

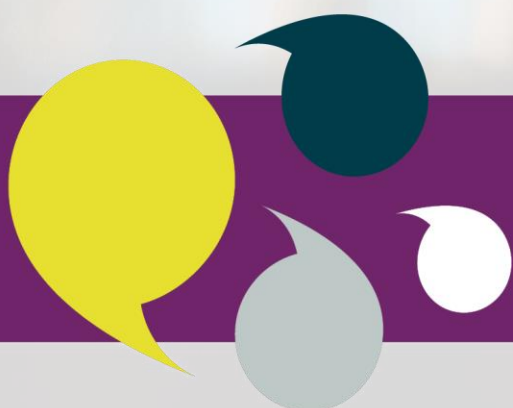
Club Wodonga

Harm Minimisation Report

March 2025

VERSION 1.0

DNS
SPECIALIST SERVICES



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1 EXECUTIVE SUMMARY

The gaming industry operates within a framework of legislation aimed at mitigating gambling-related harm. However, best practice measures often precede regulatory requirements, allowing individual venues to proactively customize their harm minimization strategies and create a safer environment for patrons.

Club Wodonga's commitment to exceeding these baseline standards is evident in its proposed gaming room design and operational practices. However, it is important to acknowledge the complexity that the Feros family are new to the Victorian market however have been operating in the NSW and Qld gaming environment for many years and fully understand the legislative and practical requirements of operating gaming machine venues. This assessment by DNS Specialist Services has been undertaken as a desktop audit of venue plans, relying on third-party documentation for review and comment. While all efforts have been made to provide an accurate and comprehensive evaluation, a site visit and practical implementation would provide a further opportunity to refine and enhance these strategies.

While the vast majority of patrons engage in gaming responsibly, the industry recognises that vulnerable individuals and at-risk groups require focused support and assistance. Therefore, Club Wodonga is required to be committed to a multi-faceted approach designed to identify and mitigate potential harm proactively, and support at risk people.

This assessment has highlighted several key features that demonstrate this commitment:

- **Strategic Design for Reduced Inducements:** The thoughtful gaming room layout restricts the visibility of EGMs from external locations, the café, and designated outdoor smoking areas (DOSAs), minimizing visual triggers for impulsive entry and promoting mindful decision-making. The strategic access points of staff at Cashiers and entry ensure that this is maintained.
- **Facilities Encouraging Breaks:** Easy access to alternative amenities, including a separated café, dedicated food and beverage options on Level 1, and convenient DOSAs, provides opportunities for patrons to step away from the gaming environment, relax, and reflect on their activities.
- **Cash Access Controls:** Strict adherence to regulations regarding EFTPOS and ATM accessibility within the Gaming Machine Area (GMA) reduces the risk of impulsive spending and over-commitment.
- **Multi-Layered Supervision:**
 - The strategic placement of the bar/cashier provides a central vantage point for staff observation.
 - A spacious layout promotes clear lines of sight across the gaming floor.
 - Planned integration of CCTV and Facial Recognition Technology (FRT) enhances the identification of at-risk patrons.
 - Dedicated floor walkers actively engage with patrons and monitor behaviour.

- All staff receive comprehensive training on responsible gambling practices.
- **Prioritized Customer Interaction:** A commitment to knowing the customer, encouraging open communication, and providing clear access to support services, fostering a culture of care and promoting responsible gambling behaviour's. It is recognised there is a need to actively work with the at risk groups to understand what the key markers and trigger points are.

By implementing these comprehensive measures, Club Wodonga strives to create a gaming environment where responsible play is actively supported, and patrons at risk receive timely and effective support. The integration of strategic design, technological surveillance, dedicated staff resources, and proactive customer interaction represents a genuine commitment to minimizing harm and promoting a safe and responsible gaming experience for all.

1.1 EXPERT PROFILE

With over 30 years of experience in the gaming industry, Danny Nixon-Smith brings a wealth of knowledge and a deep commitment to responsible gambling practices. Having served in numerous capacities, from General Manager to Consultant, Danny has gained a comprehensive understanding of the multifaceted aspects of the industry. For almost 15 years, he has operated as a consultant, providing expert advice to venues seeking to optimise their operations while prioritising harm minimization.

Danny's expertise is further validated by his active involvement in industry leadership roles. He currently sits on the board of the Safer Gambling Advisory Committee (Qld) and is also a board member of the RSL Association, demonstrating his commitment to community service and responsible gaming. As a seasoned consultant, Danny has completed in excess of 300 Community Impact Assessment reports across multiple jurisdictions, including Qld, NT, Tas, and Vic, showcasing his in-depth understanding of the social and economic impact of gaming in diverse communities.

Beyond his consulting work, Danny has been an active participant in shaping policy and promoting industry best practices. He served as a working group member with the Office of Fair Trading (Qld) and as a working member of Qld's Harm Minimisation Strategy. Danny also represented the Tasmania Hospitality Association at the Government level, advocating for responsible gaming changes. He has presented at numerous government and industry events, sharing his insights and knowledge, and has lectured at Qld University on Gambling. He is also a member of the AICD (Australian Institute of Company Directors), reinforcing his commitment to governance and ethical leadership. He has presented numerous Strategic plans and gaming designs for venues including Spirit Hotels (Coles) gaming venues.

Danny's company, DNS Specialist Services (DNS SS), employs approximately 25 staff and works with a diverse range of clients, from clubs and pubs to casinos. DNS SS has extensive experience in implementing harm minimization strategies to meet government expectations, including working with the Ville Casino. The company has a strong background and demonstrated skillset in providing a full service from policy to practice.

Through his extensive experience, active participation in industry leadership, and unwavering commitment to responsible gambling, Danny Nixon-Smith is uniquely qualified to provide expert advice and guidance to venues seeking to create a safe, responsible, and thriving gaming environment.

1.2 ABBREVIATIONS & TERMINOLOGY

The following is a list of abbreviations and terminology used throughout this report.

Figure 1.1 – Abbreviations & Terminology	
ABBREVIATION	DESCRIPTION
Act	means the Gambling Regulation Act 2003 (Vic).
Code	means this Responsible Gambling Code of Conduct.
Customer	means members and visitors of the venue.
EGM	Electronic Gaming Machines
Management	means the management of this Venue.
Patrons	means customers, members and visitors of the venue.
VGCCC	means the Victorian Gambling and Casino Control Commission.

2 INTRODUCTION

This report presents a desktop review of the harm minimisation best practice measures proposed with the application for approval of new gaming premises and operation of 75 EGMs at 48 Reid Street, Wodonga.

Notably, the gaming license to be associated with this application is new full club venue operator's licence (application no. V25100590) in the name of Huon Hill Club Ltd trading as Club Wodonga. The assessment focuses on the implementation of evidence-based strategies designed to reduce gambling-related harm.

Best practice measures considered include active monitoring of the gaming floor by trained staff, thoughtful venue design to ensure accessibility from other areas of the club while promoting balanced patronage, and the integration of ancillary features like responsible gambling information displays and accessible support services.

This report aims to evaluate the adequacy of these proposed measures in mitigating potential harm and ensuring a safe and responsible gaming environment at Club Wodonga.

3 HARM MINIMISATION

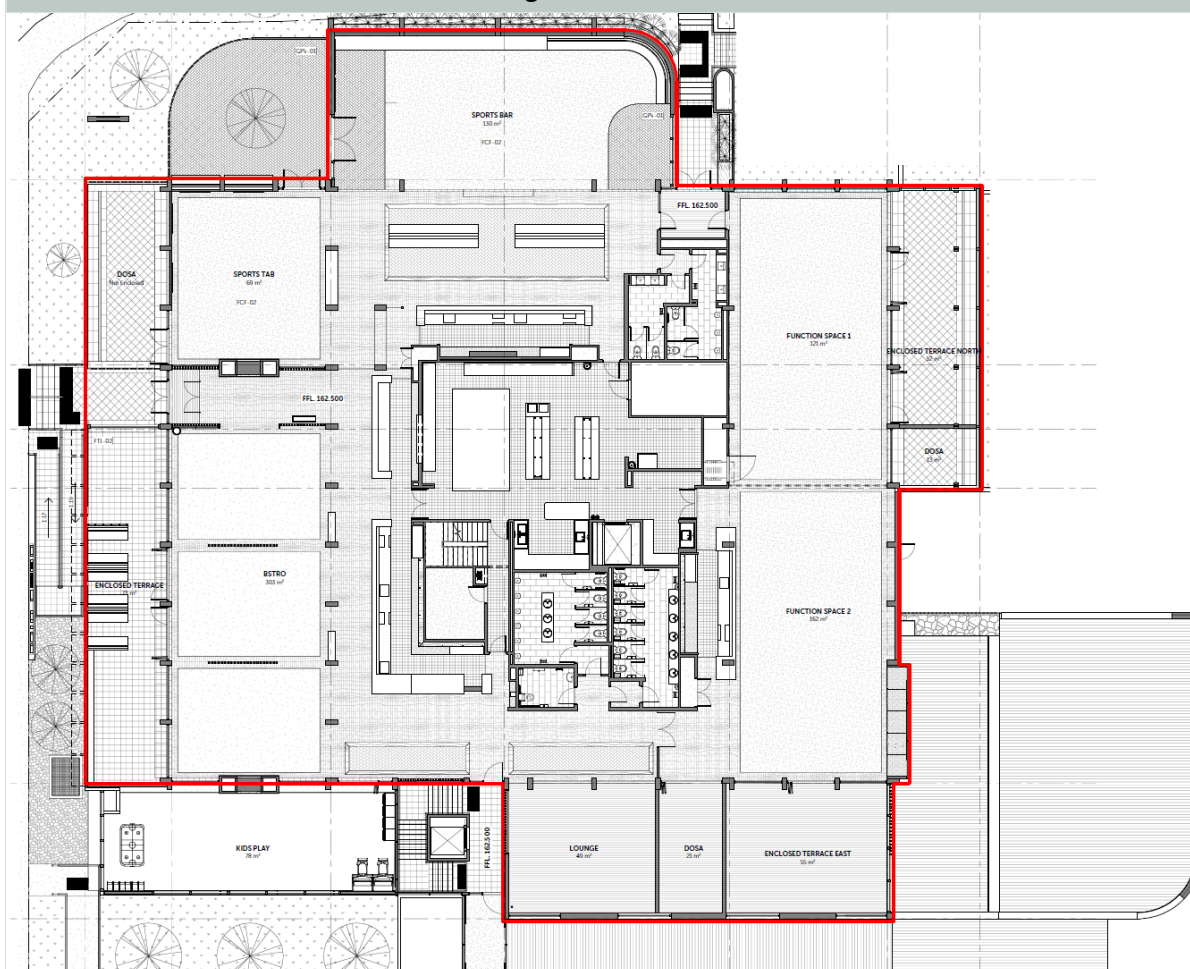
3.1 PROPOSED PLANS

Thoughtful gaming room design offers a significant opportunity to incorporate features that actively support harm minimization. By prioritizing accessibility, visibility, and a balanced environment, Club Wodonga can further enhance its commitment to responsible gambling.

The design of the gaming room will consider principles of harm minimization. This includes limiting inducements to gamble (e.g., restrictions on promoting cash withdrawals or "near miss" fallacies), providing visible responsible gambling information, and ensuring that food and beverage services are easily accessible outside the gaming area. The intent is to promote a balanced patronage and limit inducements for patrons to continually play gaming machines.

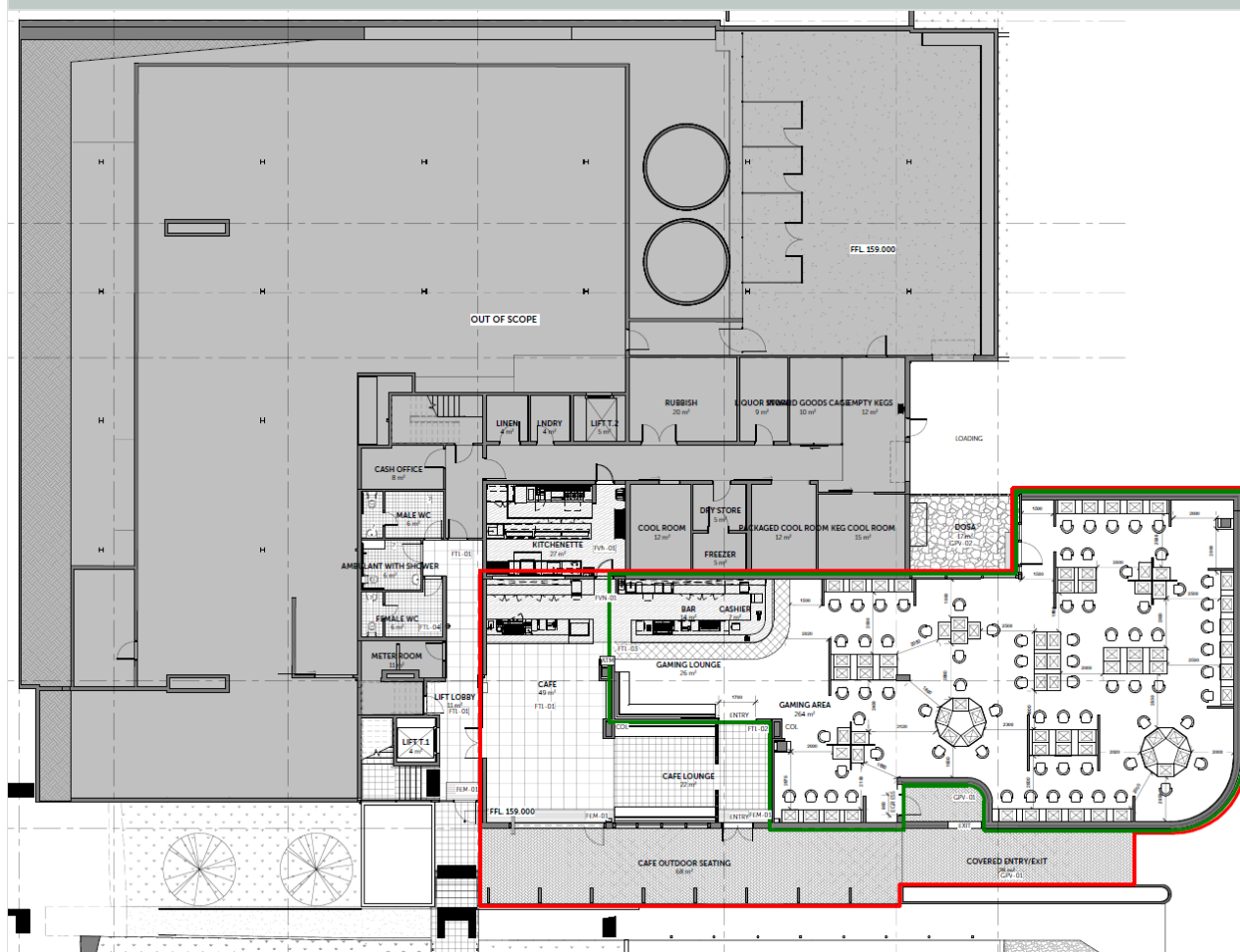
To support this the design will assist in patrons being able to easily access other areas of the venue where they can access refreshment and entertainment facilities. By prioritizing these design considerations, Club Wodonga demonstrates a commitment to creating a safe and responsible gaming environment, aligning with best practices in harm minimization and addressing the complex issues associated with gambling.

Figure 3.1 – First Floor



Source: Williams Winter / BSPN Architecture

Figure 3.2 – Ground Floor



Source: Williams Winter / BSPN Architecture

3.1.1 ACCESSIBILITY

Entry and monitoring are critical elements in harm minimization, influencing patron behaviour and enabling proactive intervention. The proposed design prioritises patron flow that supports responsible gambling by offering alternative routes to other venue areas without requiring passage through the gaming room. This is a key strategy for minimizing prolonged exposure to gaming stimuli and encouraging participation in diverse venue offerings, promoting a more balanced experience. The layout allows patrons to enter other areas of the venue without traversing through the gaming room.

Specifically, thoughtful entry point design provides access to the café lounge before reaching the gaming room. This design choice encourages patrons to engage in social interaction and other leisure activities prior to entering the gaming environment. To further promote thoughtful entry, it is acknowledged that the access to the gaming room is accessible via a door but is strongly recommended that this door be a sliding door activated by a button press. This deliberate action creates a brief pause and requires a conscious decision to enter the gaming area, reducing impulsive entry.

Furthermore, monitoring patron exit pathways are designed to facilitate direct exit from the gaming room, allowing patrons to leave the venue without necessarily passing through the rest of the premises. By reducing exposure to the gaming environment upon exit, the layout mitigates the chance of a patron being tempted to return for further play, supporting responsible exit strategies.

Finally, entry point monitoring is further enhanced by entry points to the gaming room (from the external entrance and the café) being strategically designed to require patrons to pass the Bar/Cashier service station. This placement significantly enhances the venue's ability to actively monitor patrons' behaviour. Staff stationed at these key points can observe patrons as they enter and exit the gaming room, allowing for the identification of potential signs of distress or excessive gambling and enabling timely interventions if needed.

3.1.2 SMOKING AREAS (DOSAs)

Within the gaming industry, responsible venue design recognizes the importance of providing opportunities for patrons to take breaks from continuous play. Designated Outdoor Smoking Areas (DOSAs) serve not only to comply with smoking regulations but also to promote responsible gambling practices by encouraging patrons to step away from the gaming environment.

Club Wodonga offers a number of DOSAs that are designed to maximise their benefit for patrons while minimizing potential harm. Importantly, the DOSA outside of the gaming area (level 1) is accessible without requiring patrons to traverse directly through the gaming area, patrons in the café are also able to exit the building for smoking purposes without having to use the gaming DOSA. The strategic separation reduces the pull of the gaming environment and promotes mindful disengagement with the dedicated DOSA in the gaming room allowing breaks in play for patrons.

The location of the DOSAs also takes into consideration the protection of minors, ensuring they are not accessible to individuals under the legal gaming age. Furthermore, the design of the gaming DOSA incorporates privacy screens that reduce the ability to directly view gaming machines from the smoking area, further mitigating the temptation to return to play prematurely.

In addition to DOSA directly connected to the gaming room, Club Wodonga provides alternative smoking areas in other parts of the venue. The café, located on the street level, provides patrons with the ability to step outside for a break. The level 1 area also has a dedicated smoking area for patrons utilising the venue's other facilities. The availability of smoking areas throughout the premise is of considerable value with addressing harm.

By providing readily accessible, well-designed DOSAs and alternative smoking locations separated from the immediate gaming environment, Club Wodonga reinforces a commitment to responsible gambling practices and actively promotes breaks in play as a means of mitigating potential harm.

3.1.3 MACHINE DENSITY AND SPACING

While acknowledging that any gaming room layout will inherently present opportunities for patrons to find secluded areas, the overall design of Club Wodonga prioritises transparency and spaciousness to mitigate the potential negative impacts of these secluded areas. It is recognized that

some patrons may seek privacy; however, this can be counteracted by other important monitoring strategies such as CCTV and proactive floor walkers, which will be addressed separately.

The layout of the gaming room is considered spacious, allowing for a generous 3.5 square meters per gaming machine. This provides an environment less conducive to prolonged play and over crowding with the additional benefit that the layout should allow staff and patrons to walk through the gaming floor unobstructed via space between banks and individual EGMs. This uninhibited movement enhances staff's ability to monitor the gaming floor effectively and ensures that all patrons can comfortably access various areas.

The inclusion of a dedicated bar/cashier service station within the gaming room further supports harm minimization. This readily accessible amenity encourages patrons to take breaks from play, promoting responsible consumption and providing opportunities for interaction with staff. The inclusion of the cashier promotes responsible gambling with limited amounts of access.

Crucially, the design ensures that Electronic Gaming Machines (EGMs) are not visible from outside the gaming room, effectively separating them from external view and from the venue's café and lounge facilities. This design element minimises inducement to gamble for patrons in non-gaming areas, reinforcing a clear distinction between the gaming environment and other entertainment options within Club Wodonga

3.1.4 ACCESSIBILITY OF CASH FACILITIES:

Club Wodonga is committed to strict adherence to all relevant regulations concerning access to cash within the gaming environment, specifically the Victorian Gambling and Casino Control Commission (VGCCC) rules for venue operators. We confirm that the layout of the gaming room is meticulously designed to comply with rule 5 of the Commission rules, which stipulates that an EFTPOS device or ATM must not be directly accessible for withdrawing cash within the Gaming Machine Area (GMA) by any person.

The venue's approach goes beyond mere regulatory compliance, embodying best practice principles of harm minimization. The strategic placement of the EFTPOS facility and any ATMs ensures that patrons are not able to directly withdraw cash within the GMA. This design effectively reduces the risk of impulsive decisions and overspending, both of which are considered significant contributors to gambling-related harm.

Furthermore, to access the EFTPOS or ATM, patrons are required to walk past the gaming bar/cashier service station. This strategic positioning is not coincidental; it provides an opportunity for venue staff to observe patrons who may be accessing cash facilities. The increased visibility allows for more effective monitoring and the potential for staff intervention if signs of distress or irresponsible gambling behaviour are observed, contributing to a safer and more responsible gaming environment.

3.1.5 SUPERVISION

Within the gaming industry, it is widely acknowledged that effective harm minimization cannot rely on a single strategy. A comprehensive, multi-layered approach is essential to address the complex factors that contribute to gambling-related harm and create a responsible gaming environment. Recognizing that subtle changes in patron behaviour can indicate escalating risk, proactive and continuous supervision forms a crucial component of this approach. Monitoring changes in behaviour from entry to exit is a key element in identifying patrons who may be experiencing or at risk of experiencing gambling-related harm. Observable changes such as increased agitation, erratic play patterns, frequent cash withdrawals, or signs of distress are key indicators that prompt staff intervention. This focus on behavioural changes allows for a more proactive and personalized approach to harm minimization, moving beyond static indicators to address the dynamic nature of gambling behaviour.

To support this critical function, Club Wodonga has implemented a multi-layered supervision strategy:

- **Strategic Bar/Cashier Placement:** The central location of the bar/cashier service station provides optimal visibility of patrons entering and exiting the gaming room from both the main entry and the café. This strategic placement enables staff to observe patron behaviour, identify individuals who may be at risk, and offer assistance proactively. The design helps deter gambling related harm.
- **Spacious Layout for Visual Supervision:** The spacious layout, with ample distance between gaming machines and banks, facilitates clear lines of sight across the gaming floor. This design feature allows staff to directly supervise a greater number of EGMs and observe patron interactions, contributing to a safer and more responsible environment.
- **CCTV and Facial Recognition Technology (FRT):** While not explicitly detailed in the plans, Club Wodonga is committed to integrating CCTV surveillance, including Facial Recognition Technology (FRT), as a key component of its monitoring strategy. FRT, in particular, enables the identification of patrons who have self-excluded or have been flagged as at-risk, allowing for timely and appropriate interventions.
- **Dedicated Floor Walkers and Increased Staffing:** The venue is committed to maintaining a consistent presence of trained floor walkers on the gaming floor at all times, with increased staffing levels during peak periods. These floor walkers are trained to actively observe patron behaviour, identify signs of distress, and initiate supportive conversations, ensuring that help is readily available when needed. The design helps deter gambling related harm.
- **Staff Training and Protocols:** All staff involved in the operation of the gaming room will receive comprehensive training on responsible gambling practices, including recognizing and responding to signs of problem gambling, implementing self-exclusion procedures, and providing information about support services. Clear protocols will be established for staff to report and address concerns related to patron behaviour, ensuring a consistent and coordinated approach to harm minimization.

By combining strategic design, technological surveillance, and dedicated staff, Club Wodonga aims to create a gaming environment where responsible play is actively promoted, and patrons at risk receive timely and effective support.

The focus is on the whole, with consideration given to design, technology and the human interactions of the Venue. It is understood that the venue simply cannot rely on any single approach and that the combination of these controls are essential to harm minimisation best practice.

3.1.6 PRIVACY SCREENS

Within the gaming industry, the strategic use of privacy screens is increasingly recognized as a best practice measure for reducing harm by minimizing the visual appeal of gaming machines to individuals who are not actively engaged in play. Limiting the visibility of EGMs from external locations helps to reduce impulsive entry, protect vulnerable individuals, and promote a more considered approach to gambling.

Club Wodonga has incorporated a number of design features that effectively restrict the direct vision of EGMs from various vantage points:

- **External Visibility:** The design restricts the direct vision of EGMs from the exterior of the gaming room, thereby reducing visual triggers for individuals entering the venue and promoting a more conscious decision to enter the gaming environment.
- **DOSA Separation:** As previously mentioned, the strategic placement of privacy screens restricts the ability to directly see a gaming machine from the Designated Outdoor Smoking Area (DOSA). This prevents visual cues from enticing patrons back into the gaming room prematurely and reinforces the importance of breaks in play.
- **Café/Lounge Separation:** While the presence of a physical door between the café is noted it is recommended that this will be using a slide door with button access, the implemented privacy screens still play a crucial role in blocking the direct view of EGMs from the café and lounge area. This separation helps create a distinct environment for dining and socializing, reducing the potential for impulsive decisions to gamble.
- **Bar/Cashier Privacy with Staff Observation:** Privacy screens are also utilized to a degree to minimise direct vision from the Bar/Cashier; however, the design also ensures that staff are still able to maintain visibility of patrons. This balance ensures that the benefits of reduced visual stimulation are maintained, but at the same time is not compromised the ability to observe patron behaviour and identify any signs of distress or potential gambling-related harm.

By strategically employing privacy screens to minimise the external visibility of EGMs from strategic locations while maintaining staff oversight of patrons, Club Wodonga creates a more controlled and responsible gaming environment, promoting a deliberate and thoughtful approach to gambling and mitigating the risk of impulse play.

3.1.7 SERVICE FACILITIES

Club Wodonga recognizes the importance of providing a diverse range of amenities beyond gaming machines to encourage balanced patronage and mitigate potential harm. The strategic location of the bar/cashier within the gaming room facilitates convenient breaks in play, while the adjacent café, physically separated from the gaming area, offers an alternative environment for relaxation and socialisation.

The venue's food and beverage offerings are intentionally positioned as a key harm minimization practice, providing opportunities for patrons to step away from the gaming machines, refuel, and reflect on their activities. While the ground floor primarily focuses on gaming and café services, the dedicated food and beverage options on Level 1 further enhance this strategy, creating a distinct area for those seeking entertainment and relaxation independent of gambling, thus deterring impulse gaming purchases.

To further support this separation, the venue provides toilet facilities located outside of the gaming room, ensuring patrons utilizing the café or other venue amenities do not need to enter the gaming area. In addition, outdoor café seating provides yet another option for patrons to relax and enjoy the venue without being exposed to the gaming environment.

Through this considered combination of facilities and amenities, Club Wodonga supports a multi-faceted approach to harm minimization, catering to a diverse range of patron preferences and promoting responsible engagement.

3.1.8 INTERACTION WITH CUSTOMERS

In the gaming industry, proactively engaging with patrons and monitoring their behaviour is recognized as essential for promoting responsible gambling and minimizing potential harm. Venues that prioritize meaningful interactions and utilize a multi-faceted approach to customer care are best positioned to create a safe and supportive environment for all. Club Wodonga demonstrates a commitment to this best practice through the following key elements:

Strategic Service Facility Placement:

- The bar/cashier is strategically situated to provide a clear view of the gaming floor, entry points, and exit pathways. This placement enables staff to observe patron behaviour, identify individuals who may be at risk, and offer assistance proactively. Staff can discreetly monitor patrons' facial expressions, body language, and interactions with gaming machines and other patrons. The design also allows for staff to be readily available to answer questions, provide information on responsible gambling practices, and offer assistance to patrons who may be experiencing difficulties.

Purposeful Entry Point Design:

- Entry points are purposefully designed to channel patrons past key vantage points, such as the bar/cashier area and designated staff observation zones. This design facilitates visual

assessment of patrons' demeanour and condition upon entering the gaming area. It allows staff to quickly identify potentially intoxicated or distressed individuals. The conscious design also allows for signage to be placed on the entry with information about responsible gambling.

Technological Support (CCTV & FRT):

- Integration of CCTV surveillance and Facial Recognition Technology (FRT) adds an invaluable layer of indirect monitoring. CCTV cameras provide comprehensive coverage of the gaming floor, enabling staff to remotely observe patron behaviour and identify potential incidents. FRT allows for the automated identification of self-excluded patrons or individuals who have been flagged as at-risk due to previous concerning behaviour. The combination of CCTV and FRT provides a powerful tool for enhancing security and promoting responsible gambling. It should also be noted there are strict laws governing usage of this.

Dedicated Floor Walkers:

- The continuous presence of trained floor walkers on the gaming floor ensures proactive engagement with patrons. Floor walkers are trained to actively monitor patron behaviour, identify signs of distress, and initiate supportive conversations. Their presence provides a visible source of assistance for patrons who may have questions or concerns. Floor walkers also play a key role in enforcing responsible gambling policies and intervening in situations where patrons are exhibiting concerning behaviour. A positive contribution is to ensure these staff are rotated through different roles to ensure the level of boredom does not affect decision making and engagement.

Comprehensive Staff Training:

- All staff, including those working at the bar/cashier, floor walkers, and security personnel, are expected to receive extensive training on responsible gambling practices. This training equips them with the knowledge and skills to recognise the signs of problem gambling, implement self-exclusion procedures, effectively direct patrons to support services, and de-escalate potentially volatile situations. Ongoing training and refresher courses are essential to ensure that staff remain up-to-date on best practices and are confident in their ability to promote a responsible gaming environment. It must also be noted that the training is not a one off event but ongoing and supported by management and other staff.

Through this integrated and multi-faceted approach, Club Wodonga is dedicated to fostering meaningful interactions with patrons, promoting responsible gambling behaviour's, and creating a safe and supportive gaming environment for everyone.

3.2 RESPONSIBLE GAMBLING CODE OF CONDUCT

The Club Wodonga will be adopting the Community Clubs Victoria (CCV) Responsible Gambling Code of Conduct, a vital framework designed to minimize gambling-related harm within licensed venues. This Code, developed in consultation with both industry stakeholders and government

bodies, demonstrates a commitment to responsible gambling practices and serves as a cornerstone in the venue's harm minimization strategy. The Code aims to prevent and minimize harm arising from gaming machines by focusing on proactive measures, comprehensive staff training, and a supportive environment for patrons.

A key aspect of the CCV Code is its emphasis on proactive identification and intervention. The Code outlines clear guidelines for staff to monitor the gaming floor, recognize signs of distress or problematic gambling behaviour, and initiate appropriate interactions. This includes discouraging intensive and prolonged play, offering breaks, and providing information about support services. To further enhance these efforts, the Code mandates the appointment of Responsible Gambling Officers (RGOs) who are specifically trained to monitor compliance, respond to incidents, and provide advice to both staff and customers. Regular meetings between venue management, RGOs, and the venue's support worker are also required to maintain a strong focus on proactive measures.

The CCV Code also places significant importance on the responsible gambling environment. This includes limiting inducements to gamble (e.g., restrictions on promoting cash withdrawals or "near miss" fallacies), providing responsible gambling information, and ensuring that food and beverage services are accessible outside the gaming area. The Code stipulates that staff are not permitted to gamble at the venue on their rostered days, further demonstrating a commitment to integrity and harm minimization.

Finally, the Code emphasizes the importance of accurate record-keeping and ongoing evaluation. The venue will maintain a Responsible Gambling Register to document all gambling-related incidents and interventions, ensuring accountability and enabling analysis of trends. The Code also highlights the importance of staff training, the use of Venue Support Workers and continued awareness of harm minimisation. By implementing the CCV Responsible Gambling Code of Conduct, Club Wodonga demonstrates a commitment to creating a safe and responsible gaming environment, aligning with best practices in harm minimization and addressing the complex issues associated with gambling. The CCV Code of Conduct is a living document and as such Club Wodonga will ensure that staff are up to date with any changes or modifications to the code.

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