
<https://www.clubsnsw.com.au/thirdpartyexclusioncontactform>
- The club notified members of the club's policy in relation to family-initiated and club-initiated exclusions on 10<sup>th</sup> November 2023

- The club notified members of the club's Policy in relation to Club-Initiated Exclusions on 10<sup>th</sup> November 2023
- If a patron breaches or attempts to breach their exclusion, the club notifies their multi-venue scheme and documents it in the Gambling Incident Register.

### Electronic Exclusion Detection (Sections 51-52 of the Code)

- The club's provider of digital sign-in linked to the exclusion database is Circle Solutions and ClubSafe MVSE.

### Gambling Incident Register (GIR) (Sections 57-60 of the Code)

- A paper-based Gambling Incident Register (GIR) is kept in the Duty Managers Office.
- The RGO reviews the GIR weekly. Results of the GIR review are reported quarterly at the March, June, September, and December Board meetings.

### Access to Money (Sections 61-62 of the Code)

- All staff are informed of the prohibition to provide credit for gambling via staff induction training.
- The following measures have been taken to ensure the ATM is located outside the gaming area and visibility from gaming machines is minimised: ATM 1 is located more than 15m away from the Clubs gaming area. ATM 2 is screened from view and not physically visible from the Clubs gaming area.

### Player Information (Sections 63-64 of the Code)

- Staff check the gaming area daily to ensure the following brochures are available:
  - Brochure 1 - Info about the odds - Betting on gaming machines
  - Brochure 2 – ClubSAFE or Bet Safe Counselling and Support
  - Brochure 3 – Information about Responsible Gambling Behaviours

### Minors (Section 65-66 Code)

- The club adheres to the legislations and regulations surrounding the prevention of minors from accessing the gaming machines areas and by doing this utilises the correct signage and has put in place policies and procedures. This is checked daily, as well as independently by a third-party operator, Liquor and Gaming Solutions Lty Ltd.

## Advertising, Promotion and Player Reward Schemes (Sections 67-72 of the Code)

- All gaming-related advertising and promotion approvals will be reviewed and approved by the RGO. A copy of the relevant approvals will be kept for a period of 5 years.
- The Club will review the Player Rewards Scheme for compliance with the Code (Sections 69-72) at least annually.

## AML/CTF (Sections 73-77 of the Code)

### (For Clubs with 16 or more gaming machine entitlements)

- The Secretary Manager and all Directors completed (Executive/Board Oversight Training) within 12 months of commencement on the board or taking the role of Secretary Manager.
  - For existing Secretary Managers and at least 50 per cent of the existing board have completed AML/CTF Oversight Training within 12 months [Insert date when training was completed]
  - All remaining existing directors must complete AML/CTF Oversight Training within three (3) years [Insert date when training was completed]
- The AML/CTF Compliance Officer (ACO) Officer is Brendon Sacilotto
- The AML/CTF Backup Compliance Officer is Daniel Connell
- The ACO and ACO Backup completed the approved ACO training on 10<sup>th</sup> November 2023.

## AML/CTF Staff Awareness Training (Sections 67-72 of the Code)

- A register of the completion of AML/CTF Awareness Training (for those involved in the gaming machine operations and wagering) can be found online, via Barrington's Training.
- All other staff, including those who work outside of gaming are required to complete AML/CTF Staff Awareness training via Barrington's Training.

## AML/CTF Bans (Sections 81-82 of the Code)

- The club adopted a policy on banning people suspected of money laundering on 22<sup>nd</sup> November 2023.

## Assurance (Sections 83-88 of the Code)

- The Clubs Chief Executive Officer will conduct an annual internal audit of compliance with the Code using the ClubsNSW online self-audit checklist and report to the board for consideration.
- The club will engage ClubSafe as an external auditor every 5 years to audit the club's compliance with the Code and report to the board for consideration.

## Player Welfare Check Process

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\*

