
HARM MINIMISATION AND CODE OF CONDUCT POLICIES AND PROCEDURES

CLUB OFFICER

January 2026

Club Officer commits that breaches by venue staff of the Harm Minimisation and Code of Conduct Policies and Procedures document will be recorded in a separate register.

This register will be completed and reviewed by Venue Management and any performance issues identified, addressed via Club Officers HR policies.

This register will be made available to the VGCCC upon request.

1. Responsible Gambling Message

A venue operator has a duty to take all reasonable steps to prevent and minimise harm from the operation of gaming machines in the approved venue, including monitoring the welfare of gaming machine players, discouraging intensive and prolonged gaming machine play and intervening when a person is displaying behaviour that is consistent with gambling harm.

Our Policy describes how we do this and continue to provide gambling services in a socially rewarding, enjoyable and responsive manner.

This document will be made available in written or electronic form to patrons upon request. A sign advising patrons of how to obtain a copy of the Code of Conduct will be displayed at the gaming room entrance and/or the cashier's station in the gaming room.

The Code of Conduct is also be available on Club Officer's website in English and multiple community languages.

Club Officer ensures that the Responsible Gambling Register is made readily available to any authorised person or a VGCCC inspector upon request.

Club Officer provides the highest standards of customer care and responsible service of gambling to all our patrons and displays the following responsible gambling message at the cashier's desk/station and/or entrance to the gaming room so that it is clearly visible wherever Club Officer provides electronic gaming machine (EGM) products:

Club Officer is committed to the wellbeing of its patrons, employees and the wider community in which it operates. It strives to deliver all its services in a responsible and sustainable manner providing the means for our patrons to have informed choices and to exercise a rational and sensible informed choice based on their personal and individual circumstances. As part of this commitment, Club Officer has adopted a comprehensive Responsible Gambling Code of Conduct and a Self-Exclusion Program, and will provide the necessary resources, both financial and human, to support the proper operation and fulfilment of the Code at these premises.

2. Interaction with customers – communications with gamblers

2.1 Club Officer ensures that communications with Patrons do 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.

Gambling Product Information

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 the EGM.

All gaming staff must be able to show a patron how to access the PID screens and explain their contents on each screen.

Gaming staff should use the PID screen to respond to customer complaints that an EGM is "rigged" or "not paying out".

- 2.2 Club Officer takes reasonable steps to ensure that communications with customer discourage intensive and prolonged gaming machine play.
- 2.3 With the exception of EFTPOS signage, Club Officer does not induce a customer to:
 - (a) Withdraw money, or withdraw more money, from a cash facility, or
 - (b) Leave Club Officer to obtain money, or obtain more money, to enable that customer to play, or to continue to play, a gaming machine.
- 2.4 Club Officer 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 Club Officer takes all reasonable steps to ensure the gaming machine area and entrances to the gaming machine area are monitored at all times when gaming machines are available for play.

*Club Officer has adopted an approved Self-exclusion Program. During each shift gaming room/wagering staff **must** view the photographs of customers who have self-excluded from Club Officer's gaming room or TAB/Sportsbar.*

*If a patron asks about Club Officer'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 on the RGR*

*Club Officer will refer to **Appendix B** for the process to deal with Self-excluded detected in Club Officer's gaming room.*

- 3.2 Club Officer takes all reasonable steps to ensure that Patrons in the gaming machine area are regularly observed to monitor behaviour that is consistent with gambling harm.
- 3.3 Club Officer does not encourage or induce a customer to engage in intensive or prolonged gaming machine play.
- 3.4 The Responsible Gambling Officer 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 The Responsible Gambling Officer 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 The Responsible Gambling Officer is expected to 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.

Club Officer commits a minimum staffing level on the gaming floor will be no less than two GIE licensed staff within the Green Line Plan area at all times.

A minimum of one Responsible Gambling Officer will be allocated to regularly roam and monitor the gaming machine area, engaging with and assisting patrons as required.

4. Gaming Venue Staff

- 4.1 All staff at Club Officer are not permitted to play an EGM at any time.
- 4.2 Club Officer provides information to staff so that they are aware of their increased risk of harm from gambling.

Club Officer commits that any venue staff who complete duties associated with gaming machines and/or membership must complete annual YourPlay training as provided by the Department of Justice and Community Safety (DJCS).

Additional annual gaming attendant training may also be determined as required to enhance skills and knowledge in other gaming related topics such as Responsible Gambling Officer and Code of Conduct Training.

5. Interaction with Gamblers Help Support Services

- 5.1 Club Officer will ensure that staff who have day-to-day Management of the operation of Club Officer and Responsible Gambling Officer's meet, with Club Officer's nominated Venue Support Worker at least once every six months.

6. The Gambling Environment

- 6.1 Club Officer does not encourage a customer to play multiple gaming machines simultaneously.
- 6.2 Club Officer takes 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, Club Officer ensures that a customer can order and be served food and beverage without having to enter the gaming machine area.
- 6.4 Club Officer will not 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.

Club Officer commits that it will not under any circumstances supply food or beverage to any patron, seated or standing at, or playing an EGM. The patron will be notified to collect the food or beverage from a designated area away from the gaming machine. This indicates a clear break in play.

7. Responsible Gambling Officer

- 7.1 Responsible Gambling Officers have been appointed at Club Officer.
- 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 Club Officer displays prominently in the gaming machine area a notice advising that a Responsible Gambling Officer is available for assistance at all times.
- 7.4 Club Officer's Responsible Gambling Officers 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 Patrons 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 venue.
- 7.5 Club Officer's Responsible Gambling Officer may be required to attend additional training.

*A Responsible Gambling Officer Duties can be located in **Appendix A***

Further Responsible Gambling information

Club Officer provides patrons with further information regarding responsible gambling, including:

- a. How to access the Commonwealth Government's website 'Money Smart' www.moneysmart.gov.au (or similar government household budgeting website); and
- b. How gamblers and their families or friends can find gambling support services and self-exclusion programs and the State Government's responsible and problem gambling support website www.gamblershelp.com.au

8. Responsible Gambling Register

- 8.1 Club Officer 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 Club Officer 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 Club Officer will provide a copy of the responsible gambling register to the Victorian Gambling and Casino Control Commission on request.
- 8.4 Club Officer 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.

Definitions

-
- "Code" means this specific Responsible Gambling Code of Conduct
 - "Customer" means members and visitors of Club Officer.
 - "EGM" means electronic gaming machine.
 - "Management" means the management of Club Officer
 - "Patrons" means customers, members and visitors of Club Officer.
 - "Responsible Gambling Register" means the register maintained by Club Officer in which Club Officer records the information required under the Code.
 - "Responsible Gambling Officer" means the person responsible for the administration of the Code at Club Officer at any time.

Preparation of the Code and Code Policy and Procedures

The Harm Minimisation and Code of Conduct Policies and Procedures document, has been prepared on our behalf by Leigh Barrett & Associates Pty Ltd and has been made readily available for adoption and integration into our gaming business operations. It is a straightforward document and has been written in such a manner as to enable a ready understanding by our patrons and a simple interpretation and explanation by and for our staff. It has been written in plain English and presented in such a way as to be accessible to all our patrons, including those from culturally and linguistically diverse backgrounds.

Appendix A

Responsible Gambling Officer Duties

It is a requirement of Club Officer's Harm Minimisation and Code of Conduct Policies and Procedures a minimum of two Responsible Gambling Officers (RGO) be designated for any time that Club Officer is open for gaming. All staff must be aware of the designated RGO's for any shift and the RGO's must be aware of his/her duties.

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

1. Ensuring that they are aware of and have read Club Officer's Responsible Gambling Code of Conduct;
2. Ensuring that they are aware of and have read Club Officer's Self-exclusion Program Procedures;
3. Liaise with Club Officer's Self-exclusion Program provider where necessary to maintain compliance with the Program's requirements.
4. Monitoring the gaming machine area and ensure compliance with the Act, regulations and the Harm Minimisation and Code of Conduct Policies and Procedures.
5. Ensuring they record responsible gambling incidents and interventions in the Responsible Gambling Register;
6. Observing customers who display behaviour that is consistent with gambling harm and provide assistance as necessary;
7. Providing advice to new RGO's about gambling harm and how to respond to signs of gambling harm;
8. Responding to patron enquiries and complaints about the supply of gambling in Club Officer;
9. Ensuring that all relevant staff review Club Officer's self-excluded customers during every work shift. This is necessary as new self-excluded customers may be added at any time; this includes the use of Facial Recognition Technology.
10. Interacting with customers who self-identify as having problem gambling issues as outlined in Club Officer's Harm Minimisation and Code of Conduct Policies and Procedures;
11. Interacting with any customer displaying unacceptable behaviour as outlined in Club Officer's Harm Minimisation and Code of Conduct Policies and Procedures;
12. Interacting with self-excluded customers who are detected breaching their Self-exclusion Deeds;
13. Ensuring that all relevant staff record responsible/problem gambling incidents in the Responsible Gambling Register; and
14. Ensuring that all relevant staff record detected breaches of self-exclusion in the Responsible Gambling Register and file a report with Club Officer's Self-exclusion Program.

Appendix B

Self-exclusion Program

Club Officer has adopted an approved Self-exclusion Program and has installed Facial Recognition Technology to assist in identifying and monitoring self excluded patrons, within Club Officer.

In the event that a self-excluded customer is detected in the gaming room, (either by a gaming attendant or facial recognition technology) the following procedure applies:

- The customer is approached by the Responsible Gambling Officer who discreetly asks for identification to verify the identity of the customer;
- If the customer is identified as being currently self-excluded from Club Officer's gaming room, he/she is quietly requested to leave the gaming room;
- When the customer leaves the gaming room Responsible Gambling Officer records the interaction and breach in Club Officer's Responsible Gambling Register; and
- The Self-exclusion Program is notified of the breach by the Responsible Gambling Officer immediately.

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

- The Responsible Gambling Officer must be immediately advised;
- The Responsible Gambling Officer must advise the customer that the "Deed of Self-exclusion" gives Club Officer permission to use reasonable force to remove the customer from the Gaming Room;
- If security personnel are rostered on duty, the security personnel must act to remove the customer from the Gaming Room;
- If security personnel are not rostered on duty, the customer 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.