

**IN THE MATTER OF AN APPLICATION TO THE VICTORIAN
GAMBLING AND CASINO CONTROL COMMISSION BY
HUON HILL CLUB LTD FOR APPROVAL OF PREMISES AS
SUITABLE FOR GAMING WITH SEVENTY (70)
ELECTRONIC GAMING MACHINES AT CLUB WODONGA
SITUATED AT 48 REID STREET, WODONGA, VICTORIA**

WITNESS STATEMENT OF SARAH RACHAEL LEWIS

Date of document:	July 2025
Filed on behalf of:	The Applicant
Prepared by:	
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Background

1. My full name is Sarah Rachael Lewis and my residential address is [REDACTED]
[REDACTED]. I am currently the Licensee at the General Gordon Hotel in Sydenham owned and operated by the JDA Group. I have over 25 years experience in the hospitality industry, beginning with Howard Smith Wharves in Brisbane before moving to the Riversdale Group, Solotel and most recently ALH Group Head Office in Brisbane. Of my 25 years of experience in hospitality, 18 of those years have specifically been in the gaming industry.
2. As well as continuing in my role at the Licensee at the General Gordon Hotel, I am now also the Regional Operations Manager for JDA Group. Included in my portfolio is the General Gordon Hotel (a metropolitan hotel with a particular local community), the Globe Hotel in Deniliquin and the Huon Hill Hotel Wodonga, soon to be Club Wodonga
3. I began my employment with the JDA Group in 2021 as Licensee at the General Gordon Hotel. The General Gordon Hotel was destroyed by fire in 2018. The reopening of the General Gordon Hotel was a poignant milestone for new and loyal patrons considering the Hotel's rich history and iconic standpoint within the community. I was initially employed by the JDA Group prior to the re-opening to assist with the restoration and marketing of the rejuvenated hotel and particularly the training and management. In my previous roles I had been involved with and responsible for the refresh, rejuvenation or

the new venues coming on board within a group. My role and responsibility was to ensure such venues were integrated with the particular group and mirrored the philosophy and quality of venues within that group. This was my responsibility at the General Gordon Hotel when employed by the JDA Group, and also the Globe Hotel in Deniliquin and now Club Wodonga.

4. The focus in my current role is managing the systems and compliance together with all operational requirements to ensure the venues within my portfolio operate efficiently and in accordance with all relevant rules and regulations to a very high standard. My current responsibilities include the hiring of key management roles at the venues within my portfolio as well as any other general recruitment. I am also involved in the training of employees.
5. The philosophy of the Feros family who operates the JDA Group resonates strongly with my experience and my background having worked with Solotel, which has a “family” philosophy. The concept of Club Wodonga was first raised with me by the JDA Group and I have contributed to the discussions about how the vision of Mr. Perry could be realised. I feel my experience and my values align.
6. In relation to Club Wodonga the time and effort that has gone into the revamping of the Premises, which is already modern and impressive, has had a focus on the community aspect and the needs of the local area following consultation with stakeholders principally including the local Council. I have been involved with discussions with the local Council together with John Feros, the CEO of the JDA Group.
7. The facilities at Club Wodonga shall comprise of the following facilities:

(a) Sports Bar;	(h) Bistro seating approximately 200;
(b) Kids play area;	(i) Lounge;
(c) Enclosed terrace dining;	(j) Undercover link to Quest;
(d) TAB;	(k) Car parking; and
(e) DOSA;	(l) Function room/space seating
(f) Café/lounge;	approximately 174, with standing
(g) Gaming room;	capacity of 340 (may be split into two
	separate rooms as required).

8. In order to ensure that the JDA Group is a part of the community and supporting the community where it is most needed, there have been many discussions with local organisations, community groups and individuals including:

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|--|--|
| (a) Boys to the Bush; | (g) Wodonga Bulldogs (football/netball); |
| (b) Veterans Hub; | (h) Meals on Wheels; |
| (c) Wodonga Raiders; | (i) Men's Shed; |
| (d) Wodonga Warriors
(baseball/softball); | (j) Local Umpires Association; |
| (e) Junior sports; | (k) Wodonga RSL; and |
| (f) Wodonga CFA; | (l) Vietnam Veterans Association. |

I have developed connections that I intend to continue developing as the concept of Club Wodonga is realized.

9. Club Wodonga will offer a loyalty program, but it will be a new program differing from the programs in place in New South Wales and Queensland. Incentives and competitions have been introduced and will expand with the transition to Club Wodonga, including the following:

- | | |
|-------------------------|--------------------------------|
| (a) Kids meals deals; | (e) School holiday activities; |
| (b) Seniors meal deals; | (f) Halloween parties; and |
| (c) Meal promotions; | (g) Christmas parties. |
| (d) Drink promotions; | |

Club Wodonga will invest in a courtesy bus to assist patrons in attending the venue responsibly. Raffles will be held to raise additional funds for community and there will be an increased family focus at the venue.

10. The Huon Hill Hotel currently employs 31 employees including 10 full time employees and 21 casual employees. These employees are all trained in responsible service of alcohol save and except those who work exclusively in the kitchen only. I am trained in the responsible service of alcohol. It is company policy at the JDA Group that no employee commences at any venue without a current responsible service of alcohol training accreditation, again save and except those who work exclusively in the kitchen only.

11. Of the employees currently employed at the Hotel all reside in the local area with 15 employees residing within 5 km of the venue and 2 within 6.2 km of the venue. There have been new employees employed since JDA Group commenced operating the venue however some employees have worked there for many years.
12. Upon the opening of Club Wodonga as a full facility offering with a gaming room approximately 20 employees will be required in the gaming area with the following on shift at any one time:
 - (a) 1-2 cashiers; and
 - (b) 1-3 floor walkers,
(trade dependant).
13. I will be primarily responsible for ensuring that Club Wodonga fosters a safe and friendly environment for patrons to play EGMs responsibly. I will commence training staff in the Policy and Procedures Manual which has been developed in consultation with industry experts and following consideration of the gaming industry in Victoria. Although I have been involved in the gaming industry for many years it is the first time that I have had experience in relation to EGMs in Victoria. Accordingly, together with other members of the JDA Group I have sought expert advice in relation to the responsible service of gaming and harm minimization measures and requirements that will assist in best practice being in play in relation to the EGMs at Club Wodonga. Enclosed herewith as Attachment 1 is the Gaming Policies and Procedures Manual which includes numerous suggestions offered by DNS Specialist Services and conditions which have been required by the VGCCC in recent hearings and which appear to be indicators of best practice and requirement in Victoria. Each and every one of those conditions or recommendations will be mandated in Club Wodonga. It is expected that before the EGMs if approved are installed all staff will be trained and tested in relation to these requirements and the manual and thereafter there will be continuing professional development on these issues which will be conducted by external parties and audits will take place for such training.
14. It will also be a standard procedure for Club Wodonga to assign any new gaming room staff with an experienced gaming staff member as a mentor upon employment for the purpose of learning the venue, learning the customers and learning how to deal with any difficult situations. We intend to hire a number of experienced gaming staff sufficient to ensure any new gaming staff have experienced colleagues to guide them through the challenging parts of their role that can only be learnt on the job.

Furthermore, all staff will be required to attend a minimum of 2 Gamblers Help training sessions each year together with the JDA Group initiated training.

15. By utilizing the experience of gaming venues in New South Wales and Queensland, I believe the policies and procedures that will be put in place at Club Wodonga will ensure that not only compliance in Victoria is adhered to but that best practices are genuinely in place and utilized appropriately. Facial recognition technology was implemented by the JDA Group in the last 12 months and has been highly successful in relation to self-exclusion and obligations relating thereto. The technology is installed at the entry to gaming room in our venues. The approved Clubs VIC Self-Exclusion Program attached at Attachment 2 has been adopted by Huon Hill Hotel Ltd trading as Club Wodonga. This program will be included in all training as per the Policies and Procedures Manual and staff will be updated with the latest information and findings in relation to the self-exclusion issue. Any new self-excluded individuals added to the list at Club Wodonga will be also a trigger for more training for staff. The approved Community Clubs Victoria Responsible Gambling Code of Conduct attached at Attachment 3 has also been adopted by Huon Hill Hotel Ltd trading as Club Wodonga.
16. At each of the gaming venues operated by the JDA Group there is an electronic incident register which is in the format of the annexure enclosed at Attachment 4. The process is that the gaming attendant or security personnel involved in the event of an incident has access to the register for the purpose of recording an incident. They are not however able to approve any incidents. The duty manager is advised of every entry within 24 hours of it occurring and approves incidents for inclusion in the register. Dependent on the issue at hand, the duty manager or the general manager will deal with the matter in the appropriate way which could be liaising with the patron in question, providing contact details and information to the patron, liaising with the staff involved, training the relevant staff on the particular issue at hand, contacting Victoria Police or the Venue Support Worker.
17. Other RSG initiatives implemented at Club Wodonga will include the following:
 - (a) Self-Exclusion Program: easy access to self-exclusion options, allowing patrons to voluntarily ban themselves from gaming activities.
 - (b) Responsible Gambling Officers (RGOs): trained RGOs monitor gaming areas, identify at-risk patrons and provide information on support services.
 - (c) Signage and information: clear signage and brochures on display about gambling risks and available help resources, such as counselling services.

- (d) Mandatory RSG Training: staff working in the gaming room are required to have achieved RSG accreditation.
 - (e) Welfare Checks: regular welfare checks on patrons showing signs of distress or prolonged play, encouraging breaks and providing support information.
 - (f) Cash and ATM Restrictions: ATMs are placed away from gaming areas and cash withdrawals from credit accounts are prohibited to discourage impulse gambling.
 - (g) Regular Audits and Reviews: regular audits of gaming practices to ensure compliance and identify improvement areas.
 - (h) Venue Support Workers: Club Wodonga has regular contact with and refers patrons at risk of gambling harm to Venue Support Workers and Gateway Health.
18. The proposed layout of the gaming room which is attached as an Annexure and marked Attachment 5 ensures that each of the 70 EGMs will be visible from the bar and cashier area either physically or by viewing the camera surveillance screen in the cashier station meaning that staff can easily observe patrons at the EGMs. To assist with patron observation and customer service there will be at least 2 dedicated floor walkers in the gaming room at any one time with someone always at the cashier station during peak periods and a minimum of 1 dedicated floor walker and 1 cashier at all other times.
19. In accordance with the authorised Liquor Licence trading hours at the venue and mandated closure periods, the gaming room will be open and EGMs operational only between 10 am and 1 am the following morning on any given day, except for Sundays which will be between 10 am and 12 midnight and Good Friday and ANZAC Day which will be between 12 noon and 12 midnight.
20. After working with the JDA Group and being involved with Club Wodonga as a concept since John Feros discussed the same with me, I am very confident that Club Wodonga will be a success being an integral and vital part of the local community with a superior and quality hospitality and entertainment offering serving the local community as a social venue, function facility and very clear alternative to travelling across the border to the larger gaming venues in Albury NSW as well as financially assisting the groups within the local community that need support the most.

Signed on this

day of

2025.

Sarah Rachael Lewis

The ClubsVIC Self Exclusion Program

Definitions:

"Database" means the database maintained by the Office in accordance with clauses 68 - 72

"Deed" means the self exclusion deed that a person executes in order to enter the Program and become a self excluded person in accordance with clauses 15,16 and 17; "

"Employee feedback form" means the form described in clause 73;

"ICRP" means the Independent Complaints Resolution Process set out in clauses 84 – 86;

"Interviewer" means the person who conducts the self exclusion or the revocation interview and will usually be the SEO but may also be a person appointed by the Office in accordance with clause 13;

"Nominated person": means the persons nominated by the venue management to be responsible for ensuring compliance with responsible gaming initiatives during the times that the venue is operating its gaming facility, and will usually be the duty manager on each shift;

"Office" means the administrator of the Program;

"Patron review form" means the form that is forwarded to a sample of self excluded persons in accordance with clauses 78 - 81

"Program" means the ClubsVIC Self Exclusion Program;

"Responsible gambling incident register" means the register maintained by the venue in which the venue records the information regarding the code, self exclusion, and may also be the liquor and/or AML/CTF registers;

"Revocation interview" means an interview conducted for the purposes of revoking a self exclusion prior to the expiry, or varying the term of self exclusion in accordance with clauses 18 – 22;

"Self exclusion interview" means the interview conducted in accordance with clauses 6 – 17;

"Self excluded person's list" means the photographs of self excluded persons together with their details including name, address, date of birth and date that the self exclusion expires;

"Self exclusion review form" means the form that is completed annually by the venue in accordance with clauses 74 - 77.

"SEO" means the self exclusion officer appointed by the Office;

"Venue" means a licensed venue operator of a gaming venue that has subscribed to the Program.

Ministerial Direction 1 - Administration of the Program

The Program is administered by the self exclusion the Office.

Ministerial Direction 2 - Process for self-excluding

What the Program must include:

Ministerial Direction 2.1 - Steps that a person needs to take to voluntarily self-exclude

1. Persons find out about the Program in various ways, for example from problem gambling counsellors, medical practitioners, friends who are on the Program, staff at gaming venues, website information, responsible gambling brochures available at venues etc.
2. It is preferable for entry to the Program to be recommended by a problem gambling counsellor who has determined that the person is suitable for self-exclusion.

Person makes contact with the SEO officer

3. Once a person has made the decision that self exclusion is appropriate for them, the person contacts the Office. This contact is made by any means eg telephone, email, fax, or the person's counsellor or medical practitioner can make the first contact.
4. As soon as possible after a person makes contact with the Office, the Office will attempt to ascertain whether or not the person is receiving counselling.
5. If the person is not receiving counselling the Office will advise that at the time of the interview a referral to Gamblers' Help can be made if the person wishing to self exclude so desires.

Self exclusion interview is arranged

6. As soon as possible after a person makes contact with the Office, the Office will make an appointment for the person to attend at a self exclusion interview at a place that is convenient to the person, and at the earliest time that is convenient to the person.
7. The person can nominate where the self exclusion interview will take place, unless the person requests otherwise, the self exclusion interview will take place at the Office premises.
8. The Office will advise the person how the self exclusion interview will be conducted and who may attend.
9. The person may request that the person's current counsellor attend the self exclusion interview, in which case the person will arrange for the counsellor to attend.
10. Otherwise, the Office will advise the person that subject to availability a problem gambling counsellor may attend at the self exclusion interview unless the person requests otherwise. In the event that a problem gambling counsellor is unavailable to attend at the interview the person

wishing to self exclude may provide the Office with consent for the person to be contacted by a Gamblers' Help counsellor.

11. If the person agrees to the presence of a problem gambling counsellor at the self exclusion interview, the Office will advise the relevant Gamblers Help Service of the details of the self exclusion interview and request that a Gamblers Help counsellor be present at the place and time where the self exclusion interview is conducted.

Self exclusion interview is conducted

12. Where practicable, the SEO will conduct the self exclusion interview.
13. Otherwise the Office will make arrangements for another appropriate interviewer to conduct the self exclusion interview.
14. Persons can bring anyone along to the self exclusion interview, including a support person such as a friend or family member.
15. At the self exclusion interview the interviewer will explain how the Program works and the contents of the Deed including:
 - 15.1. That the Deed is not a contract between parties but rather an individual commitment by the person to become a self excluded person;
 - 15.2. That the Deed provides for the self excluded person to:
 - 15.2.1. Undertake not to enter the gaming room and not to play gaming machines at the venues that they have nominated;
 - 15.2.2. Authorise the staff at the nominated venues to stop them entering the gaming room and to remove them from the gaming room;
 - 15.2.3. Authorise the taking, dissemination and display of their photographs and personal details;

- 15.2.4. Release all other relevant persons from any legal liability in respect of the self exclusion, including (but not limited to) assault, defamation, duty of care; and undertake not to sue in respect of the self exclusion;
 - 15.2.5. Indemnify all other relevant persons in respect of the self exclusion;
 - 15.2.6. Acknowledge that they have entered the Deed voluntarily, and that the Deed is enforceable against them alone, that there is no legal duty on any other person except themselves;
 - 15.2.7. Acknowledge that they understand the contents of the Deed;
 - 15.2.8. Nominate the period of self exclusion which is a minimum of 6 months and a maximum of 24 months;
 - 15.2.9. Nominate the venues from which the person is self excluding;
 - 15.2.10. Authorise the Office to contact the person if the person is detected breaching the self exclusion;
 - 15.2.11. Undertake to attend at counselling during the period of the self exclusion (optional)
- 16.** At the self exclusion interview, the SEO will discuss the effect of the Deed and emphasise the voluntary nature of the Program. The person will be encouraged to ask questions during the self exclusion interview in order to fully understand the effect of the Program.
- 17.** At the end of the self exclusion interview, if the person is prepared to proceed:
- 17.1.** The SEO will witness the execution of the Deed by the person who then becomes a self excluded person; and

- 17.2. Photographs of front facial profile and side profile of the self excluded person will be taken;
- 17.3. The person is requested to complete a questionnaire &/or an 'Additional Consent Form' (drafted with input from Gamblers Help) that collects data for the database.

Ministerial Direction 2.1 (b) - The steps a person must take to revoke a decision to self exclude

- 18. The Program is offered for a minimum of 6 months and a maximum of 24 months, and the person nominates the period of self exclusion at the self exclusion interview.
- 19. If the self excluded person decides to revoke their self exclusion prior to the stipulated time, or to reduce the period of self exclusion they must:
 - 19.1. Attend a session with a problem gambling counsellor and obtain written acknowledgment that the self excluded person has attended at a counselling session and discussed early revocation or reduction of the self exclusion period and sought guidance on the revocation or reduction (including the ramifications thereof); and.
 - 19.2. Attend at a revocation interview with the SEO or a delegate where the self excluded person must:
 - 19.2.1. Sign a Revocation Deed; and
 - 19.2.2. Produce the written acknowledgement referred to in 19.1 above

Ministerial Direction 2.1 (b) The steps a person must take to vary the terms of the self exclusion

- 20. The self excluded person may reduce the period of self exclusion in accordance with clause 19 above.

21. A self excluded person may extend a period of self exclusion or include or remove venues from the Deed by contacting the SEO and arranging for the alteration of the Deed.
22. No other variations to the Deed are allowed.

Ministerial Direction 2.2 - Design of the Program

Ministerial Direction 2.2(a) - Potential self excluded persons are not deterred by unnecessary administrative requirements and complexities

23. The Program can be accessed by contacting the Office by any appropriate means – telephone, email, fax, post.
24. The Office must act as soon as possible and take all actions to ensure that a person seeking self exclusion is assisted in every way including accessing problem gambling counselling services.
25. The SEO must use the interview process to assist potential self excluded persons to understand the Program and to comply with the requirements of the Program.

Ministerial Direction 2.2 (b) - There is capacity to assist a person who chooses to self exclude to also self exclude from gaming venues that have a different self exclusion program.

26. The Office will stay informed of any other self exclusion programs available, including Victorian programs and interstate programs.
27. The Office will maintain contact with the administrators of any other relevant self exclusion programs and shall establish protocols for persons who wish to be excluded from venues that have different self exclusion program/s.
28. Where possible, the Office will establish protocols with other self exclusion program providers in order to facilitate a one-step process for persons to self exclude from venues with various programs.

29. If the Office is unable to establish protocols for one-step self exclusion referred to in clause 28, then the Office will ensure that information regarding other self exclusion programs is made available to any person who contacts the Office and requires this information.

Ministerial Direction 3 - Duration

30. The Program is offered for a minimum of 6 months and a maximum of 24 months, and the person stipulates at the self exclusion interview the period of self exclusion.
31. If the self excluded person decides to revoke a self exclusion prior to the stipulated time, or to reduce the period of self exclusion they must comply with clause 19
32. One month prior to the expiry date specified in the Deed, the Office will send to the self excluded person a letter advising them of the date that their period of self-exclusion will expire, and how the self exclusion can be renewed.
33. If the self excluded person wishes to renew the self exclusion, they follow the procedures set out in clauses 3 to 17 above.
34. If the person does not respond to the letter, then the self excluded person is considered as having completed their period of self-exclusion on the specified date.

Ministerial Direction 4 - Provision of information

35. The venue will make persons aware of the availability of the Program, how it works and how to access the Program by:
- 35.1. Displaying appropriate posters, brochures and/or convenience notices in the gaming room and adjacent area/s, and
- 35.2. Making the information available on the venue's website (if any) and on the Office website

Ministerial Direction 5 - Identification of a self excluded person in the gaming machines area

Ministerial Direction 5.1 (a) - ensuring that a self excluded person does not enter gaming room

36. The Office will provide venues with the personal details and copies of photographs of self excluded persons who have self excluded from that venue by post and by secure web-based access as soon as possible after the self exclusion interview.
37. Upon receipt of the photographs and details of a self excluded person, the venues will update the venue records and the self excluded person list.
38. Venues will display the self excluded persons list at the 'back of house' in an area which is not accessible to the public.
39. Employees will view the photographs and re-acquaint themselves with the self excluded persons list prior to each shift.
40. Venues will ensure that their gaming machine player loyalty programs (if any) do not include self excluded persons.
41. Employees will use their best endeavours to identify any self excluded person who approaches the gaming room.
42. If an employee notices a self excluded person approaching the gaming room with an apparent intention to enter, the employee will immediately advise the nominated person.
43. The nominated person will decide whether or not the person is a self excluded person by:
 - 43.1. Referring to the self excluded person list (especially the photographs);
 - 43.2. Asking the person their name and checking it against the details on the self excluded persons list;

- 43.3.** Applying their personal knowledge of the person – ie the nominated person may know the self excluded person; and/or
- 43.4.** Asking someone else (another employee or another person).
- 44.** If the nominated person decides that the person is a self excluded person, the nominated person will take such immediate action as the nominated person considers appropriate to stop the self excluded person from entering the gaming room.
- 45.** Some of the actions that the nominated person may take are set out in clause 52 below.
- 46.** After taking the appropriate action the nominated person will record the incident in the responsible gambling incident register and complete an employee feedback form and the venue will forward a copy of the employee feedback form to the Office.

47. Employees will re-acquaint themselves with the self excluded persons list (especially the photographs) prior to each shift.
48. During their shifts, employees will use their best endeavours to identify any self excluded person who has entered the gaming room by the means set out in 43 above.

49. If an employee identifies a self excluded person in the gaming room, the employee will immediately advise the nominated person.
50. The nominated person will decide whether or not the person is a self excluded person by using the means as set out in clause 43 above.
51. If the nominated person decides that the person is a self excluded person, the nominated person will take such immediate action as the

nominated person considers appropriate to remove the self excluded person from the gaming room.

- 52.** Some of the actions that the nominated person may take include:
- 52.1.** Approach the self excluded person, remind them of their self exclusion, and suggest that they leave the gaming area;
 - 52.2.** Approach the self excluded person remind them of their self exclusion, and suggest that they take refreshments in a different area;
 - 52.3.** Approach the self excluded person remind them of their self exclusion and offer to call a taxi to take the self excluded person home;
 - 52.4.** Approach the self excluded person remind them of their self exclusion and offer to contact a friend or a problem gambling counsellor;
 - 52.5.** Approach the self excluded person remind them of their self exclusion and offer them the use of the club's telephone;
 - 52.6.** Announce over the public address system that the self excluded person has a telephone call to be taken at reception;
 - 52.7.** Announce over the public address system that the self excluded person is required at reception;
 - 52.8.** Announce over the public address system that the self excluded person has a meal ready in another area;
 - 52.9.** Approach the self excluded person remind them of their self exclusion and insist that they leave the gaming room;
 - 52.10.** Approach the self excluded person, remind them of their self exclusion and advise them that unless they leave the gaming room the nominated person will call the venue security or the police to have them physically removed;

- 52.11.** If the self excluded person does leave the gaming room, as a last resort, have the self excluded person physically removed from the gaming room.
- 53.** After taking the appropriate action the nominated person will record the incident in the responsible gambling incident register and complete an employee feedback form and the venue will:
- 53.1.** report the breach on the ClubsVic self exclusion on-line database; or
- 53.2.** forward a copy of the employee feedback form to the Office.
- 54.** Upon receipt of a report under clause 53 the Office will take whatever action it deems appropriate in the circumstances. Such action may include:
- 54.1.** Advising all venues from which the self excluded person has self excluded that the self excluded person has breached the self exclusion and advise the venues to increase surveillance in respect of this self excluded person;
- 54.2.** Advising the administrators of other relevant self exclusion programs that the self excluded person has breached their self exclusion;
- 54.3.** Advising the self excluded person that they have been detected breaching their self exclusion;
- 54.4.** Providing the self excluded person with contact details for their local Gamblers' Help office; and
- 54.5.** Inform Gamblers' Help of the breach if the self excluded person has provided the Office with consent to contact Gamblers' Help in the event of a breach. .

Ministerial Direction 5.2 - The Program must have due regard for the privacy and dignity of the self excluded person

- 55. The nominated person will make every attempt to be discreet when approaching a self excluded person, and to draw as little attention as possible to the situation and to the self excluded person.
- 56. Inclusions in the responsible gambling incident register may be subject to the Privacy Act and the nominated person will ensure compliance with the National Privacy Principles.
- 57. The venue will provide training for all employees who carry out the duties of the nominated person.
- 58. Nominated persons will be trained to know how to handle self excluded persons, and also to know the requirements of the National Privacy Principles.

Ministerial Direction 6 - Staff training

- 59. All gaming employees will receive adequate training in:
 - 59.1. The operation of the Program,
 - 59.2. How to help persons seeking information about self exclusion or wishing to self exclude;
 - 59.3. Understanding how to appropriately manage persons who have self excluded.
 - 59.4. How to identify self excluded persons.
- 59.5. Any incidence of non-compliance with the self exclusion program by an employee will lead to remedial action being taken by the employer against the employee and repeated non-compliance will lead to disciplinary action.
- 59.6. Annual performance reviews for all employees will include an assessment of the employee's commitment to and compliance with

the requirements of the self exclusion program. The performance review will include questions regarding the self exclusion program and how it impacts on the employee, and whether the employee has meet the requirements.

- 60.** The training may be delivered in any one or more of the following ways:
 - 60.1.** Completion of a responsible service of gaming course (or refresher course) which course will be endorsed by the Office and include components on:
 - 60.1.1. The operation of the Program;
 - 60.1.2. How to help persons seeking information about self exclusion or wishing to self exclude; and
 - 60.1.3. How to identify self excluded persons;
 - 60.2.** Briefings at staff meetings;
 - 60.3.** Attendance at self exclusion training sessions conducted by the Office; and/or
 - 60.4.** Attendance at employee training sessions conducted on the venue's premises and endorsed by the Office.
- 61.** Nominated persons will (in addition to the training provided in accordance with clause 60) be trained to know how to manage self excluded persons, and also to know the requirements of the National Privacy Principles.
- 62.** Nominated persons will receive the necessary training in one or more of the following ways:
 - 62.1.** Briefings at staff meetings;

62.2. Attendance at training sessions conducted by the Office;
and/or

62.3. Attendance at employee training sessions conducted on the
venue's premises and endorsed by the Office.

Ministerial Direction 7 - Availability of support services

Ministerial Direction 7.1 - Referral of persons to problem gambling support services

63. The Program facilitates referral of persons to problem gambling support services by the implementation of the following clauses:

- 4, 5, 9, 10, 11, 15.2.11, 19.1, 24, 31, 35, 52.4, 54.4, 54.5

Ministerial Direction 7.2 - Protocols for contact between the Office and relevant problem gambling support services

64. The Office will maintain open dialogue with all relevant problem gambling counselling services.

65. The SEO will liaise frequently with problem gambling support persons informally at self exclusion interviews.

66. At least twice a year, the Office shall facilitate a formal meeting with the convener of the Council of Gamblers Help Services to discuss the operation of the Program, and consider any recommendations for the enhancement of the Program.

Ministerial Direction 8.1 - Data management

67. The Office will maintain a database that records:

67.1. The number of persons who have self excluded;

67.2. Any non-identifying data that is available from the interviews and Deeds;

67.3. The number of self excluded persons who are reported to have breached their self exclusion;

- 67.4. The number of self excluded persons who have breached repeatedly and
- 67.5. The number of self excluded persons who extend or revoke their self exclusion.

Ministerial Direction 8.2 - How information will be collected, retained and provided to the VCGR

- 68. The self exclusion database will be retained in digital form on the Office computer system, and will be made available to the VCGR as required in digital and/or hard copy.
- 69. As all self exclusion interviews will be facilitated through the Office, the Office will have the data required in Ministerial Directions 8.1(a) and 8.1(c).
- 70. In accordance with clauses 46 and 53, venues will be required to provide the Office with copies of employee feedback forms setting out details of any detected breaches.
- 71. The Office will enter the relevant details onto the self exclusion database.
- 72. The self exclusion database and any documents derived from that database may be subject to the Privacy Act and the Office will ensure compliance with the National Privacy Principles.

Ministerial Direction 9 - Reviewing the effectiveness of the Program

- 73. Employee feedback
 - 73.1. The venue will ensure that an employee feedback form is available with the responsible gambling incident register.
 - 73.2. The venue's induction package/staff handbook provided to all employees on commencement of employment with the venue will include advice on how the employees can provide feedback to the operation and effectiveness of the Program

by completing the employee feedback form that is available with the responsible gambling incident register.

- 73.3.** The venue will provide all employees who are employed with the venue at the time of adoption of the Program with information about how employees can provide feedback on the Program by completing the employee feedback form that is available with the responsible gambling incident register.
- 73.4.** At the end of each shift the nominated person will collect any completed employee feedback forms and deliver them to the venue management.
- 73.5.** The venue management will consider the completed employee feedback forms and:
 - 73.5.1.** if that the matter can be dealt with at the venue level, management will take appropriate action, file the completed form with the responsible gambling incident register and attach copies of any completed forms to the annual self exclusion review form; or
 - 73.5.2.** if the matter involves a systemic issue in relation to the Program or involves detection of a breach by a self excluded person the matter will be referred immediately to the Office for appropriate action.

Venue review

- 74.** The venue will complete a self exclusion review form during June in each year.
- 75.** The self exclusion review form will be drafted in conjunction with the Council of Gamblers Help Services.
- 76.** The Office may, upon application, grant an extension of time for completion of the self exclusion review form.

77. The completed self exclusion review form will be kept at the venue's premises together with any employee feed back forms that were received through the preceding year, including copies of those that were forwarded to the Office during the year.

Patron review

78. In May each year the Office will forward to a sample of self excluded persons a patron review form.
79. The patron review form will be drafted in conjunction with the Council of Gamblers Help Services.
80. The sample of self excluded persons will be asked to complete the patron review forms and return them to the Office.
81. Completion and return by the self excluded person will be totally optional.

Office review

82. In July each year the Office will conduct:
- 82.1. a survey of venues' completed review forms;
 - 82.2. an appraisal of all returned patron review forms;
 - 82.3. an appraisal of all employee feedback forms received through the year;
 - 82.4. a general appraisal of the Program (including consideration of employee and patron feed back forms) to assess the Program's operation and effectiveness.
83. The Office will make any appropriate changes to the Program and will seek approval of those changes by the VCGR and advise venues accordingly.

Ministerial Direction 10 - Complaints process

84. The venue will subscribe to the ICRP administered by the ICRP office.

- 85.** The ICRP complies with all legislative requirements, relevant ministerial directions and has been approved by the VCGR.
- 86.** The ICRP will:
- 86.1.** specify how to make a complaint about the Program;
 - 86.2.** specify how information about complaints will be collected and retained;
 - 86.3.** set out the process for resolution of a complaint;
 - 86.4.** provide for the independent review of decisions made by the venue about complaints; and
 - 86.5.** enable the VCGR to monitor compliance with the complaints process.

87. How to subscribe to the Program

- 87.1.** The venue will present the Program to the management of the venue and the management will resolve formally to subscribe to the Program.
- 87.2.** The venue will apply to the Office for subscription to the Program.
- 87.3.** The Office will assess the application and determine whether to approve or reject the application and advise the venue promptly of its determination.
- 87.4.** If the Office determines to reject the application, the Office will provide the venue with reasons for the rejection.
- 87.5.** The venue will be at liberty to apply again for subscription to the Program.
- 87.6.** If the Office approves the application, the venue will advise the VCGR that the venue has subscribed to the Program.
- 87.7.** The Office may, at any time, determine that a venue is not a suitable venue to subscribe to the Program and, after providing the venue with adequate opportunity to address the issues, the Office may expel the venue from inclusion in the Program.

87.8. If a venue is expelled from the Program, the Office will notify the venue and VCGR.

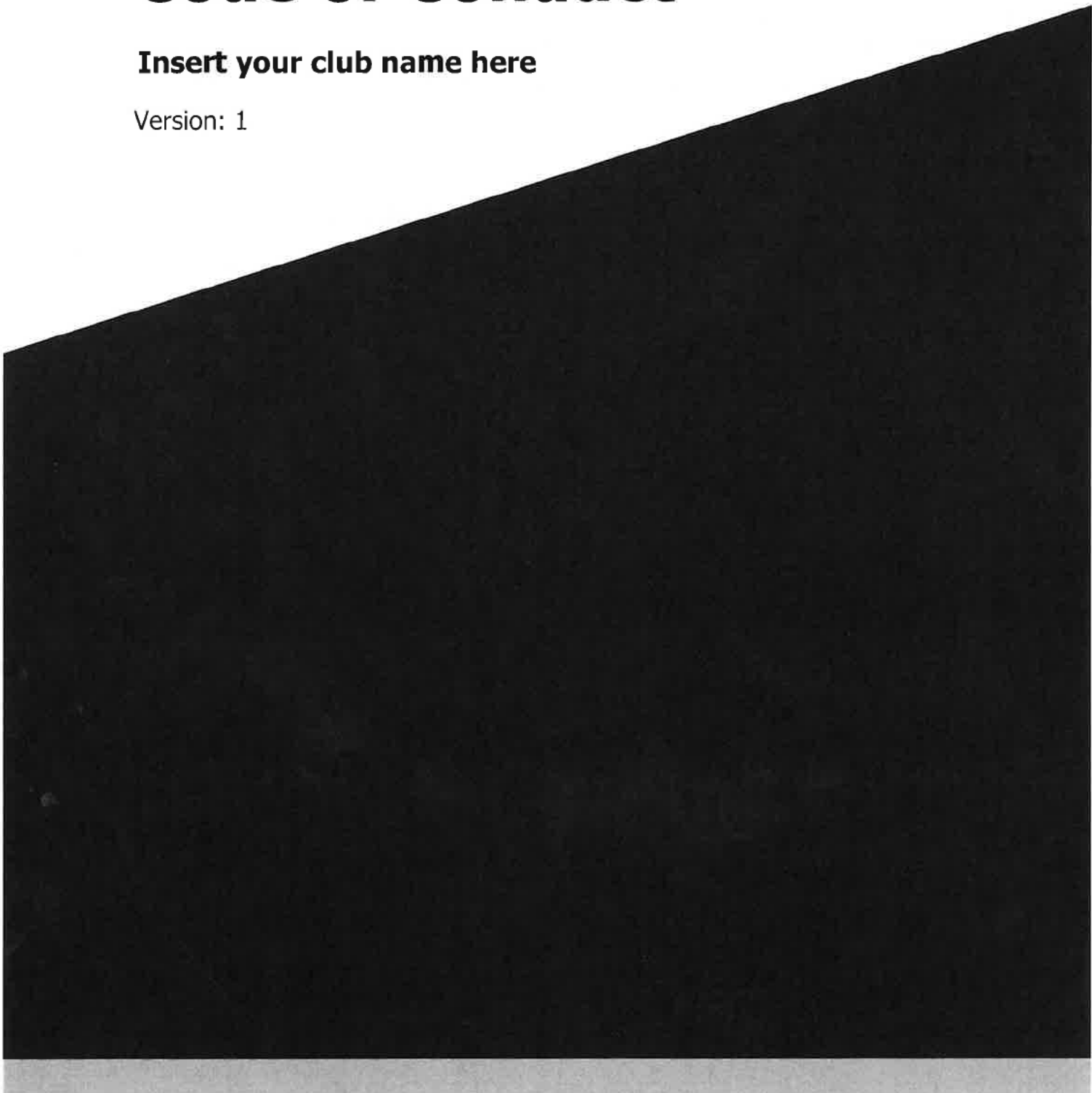
87.9. The venue will provide adequate resources (financial and human) for the administration and implementation of the Program.



Responsible Gambling Code of Conduct

Insert your club name here

Version: 1



Responsible Gambling Code of Conduct

1. Responsible Gambling Message

This venue will take all reasonable steps to prevent and minimise harm from the operation of gaming machines in this venue, including by monitoring the welfare of customers, discouraging intensive and prolonged gaming machine play and intervening when a customer is displaying behaviour that is consistent with gambling harm.

This venues code will be made available on our website (where a website exists) and in written form to customers upon request. A sign advising customers of this will be displayed in the gaming area.

The code will also be available in community languages on our website (where a website exists). Languages may include.

- Arabic
- Cantonese
- Greek
- Hindi
- Italian
- Mandarin
- Punjabi
- Vietnamese

2. Interaction and Communication with Customer

2.1 This venue will ensure that communications with customers does not:

- (a) Induce a customer to enter or remain in the gaming machine area
- (b) Induce gaming machine play (with the exception of communication that forms part of a loyalty program), or
- (c) Reinforce or encourage fallacies or misconceptions about gaming machines, including but not limited to:
 - i. Telling a customer that they can make money playing a gaming machine
 - ii. Telling a customer that a gaming machine or gaming machine jackpot has or has not paid, or that it is due to pay, winnings
 - iii. Discussing luck or superstitions
 - iv. Telling a customer that a 'near miss' means the gaming machine is about to pay winnings
 - v. Suggesting or encouraging the belief that a spin on a gaming machine is not independent of another spin on that gaming machine
 - vi. Suggesting or encouraging the belief that there are strategies that a customer can use to win when playing a gaming machine (for example, increasing or decreasing the amount bet per line or number of lines on which a bet is made), or
 - vii. Telling a customer that they deserve to win.

Responsible Gambling Code of Conduct

2.2 This venue will take reasonable steps to ensure that communications with customer discourage intensive and prolonged gaming machine play.

2.3 With the exception of EFTPOS signage, this venue will not induce a customer to:

- (a) Withdraw money, or withdraw more money, from a cash facility, or
- (b) Leave this venue to obtain money, or obtain more money, to enable that customer to play, or to continue to play, a gaming machine.

2.4 This venue may however direct a customer to a cash facility when requested to do so by the customer.

3. Interaction with Customers – Signs of Distress

3.1 This venue will take all reasonable steps to ensure the gaming machine area and entrances to the gaming machine area are monitored at all times gaming machines are available for play.

3.2 This venue will take all reasonable steps to ensure that customers in the gaming machine area are regularly observed to monitor behaviour that is consistent with gambling harm.

3.3 This venue will not encourage or induce a customer to engage in intensive or prolonged gaming machine play.

3.4 Staff at this venue will ask a customer to take a break away from the gaming machine area where an interaction has occurred and that interaction has determined that the customer is angry while gaming or has requested assistance as a consequence of their gaming.

3.5 Staff at this venue will interact with a customer who has been observed to have been playing gaming machines for a prolonged period without a break and ask that customer to take a break away from the gaming machine area.

3.6 Staff at this venue will interact with a customer who:

- (a) Has been asked to take a break and refuses to take a break away from the gaming machine area
- (b) Plays multiple gaming machines simultaneously, or
- (c) Reserves a gaming machine in order to play another gaming machine.

4. Gaming Venue Staff

4.1 Staff at this venue are not permitted to play a gaming machine on a rostered day of work at this venue.

4.2 This venue provides information to staff so that they are aware of their increased risk of harm from gambling.

Responsible Gambling Code of Conduct

5. Interaction with Problem Gambling Support Services

This venue will ensure that staff who have day-to-day management of the operation of this venue and responsible gambling officers meet with this venue's nominated venue support worker at least once every six months.

6. The Gambling Environment

6.1 This venue will not encourage a customer to play multiple gaming machines simultaneously.

6.2 This venue will take all reasonable steps to discourage a customer from reserving a gaming machine in order to play another gaming machine in the gaming machine area.

6.3 During the opening hours of food and beverage facilities outside the gaming machine floor, this venue will ensure that a customer can order and be served food and beverage without having to enter the gaming machine area.

6.4 This venue may offer a customer seated at or playing a gaming machine food or beverage provided it is offered as part of an interaction with that customer.

7. Responsible Gambling Officer

7.1 Responsible Gambling Officers have been appointed at this venue.

7.2 A Responsible Gambling Officer will be available in the gaming machine area at all times gaming machines are available for gaming.

7.3 This venue will display prominently in the gaming machine area a notice advising that a Responsible Gambling Officer is available for assistance at all times.

7.4 This venue's Responsible Gambling Officer will take all reasonable steps to:

- (a) Monitor the gaming machine area and ensure compliance with the Act, regulations and this code
- (b) Ensure that staff record responsible gambling incidents and interventions in the responsible gambling register
- (c) Observe customers who display behaviour that is consistent with gambling harm and provide assistance as necessary
- (d) Provide advice to staff about gambling harm and how to respond to signs of gambling harm, and
- (e) Respond to customer enquiries and complaints about the supply of gambling in the approved venue.

7.5 This venue's Responsible Gambling Officer will complete prescribed responsible service of gambling training, if any.

Responsible Gambling Code of Conduct

8. Responsible Gambling Register

8.1 This venue maintains a responsible gambling register. The details of all responsible gambling incidents and interventions are recorded in this register, including:

- (a) Date and time the incident occurred
- (b) Details of the incident
- (c) Details of the intervention made in response to the incident
- (d) Details of the customer's response to the intervention, if known
- (e) Date and time the entry was recorded in the responsible gambling register, and
- (f) The name of the individual if this is provided voluntarily by that individual.

8.2 This venue retains the information in the responsible gambling register for not less than six months from the day it was recorded in the responsible gambling register.

8.3 This venue will provide a copy of the responsible gambling register to the Victorian Commission for Gambling and Liquor Regulation on request.

8.4 This venue may provide information in the responsible gambling register to a Venue Support Worker for training and development purposes provided that information does not include the name or identifying characteristics of any customer.

Responsible Gambling Code of Conduct

Appendix-Definitions

Definitions

Code administrator refers to Community Clubs Victoria who has prepared and administer this code.

Interaction means measured assistance based on a case-by-case assessment by venue staff. The interaction may take the form of:

- Encouraging the customer to consider food or beverage offers available at the venue which would allow a break in play from the gaming machine
- Offering the customer some refreshments (i.e. tea or coffee) in a quieter, more private part of the gaming venue where the customer has the opportunity to request appropriate support information in a confidential manner
- Assisting the customer with travel arrangements in order to depart the venue
- Providing customer with information on gambling support, and
- Explaining how the self-exclusion program works and providing information on how to access the program.

Loyalty program means a 'loyalty scheme' as defined in section 1.3 of the Act.

Responsible gambling officers describes staff appointed to assist the venue operator:

- Minimise gambling harm in the venue, and
- Ensure compliance with all responsible gambling regulatory and code requirements
- Respond to staff and customer enquiries about the supply of gambling in the venue.

Responsible Gambling Register describes a log located in the gaming area, that venue staff have access to record responsible gambling related interactions with customers.

Venue Support Workers describes staff from the Gambler's Help Venue Support Program. These staff assist venues in fulfilling responsibilities such as:

- Identifying and responding to patrons displaying signs of problem gambling
- Raising awareness among venue staff about, and encouraging referrals to Gambler's Help services, self-exclusion programs and other community support services
- Meeting the requirements of their Responsible Gambling Codes of Conduct
- Creating and maintaining responsible gambling environments
- Ensuring their completion of the required Responsible Service of Gaming (RSG) training.

Disclaimer

Any legislative changes impacting on this code do not render this code as invalid. Any State or Federal legislation or regulatory arrangements take precedence over the contents of this code.

Gaming Policies & Procedures (Manual)

Club Wodonga

Club Liquor Licence

Club Venue Operators Licence

Club Wodonga Gaming Policies & Procedures (Manual)

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1 Club Wodonga Gaming Policies & Procedures (Manual)

1.1 The Manual

This Gaming Policies and Procedures document (Manual) as varied from time to time sets out the Responsible Service of Gaming (RSG) and gambling harm minimisation strategies, policies and procedures for Club Wodonga (the Club) at 48 Reid Street, Wodonga (Premises). The Manual details controls in place to address risks of gambling harm and operational practices implemented by the Club, as Venue Operator (VO), to manage the likelihood of events of gambling harm occurring and consequences of the same.

1.2 Staff Familiarity

Staff are required to read this Manual prior to commencing working in the gaming room and whenever there are changes to the Manual to familiarise themselves with the modified document.

The Manual is always available and accessible to staff behind the bar in the gaming room.

1.3 Review of Manual

This Manual must be reviewed at least annually, as well as periodically when modifications are required to reflect changes to operations at the Club, legislative changes or emerging risks.

2 Venue Details & Licenced Hours

2.1 Venue Details

Venue Operator	Huon Hill Club Ltd trading as Club Wodonga
Premises Address	48 Reid Street, Wodonga VIC 3690
Venue Manager	Sarah Lewis
Number of Gaming Machine Entitlements	70
Number of Electronic Gaming Machines operated	70

2.2 Liquor Licence Hours

	Mon	Tue	Wed	Thu	Fri	Sat	Sun
Start	7am	7am	7am	7am	7am	7am	10am
End	1am	1am	1am	1am	1am	1am	12am

*Note: on Good Friday and ANZAC Day, licenced hours are limited to 12pm to 12am.

2.3 Authorised Gaming Hours

	Mon	Tue	Wed	Thu	Fri	Sat	Sun
From	10am	10am	10am	10am	10am	10am	10am
Until	1am	1am	1am	1am	1am	1am	12am

*Note: on Good Friday and ANZAC Day, authorised gaming hours are limited to 12pm to 12am in accordance with Liquor Licence hours.

The lower ground floor café lounge will be open at all hours the gaming room is open and will provide a full range of services including food that is more than pre-packaged snacks.

3 Minimising Gambling Harm

3.1 Risk Assessment & Risk Register

The Risk Assessment and Risk Register prepared by DNS Specialist Services as at the date of the hearing (or as amended as required by the Victorian Gambling and Casino Control Commission (VGCCC)) is relied upon by the Club to further develop and adopt this Manual to ensure best practice and ensure harm minimisation in connection with the use of Electronic Gaming Machines (EGMs) at the Premises.

3.2 Compliance with the Manual

The Club operates the gaming room in accordance with this Manual. A current copy of the Manual is kept behind the bar in the gaming room and available to patrons upon request. The Manual (as in force from time to time) will also be published and available for viewing on the Club website.

In the event that this Manual is breached, the breach and steps taken to remedy the breach will be recorded and kept in a Compliance Register attached to the Manual.

3.3 Practices in Place

The Club has in place the following measures to address the impact of and minimise harm to patrons caused by gaming at the Premises:

Self-Exclusion Program (SEP): Offer easy access to self-exclusion options, allowing patrons to voluntarily ban themselves from gaming activities.

Responsible Gambling Officers (RGOs): Employ trained RGOs to monitor gaming areas, identify at-risk patrons, and provide information on support services.

Signage and information: Display clear signage and brochures in multiple languages about gambling risks and available help resources, such as counselling services.

Mandatory Responsible Service of Gaming (RSG) Training: All staff working in the gaming room are required to have achieved RSG accreditation and are trained to recognize signs of problem gambling and respond appropriately, offering assistance and information on responsible gambling.

Welfare Checks: Conduct regular welfare checks on patrons showing signs of distress or prolonged play, encouraging breaks and providing support information.

Cash and ATM Restrictions: Place ATMs away from gaming areas and prohibit cash withdrawals from credit accounts to discourage impulse gambling.

Regular Audits and Reviews: Perform regular audits of gaming practices to ensure compliance and identify improvement areas.

Facial recognition technology: at the entrance to the gaming room.

Venue Support Workers (VSW): The Club has regular contact with local VSW and refer patrons at risk of gambling harm to the VSW and Gambling Support Services offered by Gateway Health.

4 Responsible Gambling Officers (RGOs)

4.1 Venue Manager & RGOs

The Venue Manager and/or supervisor on shift in the gaming room will serve as the Responsible Gambling Officer (RGO). The RGO is responsible for overseeing the implementation of this Manual and must have completed both 'foundation' (Victorian Government RSG Module 2) and 'advanced' (Victorian Government RSG Module 4) Responsible Gaming Training within the last 2 years.

Additionally, all gaming staff are required to maintain a current Responsible Service of Gaming (RSG) training accreditation and will perform the duties of a RGO while on duty. For the purposes of this Manual, each rostered gaming staff is and shall be referred to as an RGO together with the appropriately trained and qualified Venue Manager and/or supervisor on shift in the gaming room.

From 10pm to 1am on any day the gaming room is open, RGOs will be primarily focused on their role in the gaming room. A RGO may undertake additional gaming duties as long as these do not detract from their primary responsibilities. Temporary absences from the gaming room is permitted by an RGO when these occur as part of their primary duties, such as engaging with an EGM player in a private space or taking routine breaks like meal or bathroom breaks.

The VO, Venue Manager and all gaming staff shall attend monthly meetings to discuss any gambling harm risk issues/events, their duties, RSG generally, this Manual and any queries or updates in relation to gaming operations at the Premises.

New gaming staff will be partnered with an experienced gaming staff member as a mentor upon employment for the purpose of learning the venue, this Manual and patrons and how to deal with any difficult situations.

4.2 RGO Duties

RGO duties are:

1. monitor the gaming room and entrances to the gaming room and patrons within;
2. to identify patrons who are at risk of or experiencing gambling harm;
3. to identify patrons who are displaying behaviour related to gambling harm;

4. to make inquiries with a patron if the officer suspects the patron is at risk of or experiencing gambling harm;
5. to notify senior management of serious instances of patrons at risk of or experiencing gambling harm for the purposes of enabling senior management to intervene;
6. to facilitate requests by patrons for information about or to participate in self-exclusion schemes conducted by the Club;
7. to record, in the club's gambling incident register, incidents relating to persons who are at risk of or experiencing gambling harm, or who display behaviour related to gambling harm, observed by the officer;
8. to assist staff and management in ensuring the Club meets its harm minimisation obligations under the Act and this regulation; and
9. to promote harm minimisation measures within the Club.

All gaming staff are also required to be trained in 'YourPlay' to assist patrons enrolling with 'YourPlay' and able to set EGM time and spend pre-commitment settings.

4.3 Venue Manager Duties

A full-time Venue Manager will be employed at the Premises to coordinate the Premises' Self Exclusion Program and implement and maintain harm minimisation training for all staff.

The responsibilities of the Venue Manager or supervisor/s on duty are to:

1. take reasonable steps to ensure RGOs carry out their duties;
2. ensure work health and safety procedures and policies are followed to support RGOs in exercising their duties;
3. ensure RGOs have had an opportunity to raise issues with the Venue Manager about their role and its responsibilities;
4. ensure the issues raised by RGOs in relation to point 3 are addressed;
5. ensure RGOs are not impeded by the Venue Manager or other staff of the Club in carrying out their duties;
6. inform RGOs about their duties;
7. inform RGOs of patrons reasonably suspected to be at risk of or experiencing gambling harm; and
8. assist patrons who are at risk of gambling harm or displaying behaviour related to gambling harm.

5 At-Risk Gambling Behaviour

5.1 Identifying At-Risk Gambling Behaviour

At-risk gambling behaviour is gambling behaviour that leads to gambling harm because it involves:

- spending more money on gambling than the person can afford based on their income and financial commitments: and/or
- spending so much time on gambling that it interferes with the person's relationships, social life and/or work responsibilities.

‘Gambling harm’ refers to difficulties or other negative consequences that result from excessive gambling and affect the wellbeing of the person and/or their loved ones in many areas of their daily lives. Gambling harm can affect people’s physical and mental health as well as their financial wellbeing, relationships, education and employment, social and psychological wellbeing.

RGOs are trained to proactively identify at-risk gambling behaviours by regularly patrolling the gaming room and observing players for signs of distress or excessive play. Staff aim to be vigilant in monitoring patrons both while providing service and while on their rounds, looking for indicators such as players spending extended periods at machines, showing signs of agitation or stress, or making repeated cash withdrawals.

5.2 Interacting with Patrons

Staff must not encourage patrons to enter or remain in the gaming room, engage in EGM play, withdraw money from a cash facility or leave the venue to obtain money to enable them to play (or to continue to play) a EGM. Staff are however permitted to direct patrons to cash facilities if/when requested to do so by a patron.

RGOs communications with patrons should at all times discourage intensive and prolonged EGM play and discourage patrons from playing multiple EGMs simultaneously. Reserving a EGM in order to play another EGM in the gaming room is prohibited. Patrons should be directed to exit the gaming room to order and be served food and beverages during the usual bistro trading hours and staff are only permitted to offer patrons seated at or playing a EGM food or beverages as part of an interaction, but the patron must leave the EGM to collect the food/beverage.

5.3 Request to Take Breaks

RGOs should ask patrons to take a break away from the gaming room where:

- a patron is observed to have been playing EGMs for a prolonged period without a break;
- an interaction with a patron has determined that the patron is angry while gaming;
- a patron has requested assistance as a consequence of their gaming; and/or
- a patron is observed playing multiple EGMs simultaneously or reserving a EGM in order to play another EGM.

6 Gambling Information/Signage

6.1 Mandatory Signage

Mandatory EGM signage and brochures include:

- **A copy of the Venue Operators Licence**, displayed at the cashier’s station and gaming room entrance;
- **A notice stating an RGO is available for assistance at all times**, displayed at the cashier’s station;
- **A responsible gambling sign**, displayed at the gaming room entrance;
- **A notice to patrons where they can find a copy of VGCCC rules**, displayed at the gaming room entrance. A copy of the VGCCC rules is available for patrons to inspect from the gaming room bar upon request;
- **Player information posters** (Your Play and Gamblers Help), three (3) of each displayed evenly throughout the gaming room and visible from each EGM;
- **Pre-commitment and player information brochures** at each cashier station and player service point; and

- **A notice in the approved form prohibiting persons under 18 years of age from entering the gaming room**, displayed at each entrance to the gaming room.

Signage and information are available upon request in the following languages: Arabic, Cantonese, Greek, Hindi, Italian, Mandarin, Punjabi and Vietnamese.

There is no gambling or directional signage to the gaming room throughout the Premises other than on the gaming room entrance/s.

6.2 Checking Signage & Brochures

Staff conduct weekly checks to ensure all gaming signage and brochures are up-to-date and clearly visible in the required locations, as mandated by legislation. These checks are performed three times a week to maintain compliance and ensure patrons have access to important information.

7 Responsible Gambling/Incident Register

The Club maintains a responsible gambling register (RSG Register) in accordance with VGCCC and legislative requirements.

Incidents that must be recorded include:

1. when a patron displays behaviour that indicates the patron is experiencing or at risk of gambling harm;
2. when a patron, or a person who identifies themselves as a family member of the patron, asks for information about a self-exclusion scheme or some form of intervention for the patron;
3. a breach or attempted breach of the Self-Exclusion Program;
4. welfare checks; and
5. an offence, alleged offence or incident involving a minor.

The Club uses keeps a digital RSG Register system incident register on web-based platform which allows for efficient record-keeping and is accessible to management and staff through various devices. The Venue Manager/s can access the Register register via PC, while other staff members can use an iPad or the POS register.

RGOs are responsible for creating reports in the RSG Register, can be generated at any time during a shift and should include detailed observations and any actions taken. Once a report is created, it remains in "draft" status until reviewed by the Venue Manager or supervisor on shift, who must review and approve draft reports at the end of each shift or as soon as practicable, but no longer than 24 hours after they happen, ensuring all necessary details are included and the report is accurate.

The Club must ensure details of all responsible gambling incidents and interventions are recorded in the RSG Register and kept on file for a minimum of six (6) months, including:

1. date and time the incident occurred;
2. details of the incident and intervention made in response to the incident;
3. name of the patron/s involved and details of their response to the intervention, if known; and
4. date and time the entry was recorded in the register.

The Venue Manager should conduct a comprehensive review of all approved reports on a weekly basis to look for patterns of behaviour and ensure all incidents have been appropriately addressed.

Dependent on the relevant incident, the Venue Manager or supervisor on shift will deal with the matter in the appropriate way which may include liaising with the patron in question, providing contact details and information to the patron, liaising with the staff involved, training the relevant staff on the particular issue at hand, contacting Victoria Police or the VSW.

A copy of the RSG Register must be provided to the VGCCC for inspection on request and may be provided to a VSW for training and development purposes provided that information does not include any identifying characteristics of any person.

8 Self-Exclusion Program (SEP) and Venue Support

8.1 Clubs VIC Self-Exclusion Program (SEP)

The Club has adopted the Clubs VIC Self-Exclusion Program (SEP). This allows patrons to voluntarily exclude themselves from the gaming room at the Club as well as multiple venues around where they live, work, and socialize. The Club will initiate self-exclusion when requested by a patron at any time during its open hours.

Prior to commencing work in the gaming room, all staff are required to familiarise themselves with the SEP and attend training session offered by the Club in connection with Gamblers Help, VSW and specialist gaming service providers to assist them in fulfilling their duties under the SEP, including providing patrons information about self-exclusion, identifying self-excluded persons and understanding how to appropriately manage self-excluded persons.

A patron can self-exclude by speaking to a RGO at the Club or by contacting a Gambling Help counsellor. Self-exclusion must be voluntary. The minimum period for self-exclusion is six (6) months. Once a patron agrees to stay away from the Club for a specific time, the Club has processes in place to help them honour that commitment and may only be revoked/varied by the relevant patron in consultation with the Club and VSW/Gamblers Help.

Whenever any new self-excluded individuals are added to the list of self-excluded patrons at the Club, gaming staff will be required to attend additional training to ensure awareness of obligations under this Manual and the SEP to identify and exclude patrons on the self-exclusion list. A current list of self-excluded patrons will be kept at the gaming room bar and must be reviewed by gaming staff at the beginning of each shift to maintain familiarity.

If a patron breaches their self-exclusion, it is reported through the SEP and they are referred to the VSW/Gamblers Help for assessment by trained counsellors.

8.2 Identifying Self-Excluded Persons

The Club maintains a Self-Exclusion register (Register) with details of all self-excluded patrons under the SEP within the gaming room which is accessible by all gaming staff on duty. Staff are required to review self-exclusion photos at the start of each shift and sign off confirming they have reviewed thoroughly each photo. Throughout their shift, gaming staff must make every reasonable effort to identify and prevent the entry of self-excluded patrons into the gaming room. The Club also utilises facial recognition technology which is installed at the entry to the gaming room to assist staff in identifying and make positive facial identification of self-excluded patrons.

If staff identify that a registered self-excluded patron has entered the gaming room, RGOs are required to approach the self-excluded patron in a discreet manner, not draw undue attention, ask for proof of identification

to confirm they are a self-excluded patron and remind them that they have committed to the SEP and request they leave the gaming room.

If the patron refuses, RGOs should inform the patron that police will be called if they continue to refuse. RGOs are only permitted to use reasonable force if the patron becomes physically aggressive. After the patron has left, the breach must be recorded in the Register.

The Register must be provided to the VGCCC for inspection upon request.

8.3 Venue Support Workers

The Club has regular contact with local VSW and Gateway Wodonga which offers Gamblers Help services. The VO, Venue Manager and all RGOs are required to meet with the local VSW once every six (6) months, but may contact them as required, to ask questions and receive gaming harm risk management and SEP updates and training.

In working partnership with the VSW, the Club may refer patrons to Gamblers Help services provided by Gateway Wodonga.

Current contact details of the Venue Support Worker as follows:

Name: Jody Riordan

Phone: (02) 6022 8888

Email: Jordy.riordan@gatewayhealth.org.au

Address: 155 High Street, Wodonga Victoria 3690

9 Payment & Reward Schemes

9.1 Payment of Prizes & Cashing Cheques

Staff must award or pay a prize won on a EGM to a patron entitled to the prize in accordance with the Regulations.

If a patron claims a prize of more than \$2,000.00, the amount that exceeds \$2,000.00 (or the entire amount if requested by the patron) must be paid within 48 hours in one of two (2) ways:

1. bank cheque payable to the prize winners nominated bank account; or
2. electronic funds transfer (EFT) to the prize winners nominated bank account no sooner than 24 hours after the prize is won.

Winnings will only be issued to the patron playing the EGM at the time of the win.

9.2 Player Reward Scheme

A player reward scheme means a system, used in connection with the operation of EGMs at a the Club, in which patrons accumulate bonus or reward points from playing the EGMs.

A promotional prize means prizes or rewards (including bonus points) offered to patrons by the Club in connection with a player reward scheme or any other marketing or promotional activity that involves EGMs.

Prizes/rewards may not be in the form of or exchangeable for cash or in value exceeding \$1,000.00 (including free giveaways).

Participants and account card holders to any electronic player reward scheme offered by the Club must be provided with a player activity statement free of charge, on request and monthly, including:

- total amount of turnover, wins, and net expenditure;
- total points earned and redeemed as the result of playing EGMs;
- the total length of time the patrons player card was inserted in EGMs during each 24-hour period and total for the month;
- a note advising that the statement only relates to the EGM play while the player's card was inserted; and
- Gamblers Help information.

Records of player activity statements must be kept and information on/copies of player activity statements may only be disclosed to the relevant patron or persons lawfully entitled to have access to the information.

10 Legislative Requirements

10.1 Compliance Generally

The Club is subject to the requirements of the Gambling Regulation Act 2003, Liquor Control Reform Act 1998, Liquor Control Reform Regulations 2023 and Gambling Regulations 2015 (as amended and in force from time to time) and other legislation that establishes basic harm minimisation and responsible conduct of gambling requirements.

The Club is also subject to the Privacy Act 1988 (Cth) and related Australian Privacy Principles in the collection and use of information.

10.2 Staff Use of EGMs Prohibited

No staff member is permitted to use EGMs at the venue at any time, whether before, during or after shifts or on rostered days off.

10.3 Minors

Minors (persons under 18 years of age) must not:

- operate EGMs, or
- enter areas where EGMs are located.

The Club is a licenced venue, and as such, no person under the age of eighteen (18) is permitted entry into the Club unless they are in the company of a responsible adult and remain in an authorized or non-restricted area. Gambling by minors is prohibited, and 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 staff share the responsibility of asking for proof of age if they are uncertain whether a patron is at least eighteen (18).

The Club only accepts the following forms of evidence of age:

- A current Driver's/Rider's Licence issued in Australia or another country.
- Digital Driver's/Rider's Licence.
- Passport – Australian or other country.
- Recognized Proof of Age Card.

If relevant verification cannot be produced, the patron will be asked to leave or not be permitted to enter the gaming room and the licenced premises.

Adult patrons attending the Premises with minors accompanying them must be advised that the adult patron is responsible for monitoring the minor and the minor is not permitted to approach or enter the gaming room.

10.4 Minimum Gaming Room Staff Requirements

At all times the gaming room is in operation, at least one (1) staff member who has completed RSG Module 2 and 4 training must be on duty and at a minimum:

- during peak periods, two (2) RGOs must be on duty in the gaming room as dedicated floor walkers and one (1) RGO on duty at the cashier station at all times; and
- at any other time the gaming room is operational, one (1) RGO must be on duty in the gaming room as dedicated floor walker and one (1) RGO on duty at the cashier station.

11 Anti Money Laundering and Counter Terrorism

The Club engages an external training organisation to provide annual Anti-Money Laundering (AML) and Counter Terrorism Finance (CTF) risk awareness training to the Directors of the Club, the Venue Manager and all gaming room staff (AML/CTF Risk Awareness Training Program) covering the following minimum topics:

- the Club's obligations under Australia's AML/CTF legislation;
- the consequences of not complying with AML/CTF legislation;
- the type of AML/CTF activity staff may see at a gaming premises and the consequences of the risk of this activity; and
- how the Club will meet its obligations, including processes and procedures to identify, manage and mitigate this risk.

In accordance with the AML/CTF Risk Awareness Training Program, all staff are required to:

- act honestly and actively act to prevent criminal influence or exploitation;
- know what potential money laundering activity looks like, such as credit buying from other patrons or putting large amounts of money into the machine with little or no play, and subsequently cashing out
- closely monitor patrons who are acting suspiciously, or may be engaging in money laundering activities
- understand AML and CTF obligations and read AUSTRAC's guidance at austrac.gov.au/pubsandclubs

If staff have concerns about patron behaviour, they should notify the Venue Manager and contact the VGCCC on 1300 599 759 or contact@vgccc.vic.gov.au.

12 Complaints & Non-Compliance

12.1 Staff Complaints

RGOs may make complaints to the VGCCC about harm minimisation breaches at the Club or if they are impeded from undertaking their duties. Complaints and reports of potential breaches of the law can be made to VGCCC by contacting 1300 599 759 or contact@vgccc.vic.gov.au.

12.2 Patron Complaints

Patrons can submit complaints in person, by phone, email, or through the Club website. All staff are trained to direct complaints to the appropriate person. Each complaint is documented in a complaints register, detailing the date, time, nature of the complaint, and immediate actions taken.

The Venue Manager or RGO reviews the complaint to assess its severity. Serious issues are escalated to senior management immediately. The Venue Manager or RGO investigates by gathering information, including speaking with staff or patrons, reviewing footage, and checking relevant records.

Based on the investigation, the venue determines the appropriate resolution, which could involve offering an apology, corrective actions, or changes to prevent future issues. The resolution is documented, and the findings are communicated to the complainant promptly.

Complaints are handled confidentially, in compliance with the Privacy Act 1988.

12.3 Reporting Misconduct

Anyone may make an anonymous complaint to LCV about liquor law breaches or the VGCCC about gaming law breaches. Complaints and reports of potential breaches of the law can be made to LCV and VGCCC by contacting 1300 599 759, contact@liquor.vic.gov.au or contact@vgccc.vic.gov.au.