

**IN THE MATTER OF AN APPLICATION TO THE VICTORIAN GAMBLING AND  
CASINO CONTROL COMMISSION BY DG HOTEL PTY LTD FOR THE  
INSTALLATION OF AN ADDITIONAL EIGHT (8) ELECTRONIC GAMING  
MACHINES AT THE DORSET GARDENS HOTEL, 335 DORSET ROAD,  
CROYDON, VICTORIA**

**WITNESS STATEMENT OF JOSEPH PETER SCERRI**

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Date of document:	August 2025
Filed on behalf of:	Applicant
Prepared by:	
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Level 15, 200 Queen Street	DX: 464 Melbourne
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**Background**

1. My full name is Joseph Peter Scerri and I am a Director of DG Hotel Pty Ltd **(the Applicant)**,
2. The Applicant is the licensee and operator of the business at the Dorset Gardens Hotel, 335 Dorset Road, Croydon **(the Hotel)**.
3. I hold a Bachelor of Applied Science and Master of Medical Studies. However, I am no longer practising in the medical field and I am a Hotelier.
4. I have been involved in the ownership and operation of licensed premises since 2007 in accordance with my curriculum vitae, which is **attached** to this statement as **Annexure 1**. I have extensive experience in the operation of a range of licensed premises, including those with gaming machines.
5. As set out in **Annexure 1**, the venues that I currently operate are:
  - (a) The subject Hotel;
  - (b) The Roxburgh Park Hotel, Roxburgh Park;
  - (c) The Golden Nugget Hotel, Melbourne;

- (d) The Chase Hotel, Forest Hill;
  - (e) The Diamond Creek Tavern, Diamond Creek;
  - (f) The Pink Hills Hotel, Beaconsfield;
  - (g) The SEBEL Hotel Moonee Ponds;
  - (h) The Saros Bar and Restaurant Moonee Ponds; and
  - (i) The Settlement Hotel, Cranbourne
6. Aside from the SEBEL and Saros Bar and Restaurant, all of the above venues operate gaming machines<sup>1</sup>.
  7. The relatively modest number of venues within my portfolio allows me to be a hands-on manager at each venue and to spend time on the floor with my staff and customers. This is perhaps a point of contrast compared to how many other Hotel groups operate in that I feel it is important for me to work on the floor across all parts of all of my venues and to know my patrons and staff.
  8. I work on the floor at each Hotel during the week across all peak service times, particularly on Friday and Saturday evenings.
  9. I know the names of all my staff and am also well known by many of our regular patrons at all of my hotels. Hospitality is about providing a welcoming environment for patrons, a place to unwind and meet with friends where they feel comfortable and I feel it is important that I know my venues from the ground up to ensure we can provide this experience.
  10. The hospitality venues at which I have been involved generally have an emphasis on a strong food and beverage trade, which I believe is the cornerstone of a successful hospitality offering in the current Victorian marketplace.
  11. I have undertaken responsible service of alcohol (**RSA**), responsible service of gaming (**RSG**) and licensees' first step training, together with various refresher courses over the years.

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<sup>1</sup> Roxburgh Park operates 80 EGMs, Golden Nugget operates 60 EGMs, The Chase operates 90 EGMs, The Diamond Creek Hotel operates 50 EGMs, The Pink Hill Hotel operates 60 EGMs and The Settlement Hotel operates 52 EGMs.

## **The Dorset Gardens Hotel**

12. As set out in the statement of Rebecca Poloso, the Dorset Gardens Hotel is a very large and uniquely busy Hotel offering a full range of dining and entertainment options for our all ranges of customer demographic.
13. I have owned and operated this Hotel since 2007 and I know the Hotel and its customers extremely well. We have created consistency of senior management and senior staff and we have been able to put in place a deeply embedded culture of offering strong service and providing a venue that has makes its customers feel welcome and valued.
14. The Dorset Gardens Hotel has been a focal point for the people of the south east Corridor for many years. It is a venue that is seeded into the fabric of the local community and makes Croydon different to its adjacent suburbs.
15. The Hotel has been a place for so many people who have had weddings, birthdays christenings engagements, celebrations of life. For many, the Hotel is the first place they 'went out' as an adult, a place where people as part of their weekly or a daily routine catch up to discuss what's important to them.
16. Given the extremely broad nature of the offering, the Hotel has a very diverse demographic and attracts patrons from all walks of life. Having been at the Hotel for many years now, we are seeing multi-generational visitation from customers who bring in their children and grandchildren. It is a very popular venue for large family gatherings because of the broad range of facilities for the whole family, our ability to take large bookings and the large car park at the venue that makes accessibility easy.
17. It is a very vibrant Hotel and is somewhat unique in that it enjoys a busy trade at all times, including a stronger lunch trade than many other suburban Hotels
18. The Hotel currently offers:
  - (a) Bistro Dining with capacity for 350 patrons;
  - (b) A public bar & lounge with capacity for 650 patrons together with TAB and Keno facilities;

- (c) Function rooms with collective capacity for 200 patrons;
  - (d) Children's Play area;
  - (e) Drive through bottle shop;
  - (f) 45 Motel rooms;
  - (g) Gaming room; and
  - (h) Nightclub (generally operating on Fridays, Saturdays and the eve of Public Holidays).
19. Whilst attached to the Hotel building, the nightclub operates separately to the balance of the venue in terms of ingress and egress. It is an important social facility for people of all ages wanting a night out but wanting to stay in their local area rather than travelling into the inner suburbs or Melbourne CBD. Despite the separate entrance, we do very often get patron crossover from the nightclub to other parts of the venue, particularly the sports bar and a proportion do use the gaming lounge based on my observations over the years.
  20. As noted above, the capacity of the Hotel is high with a maximum capacity on the liquor licence of 888 patrons which we will often hit at peak periods.
  21. With the Hotel experiencing this level of popularity in all departments it is easy to see how the gaming room experiences the significant spikes of utilisation that it does. It is the busiest gaming room of all my Hotels.
  22. Thursday – Sunday we provide a courtesy bus for patrons to assist them in getting to and from the Hotel.
  23. The courtesy bus also is used to help bring mobility-affected people and those wanting to have a drink or two, to the Hotel. It is used mostly for the benefit of the care houses that are within the city of Maroondah on their outings to the Hotel.
  24. As this Hotel is the head office for my Hotel Group, I generally spend more time at this venue compared to the other venues and would be on site at some point on most days. I am in daily contact with the venue manager and the management team at this Hotel and indeed at all my Hotels.

25. Despite being a large venue, the Hotel currently lacks spaces for informal gatherings and meetings and is still insufficient in size to cope with some periods of peak demand, particularly with the number of people wanting bistro bookings. The disability access to the Hotel also needs upgrading.
26. Proposed redevelopment plans are **attached** to this statement as **Annexure 2**.
27. In short, what is planned is a complete overhaul of some of the key parts of the venue and, in particular:
- (a) An upgrade to facilities in the bistro, bistro lounge area, function rooms, sports bar and nightclub.
  - (b) Expansion of the bistro by around 100 seats; and
  - (c) Creation of casual lounge areas.
28. In relation to the bistro, Friday and Saturday nights are almost always booked out in advance. We would estimate that each week we turn away at least 10 – 15 groups of people (ranging in size from 2 – 10 patrons at each meal service from Thursday - Sunday) bookings/customers wanting bistro bookings. The renovation works will see an increase in bistro capacity by around 100 patrons.
29. There will also be informal overspill area created for walk in customers and patrons waiting for a table to become available.
30. Over time, due to the expansive car parking, size of the Hotel and existing disability access and welcoming nature of our staff, the Hotel has become a place where many carers bring people with special needs for an outing. This redevelopment has been designed with enhancing disability access and creating as many accessible spaces for these patrons as possible. These works are estimated to cost approximately \$6.7 million dollars.
31. The renovation will also ensure that the Hotel remains competitive in the local area. Our major competitors are the large operators such as The Croydon Hotel, the Manhattan Hotel and the Bayswater Hotel.

32. That said, the level of competition in the area has reduced in recent years with the closures of Daisy's Hotel (which operated 75 gaming machines) and the Maroondah Sports Club (which operates 44 machines). This has contributed to the demand not just for gaming at our Hotel but also for our other facilities.
33. Whilst in accordance with the letter from the ANZ of 4 February 2025 **attached as Annexure 3**, the Applicant has a reasonably modest level of debt, it is an entity related to the Freehold owner, and that freehold entity has more than \$37 million dollars' worth of debt as against the property.
34. As set out in the correspondence, the ANZ would be in a position to fund the works in the event that we are successful in relation to this application (and subject to other conditions also set out in that letter).
35. We intend to use cash reserves of \$1,000,000 towards the works with the balance to be bank finance. If we do not obtain this approval, we will not be able to obtain bank finance and I will not undertake these works.
36. It is proposed, upon obtaining all approvals, that the additional gaming machines will be installed relatively promptly, and the redevelopment works completed within 18 months from the date of the installation of those machines(subject to obviously the availability of builders and resources). Our intention would be to achieve this faster but recent experiences of works at other venues lead me to factor in some additional time in building a hotel I believe the time frame is realistic.

### **Responsible Service of Gaming**

37. Given that I am at the Hotel very frequently, I am in constant contact with Hotel management in relation to all operational aspects of the Hotel, including RSA and RSG.
38. All managers are instructed that staff must keep their training and knowledge of all policies and procedures up to date and check photographs of self-excluded patrons before the commencement of each shift.
39. All hotels within my group of venues have engaged Leigh Barrett and Associates in relation to the provision of RSG services. I consider that we have a very strong commitment to RSG and that our strength of delivery of

RSG at our hotels are second to none. We promote ownership of our RSG responsibility and make sure we run and drive our Hotel's programme on a daily basis.

40. **Attached** to this statement as **Annexure 4** is our Harm Minimisation Policy & Procedures Manual dated September 2024. This sets out our 'in practice' commitment to RSG.
41. Any issues that arise at the Hotel, including those in relation to RSA and RSG are resolved as soon as possible (and preferably immediately)
42. We always have a minimum of two (2) staff members on duty in the gaming room as required but usually there are three (3) and from 5pm there are four (4) staff rostered in the gaming room plus two (2) security guards so that our staffing provision is well above what is required.
43. The introduction of 'ticket in ticket out' gaming for 83 of our machines has also meant that our staff can now spend a lot more time on the floor and interacting with customers as the more 'passive' role of the cashier has significantly diminished.
44. Despite the size of the Hotel, I can say with conviction that if a customer wanted to gamble anonymously, coming to the Dorset Gardens they would find it difficult. The level of interaction with staff from reception to the department they are going to is, in my opinion, significant. We try and provide a high-level of active customer care and promote staff to interact with customers. In particular, most Hotels do not have a reception desk. Our desk is staffed at all times and provides a further point of monitoring entry to the gaming room from the main entry of the Hotel.

### **Community Contributions**

45. The Hotel also provides cash donations as well as bistro vouchers, function room subsidisation, coordination of free entertainment, free poker games, free trivia, courtesy bus facilities and rewards members with offerings within the Hotel.
46. The approval of this application and subsequent increased financial strength of the Hotel is likely to mean that the Hotel is able to maintain its present level of commitment to the community and ensure that the Hotel will meet the

demands of the next generation of people of Maroondah and its surrounding communities.

47. The Social and Economic Impact Assessment prepared by Urbis and lodged with this application includes a summary of our donations history.
48. Whilst there have been some deviations in recent years due to covid, the venue generally donates around \$20,000 in cash each year to a range of local community and sporting groups.
49. As part of this application, the applicant is willing to commit to a condition enshrining these existing donations, together with an additional \$10,000 of in-kind donations per annum for a total of \$ 30,000 in donations per year.
50. Whilst I appreciate that some other applications have provided specific proposed recipients of cash contributions, it is extremely important that we maintain the ability to be flexible as to where donations go annually as community need can vary year on year.
51. **Attached** to this statement as **Annexure 5** is a set of conditions that I am willing to commit to should the Commission determine to grant this application

## **Conclusion**

52. Whilst already a large and busy Hotel, the Dorset Gardens has become both tired and unable to accommodate the number of patrons wishing to use its facilities.
53. This renovation will ensure that the Hotel can continue to serve its large and diverse patron base across all areas into the future.



## **ANNEXURE 1**

### **Curriculum Vitae of Joseph Scerri**

## Curriculum Vitae

**Joseph Scerri**



1997-2005:	Owner/operator of La Porchetta (Shepparton)
1998-2003:	Owner/operator of La Porchetta (Echuca)
1999-2005:	<ul style="list-style-type: none"> <li>▪ Smokin' Joe's in Moonee Ponds and Ringwood</li> </ul>
1999-2005:	<ul style="list-style-type: none"> <li>▪ Cousin Joe's Moonee Ponds</li> </ul>
2003 – 2007:	Owner/operator of Skinny Dog Hotel, Kew
2004 – 2007:	<ul style="list-style-type: none"> <li>▪ Venue Operator of business at the Diamond Creek Tavern (50 EGMs).</li> <li>▪ Continued Freehold Interest.</li> <li>▪ Ivanhoe Hotel (100 EGMs) owner and operator</li> </ul>
2005 to current	Owner/operator of business and freehold of Roxburgh Park Hotel (80 EGMs)
2007 to current	Owner/operator of business and freehold of Dorset Gardens Hotel (97 EGMs)
2011 to 2022	Owner of Anglers Tavern Freehold
2013 to 2022	Owner/operator of business at Anglers Tavern
2014 to current (50EGMs)	Owner/operator of business at Diamond Creek Tavern
2017 to current	Owner/operator of business at Chase Hotel (90 EGMs)
2019 to current	Owner of freehold at The Sebel Melbourne Moonee Ponds
2020 to current	Owner/operator of business at Saros Bar & Dining
2020 to current	Owner/operator of business at Golden Nugget Hotel(60 EGMs)
2022 to current	Owner/operator of business and freehold at Pink Hills Hotel (60 EGMs)
2023 to current EGMs)	Owner/operator of business & freehold at Settlement Hotel (52

## **ANNEXURE 2**

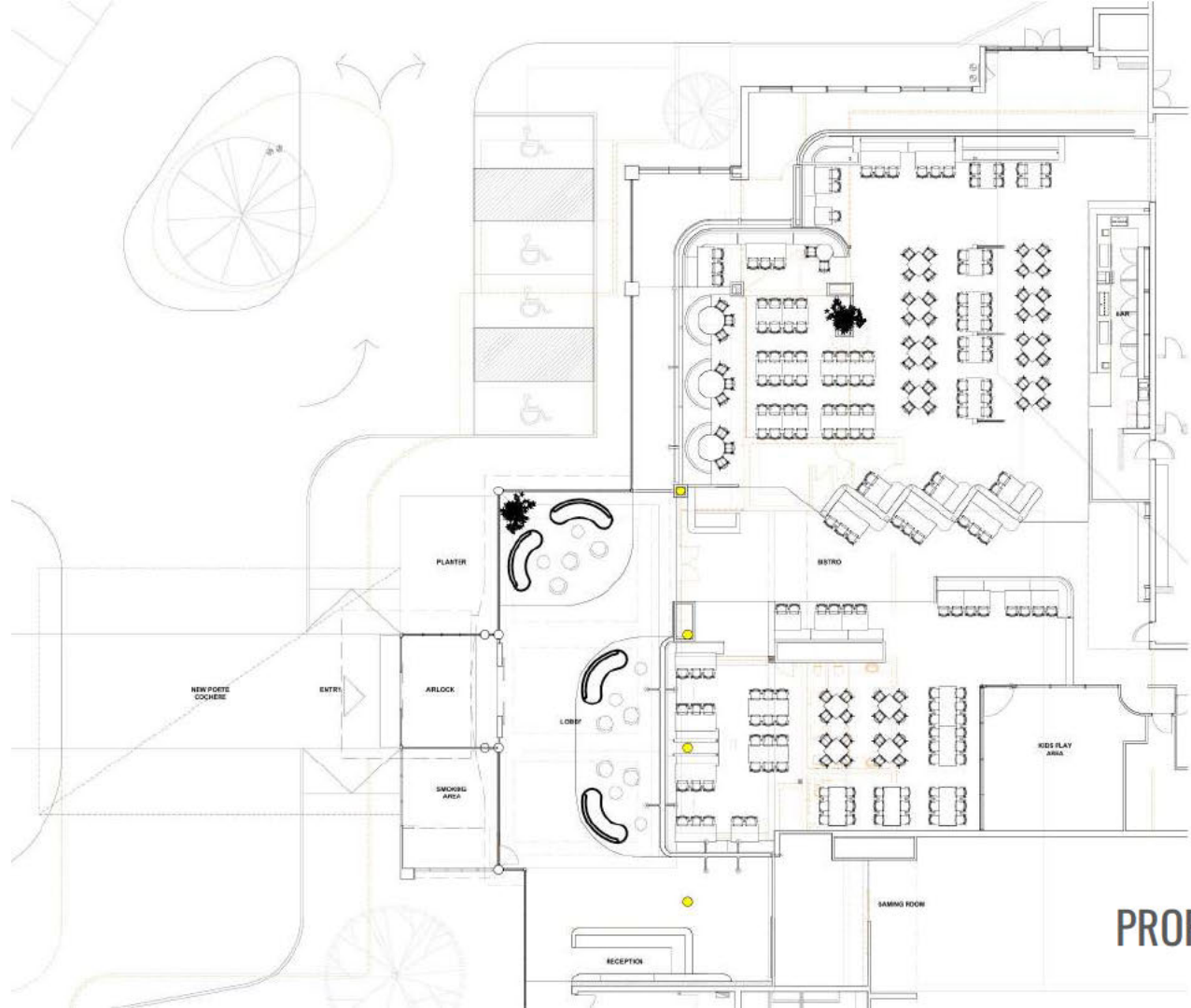
### **Proposed Redevelopment Plans and Renders**

# DORSETT GARDEN HOTEL

Design Proposal

**BISTRO**

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# PROPOSED FLOOR PLAN 01



PROPOSED VIEW OF LOBBY **02**



PROPOSED VIEW OF LOBBY **03**





PROPOSED VIEW OF GAMING LOUNGE ENTRY **04**



PROPOSED VIEW OF BISTRO ENTRY **05**



PROPOSED VIEW OF BISTRO **06**





PROPOSED VIEW OF BISTRO **07**



PROPOSED VIEW OF BISTRO **08**







PROPOSED VIEW FROM WALKWAY TO FUNCTIONS **10**





PROPOSED VIEW FROM WALKWAY TO FUNCTIONS





1. Axminster Carpet, Custom, SIGNATURE FLOORS

2. Laminate, Austral Oak, LAMINEX

3. Laminate, Roman Ceppo, POLYTEC

4. Timber-look Porcelain Tiles, EARP BROTHERS

5. Laminate, Catalina Stone, POLYTEC

6. Laminate, District Oak, POLYTEC

7. Powdercoat, Transformer Grey, DULUX

8. Paint - Moca Mouse, DULUX

9. Tile, Raster Grid Mud, EARP BRO

10. Vinyl Fabric, Urban, Brick, AUSTEX

11. Tiles, Igus 14476, ACADEMY TILES

12. Microcement, Avorio, DULUX

13. Mosaic, Supotto Bianco Matt, NATIONAL TILES

14. Acoustic Panel, Pico 468, WOVEN IMAGE

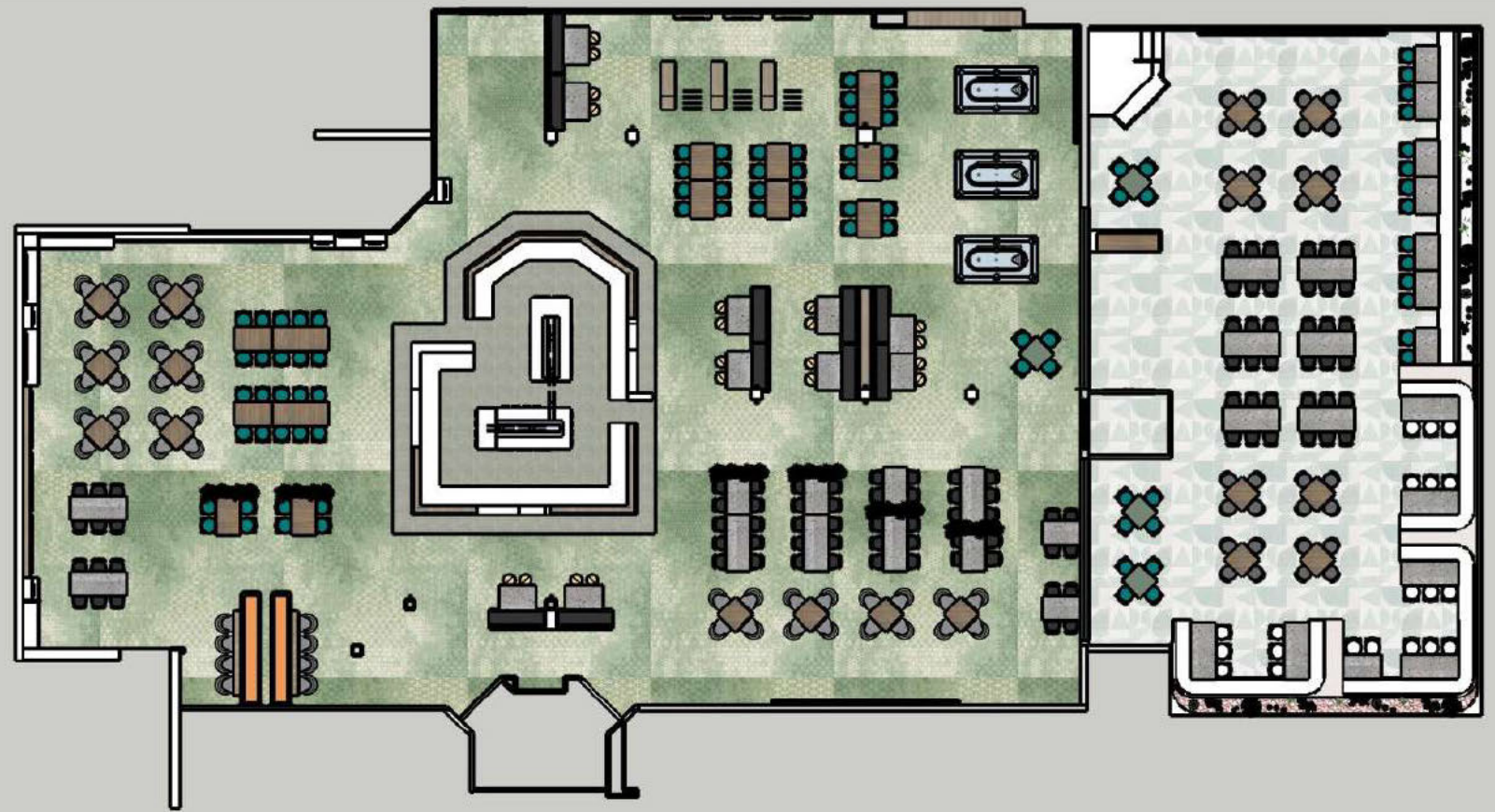
15. Assorted tiles, Oasis, PERINI

16. Axminster Carpet, Custom, SIGNATURE FLOORS

17. Tiles, Plimepaplika 15525, ACADEMY TILES

**SPORTS BAR**

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PROPOSED FLOOR PLAN **01**





PROPOSED VIEW OF BAR **02**



PROPOSED VIEW OF BAR **03**



PROPOSED VIEW OF BAR **04**





PROPOSED VIEW OF BAR **05**



PROPOSED VIEW OF SHUFFLEBOARD AREA **06**





PROPOSED VIEW OF DARTS AND POOL AREA **07**



PROPOSED VIEW OF TERRACE **08**



PROPOSED VIEW OF TERRACE **09**

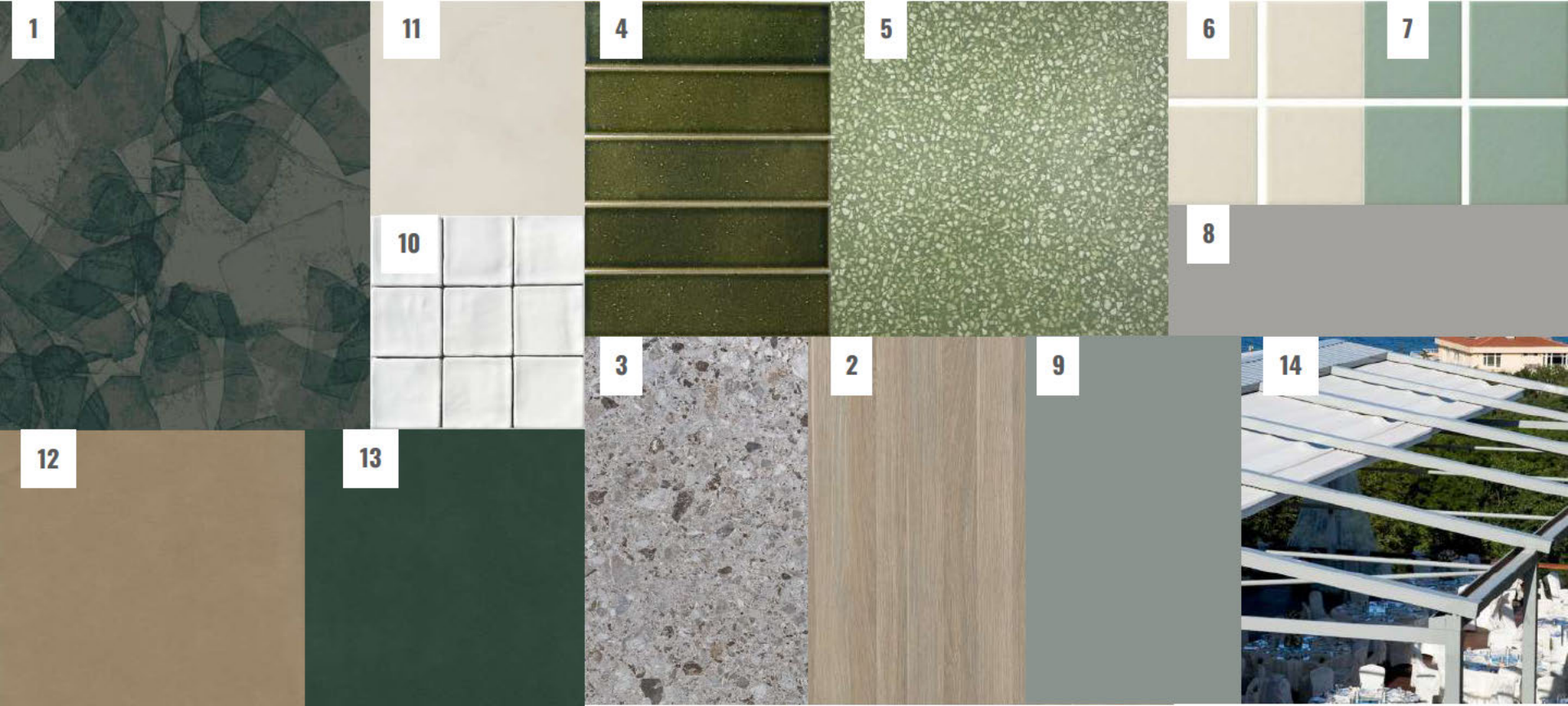




PROPOSED VIEW OF SECONDARY TERRACE **10**



PROPOSED VIEW OF SECONDARY TERRACE **11**

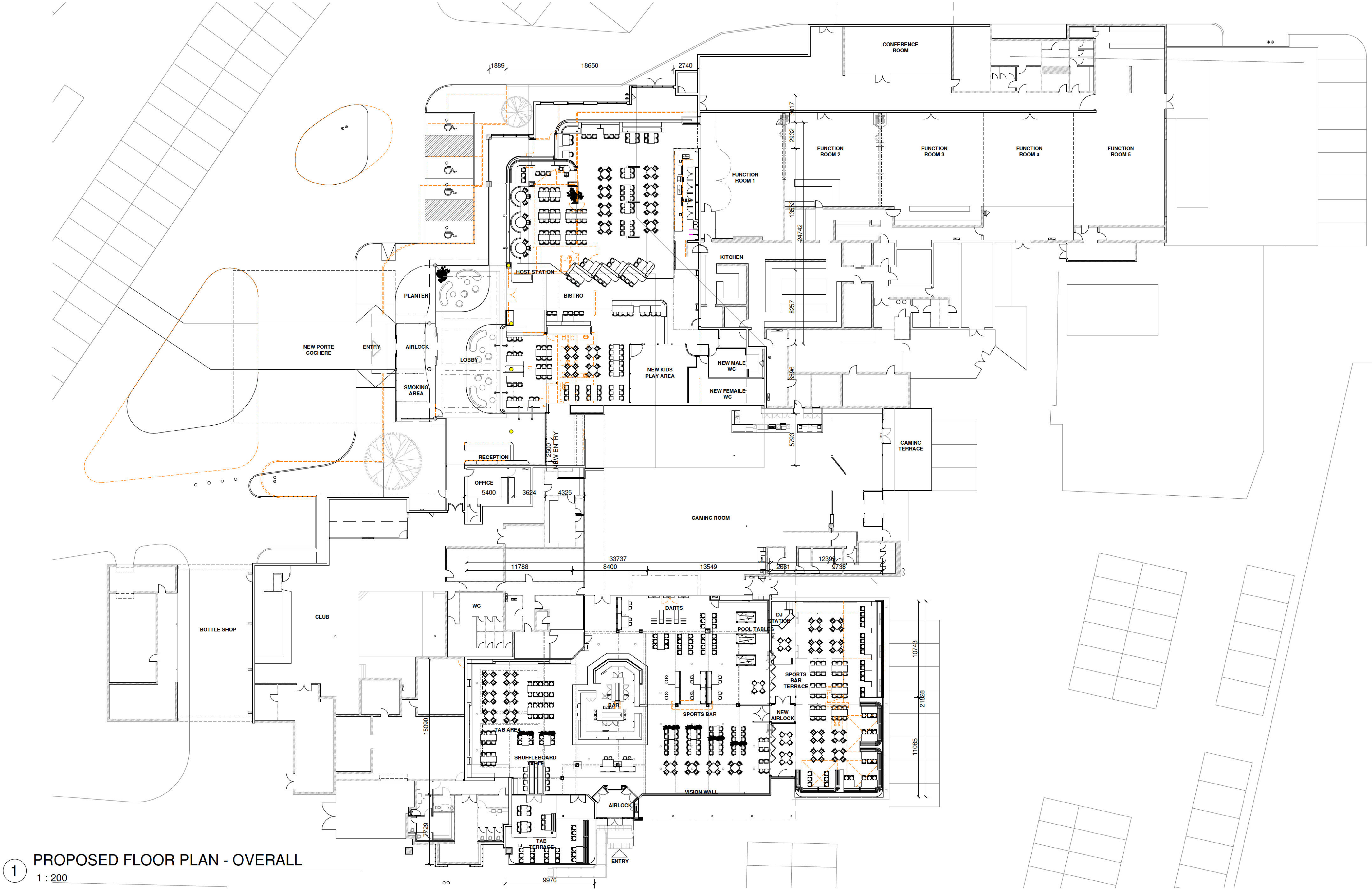


1. Axminster Carpet, Custom, SIGNATURE FLOORS
2. Laminate, Mason Oak, POLYTEC
3. Laminate, Roman Ceppo, POLYTEC
4. Tiles, Kayobrick 16977, ACADEMY TILES
5. Tiles, Gelati Melon, PERINI TILES

6. Tiles, Plimepaplika 13758, ACADEMY TILES
7. Tiles, Plimepaplika 15525, ACADEMY TILES
8. Paint, Flooded Gum, DULUX
9. Powdercoat, Transformer Grey, DULUX
10. Tiles, Masia Blanco, NATIONAL TILES

11. Microcement, Avorio, DULUX
12. Vinyl, Marlo Hunter, AUSTEX, WORTLEY
13. Vinyl, Marlo Oak, AUSTEX, WORTLEY
14. Retractable Fabric Roof System, PALMIYE





1 PROPOSED FLOOR PLAN - OVERALL  
1 : 200



Do not use or reproduce drawings, concepts or designs without written approval from SUU Studio PTY LTD.

Work to figured dimensions only. Confirm all dimensions on site. Refer any discrepancies to the Project Manager.

All work in accordance with BCA, relevant current Australian Standards & legislation.

Read this document in conjunction with all relevant architect's, service engineer, and Suu Studio's drawings and specifications.

project  
**DORSETT GARDEN HOTEL**  
335 DORSET RD, CROYDON VIC 3136

client  
**JMS HOSPITALITY AND MANAGEMENT**

title  
**VENUE RENOVATION & REFURBISHMENT**  
**PROPOSED FLOOR PLAN - OVERALL**

date drawn drawn scale drawing no.  
07/12/24 SO 1 : 200@ A1 DGH001 P 004

rev  
**A**

**A1**  
sheet size

A ISSUED FOR PRICE ESTIMATE

01/04/25  
date rev description

date



## **ANNEXURE 3**

### **Letter from ANZ**





Issuing office:  
Australia and New Zealand Banking Group Limited  
ABN 11 005 357 522  
833 Collins Street  
Docklands VIC 3008  
Phone: +61 3 8654 9867  
[Arif.Ahmed@anz.com](mailto:Arif.Ahmed@anz.com)  
[www.anz.com](http://www.anz.com)

4 February 2025

DG Hotel Pty Ltd  
DG Freehold Pty Ltd  
335 Dorset Road  
Croydon VIC 3136

Attention: Allison Elverd

Dear Allison,

As discussed with Joseph Scerri, we would like to advise of Australia and New Zealand Banking Group Limited's (**ANZ**) capability and strong desire to assist DG Hotel Pty Ltd ACN 121 566 194 in its own right and as trustee for the DG Hotel Unit Trust ABN 53 117 898 338 (**DGH**) and DG Freehold Pty Ltd ACN 121 566 407 in its own right and as trustee for the DG Freehold Trust ABN 40 485 918 422 (**DGF**) in relation to their debt requirements for the Dorset Gardens Hotel.

ANZ is currently party to a letter of offer dated 21 December 2023 with amongst others, DGH and DGF (the **Letter of Offer**). The facilities provided to DGH and DGF as borrower under the Letter of Offer are as follows (**Facilities**):

Borrower	Facility	Facility Limit (AUD)	Drawn balance (AUD)
DGF	Loan Facility (1)	37,010,000	37,010,000
DGF	Multi-Option Facility <ul style="list-style-type: none"><li>- Asset Finance Facility</li><li>- Loan Facility (2)</li></ul>	500,000	500,000
DGH	Asset Finance Facility	200,000	0
DGH	Commercial Card Facility	50,000	fluctuating

The borrowers' ability to make drawings under the Facilities is subject to the satisfaction of certain conditions precedent and compliance with terms of the agreements governing the Facilities.

ANZ understands that DGH and DGF propose carrying out a renovation of the Dorset Gardens Hotel at a cost of approximately AUD6,000,000. ANZ can confirm that we are highly interested in working with you with a view to providing facilities of up to AUD6,000,000 to DGH and DGF for the renovation (the **Proposed Financing**). The indication of support in this letter is subject to, amongst other things:

- confirmation that DGH is successful in its application for an additional 8 Electronic Gaming Machine entitlements for the Dorset Gardens Hotel;
- completion of due diligence satisfactory to ANZ;
- ANZ obtaining credit, risk and other internal approvals, as well as any required external approvals for the Proposed Financing;

- d) finalisation and due execution of documentation relating to the Proposed Financing, in form and substance satisfactory to ANZ; and
- e) there being no change in ANZ's view of the strength of the debt and capital markets as at the date of this letter.

This letter is governed by and construed in accordance with the laws of Victoria. Please read the Important Information section below which applies to this letter and the indication of support set out in it.

We would be delighted to discuss the Proposed Financing in more detail and look forward to discussing with you further.

Yours sincerely



**Arif Ahmed**  
Associate Director

## **IMPORTANT INFORMATION**

This letter does not constitute a commitment or offer by ANZ to arrange, underwrite, or otherwise provide any required funding and creates no obligation or liability whatsoever for ANZ or any of its affiliates in relation to any financing, product or otherwise.

This letter and its contents are:

- given as at the date of this letter and subject to change without notice; and
- strictly confidential and must not to be disclosed to any other person (including your related entities) without ANZ's prior written consent.

ANZ does not provide any financial, legal, taxation or investment advice to you in connection with any product or service discussed in this letter. Before making any decision, you should seek independent financial, legal, tax and other relevant advice.

You accept that ANZ owes you no duty (whether in contract or in tort, under statute or otherwise). In providing this letter to you, ANZ does not consent to you relying on this letter. You accept that if you wish to rely on any aspect of this letter for any purpose, you will do so entirely at your own risk.

You agree to release and hold harmless ANZ, its directors, agents, employees and authorised representatives from, and that ANZ will have no liability to you for, any loss or damage suffered or costs incurred by you or any other person arising out of or in connection with the provision of this letter to you or any part of this letter, however the loss or damage is caused, including, but not limited to, as a result of negligence but not as a result of the fraud or dishonesty of ANZ.

## **ANNEXURE 4**

### **Harm & Minimisation Policy & Procedures Manual**



# Harm Minimisation Policy and Procedures Manual

September 2024

Version 2.0

LEIGH  BARRETT  
ASSOCIATES

 **AMESURE**  
A division of Leigh Barrett & Associates

# Dorset Gardens Hotel

## Harm Minimisation Policy and Procedure Manual

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## 1. Definitions

- “Act” means the *Gambling Regulation Act* 2003 (current version);
- “Code” means this specific Responsible Gambling Code of Conduct;
- “EGM” means electronic gaming machine;
- “EFT” means the electronic funds transfer facility potentially made available by Hotels for EGM payouts;
- “Hotel” and the terms “Operator” and “Venue Operator” are deemed to mean the Dorset Gardens Hotel (Venue Operator Licence No. V06095993);
- “ICRP” means the Independent Complaints Resolution Process;
- “Ministerial Standards” means the mandated Responsible Gambling poster, signage and standards required by the Act’
- “Minor” means a person under the age of eighteen (18) years;
- “Nominated person” means the person appointed in accordance with clause 9 who will be responsible for providing information about the Code to patrons during all times in which the Hotel is delivering gambling products and services;
- “Patrons” means customers, members, and visitors of the Hotel;
- “PID” means the player information display on EGM screens;
- “Policies and Procedures Manual” means this Manual;
- “Responsible Gambling Officer” means the person responsible for the administration of the Manual and ICRP at the Hotel at any time;
- “Responsible Gambling Register” or RGR means the register maintained by the Hotel in which the Hotel records the information required under the Plan and may simultaneously contain the Responsible Alcohol Incident Register;
- “Review form” means the form(s) required to be completed annually by the Hotel in accordance with clause 17 of this Plan;
- “The Act” means the Victorian *Gambling Regulation Act* 2003 (current version); and
- “The Regulations” means the Victorian *Gambling Regulations* 2015 (current version).

## 2. Purpose

The Dorset Gardens Hotel recognises that, whilst EGM gambling is a legal activity in Victoria, EGM gambling operations are strongly associated with gambling harm to individuals who gamble, their families and the community in general.

Research has indicated that a person playing EGMs more than once per month has a 46% chance of experiencing harm. The Hotel accepts that it is not unreasonable to expect that distress caused by gambling harm will occur in any venue with EGM gambling. The Hotel is committed to mitigating this harm through the implementation of the Harm Minimisation Policy and Procedures Manual (Manual). The policy and procedures contained within this Manual are designed to reduce the likelihood of distress and harm among patrons, ensuring a safer and more supportive environment for all individuals who engage in gambling at our venue.

The Manual provides a policy and procedures framework for management and staff at the Hotel to:

- a. Ensure compliance with all relevant gaming and liquor legislation and regulation; and
- b. Outline the Hotel's harm minimisation measures, including those consistent with the Victorian Responsible Gambling Foundation *Venue Best Practice Guide* and *Venue Better Practice Checklist*.

The Hotel acknowledges that compliance with this policy is a condition of the venue operator's licence.

## 3. Commitment to Responsible Gambling/Patron Care

The Dorset Gardens Hotel (the "Hotel") has a strong commitment to caring for its patrons, including maintaining strong responsible alcohol and responsible gambling policies and practices.

Consistent with this commitment, the Hotel strives for *best practice* (continuous improvement) in all its Patron care policies and procedures.

The hotel will ensure sufficient resources are rostered / available to implement this, Policy.

The purpose of this Manual is to provide a *practical guide* for all staff to discharge their duties in accordance with the Hotel's commitment to the highest standards of the government expectations regarding Patron care and responsible gambling.

#### 4. Responsible Gambling Coordinator and Officers

The Hotel has appointed the Gaming Manager as the Responsible Gambling Coordinator and all supervisors act as the nominated Responsible Gambling Officer during their work shifts.

The Hotel displays a sign in the gaming room advising patrons that a “Responsible Gambling Officer is available for assistance at all times.”

Responsible Gambling Officers will wear a badge identifying them as RGO.

The **Responsible Gambling Coordinator** (RGC) is responsible for:

- Ensuring that all staff are aware of the Hotel’s Responsible Gambling Policy and Procedures and the Code of Conduct; and
- Maintaining compliance with all responsible gambling regulatory and code requirements.

The **Responsible Gambling Officers** (RGO) are responsible for and available in the gaming machine area at all times gaming machines are available for gaming:

- Respond to patrons’ requests for information about responsible gambling or problem gambling support services;
- Interact with patrons where signs of unacceptable or problematic Patron behaviour are identified by staff; and
- Provide guidance to staff about how to manage problematic Patron behaviour including indicators of potential gambling harm.

Duties of the Responsible Gambling Coordinator/Officer are listed at Appendix 1.

The RGC and RGOs meet with the Gambler’s Help Venue Support at least once every six months and details of the meetings are recorded in the Responsible Gambling Register. The RGC and RGOs undertake advanced training on a range of subjects, including:

- Managing problematic patron behaviour;
- Interacting with patrons;
- Handling patron complaints;
- Communication skills; and
- Managing potential drug and alcohol issues in the venue.

This training may be conducted by a Gambler’s Help Venue Support Worker or, where more appropriate, a specialist qualified to teach the subject matter with at least one of the above listed subjects being undertaken by the RGC and all RGOs every six months. The training, including names of participants, is recorded in the Responsible Gambling Register.

- ❖ ***Non-supervisory staff are required to refer every problem gambling, potential gambling harm and/or unacceptable behaviour matter to the Responsible Gambling Coordinator/Officer.***

## 5. Responsible Gambling/Gambling Harm Information

The Hotel provides information to assist patrons to make informed and responsible decisions about their gambling activity and about support services that are available for patrons who may experience harm from gambling.

The Hotel does so by:

- Regular Patron engagement
- Displaying responsible gambling information in a wide range of forms, including information brochures, posters and other information required by the Act and the Regulations;
- Having information brochures readily available for patrons to take away on their own initiative or upon request;
- Regularly displaying responsible gambling/gambling harm messages on television screens within the gaming area;
- Making regular announcements over the Hotel's Public Address system promoting the Hotel's Responsible Gambling Code of Practice, the operation of Your Play at the Hotel, and
- Making regular announcements that food and beverage is always available to order while the gaming room is in operation. Patrons will be encouraged to consume these away from an EGM: and
- Ensuring that staff participate in annual training in conjunction with the relevant Gambler's Help Support Worker to provide responsible gambling/gambling harm information and respond to patron queries.

The responsible gambling/gambling harm point-of sale requirements are listed at Appendix 2

A Responsible Gambling Point-of-Sale Checklist can be found at Appendix 3 of this Manual. The RGC/RGO must ensure that the items listed are checked at least weekly. It is recommended that staff members take turns to complete the checklist to assist their knowledge of the requirements.

## 6. Self-exclusion Program

The Hotel has an EGM gaming self-exclusion program that is operated by AHA Victoria.

The Hotel ensures all front of house staff view the list of self-excluded patrons before each shift and are trained on how to appropriately interact with and support patrons under self-exclusion. The Hotel ensures that deeds and photos are maintained in a secure location that can only be accessed by

relevant staff (ensuring that non-relevant staff including trades persons, cleaners and other contractors entering the venue cannot access them).

All expired deeds of exclusion and accompanying photographs must be disposed of (shredded) in a timely and discreet manner.

***If a patron asks about the Hotel's Self-exclusion Program, they must be given the Self-exclusion brochure. If necessary, refer the patron to the Responsible Gambling Officer on duty. The interaction must be recorded in the RGR.***

If a self-excluded Patron is detected in the gaming room (or TAB where applicable), the following procedure applies:

- ❖ The Patron is approached by the Responsible Gambling Coordinator/Officer who discreetly asks for identification to verify the identity of the Patron;
- ❖ If the Patron is identified as being currently self-excluded from the Hotel's gaming room, he/she is quietly requested to leave the gaming room;
- ❖ If the Patron claims not to be self-excluded, the Responsible Gambling Coordinator/Officer will take reasonable additional steps to verify the status of the Patron. If the Patron's claim cannot be substantiated, the Patron will be requested to leave the gaming room. The incident will be recorded in the Hotel's Responsible Gambling Incident Register.
- ❖ When the Patron leaves the gaming room the Responsible Gambling Coordinator/Officer provides the self-excluded Patron with information about local Gambler's Help support services;
- ❖ The Responsible Gambling Coordinator/Officer records the Incident in the Hotel's Responsible Gambling Incident Register; and
- ❖ The Self-exclusion Program office is notified of the breach by the Responsible Gambling Coordinator/Officer at the earliest practical time.
- ❖ If a potentially self-excluded Patron is unable to provide valid proof of identification the Patron will be requested to leave the Hotel.

In the event that an identified self-excluded Patron refuses to leave the gaming room when requested by a Hotel staff member, the following procedure applies:

- ❖ The Responsible Gambling Coordinator/Officer must advise the Patron that the "Deed of Self-exclusion" gives the Hotel permission to use reasonable force to remove the Patron from the Gaming Room;
- ❖ If security personnel are rostered on duty, the security personnel must act to remove the Patron from the Gaming Room;
- ❖ If security personnel are not rostered on duty, the Patron will be advised that the police will be called to have him/her removed; and
- ❖ The matter must be recorded in the Responsible Gambling Register.



## 7. Customer Loyalty Scheme

The Hotel does not have a Customer Loyalty Scheme.

## 8. Pre-commitment Strategy

The Hotel encourages patrons who play EGMs to set a time and money limit according to their individual circumstances.

Responsible gambling signage and brochures in the gaming room encourage patrons to make a pre-commitment decision in setting a limit and not exceeding that limit. At set times of the day/night the Your Play Ambassador will make announcements via a public address system in the gaming room that the Hotel encourages patrons to register with the YourPlay Program and set time and expenditure limits on their EGM play. The date and time of each announcement will be recorded in the Responsible Gambling Register.

Staff rostered in the gaming room will be available at all times to discuss how to access help in setting and keeping to limits and to access help to identify triggers which lead to overspending on gambling. This includes encouraging patrons to enrol with the YourPlay Program. The annual gambling harm staff training includes scenarios for staff to practice discussing precommitment with patrons (see Appendix 6 for training contacts).

Staff will record all Patron precommitment interactions in the Responsible Gambling Register.

## 9. Interaction with Patrons

### 9.1 Communications with Gamblers

Interaction between staff and patrons is regarded by the Hotel as an essential and integral element in the promotion of Patron service, responsible gambling, harm minimisation and Patron care. Interaction fosters a building of rapport between staff and patrons.

The Hotel must ensure that communications with patrons will not:

- a) Induce a person to enter or remain in a gaming machine area;
- b) Induce gaming machine play; or
- c) Reinforce or encourage fallacies or misconceptions about gaming machines, including but not limited to:
  - i. Telling a person that he or she can make money playing a gaming machine;
  - ii. Telling a person that a gaming machine or a gaming machine jackpot has or has not “paid”, or that it is due to “pay” winnings;
  - iii. Discussing luck or superstitions;
  - iv. Telling a person 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. Encourage or induce a person to engage in intensive or prolonged gaming machine play;
  - vii. Suggesting or encouraging the belief that there are strategies that a person 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
  - viii. Telling a person that he or she deserves to win.
- d) The Hotel takes all reasonable steps to ensure that communications and interactions with patrons discourage intensive and prolonged gaming machine play without suitable breaks from play.
- Although the Hotel actively encourages patrons to access the self-serve tea/coffee station for non-alcoholic refreshments, the Hotel, at set times of the day, will approach patrons in the gaming room to offer snacks non-alcoholic beverages as part of an interaction to discuss the Hotel's commitment to responsible gambling, encourage patrons to join the YourPlay Program or encourage the taking of breaks from EGM play.
- All approaches to patrons by staff where indicators of gambling harm are identified by staff are recorded in the Responsible Gambling Register.
- e) In line with its Gambling Harm Minimisation Policy the Hotel does not induce nor encourage a patron to:
- i. Withdraw money, or withdraw more money, from a cash facility (EFTPos): or
  - ii. Leave the Hotel to obtain money, or obtain more money, to enable that patron to play, or continue to play, a gaming machine.
- f) Notwithstanding e) above, this Hotel provides EFTPos signage and responds to patrons' queries about the location of EFTPos facilities when asked.

All staff must be aware of and strictly abide by these policies.

## 9.2 Encouraging Patron Breaks in Play

As stated throughout this Manual the Hotel is committed to minimise the potential for harm to occur from the playing of gaming machines. This includes staff actively interacting with patrons regularly to encourage patrons to take regular breaks from EGM play. This will take the form of announcements or face-to-face discussions and include:

- a) Information about the total hotel offer, including non-gaming activities;
- b) The promotion of light refreshments and bistro meal times (including the current time where this information is delivered by announcement); and
- c) Information about problem gambling support services including Gambler's Help.

To encourage breaks in play, food and beverage will be available to order at all times the gaming room is in operation. Patrons will be encouraged to consume these away from an EGM. The cashier's desk in the gaming room must not at any time be used for the sale, supply or service of food or drinks.

The Hotel offers the availability for patrons to order food and beverages at all times that the gaming room is in operation. Patrons who wish to order food and/or beverages will be directed to the bar to place and collect their order. During this interaction staff will encourage patrons to take a break away from the EGM to consume their order.

In the event of a patron with impaired mobility requesting food and/or beverages whilst seated at an EGM the request will be assessed on a case-by-case basis for food and beverage service at the EGM. Where this occurs, staff will record this event in the Responsible Gambling Register.

### 9.3. Inducements to Gamble

The Hotel does not offer any inducements to patrons to engage in gambling activities. This includes a strict policy to not:

- a) Offer a promotional prize in cash;
- b) Providing free EGM credits; and/or
- c) Offer any other form of incentive to play EGMs.

### 9.4. Signs of Distress and Unacceptable Behaviour

All staff members will be aware of the identity of the RGC and the RGO for each shift and a sign is displayed at the Cashier's station advising patrons that "A Responsible Gambling Officer is available for assistance at all times".

Any person, who approaches a staff member for information about gambling harm or problem gambling services, shows any signs of having a problem with their gambling or experiencing gambling harm must be directed to the RGO on duty for personal assistance and any necessary action.

Any patron displaying signs of distress or unacceptable behaviour will be approached by the RGC/RGO who will offer any assistance in a helpful manner and in strict confidence.

"Signs of Distress and Unacceptable behaviour includes (but is not limited to):

- Aggression
  - Hitting a machine/button with undue force;
  - Shouting at the machine or other people in the gaming room;
  - Abusing staff and/or other patrons; and
  - Behaving in a threatening manner.
- Emotion
  - Crying anywhere in the Hotel, including at an EGM;
  - Appearing extremely sad or depressed in the Hotel;
  - Sweating abnormally whilst playing an EGM;
  - Appearing very agitated in the Hotel; and
  - Continually complaining to staff.
- Withdrawn
  - Not responding to interaction by staff;

- Not responding to occurrences in the Hotel that would normally attract a Patron's attention;
- Avoiding contact with staff or other patrons
- Appearance
  - Attempting to wear a disguise in order not to be recognised; and
  - General reduction in hygiene/self-care over time.
- Intensive/extended gambling
  - Playing EGMS at the Hotel every day;
  - Playing EGMs continuously for more than 3 hours;
  - Rushing from one EGM to another;
  - Playing more than one EGM simultaneously; and
  - Not wanting to leave when the Hotel is closing.
- Asking for money to gamble
  - Asking staff for the loan of money (for any purpose);
  - Asking other patrons for the loan of money (for any purpose); and
  - Attempting to sell goods or services in the Hotel.

The process for interacting with such patrons includes measured assistance depending on case-by-case assessment by the RGC/RGO on duty although all identified behaviours will attract certain staff responses.

This interaction must take the form of:

1. Demonstrating concern and display respect for the patron.
2. Referring the patron to the supervisor/manager. Supervisor/manager approaches patron and does the following:
  - a) Discussing issue and asks if they would like to contact the Gambling Help service to make a free counselling appointment:
    - i. If the patron agrees, providing them with the contact details for the Gambling Help service and offer them the use of a phone and a quiet location within the venue. Supervisor/Manager advises the patron about their right to self-exclude from your venue.
    - ii. If the patron does not agree, provide the patron with contact details for the Gambling Help Service to take home with them. Supervisor/Manager advises the patron about their right to self-exclude from your venue.
  - b) Contacts with patrons by the RGO/RGC must be recorded in the RGR and include details of action taken by the RGC/RGO.
  - c) Details to be included in the RGR include:
    - i. the date and time of the matter;
    - ii. the name(s) of the staff member(s) involved;
    - iii. the name of the Patron involved (if available or appropriate);
    - iv. an outline or overview of the incident or matter;

- v. action taken by staff (e.g.: the provision of problem gambling support services / Self Exclusion information); and
  - vi. Date and time the entry was recorded in the RGR.
- d) The Hotel also complies with the laws and regulations regarding the responsible service of alcohol.

## 9.5 Patron Complaints

The Hotel subscribes to an Independent Complaints Resolution Process (ICRP).

The Hotel makes available to patrons' information about the ICRP including:

- how to make a complaint;
- the process for resolution of a complaint;
- the independent review of decisions made by the Hotel about member or visitor complaints;
- how information about complaints will be collected and retained; and
- how the Hotel will be assisted to monitor compliance with the complaints process.

A patron with a complaint about compliance with and/or the operation of this Manual should make it in writing directly to the Hotel management. The Hotel provides physical Complaint Forms at conspicuous locations around the Hotel and an electronic complaint form accessed through the Hotel's website.

All complaints will be checked by the Hotel manager to make sure it relates to the operation of this Manual. In any event, all recorded complaints will be available for perusal by police or the VGCCC.

Complaints will be investigated sensitively and resolved as soon as possible in the following way:

- all complaints will be acknowledged promptly;
- if it is decided not to investigate the complaint as it does not relate to the operation of this Plan, the Patron will be informed accordingly;
- during the investigation of the complaint, the Hotel's General Manager may seek information from the staff member/s concerned regarding the complaint;
- the General Manager will seek to establish whether the Patron has been treated reasonably and in accordance with the Plan;
- if the complaint is substantiated, the General Manager will detail the action that is to be taken to remedy the issue;
- the Patron will always be informed of the outcome of the complaint;
- complaint details will be maintained in the Responsible Gambling Policies and Procedures Folder and noted in the Responsible Gambling Register; and
- information about the complaints will be provided to VGCCC if requested.



If a complaint cannot be resolved at the Hotel level it will be put for resolution before the Institute of Arbitrators and Mediators Australia (IAMA). Either party involved in the complaint may contact the IAMA.

To initiate a complaint either party can go to IAMA's website ([www.iama.org.au](http://www.iama.org.au)), download a Dispute Resolver form, and then submit this completed form with the relevant fee to the IAMA.

Documentation regarding all complaints relating to the Plan must be maintained in the Responsible Gambling Policies and Procedures Folder, and noted in the Responsible Gambling Incident Register, for access by the VGCCC as required.

## 10. Prohibition of Gambling by Minors

Gambling by minors is strictly prohibited and minors, regardless of age (i.e. infants or toddlers) are not permitted to enter or remain in EGM gaming rooms at any time.

The Hotel ensures that signs are located at every entrance to the gaming room prohibiting all minors from entering the gaming room.

As all Hotel staff have the responsibility for seeking proof of age, the Hotel requires that front-of-house employees ask for verification of age if they are uncertain whether a patron or associated person in the Hotel is at least 18 years of age. Staff will conduct an ID check in the gaming room from time to time and record the checks in the RSG register.

For the purpose of verification of age, the following (current) original documents are acceptable:

- Proof of age card;
- Driver's licence;
- Driver's learners' permit; and/or
- Current Passport

If relevant verification of age cannot be produced, the patron will be required to leave the Hotel.

- ❖ **If a person is unable to provide adequate identification, he/she must be politely asked to leave and told that he/she is welcome at the Hotel when able to produce the satisfactory proof of identity required by law.**
- ❖ **In the event that an adult is identified as having a child in the gaming room, the adult must be approached and requested that they take the child out of the gaming room immediately. If they refuse, notify the Responsible Gambling Coordinator/Officer immediately.**
- ❖ **If, after the Responsible Gambling Coordinator/Officer intervention, the adult will not leave the gaming room with the child, then the police must be contacted.**
- ❖ **Details of the event must be recorded in the Hotel's Responsible Gambling Register.**

## 11. Unattended Children

It is unacceptable and **not tolerated** by the Hotel for children to be left unattended anywhere within the Hotel or outside the Hotel's entrances, including in the Hotel's car park. Children **anywhere** on the Hotel property must be supervised **at all times** by a responsible adult (not staff).

If an unattended/unsupervised child is detected anywhere on the Hotel property (whether by physical or CCTV observation), the Manager/Supervisor **must be notified immediately**. The Manager/Supervisor will endeavour to locate and identify the adult responsible for the child. When located, the adult will be warned that any future instance of the child being left unsupervised in the Hotel will result in the adult being barred from the Hotel.

In the event that an unattended/unsupervised child is detected outside any entrance to the Hotel, the child **must** be escorted to a safe location within the Hotel and the Manager/Supervisor notified immediately. The Manager/Supervisor will endeavour to locate and identify the adult responsible for the child. When located, the adult will be warned that any future instance of the child being left unsupervised outside the entrances to the Hotel will result in the adult being barred from the Hotel.

If the adult cannot be found the venue manager will contact the Police.

The Hotel staff will conduct regular checks of the car park to ensure no children are left in vehicles. Date, time and signature to be recorded in the check sheet held at the venue. **Appendix 5**

## 12. Machine Reservation

The Hotel has a gaming machine reservation policy designed to encourage patrons to have a break from EGM play and then resume playing on the machine of their choice.

A Patron may reserve a gaming machine at the Hotel for a maximum period of ten (10) minutes. To reserve the machine the Patron must place a "Reserved" sign over the screen on the machine.

During the ten-minute period, only the reserving Patron or a staff member may remove the "Reserved" sign. If the period of reservation exceeds ten minutes the sign may be removed by a staff member with or without a request from another Patron and the machine made available for play by other patrons. If there are credits remaining on the EGM the staff member must cash out and prepare the monies to be registered in unpaid monies system.

The Hotel does not allow patrons to play more than one gaming machine at a time. A Patron who is observed to either be playing more than one machine consecutively or has reserved one machine to play on another one, will be approached and informed of this policy.

If the patron refuses to comply they will be asked to leave.

## 13. Interaction with Hotel Staff

### 13.1. Employee Gambling Policy

The Hotel's responsibility is to ensure the safety of all employees and to maintain the integrity of the gambling products provided at the Hotel.

Staff at the Hotel are **not permitted** to engage in any gambling activities at the Hotel **at any time**.

Any staff member who indicates to another staff member or directly to the RGC/RGO that he/she may have a gambling problem will be provided with full counselling support and gambling harm information by the Hotel operator in a confidential manner. In determining what action is appropriate in any situation involving a staff member, the Hotel will ensure that every attempt is made to be discreet, and to draw as little attention as possible to the situation and to the staff member. The staff member will be encouraged to pursue non-gambling related duties wherever available in the Hotel.

Action taken in accordance with this clause will be recorded on the staff member's employment file, and **not** in the Responsible Gambling Incident Register.

Information about responsible gambling and gambling harm support services is included in the induction package/staff handbook provided to all employees on commencement of employment with the Hotel.

If the Hotel adopts a different policy to that set out above the Hotel must advise the VGCCC in writing of the policy change.

### 13.2 Responsible Gambling Staff Training

All gaming room staff are legally required to complete the approved Responsible Service of Alcohol (RSA) Course prior to commencing employment at the Hotel and Responsible Service of Gaming (RSG) Course Module 1 within three (3) months of commencing employment at the Hotel. Gaming room staff are also required to complete the RSG Module 2 within six (6) months of commencing employment at the Hotel.

The Hotel also requires **all** front-of-house staff to hold the RSA/RSG qualification.

The Hotel is committed to ensuring that all relevant staff have policies and procedures communicated to them, promoting Patron care, responsible gambling, and potential harm from gambling at the Hotel.

The Hotel also provides additional training for staff on a range of issues, including in Patron care and communication skills. This training is conducted by trainers who specialize in these areas.

Advanced Harm minimisation staff training.

The venue operator will seek the assistance of the venue support worker to find appropriate advanced staff training in identifying and managing patrons

who may show signs of gambling harm. This training would be over and above the current VGCCC RSG training modules.

The venue operator will keep a record of what, who and when training was completed.

### 13.3 Staff Meetings

The Venue / venue operator convenes regular, monthly meetings of staff who participate in EGM monitoring, for review of:

- o RG Register records identifying problematic gambling incidents in the venue
- o the status of any 'regular patrons' who have been the subject of monitoring or intervention action in previous periods
- o any EGMs, games, jackpots, layout positions, ATM or EFTPOS facilities or other factors in the venue associated with RG Register entries
- o patrons who play venue EGMs regularly but who have not subscribed to YourPlay; or who have subscribed to YourPlay with prima-facie inappropriate settings (eg inappropriate time or spend limits)
- o intervention actions taken in the previous period
- o intervention actions which are 'working,' and which are 'not working'
- o intervention action responses which may be appropriate for any person who has been approached but has declined offered help

## 14. The Gambling Environment – “Passage of Time”

Clocks showing the accurate time are in all major areas of the Hotel so patrons will be aware of the passage of time. Clocks showing the accurate time are also visible on the electronic display of every EGM.

Staff routinely mention the time when making announcements about the Hotel activities.

Patrons are encouraged to take regular breaks from gaming machine play. This encouragement will take the form of an announcement on the Hotel's public address system and include:

- a) Announcing that morning tea/lunch/dinner is now available;
- b) Announcing a promotional draw; and/or
- c) Announcing the commencement of other non-gaming related Patron activities within the Hotel.

Hotel staff will also monitor the activities of patrons and interact as appropriate to discourage patrons from engaging in extended and intensive gambling. This interaction will take the form of casual dialogue consistent with general hospitality initiated by staff towards patrons, for example, relating to the availability of food and/or beverages at the Hotel.

Venue policy requires a staff member to approach a patron if they have been playing machines for 3 hours or more without a break. The staff member will advise the patron of the policy and direct them to a sign in the gaming room. (see appendix 4)

## 15. Payment of Winnings

The Hotel does not cash cheques. If a patron seeks to cash a cheque, the staff member will advise the patron that the Hotel does not cash cheques.

By law in Victoria, payment of winnings or accumulated credits on an EGM of \$ 2,000 or more must be paid in full by cheque not made payable to "Cash" and marked "Not Negotiable" or by electronic funds transfer (EFT) such that the money is not available for at least 24 hours after the payment is made.

Patrons may request that winnings and/or accumulated credits of less than \$2,000 from gaming machines, and winnings and/or credits from other gambling products to be paid by cheque or EFT.

The Hotel maintains a prize payment register to record the payment of significant prizes on gambling products, including, but not limited to, cheque or EFT payments of \$2,000 or more. The prize payment register will be in the gaming room and be made available to VGCCC inspectors upon request.

Entries in the prize payment register may be subject to the *Privacy Act 1988* and the Hotel will comply with the Australian Privacy Principles with respect to the prize payment register.

The provision of access to electronic gaming machines and wagering is subject to the federal *Anti Money Laundering and Counter Terrorism Financing (AML/CTF) Act 2006*. The Hotel has adopted an AML/CTF Program and ensures that all financial transactions comply with the Program

The Hotel displays information regarding the Hotel's policy on the cashing of cheques and how patrons may have winnings paid by cheque.

The staff are encouraged to offer patrons of winnings / accumulated credits of \$ 1,000 or more to take the payout in the form of a cheque / EFT transfer.

## 16. Responsible Advertising and Promotions

All gambling-related signage displayed at the Hotel is consistent with the *Gambling Regulations (Signage) Regulations 2012*.

A monitor such as a large plasma or LCD screen used to display the jackpot for a linked gaming system or a progressive system is considered a gaming related sign. No such sign is located outside or close to the venue or anywhere inside the venue such that it can be seen from outside.

The Hotel does not publish any gaming machine advertising. This includes any advertising that gives publicity to or promotes participation in gambling activities involving gaming machines. This means that no advertising can take place on the radio, in the cinema, by video, on television, on any written advertising via the internet or other promotion, any advertising that appears in a gaming machine industry trade journal or in a publication for a trade convention involving gaming machines.

No details of gaming machine prize winners are advertised outside The Hotel



Further, the Hotel does not conduct promotions related to gambling.

Responsible Gambling related advertising within the venue will include Gamblers Help messages including the Gamblers Help 1800 858 858 and/or gamblershelp .com.au

## **17. Review of Harm Minimisation Policy and Procedures Manual**

The venue will ensure the Harm Minimisation Policy is reviewed annually by a suitably qualified gambling harm advisor, to identify any improvements and changes in industry and gambling help practices.

The results of these reviews will be documented. Any identified changes will be addressed immediately, with corrective actions documented and implemented.

## Appendix 1

### Responsible Gambling Coordinator and Officer Duties

It is a requirement of the Hotel's Responsible Gambling Code of Conduct that a Responsible Gambling Officer (RGO) be designated for any time that the Hotel is open for gaming and available in the gaming room. All staff must be aware of the designated RGO for any shift and the RGO must be aware of his/her duties and be available in the gaming machine area at all times gaming machines are available for gaming as per Ministerial Direction 1 March 2020.

The Hotel also has a primary Responsible Gambling Coordinator (RGC) who has oversight of the Hotel's Responsible Gambling/Patron Care/Gambling Harm Program.

The duties of the RGC include, but are not be limited to:

1. Ensuring that all staff are aware of and have read the Hotel's Responsible Gambling Code of Conduct;
2. Ensuring that all staff are aware of and have read the Hotel's Self-Exclusion Program Procedures (available in the Responsible Gambling Register);
3. Ensuring a process is in place to have the Responsible Gambling Point-of-Sale checklist monitored;
4. Checking that all such interactions have been recorded into the RGR;
5. Ensure that all necessary entries are recorded correctly in the RGR; and
5. Liaise with the Hotel's Self-exclusion Program provider where necessary to maintain compliance with the Program's requirements.

The duties of the RGO include, but are not be limited to:

1. Monitoring the gaming machine area and ensure compliance with the Act, regulations and the Hotel's Gaming Policy and Procedures Manual;
2. Ensuring that staff record responsible gambling incidents and interventions in the Responsible Gambling Incident Register;
3. Observing patrons who display behaviour that is consistent with gambling harm and provide assistance as necessary;
4. Providing advice to staff about gambling harm and how to respond to signs of gambling harm;
5. Responding to patron enquiries and complaints about the supply of gambling in the Hotel;
6. Ensuring that all relevant staff look over the collection of photos of the Hotel's self-excluded patrons during every work shift. This is necessary as new self-excluded patrons may be added at any time;
7. Interacting with patrons who self-identify as having problem gambling/gambling harm issues as outlined in the Hotel's Gaming Policy and Procedures Manual;
8. Interacting with any Patron displaying unacceptable behaviour as outlined in the Hotel's Gaming Policy and Procedures Manual;
9. Interacting with self-excluded patrons who are detected breaching their Self-exclusion Deeds;
10. Ensuring that all relevant staff record responsible/problem gambling interactions in the Responsible Gambling Incident Register; and

11. Ensuring that all relevant staff record detected breaches of self-exclusion in the Responsible Gambling Register and file a report with the Hotel's Self-exclusion Operator.

## Appendix 2

## Responsible Gambling Regulatory/Code of Conduct Requirements List

Item	Description	Mandatory/Recommended
<b>Responsible Gambling Register</b>	<p>A Responsible Gambling Register is required to be located <b>in the gaming room</b> (preferably at the cashier's station). The register must include details of:</p> <ul style="list-style-type: none"> <li>• Hotel contacts with Gambler's Help services;</li> <li>• Patron Care incidents that may have been gambling harm related, including Patron breaches of the Self-exclusion program;</li> <li>• Instances of strong Patron care/responsible gambling practices by hotel staff;</li> <li>• Patron Care/Responsible Gambling professional development sessions for staff;</li> </ul> <p>and Patron and staff complaints against the operation of the Plan at the Hotel.</p>	Mandatory
<b>Responsible Gambling Message Sign/ display</b>	<p>Display of the printed statement of the Hotel's commitment to responsible gambling "Responsible Gambling Message" (refer to Section 3).</p> <p>The sign must be displayed at the <b>entrance to the gaming room and/or at the cashier's station</b>.</p>	Mandatory
<b>Responsible Gambling Officer sign</b>	<p><b>"A Responsible Gambling Officer is available for assistance at all times"</b> sign must be displayed at the cashier's station. (<b>Appendix 2, #12</b>).</p>	Mandatory
<b>"Plan Available on Request" sign</b>	<p>A sign stating the Plan is available upon request to be displayed at <b>gaming room entrance or cashier's station</b>.</p>	Mandatory
<b>Copy of Plan Available</b>	<p>A written copy of the Plans, including copies in major community languages must be available for patrons if requested – <b>preferably at cashier's station</b>.</p>	Mandatory
<b>Plan Available on Website</b>	<p>Where a Hotel has a website the Plans, including in major community languages, must be displayed on the website or links to the website where the Plans can be accessed must be available on the Hotel's website.</p>	Mandatory

<b>“Playing the Pokies – Know the Facts” brochures</b>	The brochures must be displayed <b>at the cashier’s station (minimum quantity being 20)</b> . The number of brochures available around the gaming room <b>must be at least equal to the number of gaming machines in the gaming room (Appendix 2, #1)</b>	Mandatory
<b>YourPlay Brochures Available</b>	Purple, Blue and Green YourPlay brochures must be displayed <b>at the cashier’s station (minimum quantity being 20)</b> . The number of brochures available around the gaming room <b>must be at least equal to the number of gaming machines in the gaming room (Appendix 2)</b> .	Mandatory
<b>Responsible Gambling Posters</b>	Responsible Gambling Your Play posters (Framed A2) must be <b>displayed in gaming room at a ratio of 1 poster per 15 machines or part thereof</b> . Posters must be placed such that a poster is visible by a person seated at any machine in the gaming room <b>(Appendix 2)</b> .	Mandatory
<b>Casual YourPlay Player Cards</b>	Casual YourPlay player cards must be displayed <b>at the cashier’s station (minimum quantity being 20)</b> . The number of cards available around the gaming room <b>must be at least equal to the number of gaming machines in the gaming room</b> .	Mandatory
<b>Responsible Gambling YOURPLAY A2 Poster</b>	A responsible gambling YourPlay A2 poster must be <b>displayed outside each internal entrance to the gaming room (Appendix 2, #4)</b> .	Mandatory
<b>Responsible Gambling Machine YOURPLAY A5 Green &amp; Blue Talkers</b>	Every gaming machine in operation must display a Responsible Gambling YourPlay machine talker, in even quantities of blue & green <b>(Appendix 2)</b> .	Mandatory
<b>YourPlay Function Operational on EGMs</b>	The YourPlay functionality <b>must be operational on each EGM that is available for game play</b> .	Mandatory
<b>Player Information brochures</b>	Player Information brochures <b>must be displayed in the gaming room (Appendix 2)</b> .	Mandatory
<b>Gamblers Help brochures</b>	Brochures promoting the availability of Gamblers Help support services must be displayed in the Hotel <b>(preferably in the gaming room) (Appendix 2)</b> .	Mandatory
<b>“Payment of Winnings Policy” sign</b>	A sign stating that “All winnings or accumulated credits of \$2,000 or more must be paid in full by cheque” <b>must be displayed in the gaming room (preferably at the cashier’s station) (Appendix 2)</b> .	Mandatory



<b>Budgeting &amp; Responsible Gambling Information</b>	<p>A sign referring patrons to the federal government's MONEYSMART <a href="http://www.moneysmart.gov.au">www.moneysmart.gov.au</a></p> <p>and the Victorian Government's Responsible Gambling <a href="http://www.responsiblegambling.vic.gov.au">www.responsiblegambling.vic.gov.au</a></p> <p>websites must be displayed in the gaming room.</p> <p>If a Hotel has a website, the above website links must also be displayed &amp; connecting. <b>(Appendix 2, #10)</b></p>	Mandatory
<b>"Conditions of Play" Poster</b>	An EGM "Conditions of Play" poster should be displayed at a place in the gaming room where it can be read by patrons.	Recommended
<b>"Prohibition on the Provision of credit for Gambling" sign</b>	A sign stating that the Hotel's provision of credit to a Patron for gambling is prohibited must be displayed in the gaming room. <b>(Appendix 2).</b>	Mandatory
<b>Self-exclusion Information brochures</b>	Brochures about the Hotel's self-exclusion program <b>must be displayed in the Hotel (preferably in the gaming room). (Appendix 2).</b>	Mandatory
<b>Self-exclusion Incidents</b>	All Self-exclusion incidents are required to be documented in the Hotel's Responsible Gambling Register, which is required to be located <b>in the gaming room</b> (preferably at the cashier's station). This register must include details of all detected breaches of self-exclusion by patrons self-excluded from the Hotel and the action taken by staff following detection of the breach.	Mandatory
<b>Player Information Displays (PIDS)</b>	Player Information Displays on EGMs (accessed by pushing the "I" button) must be accessible. These should be checked regularly. <b>(Appendix 2).</b>	Mandatory
<b>"Gambling by Minors Prohibited" signage</b>	Signage stating that "Gambling by Minors is prohibited. It is illegal for a person under 18 years of age to enter or remain in a gaming room and/or to play a gaming machine" must be located <b>at every internal entrance to the gaming room. The signage must be fixed so that it cannot be easily moved/removed.</b>	Mandatory
<b>"Constant Video Surveillance" sign</b>	Signage stating that the area is under constant video surveillance must be displayed at every internal entrance to the gaming room as well as at every entrance to the Hotel.	Mandatory
<b>VGCCC Rules Available</b>	A sign stating that the Victorian Gaming and Casino Control Regulation Rules are available for inspection upon request must be located <b>at the cashier's station in the gaming room.</b>	Mandatory

OFFICIAL

<b>Reservation of Gaming Machine Policy</b>	A sign stating the Hotel's Machine Reservation Policy to be displayed in the gaming room. <b>(Appendix 2).</b>	Recommended
<b>Responsible Gambling A4 Poster and Business Cards</b>	A Responsible gambling A4 poster and business cards should be in <b>the toilets nearest the gaming room.</b>	Recommended
<b>Gambler's Anonymous Poster</b>	A Gambler's Anonymous poster should be displayed <b>at a convenient location in the Hotel.</b>	Recommended
<b>Child Safety Stickers</b>	Child Safety Stickers should be positioned <b>at all external entrances through which patrons can gain entry to the gaming room.</b>	Recommended
<b>Child Safety Signs</b>	Child Safety Signs should be <b>prominently positioned in all car parks owned or controlled by the Hotel.</b>	Recommended
<b>RSG Training Certificates</b>	Any person with regular duties in the gaming room <b><u>must</u> have a current Responsible Service of Gaming (RSG) certificate and the Hotel must be able to produce it upon request by the VGCCC.</b>	Mandatory

## Appendix 3

# Responsible Gambling Materials Information

## (1) Playing The Pokies- Know the Facts



## (2) Your Play Brochures



**(3) Player Information Display Brochures**



**(4) A2 Your Play Poster and A5 Machine Talkers**



**(5) Gamblers Help support services Brochure**



**(6) Payment of Winnings**

By law, all winnings, or accumulated credits of \$2,000 or more,  
must be paid in full by cheque that is not made out to cash.  
These winnings cannot be provided as machine credits.

This Hotel recommends winnings greater than \$300 be paid by cheque.

## (7) Prohibition on the Provision of Credit for Gambling Purposes

The *Gambling Regulation Act 2003*

prohibits this Hotel from  
providing credit to patrons for  
playing gaming machines.

## (8) Self-exclusion Program



## (9) Reservation of Gaming Machine Policy

### **Reservation of Gaming Machine Policy**

This Hotel allows a patron to “reserve” a gaming machine for a period of 10 minutes by placing a “Reserved” sign over the screen of the machine.

During the 10-minute period, only the person who reserved the machine, or a staff member, may remove the Reserved sign and make the machine available for play by another person.

This Hotel does not permit the reservation of a gaming machine to allow the person to play another gaming machine during the period of reservation.

For further information on our “Reservation” Policy, please ask the Manager on duty.

## (10) MoneySmart & Responsible Gambling cashier’s & website information links

**As part of our commitment to responsible gambling, this Hotel provides patrons with further information regarding responsible gambling, including:**

**\*How to access the Commonwealth Government’s website “MoneySmart” –**

**[www.moneysmart.gov.au](http://www.moneysmart.gov.au)**



**\*How gamblers and their families or friends can find gambling support services and self-exclusion programs and the Victorian Government's Responsible Gambling website – [www.responsiblegambling.vic.gov.au](http://www.responsiblegambling.vic.gov.au)**

## (11) Player Information Display

The rules for each Electronic Gaming Machine (EGM) game, including the chances of winning, are available by going to the Player Information Display (PID) screens on each gaming machine.

Patrons should be shown how to access the PID screens and to view the information and/or be given the Player Information Display (PID) brochure, available within the gaming room.



## (12) Responsible Gambling Officer Available

**A Responsible  
Gambling Officer is  
available for assistance  
at all times**

LEIGH BARRETT  
ASSOCIATES

## Appendix 4

***Throughout a visit to Dorset Gardens Hotel gaming machine area, we will check in on you from time to time.***

***Breaks in play are encouraged and if your visit spans 3 hours, we will ask you to take a 15-minute break.***

## Appendix 5

<b>Dorset Gardens Hotel – Harm Minimisation Policy and Procedures</b>			
<b>Car Park Check</b>		<b>Week Commencing      /      /</b>	
<b>Day</b>	<b>Time</b>	<b>Name</b>	<b>Signature</b>
<b>Monday</b>			
<b>Tuesday</b>			
<b>Wednesday</b>			
<b>Thursday</b>			
<b>Friday</b>			
<b>Saturday</b>			
<b>Sunday</b>			

## Appendix 6

### Gambler's Help Contacts:

- Venue Support Worker- [REDACTED]  
Email: [REDACTED]  
*(RSG training, RGO/Manager Meetings, Code of Conduct and Gambling Harm Information)*
- Local Support Services: 9575 5333  
*(Local Gambler's Help Counselling Services)*
- National Hotline: 1800 858 858  
*(National Gambler's Help Counselling Services 24hrs)*

### Self-Exclusion Contacts:

- AHA- [REDACTED] [self.exclusion@ahavic.com](mailto:self.exclusion@ahavic.com)  
[www.ahavic.com.au](http://www.ahavic.com.au)
- CCV- [REDACTED] [REDACTED] [www.clubsvic.org](http://www.clubsvic.org)

### YourPlay Contacts:

- Ron Prasad- [REDACTED]  
Help Desk Phone: 1300 838 031  
Help Desk Email:  
[YourPlay@justice.vic.gov.au](mailto:YourPlay@justice.vic.gov.au)
- YourPlay advanced training  
*(scan code)*



## **ANNEXURE 5**

### **Set of conditions**

## **Condition 1 – Risk Assessment and Risk Register**

- 1.1 **Not required as it has already been done and will be implemented as soon as finalised.**

## **Condition 2 – Compliance with Risk Register**

- 2.1 No later than 12 month after the installation of the extra machines and every 12 months after that date, the VO must provide a written attestation to the Commission confirming the following
- 2.1.1 that the VO has made all necessary enquiries to be satisfied that all the identified practices and controls have been, and continue to be, implemented; and
- 2.1.2 that the VO has reviewed the Risk Register to ensure that any new risks or changes to risks have been identified and that the Risk Register has been updated to ensure the treatments and controls are effective to address those risks.
- 2.2 The written attestation must be made by an officer of the VO.

## **Condition 3 – Compliance with other obligations**

- 3.1 At all times any of the Additional EGMs are in operation at the Premises, the VO must ensure that:
- 3.1.1 the service of food and beverage to patrons whilst seated at any EGM at the Premises will not occur;
- 3.1.2 Minimum staffing levels are maintained as follows:
- 3.1.2.1 From 10:00 AM until 1:00 AM the following day, a minimum of 2 staff on duty in the gaming room;
- 3.1.2.2 From 10:00 AM until 10:00 PM, a minimum of 1 responsible gambling officer (**RGO**) on duty in the gaming room at all times the gaming room is operational;
- 3.1.2.3 After 10:00 PM until close of the Hotel, a minimum of 2 RGOs on duty in the gaming room at all times the gaming room is operational; and
- 3.1.2.4 A person aged over 18 years who is appropriately qualified and trained as manager in charge of the hotel operations at the Premises.
- 3.1.3 All staff rostered in the gaming room are trained in YourPlay and able to assist patrons to enrol with YourPlay and set pre-commitment levels for EGM time and spend;
- RGO will coordinate the venue's self-exclusion program, and implement harm minimisation training for staff. The RGO must have completed Victorian



Government Responsible Service of Gaming (**RSG**) Module 2 and Module 4 within the last 2 years;

- 3.1.4 RGO will coordinate the venue's self-exclusion program, and implement harm minimisation training for staff. The RGO must have completed Victorian Government Responsible Service of Gaming (RSG) Module 2 and Module 4 within the last 2 years;
- 3.1.5 At all times the gaming room is in operation, at least 1 staff member who has completed RSG Module 2 and Module 4 training is on duty;
- 3.1.6 Staff are prohibited from using EGMs at the Premises at any time;
- 3.1.7 Patrons are prohibited from reserving an EGM in order to use another EGM;
- 3.1.8 Patrons are prohibited from reserving an EGM for longer than 10 minutes;
- 3.1.9 EGMs are prohibited from being in use between 4 AM and 10 AM on any day;
- 3.1.10 All officer holders of the VO have completed RSG Modules 1 and 2 training within 60 days of their appointment or prior to commencement of the operation of any EGMs at the Premises (whichever is the earlier).
- 3.2 No later than 12 month following the installation of any EGMs at the Premises and every 12 months after that date, the VO must provide a written attestation to the Commission confirming that they have made all necessary enquiries to be satisfied that the requirements in 3.1 are being complied with. The written attestation is to be made by an office holder of the VO.
- 3.3 The written attestation must specify each of the systems, policies and procedures that have been developed and implemented to ensure continued compliance with each of the requirements in Condition 3.

#### **Condition 4 – Risk of criminal influence**

- 4.1 Prior to the installation of any EGMs at the Premises, the VO must ensure that:
  - 4.1.1 all office holders of the VO, the nominee, managers and all gaming room staff have completed Anti-Money Laundering (AML) and Counter Terrorism Finance (CTF) Training within the last 12 months;
  - 4.1.2 adequate systems, policies and procedures have been developed and implemented at the Premises to ensure all staff are appropriately trained in identifying and mitigating this risk.
- 4.2 Every 12 months after the installation of any EGMs at the Premises, the VO must provide a written attestation to the Commission confirming that they have made all necessary enquiries to be satisfied that the requirements in 4.1 above are being complied with. The written attestation is to be made by an office holder of the VO.

#### **Condition 5 – Works**

- 5.1 The Works at the Premises as defined in condition 5.2 must be substantially completed to the satisfaction of the Victorian Gambling and Casino Control Commission (Commission) by the date that is 36 months after the commencement of the operation of any of the Additional EGMs at the Premises

- 5.2 For the purposes of this clause, the Works must be generally in accordance with the plans prepared.
- 5.2.1 Installation of screening to reduce visibility of the machines in the Hotel lobby / Foyer
- 5.3 If the Works referred to in condition 5.2 are not substantially completed by the date that is 36 months after the commencement of the operation of any of the Additional EGMs at the Premises, the operation of the Additional EGMs must cease immediately until the Commission is provided with the required written confirmation.
- 5.4 The Commission may, on the request of the Venue Operator, agree to extend the time for completion of the Works referred to in condition 5.2. The request must be made no later than the date that is 30 months after the commencement of the operation of any of the Additional EGMs. Any request for an extension of time must include an explanation as to why the Works have not been substantially completed.
- 5.5 If the Commission agrees to extend the time for completion of the Works in accordance with condition 5.4, the Commission may require that any of the Additional EGMs cease operation during the period of any extension of time granted by the Commission.

#### **Condition 6 – Community Benefit**

- 6.1 The Venue Operator will maintain annual contributions with a total value of \$30,000 for as long as any of the Additional EGMs are in operation at the Premises (**the Contribution**).
- 6.2 The Contribution will be allocated as follows:
- 6.2.1 the contributions will be made as follow
1. \$20,000 cash donations to community associations selected by the VO.
  2. \$10, 000 spent on the maintenance and ownership of a courtesy Bus and driver to be used by customers, associated clubs of the Venue or any other association or club that may ask for assistance and the supply of in kind vouchers to be used by any association, club or community group at the discretion of the VO
- 6.6 If any part of the Contribution remains undistributed at the end of each reporting period, the VO must cease the operation of all Additional EGMs at the Premises for as long as the Contribution remains outstanding.
- 6.7 The VO must provide to the Commission evidence of payment of the Contribution annually from the date of installation of the Additional EGMs in the Premises.

#### **Condition 7 – Breach of conditions**

- 7.1 Where the Commission determines that the VO has not complied with one or more of the conditions, the Commission may require the VO to cease operating any EGMs at the Premises until it is satisfied that:
- 7.1.1 such failure is rectified to the satisfaction of the Commission; and
- 7.1.2 the VO has carried out the relevant and necessary action and/or implemented the relevant and necessary systems, processes and procedures to prevent the occurrence of a future breach.

