



Class 1 Local Impact Assessment

Ingleburn Hotel
14 Ingleburn Road, Ingleburn

Prepared by **Tony Schwartz**
Director and Lawyer

16 December 2021

bsv

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Liquor Licensing Specialists

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1. Executive Summary:

- 1.1 This Local Impact Assessment (**LIA**) has been prepared in relation to hotel licence number LIQH400110693 (**the Licence**) attached to premises at 14 Ingleburn Road, Ingleburn that trades as *The Ingleburn Hotel* (**the Hotel**).
- 1.2 The Hotel is in a Band 2 *Statistical Area Level 2* (**SA2**), in the local government area (**LGA**) of Campbelltown. The Hotel seeks to increase its gaming machine threshold (**GMT**) by one (1) (from 29 to 30).
- 1.3 The Licensee and Business Owner of the Licence are experienced in operating licensed venues in NSW. The Hotel has policies and procedures in place to:-
 - ensure all mandatory harm minimisation and responsible gambling practices, as set out in the *Gaming Machines Act 2001* (**the Act**) and the *Gaming Machines Regulation 2010* (**the Regulation**) – collectively referred to as “**the Legislation**”, are adhered to; and
 - ensure its voluntary harm minimisation and responsible gambling practices that are over and above those defined by Legislation are implemented and sustained.
- 1.4 Despite the operation of gaming machines (**GMs**) at this Hotel, the primary purpose of the Licence is the sale of liquor by retail. The keeping and operation of GMs at this Hotel does not and will not detract:- (a) unduly from its character - the GMs are located in a discrete gaming room; or (b) from the enjoyment of persons using the Hotel for other purposes. The approval of this Application will not alter that position.
- 1.5 As detailed in **Section 2**, this Hotel offers other facilities for its patrons including bar, lounge, numerous seating areas (such as in the 2 courtyards), pool table facilities and both indoor and outdoor dining areas.
- 1.6 If this Application is approved, the Hotel will make a positive contribution to the local community through:-
 - Its contribution to the Responsible Gaming Fund (**RGF**) - see **Section 4**,
 - The implementation of a Gaming Plan of Management [**Annexure D**] – It is significant that this is a new policy that the Hotel will be asked to comply with by way of a Licence condition. It introduces many intermediate and advanced measures in the Office of Responsible Gambling’s factsheet titled “Going above and beyond – responsible conduct of gambling venues”, in order to improve responsible gambling at the Hotel - see **Section 3**, and
 - Its other financial contributions to the local community – **Section 4**.
- 1.7 For this Application to be approved, the NSW *Independent Liquor and Gaming Authority* (**the Authority**) must be satisfied that:-
 - (a) This LIA complies with the requirements of the Act, Regulation, and the *Class 1 Local Impact Assessment Process Guidelines* (**the Guidelines**) issued by the Authority,
 - (b) This LIA demonstrates that gambling activities will be conducted in a responsible manner,
 - (c) The proposed increase in the GMT will provide a positive contribution to the local community, and
 - (d) The Applicant addresses community concerns arising out of the consultation process.

It is the Applicant’s submission this LIA satisfies (a), (b) and (c), and that (d) will be satisfied through the Applicant’s undertaking to respond appropriately if any community concerns are raised.

2. Details of the Hotel and Local Community:

- 2.1 Applicants are required "to include a map of the surrounding area, which identifies the venue, and the SA2 it sits within". A map has been included in **Annexure A** together with other relevant data applicable to this Hotel.
- 2.2 For the purpose of this LIA, the *local community (LC)* is the state suburb of Ingleburn. In this document, the words "LC" and "Ingleburn" have the same meaning. Ingleburn is a large geographical area of 12.5 sqm kms¹ (see **Annexure B**). "The 2020 Estimated Resident Population for Ingleburn is 16,519, with a population density of 1,333 persons per square km"². It has been chosen as the LC because most (but not all) of the patrons to this Hotel live in that area.
- 2.3 Section 4 of the Act defines "new hotel" to mean "a hotel that becomes licensed for the first time under the Liquor Act 2007 (otherwise than because of the operation of clause 3 of Schedule 1 to that Act)" or "a hotel to which a licence is removed under that Act". The Hotel is **not** a "new hotel".
- 2.4 Therefore, the question of whether the Hotel is in the immediate vicinity of a school, hospital or place of public worship is not a relevant factor in this Application. Nevertheless, the Applicant advises that there is no school, hospital or place of public worship that is within 350 metres of the Hotel.
- 2.5 The Applicant is conscious of and sensitive to the issue of problem gambling, and by lodging this GMT increase Application, does not seek to change the focus of the Hotel from that of a social destination for the LC.
- 2.6 The Applicant advises: -
- The approved licensed area of the Hotel is about 800sqm. The floor space dedicated to gaming (i.e. the Gaming Room) is about 150 sqm;
 - The Hotel has a patron capacity of about 250 to 300 persons. It offers a bar area, numerous discrete seating areas (lounge, courtyards, indoor and outdoor dining areas), pool table facilities, a TAB area, a gaming room, kitchen, sanitary facilities and other back-of-house facilities. Attached to the Hotel is a drive through bottleshop.
 - The mandatory 6-hour gaming machine shutdown period is between:-
 - 1.00am and 7.00am on Monday to Friday.
 - 3.00am and 9.00am on Saturday, and
 - 4.00am and 10.00am on Sunday and public holidays).
 - The hotel employs 12 full, part time and casual staff (excluding any contract workers), any one time, thus providing significant local employment opportunities.
- 2.7 The Gaming Room complies with the Legislation because it is in a restricted area of the Hotel. It is also separate from the general bar area. There are also 2 doorways leading from the Gaming Room to other areas of the Hotel (including an operating bar area and toilets at Ground Level). Patrons are not required to pass through the Gaming Room to enter or leave the Hotel, or when in the Gaming Room return to the public street before gaining access to other parts of the Hotel. The public are allowed to enter the Gaming Room free of charge.
- 2.8 Further, the GMs are in positions, so that in compliance with clauses 8 of the Gaming Machine Regulation 2010 no-one can see them when standing outside the Hotel. There is sufficient space around them, so patrons can easily move about. The Gaming Room is properly supervised (i.e. electronic means or a physical presence).
- 2.9 Statistical data that is relevant to this Application has been included in **Annexure C**. We do not believe there are any adverse findings that should negatively impact on this Application.
- 2.10 As set out above, the profile id website states³ "The 2020 Estimated Resident Population for Ingleburn is 16,519". The same website states⁴ "The Campbelltown City Council population forecast for 2021 is 176,151, and is forecast to grow to 272,303 by 2041". The change is 54.59%

¹ 2016 ABS Community Profile for Ingleburn.

² [About the profile areas | Ingleburn | profile.id](#) (accessed 28.11.21)

³ <https://profile.id.com.au/campbelltown/about?WebID=210>

⁴ <https://forecast.id.com.au/campbelltown>

for the period 2021-41. We could not source population growth data for Ingleburn directly, but we note it is likely to receive some of the population growth that is expected for the LGA.

3. Harm Minimisation and Responsible Gambling Measures:

- 3.1 The Guideline states that the Authority "*considers "harm minimisation" to mean interventions and measures to prevent or reduce the negative social, economic and physical harms that can occur from gambling*". Clause 38 of the Regulation requires this LIA to include details of the harm minimisation and responsible gambling measures that are (or will be) in place at the Hotel.
- 3.2 The Applicant complies with all mandatory requirements and, in respect of the preparation of *this Application*, completed the "*Gaming Operations*" section (at pages 9 to 19) of the *Hotel Licence Self-Audit Checklist, CL1003 (the Checklist)*⁵. The Checklist is available on the website of Liquor and Gaming and this Hotel complies with all mandatory requirements, as noted on pages 9 to 19 of the Checklist.
- 3.3 The Hotel voluntarily provides additional harm minimisation requirements, and the majority of these are noted in the Gambling Plan of Management at **Annexure D**. Further:-
- Whilst all staff are required by law to have their Responsible Service of Alcohol (**RSA**) and RCG Competency Cards, this Hotel reinforces a best practice approach to its business operations by ensuring a thorough induction of all staff on RSA and RCG measures. This occurs before a new staff member commences their first shift and it is reinforced at monthly staff meetings. This means all staff (and not only the managers) are properly trained to watch for problem gamblers and talk regularly to patrons, assisting patrons when required.
 - Whenever the Hotel trades after Midnight (and at any other peak trading periods) there is a dedicated staff member responsible for the business operations in the Gaming room. During peak trading periods they are supported by an additional staff member whose role is to also supervise the Gaming Room. The Hotel's commitment is to ensure maximum effectiveness of their staff and their ability to identify individuals and circumstances that need close attention to minimise harm and ensure safe gambling practices are enforced. The Hotel is of the strong belief that this strengthens the Hotel's ability to provide a responsible gambling environment.
 - A monitor is available in the Gaming Room that is dedicated to educating patrons about responsible gambling (i.e. it rotates messages such as the G-line (Gambling Help line) and Game Care Self Exclusion hotline phone number as well as the Liquor and Gaming's responsible gambling messages).
 - The Hotel maintains an active membership of the NSW Australian Hotels Association (**AHA**) and supports its policies and procedures relating to gaming harm minimisation. For example, in addition to the mandatory legislative requirements, the Hotel has implemented the AHA's *Game Care* problem gaming counselling and self-exclusion scheme and gaming code of conduct and is an active member of the Local Liquor Accord.
 - This Hotel does not offer prizes associated with the use of its GMs and it has a policy of not cashing cheques.
 - The Hotel provides gaming related help line pamphlets and other signage in other areas of the Hotel (and not just in the mandatory locations). Further, these pamphlets and signage are provided in the top 4 non-English speaking nationalities in Ingleburn (namely Indian, Bengali, Filipino and Chinese) – see **Figure 5 of Annexure C**.
 - It promotes and highlight throughout the Hotel the potential harms from gambling - for example an education program for vulnerable groups about the potential harms from gambling and how to seek help.

⁵ <https://www.liquorandgaming.nsw.gov.au/operating-a-business/running-your-business/signs-for-your-business> (accessed 15.12.21).
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- 3.4 The Guideline states the Authority *"is required to determine whether the venue is going above and beyond any mandatory requirement with respect to harm minimisation, responsible gambling or community contributions"*.
- 3.5 As shown above, the Hotel's Gaming Plan of Management (supported by the additional information set out above) means it is clear the Applicant proposes harm minimisation and responsible gambling measures that are in addition to measures required by law.

4. Details of the Benefits:

- 4.1 Clause 38 of the Regulation requires this LIA to include details of the benefits that the Hotel will provide to the LC if the Application is approved.
- 4.2 Regarding the financial benefits, the Guideline states that the Authority *"is of the view that venues should primarily be providing funding to the Responsible Gambling Fund, as this will allow the Independent Liquor & Gaming Authority to more easily assess whether the proposed GMT increase is a positive benefit"*.
- 4.3 The industry formula for establishing the contribution to the Responsible Gambling Fund is *"15% of average profit of existing gaming machines before tax X GMT increase X 5 years"* (**the Formula**).
- 4.4 Based on the trading history of this Hotel, the Applicant's contribution to the RGF is likely to be in the vicinity of \$200,000 (payable over 5 years).
- 4.5 Additional financial benefits will flow from the approval of this Application such as donations and support to local clubs and member groups that will be over and above the mandatory contribution to the RGF. The Bonnie Hotel group raises and donates between \$50,000 and \$60,000 annually to the 'The Smiling for Smiddy' foundation. It also holds a function at the 'Bong Bong' Picnic races. The Hotel sponsors the local golf club, fishing club and women's netball and soccer clubs (in the vicinity of \$10,000 per year). Some of these donations have stalled due to the COVID outbreaks.
- 4.6 The Guideline also states that *"the Act prescribes additional positive contribution may include... the putting in place of harm minimisation and responsible gambling measures that are in additional to measures already required by law"*.
- 4.7 This LIA has established in Section 3 that as a direct result of the approval of this Application that this Hotel will offer extra measures.
- 4.8 In summary, the benefits of this proposal are:-
- The Hotel's contribution to the RGF.
 - The implementation of a Gambling Plan of Management, and the additional harm minimisation and responsible gambling measures that detailed in **Section 3**.
 - The Hotel's other financial contributions to the local community (that it makes from time to time).

5. Conclusion:

- 5.1 The Guideline states that the Authority considers *"the concept of "responsible gambling" is a broad one which recognises gambling is a legitimate, lawful and regulated activity in NSW and that there are benefits associated with gambling activities, but also that gambling can cause personal and social harms. Activities that promote responsible gambling include those which seek to:*
- *enable persons to make informed decisions about their participation in gambling,*
 - *minimise the potential for, and incidence of, harm associated with gambling, and*
 - *reduce the incidence and prevalence of problem gambling"*

- 5.2 This LIA sets out the mandatory and voluntarily measures to be put in place at this Hotel to ensure (as far as is humanly possible) that harm does not result from the approval of this Application [see Section 3].
- 5.3 The Hotel will monitor its responsible gaming and harm minimisation strategies and revise them (where possible) to continually improve their effectiveness, thereby minimising future negative impacts of operating the additional GM at this Hotel on the LC.
- 5.4 While it is unknown the exact contribution of this Hotel to the RGF, this contribution will nevertheless be significant.
- 5.5 The above means that this proposal will provide support to people dealing with social and health problems, therefore offsetting any potential negative impacts that could arise from the approval.
- 5.6 Further, the Hotel makes other significant donations and/or contributions to the community [see para. 4.5 above].
- 5.7 This LIA:-
- complies with requirements of the Act, Regulation and Guidelines.
 - has provided information that demonstrates that gambling activities will be conducted in a responsible manner; and
 - confirms the proposed increase in the GMT from 29 to 30 will provide a positive contribution towards the LC.
- 5.8 Based on the foregoing information and as the Hotel is in a Band 2 and therefore this Application relates to a low range increase in the GMT, it is submitted that there are more positive impacts for the LC if the Application is approved than negative ones (if any at all). Therefore, increasing the GMT of this Hotel from 29 to 30 provides a positive contribution to the LC.

Dated: 16 December 2021



Tony Schwartz

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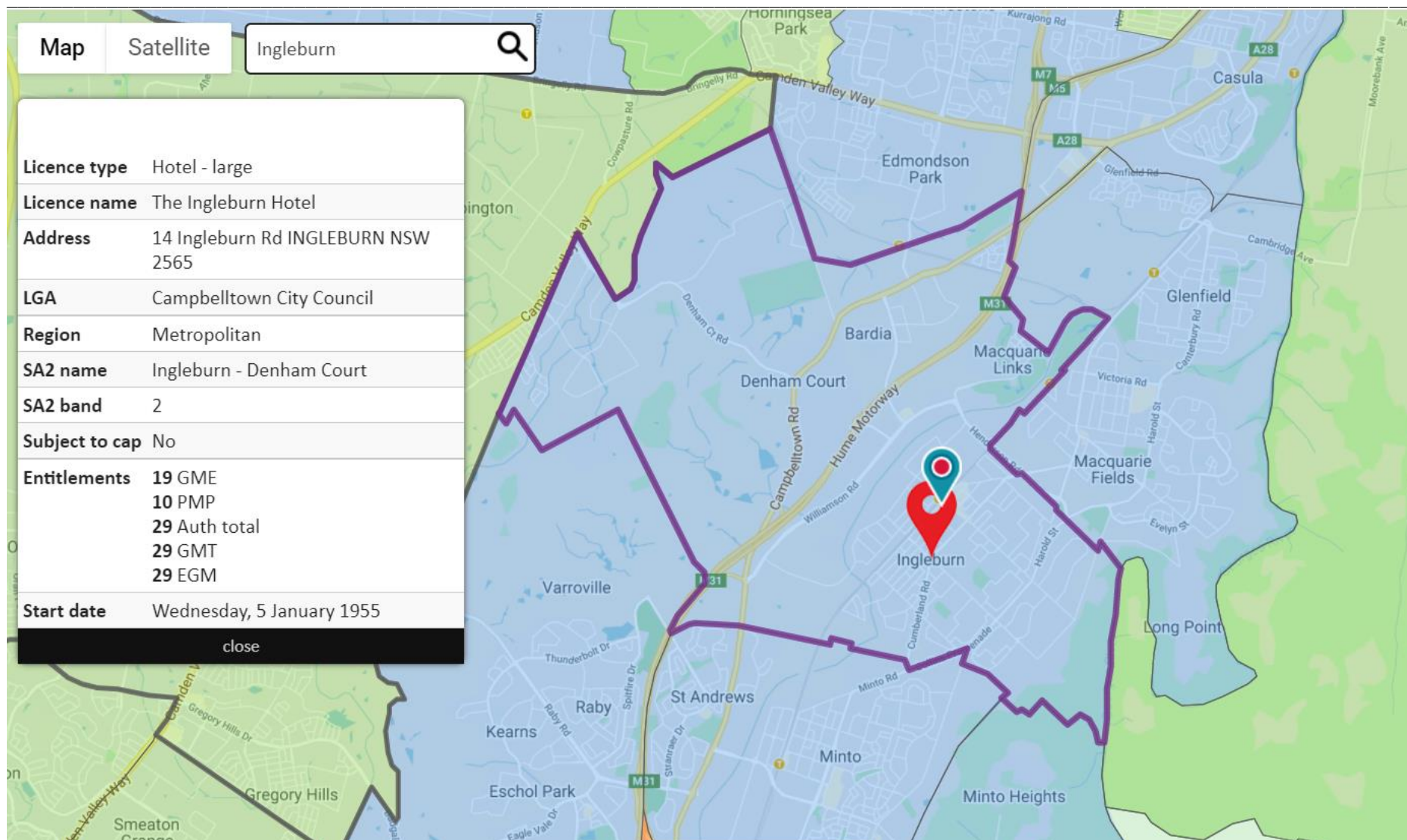
tschwartz@bsv.com.au

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Annexure A¹: Map that illustrates the Hotel, the surrounding area, and the SA2 it falls within.

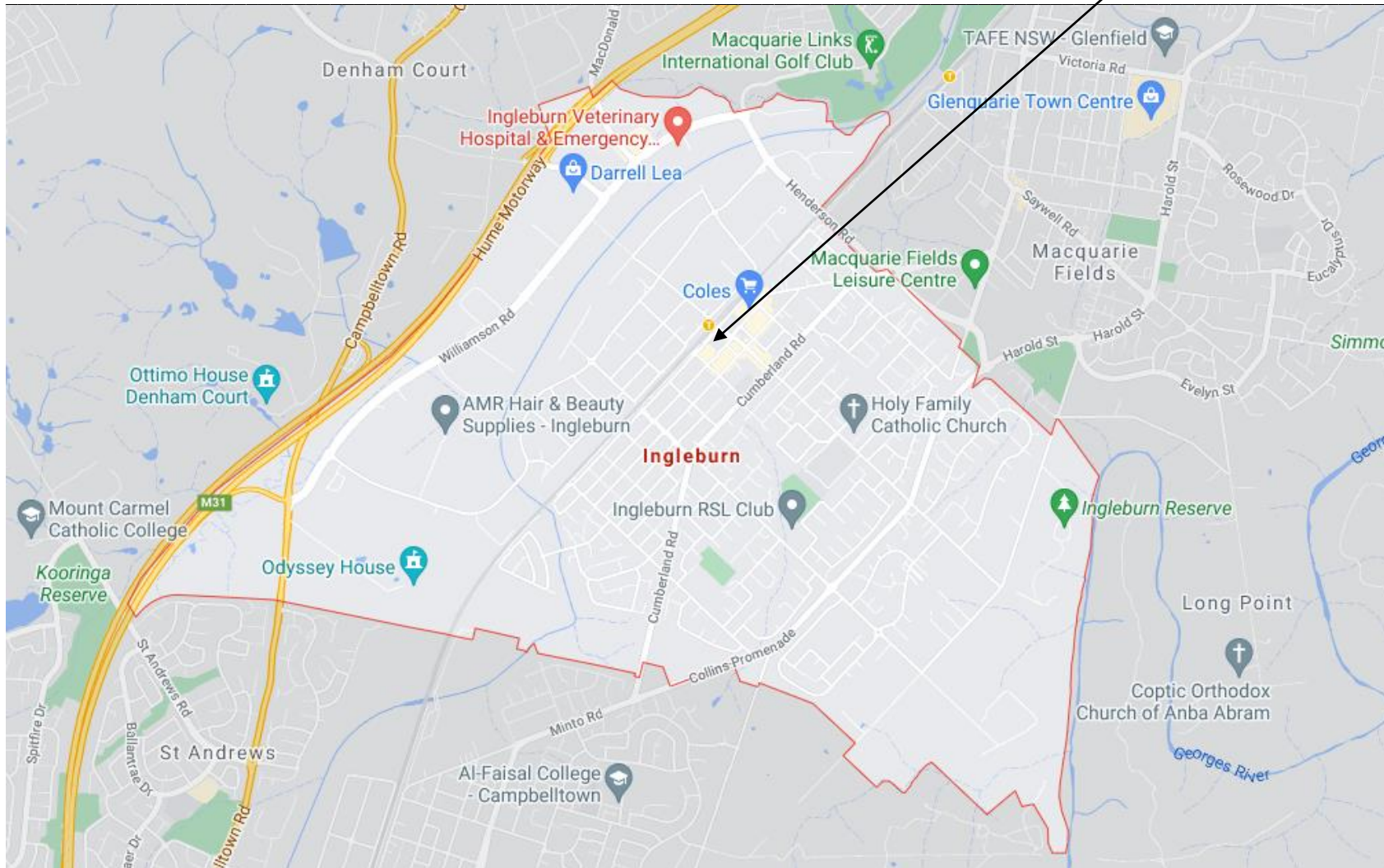
 = location of this Hotel



¹ <https://digital.liquorandgaming.nsw.gov.au/FindmyLIABand/> (accessed 25.11.21)
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Annexure B¹: Map that illustrates the geographical area that comprises Ingleburn (or the LC).

The Hotel



¹ <https://www.google.com.au/maps/place/Ingleburn+NSW+2565/@-34.0005931,150.8586543,14z/data=!4m5!3m4!1s0x6b12eb6398af0615:0x5017d681632bb90!8m2!3d-34.0044124!4d150.8630229?hl=en-AU> (accessed 28.11.21)

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Outlet density:

1. While *outlet density* (or *outlet saturation*) and *outlet clustering* will not change with the approval of this Application, it is nevertheless relevant to consider if there is an over-provision or under-provision of hotels in this location (and the proximity of each to the other). Therefore, we have reproduced the relevant parts of the LiveData¹ report in **Table 1**.

Table 1:

Year	Outlet Saturation	Ingleburn	Campbelltown LGA	Major Cities of Australia (NSW)	All of NSW
Nov 2021	Hotels	6.6	9.6	19.9	28.4
	Outlet Clustering				
	Overall	4.0	13.1	134.3	95.6
	Hotels	0	0.9	27.1	15.3

Green font is a Rate below NSW

Alcohol related crime:

2. The BOCSAR data forms part of the *LiveData* report. We have set out the relevant 12-month data (as a *Rate* per 100,00 of population) ending in June 2021 in **Table 2**. For clarity, the numbers appearing in brackets are the number of offences recorded.

Table 2:

	Year	Ingleburn	Campbelltown LGA	Major Cities of NSW	NSW
Alcohol related domestic assault (annual rate per 100,000 residents)	2021	134	147.4	93	115.7
	2020	128	126.9	3.6	112
	2019	85.3	134.6	194.6	114
Alcohol related non-domestic assault (annual rate per 100,000 residents)	2021	42.7	80.7	81	98.3
	2020	36.6	73.1	3.9	96.3
	2019	79.2	87.8	213	116.3
Alcohol related offensive conduct (annual rate per 100,000 residents)	2021	6.1	11.1	21.6	24.9
	2020	18.3	17.6	0.8	28.3
	2019	6.1	10.5	59.2	36.2
Late-night alcohol-related non-domestic assault	2021	0	24	23.6	28.6
	2020	0	23.4	1.1	29.6
	2019	24.4	20.5	73.2	39.7
Malicious damage (annual rate per 100,000 residents)	2021	688.5	844.7	581.9	658.3
	2020	749.4	808.5	27.4	674.6
	2019	853	786.8	1326.4	712

Green font indicates a Rate lower than NSW while red font indicates a Rate higher than NSW

Alcohol related hotspot maps:

3. The *LiveData* maps are included in Figures 1 to 3 that commence at the next page.

Figure 1: The Hotel is marked with a blue circle

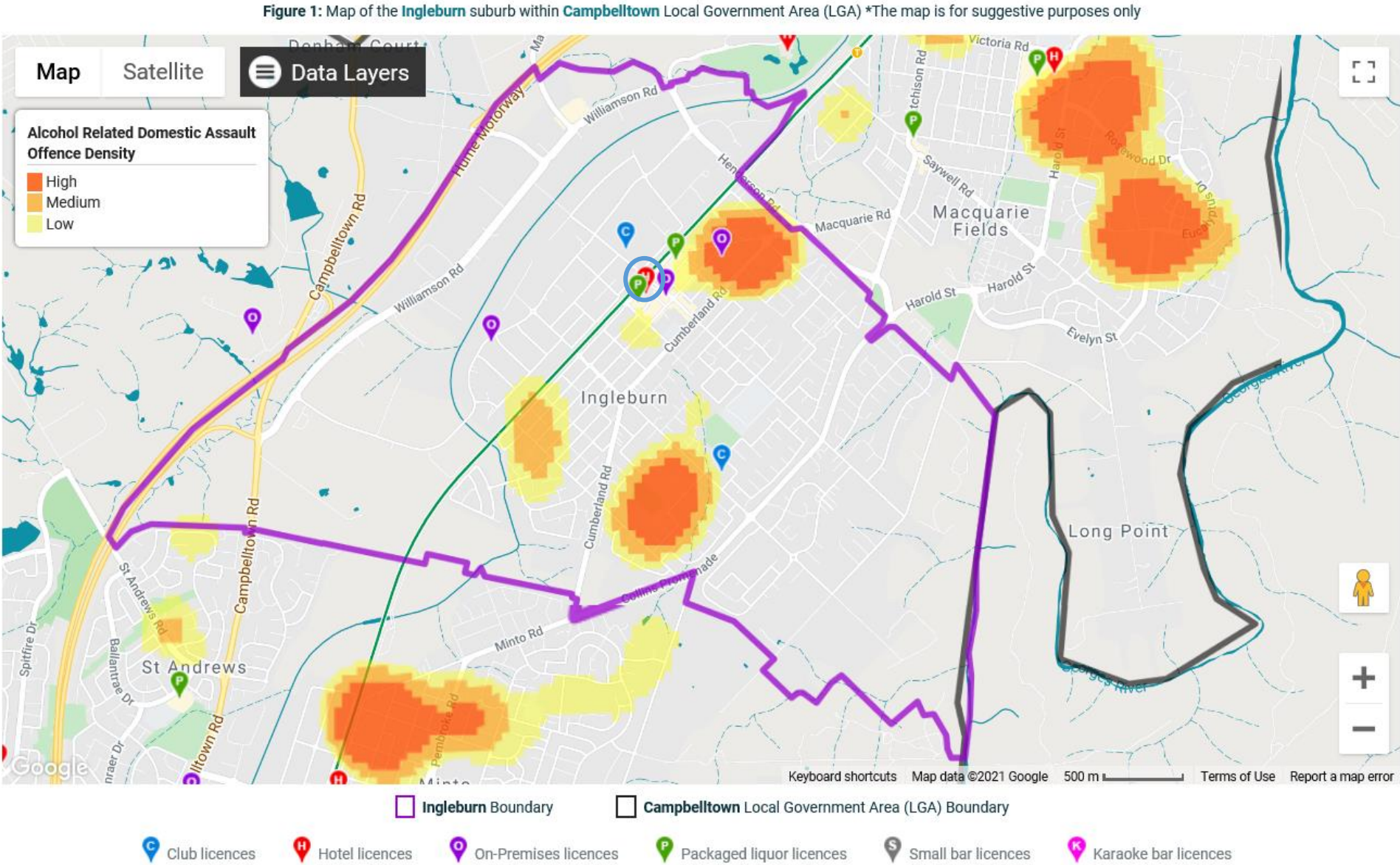


Figure 2: The Hotel is marked with a blue circle

Figure 1: Map of the Ingleburn suburb within Campbelltown Local Government Area (LGA) *The map is for suggestive purposes only

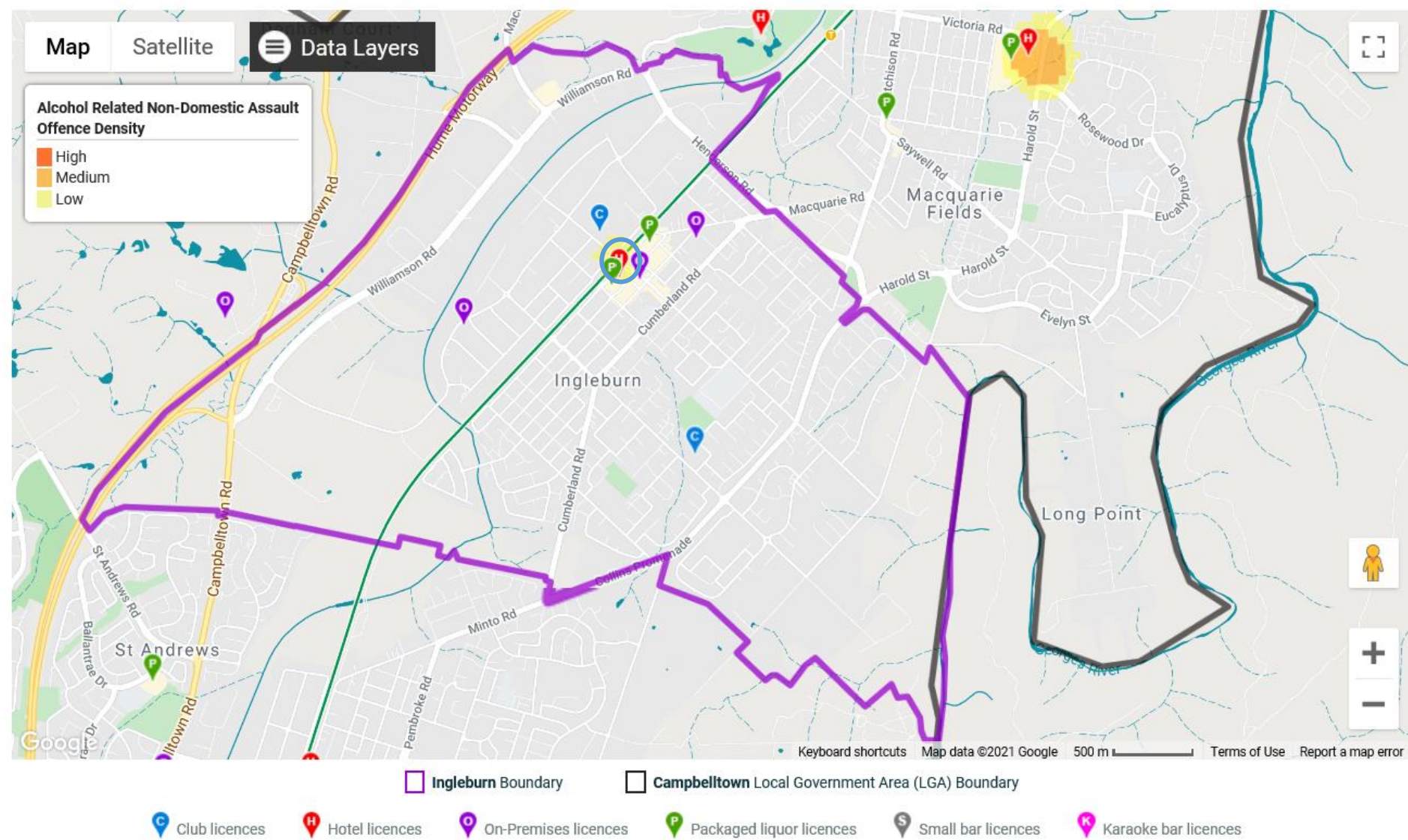
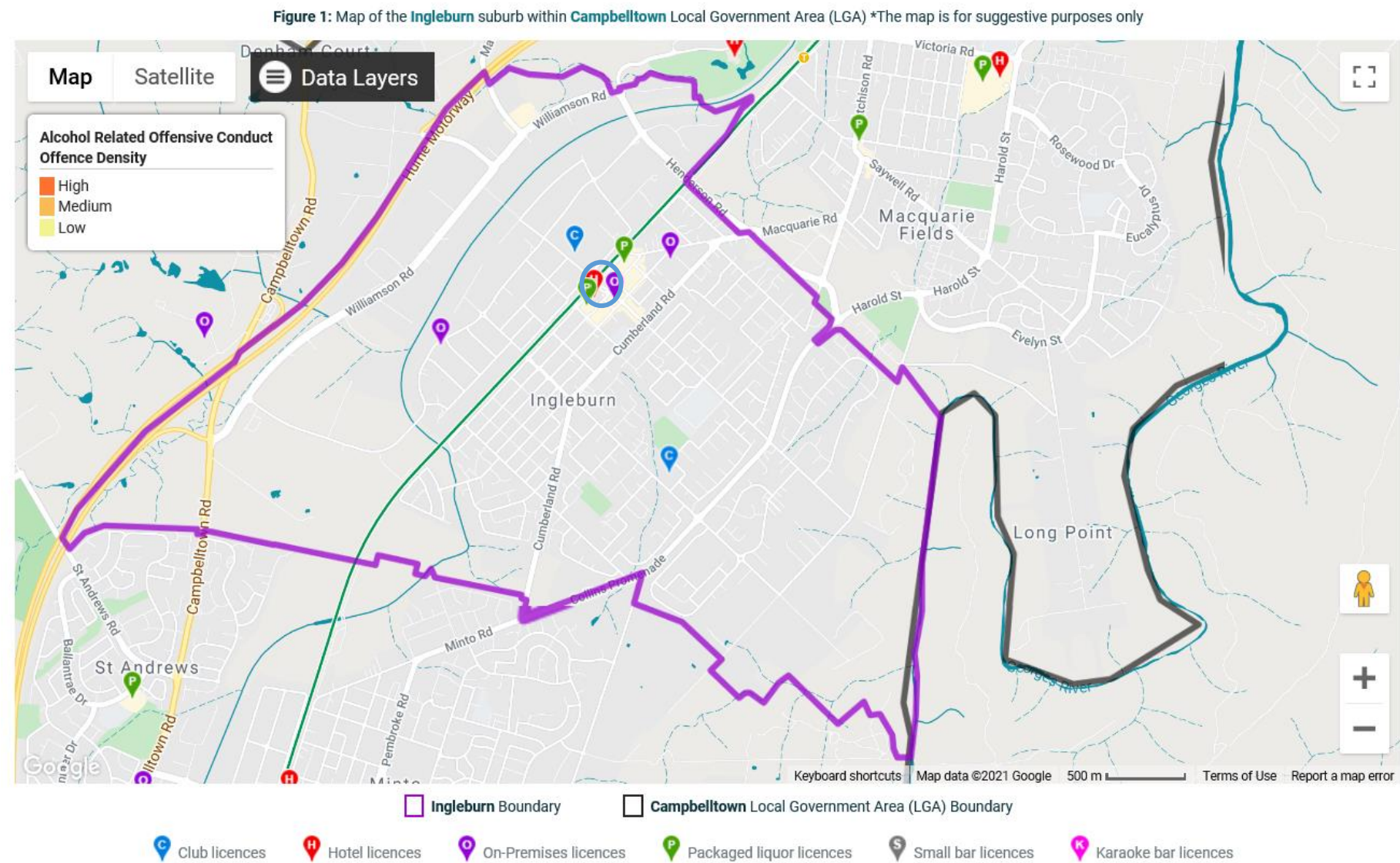


Figure 3: The Hotel is marked with a blue circle



Alcohol related harm:

4. The health data that forms part of the *LiveData* is set out in **Table 3**.

Table 3:

	Year	Campbelltown LGA	Major Cities of NSW	All of NSW
Alcohol-attributable hospitalisation (annual rate per 100,000 residents)	2017/2018- 2018/2019	432.1	580.3	542.1
	2016/2017- 2017/2018	413.9	544.1	518.2
	2015/2016- 2016/2017	357.2	517.3	498.3
Alcohol-attributable death (annual rate per 100,000 residents)	2017 - 2018	19.7	18.8	20
	2016 - 2017	20.9	19	20.4
	2015 - 2016	21.9	19.5	20.9

Red font indicates a Rate higher than NSW while green font indicates a Rate equal or lower than NSW

SEIFA:

5. The socio-economic status data also forms part of the *LiveData* report and is set out in **Table 4**.

Table 4:

	Year	Ingleburn	Campbelltown LGA	Major Cities of NSW	NSW
Socioeconomic status	2016	Bottom 29%	Bottom 41%	N/A	N/A

Red font indicates disadvantage.

ATSI composition:

6. The data that forms part of the *LiveData* report is set out in **Table 5**. *LiveData* does not compare the data to NSW. This comparison is included in **Table 6**. We cannot explain the discrepancy in the percentages between *LiveData* (Table 5) and the ABS (Table 6), but we note the ABS data should be preferred. In any event, it is clear the proportion of individuals who are ATSI in Ingleburn or in the Campbelltown LGA is lower when compared to the NSW average (see Table 6).

Table 5:

	Year	Ingleburn	Campbelltown LGA
Aboriginal & Torres Strait Islander	2016	2.5%	4.5%

Green font indicates a Rate lower than NSW, whereas red font indicates a Rate higher than NSW (see Table 6)

Other demographical data:

7. The *LiveData* report does not provide any additional data other than that disclosed in **Table 5**. We have offered the additional data in **Table 6** that commences at the next page.

Table 6	NSW	Campbelltown LGA	Ingleburn (suburb)
Population ²	7,480,228	157,006	15,039
Median age	38	34	35
Male/female distribution	49.3% (M) 50.7% (F)	49% (M) 51% (F)	49.8% (M) 50.2% (F)
Age distribution	See Figure 4	See Figure 4	See Figure 4
Young persons (15-24 years)	12.5%	14.1%	13%
Older Australians (65 years plus)	16.2%	11.9%	11.8%
Indigenous persons	2.9%	3.8%	2.4%
NESB Persons ^	68.5%	63.8%	56.4%
Labourers	8.8%	11.3%	11.9%
Ancestry	-	See Figure 5	See Figure 5
Unemployed	6.3%	7.9%	8.5%
Employment status	-	See Figure 6	See Figure 6
Highest educational attainment bachelor degree level & above	23.4%	15.4%	19.7%
Occupations	See Figure 8	See Figure 7	See Figures 7 and 8
Number of one parent families	16%	21.7%	20.3%
Housing tenure – renters	31.8%	32.9%	31.9%
Median weekly income – household	\$1,486	\$1,459	\$1,401
Median weekly income - personal	\$664	\$632	\$637
Median rent (weekly)	\$380	\$350	\$360
Median mortgage payments (monthly)	\$1,986	1,842	\$1,800

Unless stated otherwise, all data has been sourced from the 2016 ABS census data.

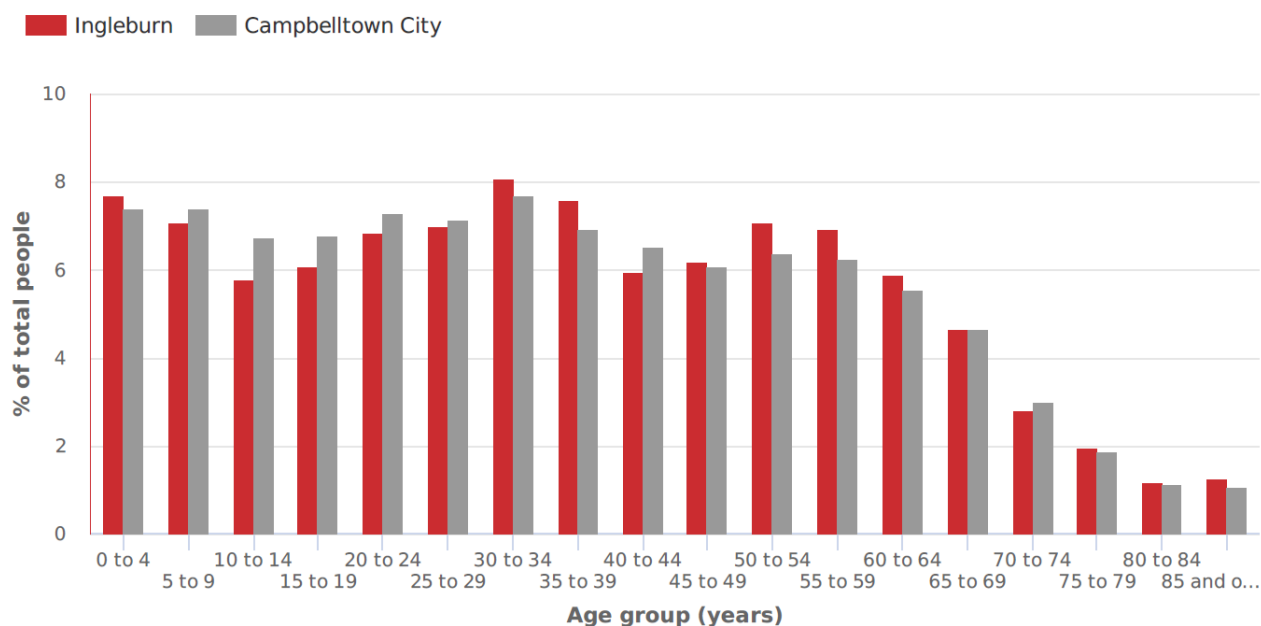
Green print indicates an under-representation when compared with NSW or a positive attribute; red print indicates a representation that is 10% or greater over-represented when compared with NSW or a negative attribute, while blue print indicates a representation not greater than 10% and therefore like NSW.

^ With respect to NESB persons, where the percentage is higher in that area (i.e. when compared to the rate for NSW) this means there are more people who only speak English in that area. Consequently, there is not an over-representation of NESB persons in that area. Where the percentage is lower than the NSW average, this in turn means there is a higher NESB population in that area.

Figure 4 – age distribution (Ingleburn compared with Campbelltown and NSW)³

Age structure - five year age groups, 2016

Total persons

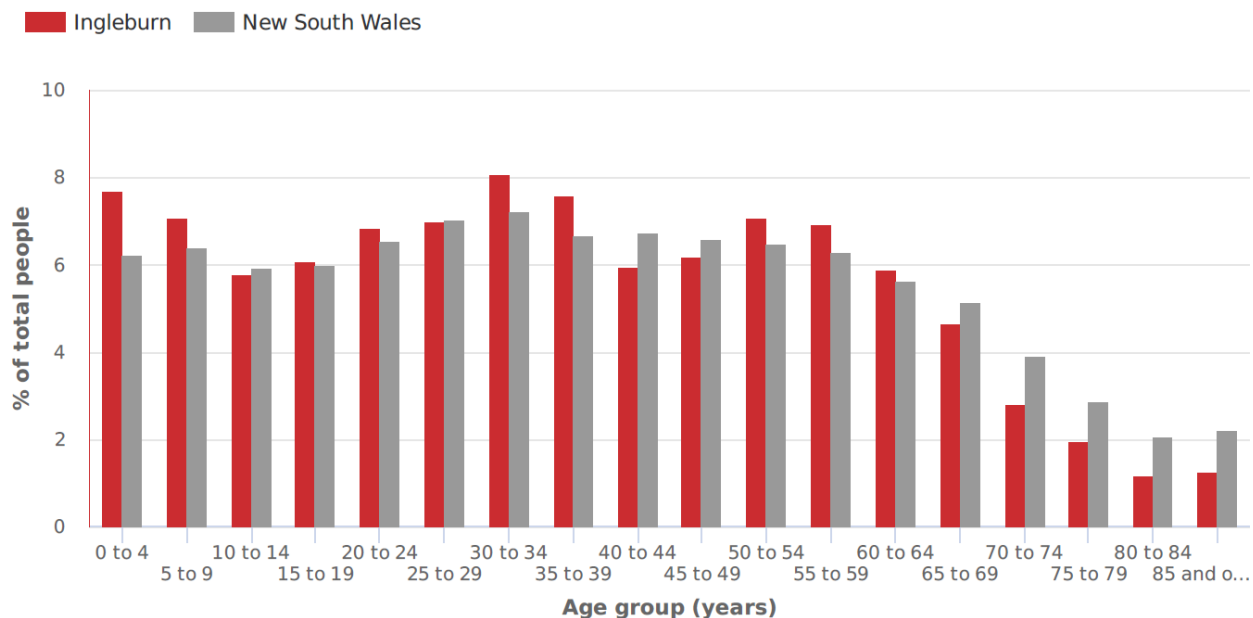


Source: Australian Bureau of Statistics, Census of Population and Housing, 2016 (Usual residence data). Compiled and presented in profile.id by .id (informed decisions).

.id informed decisions

Age structure - five year age groups, 2016

Total persons



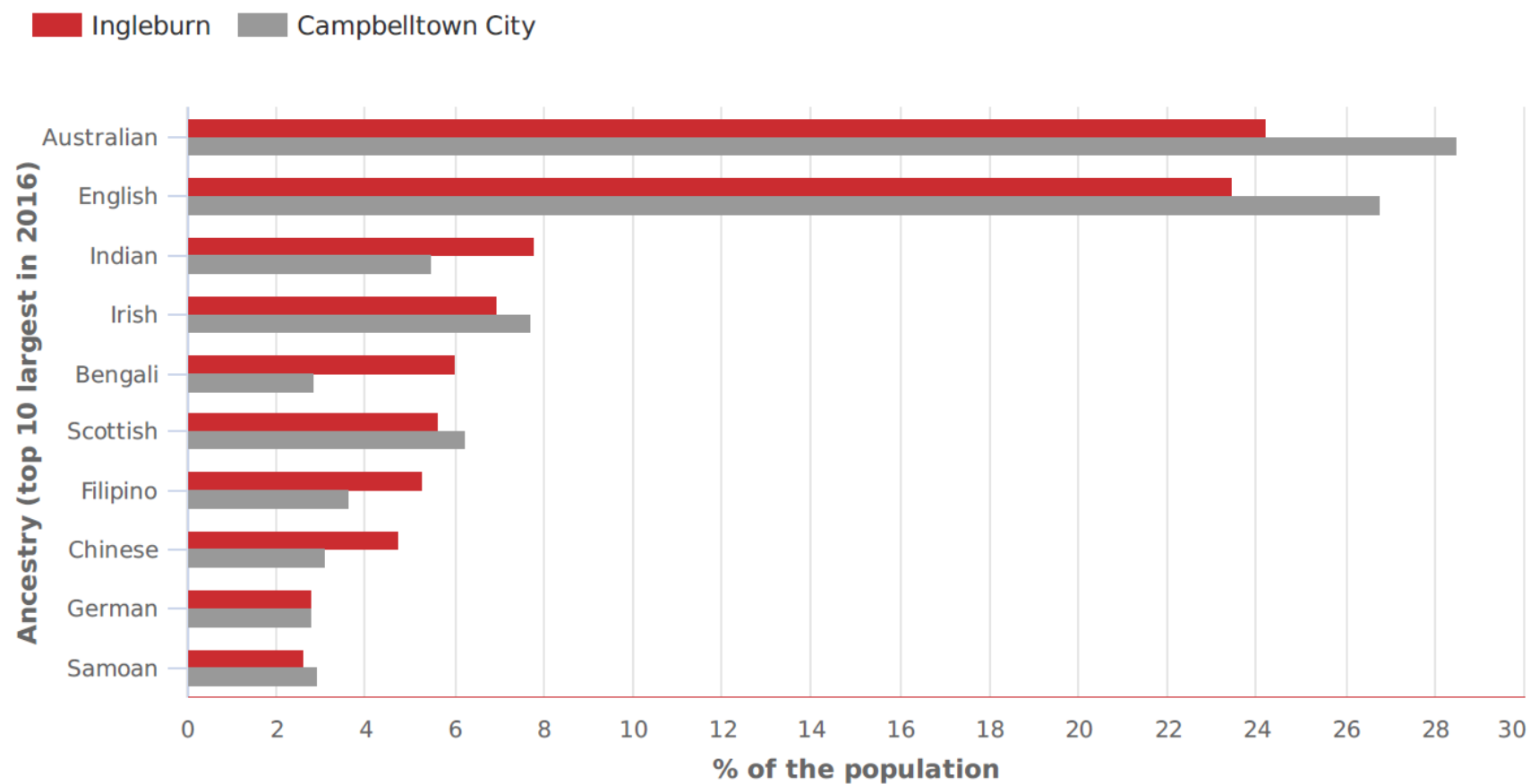
Source: Australian Bureau of Statistics, Census of Population and Housing, 2016 (Usual residence data). Compiled and presented in profile.id by .id (informed decisions).

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³ <https://profile.id.com.au/campbelltown/five-year-age-groups?WebID=210&BMID=10> (accessed 28.11.21)

Figure 5 - Ancestry⁴

Ancestry, 2016



Source: Australian Bureau of Statistics, Census of Population and Housing, 2016 (Usual residence data). Compiled and presented in profile.id by .id (informed decisions).

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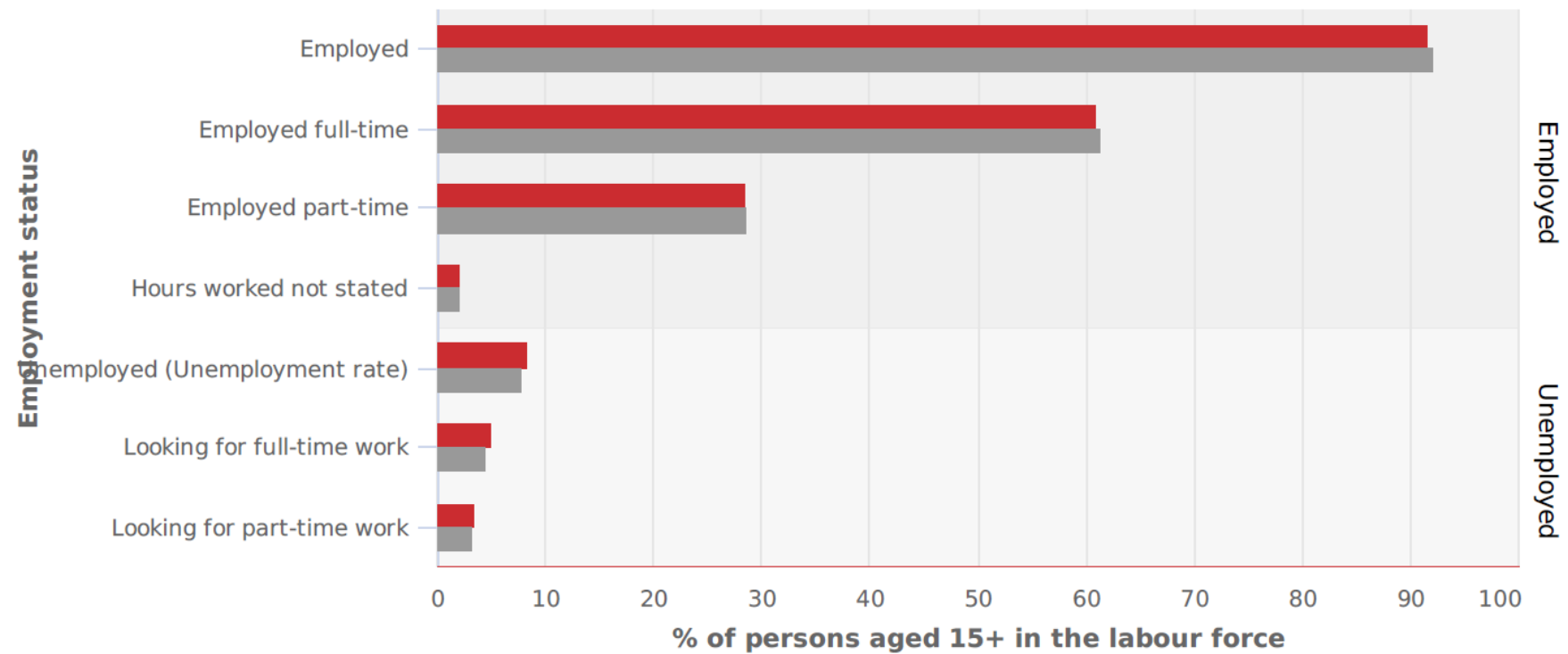
⁴ <https://profile.id.com.au/campbelltown/ancestry?WebID=210&BMID=10> (accessed 28.11.21)

Figure 6 – Employment status – Ingleburn compared with Campbelltown⁵

Employment status, 2016

Total persons in the labour force

■ Ingleburn ■ Campbelltown City



Source: Australian Bureau of Statistics, Census of Population and Housing, 2016 (Usual residence data). Compiled and presented in profile.id by .id (informed decisions).

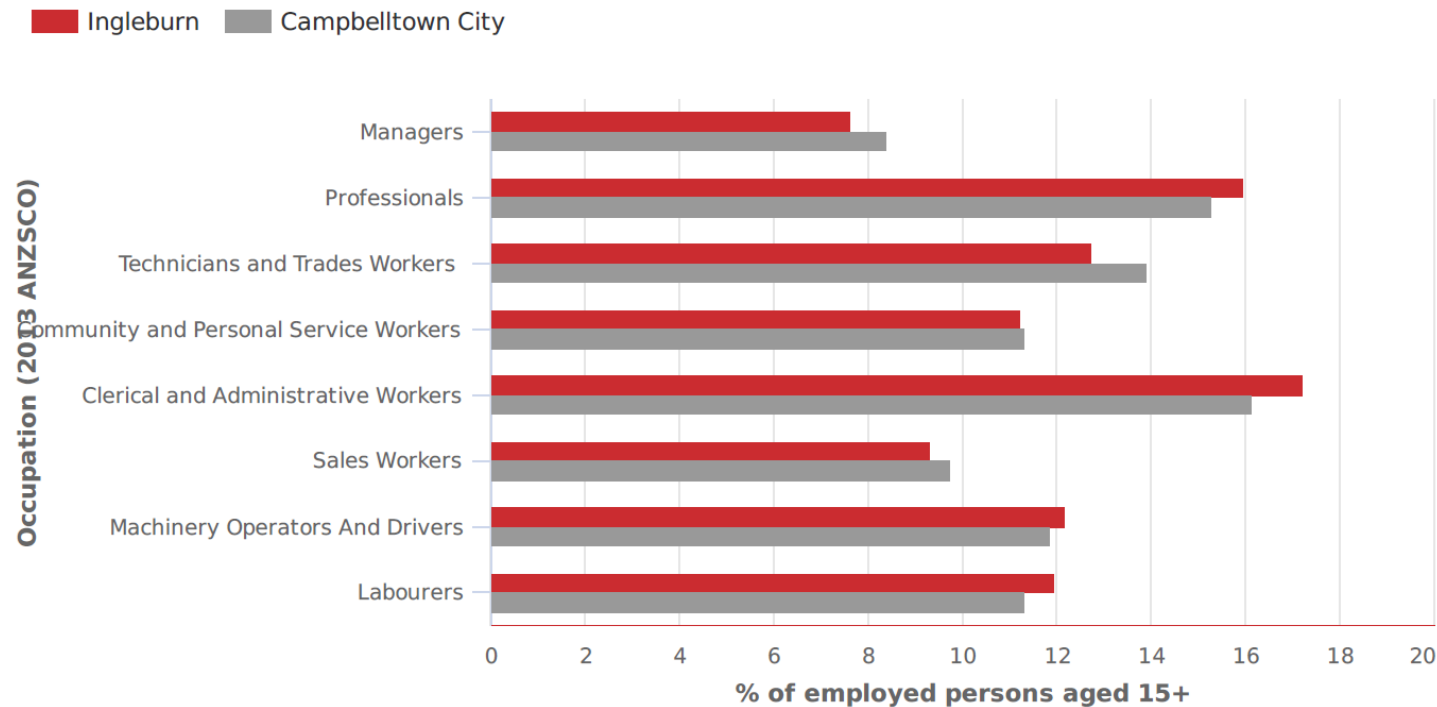
.id informed decisions

⁵ <https://profile.id.com.au/campbelltown/employment-status?WebID=210&BMID=10> (accessed 28.11.21)

Figure 7 – occupations (Ingleburn compared with Campbelltown)⁶

Occupation of employment, 2016

Total employed persons



Source: Australian Bureau of Statistics, Census of Population and Housing, 2016 (Usual residence data). Compiled and presented in profile.id by .id (informed decisions).

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An analysis of the jobs held by the resident population in Ingleburn in 2016 shows the three most popular occupations were:

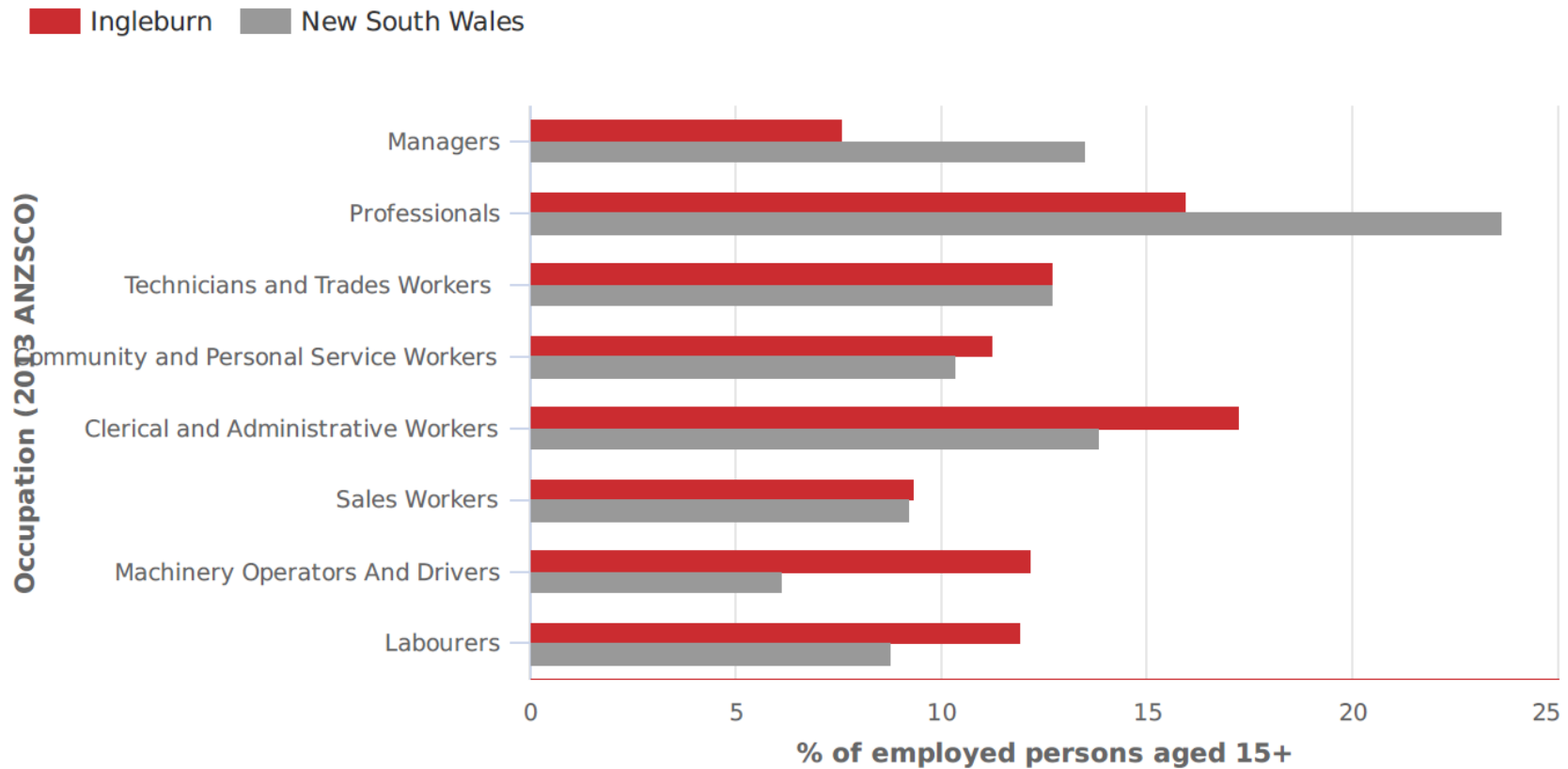
- Clerical and Administrative Workers (1,153 people or 17.2%)
- Professionals (1,069 people or 16.0%)
- Technicians and Trades Workers (851 people or 12.7%)

In combination these three occupations accounted for 3,073 people in total or 45.9% of the employed resident population.

⁶ <https://profile.id.com.au/campbelltown/occupations?WebID=210&BMID=10> (access 28.11.21)

Figure 8 - occupations (Ingleburn compared with NSW)⁷
Occupation of employment, 2016

Total employed persons



Source: Australian Bureau of Statistics, Census of Population and Housing, 2016 (Usual residence data). Compiled and presented in profile.id by .id (informed decisions).

.id informed decisions

⁷ <https://profile.id.com.au/campbelltown/occupations?WebID=210&BMID=40> (accessed 28.11.21)
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Annexure D: The Hotel's Gaming Plan of Management



Gaming Plan of Management

The Ingleburn Hotel
14 Ingleburn Road, Ingleburn

Prepared by **Tony Schwartz**
Director and Lawyer

13 December 2021

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1. Introduction

- 1.1 The purpose of this Gaming Plan of Management (**Gaming Plan**) is to provide the framework for the responsible conduct of gambling at the Ingleburn Hotel at 14 Ingleburn Road, Ingleburn (**the Hotel**). The Hotel is the subject matter of Licence No: LIQH400110693 (**the Licence**).
- 1.2 The Hotel has developed this Gaming Plan as part of its ongoing commitment to reduce gambling related harm.
- 1.3 The Gaming Plan will: -
 - complement the general Plan of Management (**the General Plan**) for the Hotel that is referred to in condition 11000 of the Licence (or any subsequent approved versions of it). In the event of any conflict between the Gaming Plan and the General Plan, then the higher standard will apply.
 - ensure that the Hotel is conducted in a manner consistent with best practice.
- 1.4 Many of the strategies outlined in this Gaming Plan extend beyond the requirements set out in the *Gaming Machines Act 2001* and the *Gaming Machines Regulation 2010*. By committing to these further strategies, the Hotel treats the welfare of its patrons seriously.
- 1.5 The Hotel will abide by the *Gambling advertising and inducements* Guidelines (GL4015) and will also ensure all relevant signage, promotional material, contact cards, stickers and brochures that, for example, advertise counselling services or help for problem gamblers, and detail the chances of winning etc, are available at the Hotel¹. This includes those services promoting the self-exclusion program.
- 1.6 Staff will take part in an induction process at the time they commence employment at this Hotel. The induction process will include the staff member being provided with a copy of: -
 - (a) the Licence,
 - (b) the Gaming Plan and General Plan,
 - (c) the New South Wales Police Force's *Crime Scene Preservation Guidelines for Licensed Premises*, and
 - (d) the NSW Liquor and Gaming's (**L&GNSW**):-
 - *Intoxication Guidelines*; and
 - *Liquor Promotion Guidelines*.or any updated versions of these documents.Staff will sign a sheet acknowledging that they have read these documents and understand their implications.
- 1.7 The documents referred to in c) and d) in the above paragraph are referred to in this document as the Guidelines. This document does not repeat the information in the Guidelines because they provide a comprehensive, legally binding and industry standard guide to be followed.

¹ This information is published on the website of L&GNSW and, as at the date of this Gaming Plan, is detailed in the links: <https://www.liquorandgaming.nsw.gov.au/operating-a-business/running-your-business/signs-for-your-business> and <https://www.liquorandgaming.nsw.gov.au/working-in-the-industry/licensees-and-approved-managers/gaming-machine-harm-minimisation>

2. Gaming - Introduction

- 2.1. Most people use gaming machines as a casual recreational activity. However, for some it is a problem in varying degrees. Such people may: -
- spend increasing amounts of time and money on gambling,
 - lie about their gambling,
 - be unable to control the impulse to gamble, and
 - engage in socially destructive behaviour to continue to gamble, including relationship breakdown, loss of assets and crime.
- 2.2. The intention of this Gaming Plan is to assist in reducing the harm associated with the abuse and misuse of gambling activities and to foster responsible gambling policies and procedures, with the ultimate aim to help patrons experiencing problems with their gambling. Responsible gambling will occur when a patron:
- does not spend more than can be afforded,
 - understands their chances of winning and losing,
 - is able to limit their time gambling and walk away, and
 - does not allow gambling to affect social and work relationships.

3. Signs of Problem Gambling (Welfare Checks)

- 3.1 The information that is set out below is provided to assist staff in recognising a patron who might be a problem gambler. The information forms the basis of our *Welfare Checks* at this Hotel. It is to be read in conjunction with "*Know the signs and how to act*" factsheet published on the website of L&GNSW as amended from time to time (copy **attached**). This factsheet describes problematic gambling behaviour e.g. of the kind specified under the topic "*Signs of risky and problem gambling behaviour*".

Frequency, duration and intensity:

- Gambles every day
- Gambles for 3 hours or more without a break of 15 minutes or longer
- Gambles so intensely that they are unaware of their surroundings
- Bets \$2.50 or more per spin most of the time
- After winning on a machine, they play on without waiting for the jingle to finish
- Rushes from one machine to another
- Gambles on 2 or more machines at once
- Significant increases in spending patterns.

Impaired control:

- Starts gambling when the Hotel opens
- Gambles through meal times
- Gambles after drinking a lot of alcohol
- Tries to win obsessively on one machine
- Stops gambling only when the Hotel is closing.

Social behaviour:

- Asks staff to not let anyone know where they are
- Is rude or impolite to staff
- Appears to avoid cashier and only uses cash facilities
- Avoids contact and communicates very little with anyone
- Stays in the Hotel to gamble when friends leave
- Becomes angry or agitated if someone takes their preferred machine
- Stands over other players while waiting for their favourite machine
- Blames the Hotel or machine for losing
- Complains to staff about losing
- Brags about winning
- Significant decline in appearance over several days

Cash:

- Accesses cash to gamble from ATM or EFTPOS on 2 or more occasions
- Asks to change large notes before gambling
- Borrows money from other people in the Hotel
- Asks the Hotel or staff for a loan or credit
- Puts large winnings back into the machine and keeps gambling
- Leaves the Hotel to find more money for gambling
- Appears to have run out of money when they leave
- Uses coin machine at least 4 times.

Emotional responses:

- Seen to be shaking while gambling
- Sweats a lot while gambling

- Acts nervously e.g. bites lip continuously
 - Vocally displays anger e.g. swears to themselves, grunts
 - Kicks or strikes machine with fists
 - Looks very sad or depressed after gambling
 - Cries after losing a lot of money
 - Sits with head in hands after losing
 - Shows significant mood changes while playing.
- 3.2 If a patron exhibits these indicators, then they may have a problem. Staff should then engage with the patron and ask the patron tactfully if they want help. Staff must use good communication skills so as not to exacerbate the situation particularly if the patron becomes aggressive.
- 3.3 If a patron approaches a staff member and asks for help, then you should privately provide every assistance possible, including giving them details of professional services available and the self-exclusion scheme [Section 5].
- 3.4 In all cases staff must listen and assist. Every situation will be different. However, you are not trained counsellors and must point the patron in the right direction.

4. Gaming - General Provisions

- 4.1. The Licensee, all managers and staff will be trained in the responsible conduct of gambling and the operation of gaming machines and shall complete an approved course in "Responsible Gambling".
- 4.2. No person under the age of 18 years shall be permitted in the gaming room of the Hotel. Signs shall be displayed to this effect adjacent to the entrance to the gaming room, on each gaming machine, at any EFTPOS facilities and at the ATM located within the Hotel.
- 4.3. The Hotel will: -
- comply with all advertising and promotional requirements and not display nor publish signs/advertising or any other material promoting gambling.
 - not encourage nor promote any irresponsible gaming practices.
 - provide a clock in a prominent position for patrons in the gaming room.
- 4.4. Patrons will be made aware of the AHA's counselling services and government funded counselling services such as "Gambling HELP".
- 4.5. The Licensee will keep and maintain a Gambling Incident Register:-
- The gambling incident register must record:
 - (a) any incident in which a patron of the venue displays or engages in problematic gambling behaviour of the kind specified in the 'Signs of risky and problem gambling behaviour: Know the signs and "how to act" factsheet published on the L&GNSW website as amended from time to time.

- (b) the time, location and machine number(s) and brief description (or identity, if known) of any gaming machine player identified displaying or engaging in that behaviour.
 - (c) any proposed or implemented self or third-party exclusions of gaming machine players (specifying the player's name (where provided or known), membership number (if applicable) and duration of any exclusion) and the patron's response to the same.
 - (d) Any breach or attempted breach of a self or third party exclusion.
- The gambling incident register must also record details of the action taken in response to the incidents, applications and other matters recorded in the register.
 - The licensee must review the gambling incident register at least on a monthly basis and must consider whether an exclusion order is appropriate for any person who has been asked to self-exclude but has declined to do so.
 - The information recorded in a gambling incident register must be retained for at least 3 years from when the record was made.
 - The licensee must, at the request of a NSW police officer or L&GNSW inspector, make any gambling incident register available for inspection.

4.6. Whenever the Hotel is trading past 12 Midnight the following shall apply:-

- The Licensee shall ensure that one Responsible Gambling Officer (Gambling Contact Officer), being a **dedicated staff member** who holds a current RCG certificate, is on duty and monitoring the gaming machines of the venue whenever gaming machines are operating after midnight.
- The Officer's primary duties are to:
 - (i) maintain the gambling incident register;
 - (ii) make reasonable efforts to identify gaming machine players who display or engage in problematic gambling behaviour or maybe approaching a state of intoxication;
 - (iii) if any gaming machine player displays or engages in multiple problematic gambling behaviour as outlined in the Authority's Guideline, during a single trading day, then the Officer must (at least once during that trading day);
 - (a) request that the player take a break from gaming machine play until the close of trade on that day or night (noting that a player who complies with a request to take a break may remain on the premises and consume other goods and services);
 - (b) provide information about the self-exclusion scheme offered at the premises (being the scheme available pursuant to s. 49 of the Gaming Machines Act 2001) and ask whether the player wishes to participate in that scheme;
 - (c) provide information about and access to problem gambling counselling.
- This condition is not breached by:
 - (i) a Responsible Gambling Officer (Gambling Contact Officer) undertaking minor additional gaming duties, so long as such duties do not detract from the Officer's primary duties; or

- (ii) the temporary absence of the Officer from the gaming machine areas, where such absence occurs in the ordinary course of their primary duties (for example, to engage with a gaming machine player in a private space) or is by way of a routine break from work (such as a meal break or a bathroom break).
- At all times, the Duty Manager or other senior manager responsible for gaming machine operations will assist the Responsible Gambling Officer (Gambling Contact Officer) in carrying out the duties described in this condition.

5. Gaming - Going Above and Beyond

- 5.1. The Hotel has reviewed Guideline 16 issued by the NSW *Independent Liquor and Gaming Authority* (**the Authority**) and, in particular, the “*Going above and beyond*” brochure (**the Brochure**) to the rear of that document. The strategies the Hotel has put in place to address the “*foundational*” and “*intermediate*” levels of the Brochure are set out in **Table 1**. If possible, the Hotel has also considered and addressed the “*advanced*” measures that are also detailed in the Brochure.
- 5.2. The left-hand column of **Table 1** uses the sub-headings (and dot point information) that is outlined in the Brochure. The information in the right-hand column are the strategies implemented at this Hotel in response.

Table 1:

Method of Complying with the “foundational” and “intermediate” levels of the Brochure	
Topic:	How addressed at this Hotel:
<p>Start with a plan:</p> <p><u>Foundation:</u> “develop a Gaming Plan of Management that identifies your responsible conduct of gambling (RCG) obligations and goals and what you are doing to meet them”.</p>	<p>This Gaming Plan outlines the strategies, policies and procedures of this Hotel to prevent or reduce gambling related harm.</p>
<p>Provide staff with additional training and resources:</p> <p><u>Foundation:</u> “regular in-house training and refreshers on your policies and procedures”.</p> <p><u>Intermediate:</u> “training or resources on the signs of risky and problematic gambling behaviour”.</p> <p><u>Advanced:</u> “communication skills training to support staff to approach patrons identified as at-risk”.</p>	<ul style="list-style-type: none"> ▪ The Hotel (through its management team) will hold regular staff meetings at least once a month to update staff with the strategies, policies and procedures of the Hotel and to better equip staff in ways to identify the signs of risky and problematic gambling behaviour, and how to best handle difficult situations. At these meetings: - <ul style="list-style-type: none"> - any operational concerns will be openly discussed, - any updates to the Guidelines will be considered, - staff can discuss any previous incidents or concerns at the Hotel and provide feedback how such matters were handled and, if relevant, how the Hotel could better manage those situations in the future, - management will promote and update staff as to programs to minimise gambling harms that are recommended by the NSW Office of Responsible Gambling as referred to below, - strategies will be discussed as to ways to watch for problem gamblers, assist patrons when appropriate to do so, and

	<p>how to interact or talk with patrons that have been identified as being potentially “<i>at-risk</i>”, and</p> <ul style="list-style-type: none"> - new entries in the Gambling Incident Register [see para. 4.5 above] will be discussed.
<p>Support staff to identify and assist patrons who need help:</p> <p><u>Foundation</u>: “<i>have a strong presence of supervisors in gaming rooms</i>”.</p> <p><u>Intermediate</u>: “<i>provide feedback on the action taken by managers when an issue is reported</i>”.</p> <p><u>Advanced</u>: “<i>have structured systems for staff to do welfare checks, encourage breaks in play and suggest alternatives to gambling available in the venue or beyond</i>” and “<i>increase welfare checks and patron interactions after midnight to encourage breaks in play</i>”.</p>	<ul style="list-style-type: none"> ▪ At least 1 staff member will be in charge of supervising the Gaming Room and its patrons. That person’s duties include: <ul style="list-style-type: none"> - to support responsible gambling activities at the Hotel and to minimise the harm associated with problem gambling, - oversee patron behaviour, engage in conversation with patrons (if necessary) to determine if there are any “at-risk” signs, and carry out regular Welfare Checks [see Section 3]. - actively assisting patrons who need help. - observe if any patrons maybe approaching a state of intoxication. <p>[note the additional requirements in para. 4.6 above when trading after 12 Midnight].</p> ▪ Welfare Checks [Section 3] will be carried out:- <ul style="list-style-type: none"> - Hourly before Midnight, and - Twice hourly after Midnight. ▪ If after carrying out a Welfare Check the staff member is concerned that a patron is approaching gambling related harm or is potentially “at-risk”, then the strategies that are set out below are designed to provide immediate proactive assistance to the patron: - <ul style="list-style-type: none"> - engage with the patron through conversation and encourage a break in play. For example, you may encourage them to leave the Gaming Room and have a meal in the dining area of the Hotel, or even leave the Hotel to meet up with family or friends at home or elsewhere. - point to brochures and signage in the Hotel if it will assist with discussions. - provide gambling related brochures to the patron if it will assist with discussions. - instigate a discussion with the patron focused on self-exclusion. ▪ At staff meetings (that are discussed above) there will be an open discussion about any previous incidents or concerns at the Hotel and how such matters were handled and, if relevant, how the Hotel could better manage those situations in the future. ▪ When a patron has been identified as being potentially “at risk”, then the actions taken by staff or management at the time will

	<p>be recorded in the Gambling Incident Register that is maintained at the Hotel [see para. 4.5 above].</p>
<p>Create a strong culture of gambling minimisation:</p> <p><u>Foundation:</u> “make it clear to staff that patron welfare is of the utmost importance”.</p> <p><u>Intermediate:</u> “discuss harm minimisation at all staff meetings and handovers” and “maintain a Gambling Incident Register to record RCG related incidents and the actions taken to address them”.</p>	<ul style="list-style-type: none"> ▪ The Hotel promotes a culture of putting the welfare of its patrons first. ▪ Before any change of shifts and staff departing the Hotel, they will discuss with their supervisor or replacement staff member(s) any potential concerns that occurred that day. ▪ A Gambling Incident Register will be maintained, and it will record any gambling related incident, the time and date of the incident, and the actions taken by staff or management to address it [see para. 4.5 above]. The Register is to be reviewed at least on a monthly basis by the licensee and any new entries discussed at the regular staff meetings.
<p>Encourage breaks in play through venue and service design:</p> <p><u>Foundation:</u> “don’t provide complementary [sic] food and snacks at gaming machines”.</p> <p><u>Intermediate:</u> “don’t provide food or drink service at gaming machines” and “place ATMs as far from the gaming room as practical”.</p>	<ul style="list-style-type: none"> ▪ It is the policy of this Hotel that we will: - <ul style="list-style-type: none"> – not provide a free food and snack service at the gaming machines. – place the ATM as far as practical from the gaming room. – monitor patrons to ensure no one maybe approaching a state of intoxication.
<p>Promote local support services:</p> <p><u>Foundation:</u> “display information about local support services in strategic locations, like the bathroom and on digital displays”.</p> <p><u>Intermediate:</u> “promote local support services in direct marketing to patrons and members”.</p> <p>and</p> <p>Break down the stigma associated with gambling problems:</p> <p><u>Foundation:</u> “promote gambling awareness campaigns in your venue and your marketing”.</p> <p><u>Intermediate:</u> “promote and hold events during relevant awareness weeks”.</p>	<ul style="list-style-type: none"> ▪ The L&GNSW has a range of programs to minimise gambling harms through the Office of Responsible Gambling. This Department continues to develop and implements programs and initiatives, funded by the Responsible Gambling Fund (RGF). There are a number of RGF funded services in the Campbelltown local government area. This Hotel assists these programs through its contribution to the RGF and its strategic approach that supports responsible gambling and prevents and minimises the risk of gambling related harm in the community. ▪ The Hotel will have available pamphlets informing patrons of the dangers of problem gambling and of the availability of counselling, and the self-exclusion scheme will be displayed within the Hotel in a number of community languages. ▪ It is the policy of this Hotel that we will promote any gambling awareness campaigns or programs by displaying information about them in strategic locations at the Hotel (e.g. at the entrance to the Gaming Room and in the bathrooms).
<p>Make sure self-exclusion is understood, available and enforced:</p> <p><u>Foundation:</u> “initiate self-exclusion when requested, regardless of the day or time” and “have strong systems for staff</p>	<ul style="list-style-type: none"> ▪ Welfare Checks will apply as set out above. ▪ The Hotel operates a self-exclusion scheme. Therefore, it is the policy of this Hotel that we will partake in self-exclusion schemes.

to familiarise themselves with photos of people who have self-excluded”.

Intermediate: *“proactively talk to patrons about self-exclusion during welfare checks”.*

- It is part of the Hotel's policy that staff are to proactively talk to patrons about self-exclusion during welfare checks.
- Staff are to initiate self-exclusion when requested, regardless of the day or time. Staff and management are to discuss (including at staff meetings) how to familiarise themselves with patrons (e.g. photos of people who are self-excluded will be kept behind the bar (but out of public view) for staff to view.
- Patrons experiencing problems with gambling are able to enter into a voluntary self-exclusion agreement that bans them from the Gaming Room or the entire Hotel. The minimum period for self-exclusion is six months.
- The Hotel provides the following information in the Gaming Room:
 - the name and contact of the problem gambling counselling service,
 - a statement that tells patrons a self-exclusion scheme is available,
 - details of the person or organisation who can help a patron to join the scheme i.e. Betsafe and GameCare, operated by AHA (NSW).
- Any patron experiencing problem gambling and who asks to be excluded from the Hotel or the Gaming Room, must sign a self-exclusion agreement not to gamble at the Hotel.
- As a provider of a self-exclusion scheme we will therefore:
 - tell our patrons we have a scheme available,
 - give patrons information about how the scheme operates,
 - allow a patron to participate,
 - allow a patron to specify the part/s of the Hotel they wish to be excluded from,
 - give a patron a written and signed undertaking that the Hotel will not allow them to gamble at the Hotel for a specified period,
 - give a patron written details about the gambling-related counselling service available,
 - give a patron the opportunity to obtain independent legal or other professional advice about the intention of the agreement before it commences,
 - ensure staff at the Hotel can identify the patron (i.e. through a recent photograph or by some other means), and
 - stop a patron from withdrawing from the scheme within six months of asking us to be involved.
- Staff at the Hotel have indemnity against civil or criminal liability for complying with a Self-exclusion Agreement,

	provided they act in good faith. Staff may use reasonable force to prevent a self-exclusion participant from entering a nominated area or remove a participant who refuses to leave a nominated area.
<p>Promote responsible gambling:</p> <p><u>Foundation:</u> "include responsible gambling messages on your website, and in newsletters and loyalty program marketing".</p> <p><u>Intermediate:</u> "share responsible gambling messages over the public address system and on electronic displays".</p>	<ul style="list-style-type: none"> ▪ The Hotel will also actively promote responsible gambling in any marketing material associated with the Hotel including in any emails, newsletters and loyalty marketing programs. ▪ Messages will also be available on electronic displays in the Hotel.
<p>Enable and respond to customer complaints:</p> <p><u>Foundation:</u> "provide information on how to make a complaint about RCG".</p> <p><u>Intermediate:</u> "have a robust customer complaint policy in place with specific arrangements for RCG-related complaints".</p>	<ul style="list-style-type: none"> ▪ The Hotel has implemented a complaint procedure in its Liquor Plan. That complaint procedure extends to any gaming related complaints. For clarity: - <ul style="list-style-type: none"> - All complaints made to the Hotel are to be recorded in the incident book and shall note the: date and time of the incident; nature of the complaint, address and contact details of the complainant; and any actions proposed to deal with the complaint. A note of the complaint and whether it has been, or needs to be, followed up is to be made in the day diary. - All complaints are to be responded by management within 48 hours of a complaint being made if the complaint was not made to management in the initial call. - The incident register is to be reviewed weekly by the licensee to ensure that complaints, where possible, are being dealt with. - Any recurring complaints should be dealt with, if attributable to the Hotel, through new management procedures and incorporated into the Gaming Plan.

6. Modification and maintenance of the terms of the Gaming Plan

- 6.1. If, in circumstances where experience shows that it is reasonable or desirable to modify any provision of this Gaming Plan for the better management of the Hotel, then that modification shall be made, and a copy shall be provided to the local Licensing Police, and the Authority/L&GNSW.

Signs of risky and problem gambling behaviour: Know the signs and how to act

General Signs		What to do
Length of play <ul style="list-style-type: none"> Starts gambling when the venue is opening or only stops when venue is closing Gambles most days 	Money <ul style="list-style-type: none"> Asks to change large notes before gambling Rummages around in wallet for additional money Uses coin machine at least four times Has run out of all money when he/she leaves venue 	<p>Seen by themselves, these signs may be an early warning sign.</p> <p>Someone displaying several of these signs could be experiencing problems with gambling.</p> <ul style="list-style-type: none"> Monitor the person's behaviour If you have an incident register, record what you have seen If you observe a patron who is exhibiting two or more signs you should notify your manager or licensee
Behaviour during play <ul style="list-style-type: none"> Gambles on two or more machines at once Rushes from one machine to another Significant increase in spending pattern Complains to staff about losing, or blames venue or machines for losing Rituals or superstitious behaviours (rubbing or talking to machine) 	Social behaviours <ul style="list-style-type: none"> Stays on to gamble even after friends leave venue 	
Probable Signs		What to do
Length of play <ul style="list-style-type: none"> Gambles right through normal meal times Finds it difficult to stop gambling at closing time 	Money <ul style="list-style-type: none"> Gets cash out on two or more occasions through ATM or EFTPOS Avoids cashier and only uses cash facilities Puts large wins back into the machine Leaves venue to find money to continue gambling EFTPOS repeatedly declined 	<p>Someone displaying any of these signs is much more likely to be experiencing problems with gambling.</p> <ul style="list-style-type: none"> Monitor the person's behaviour If you have an incident register, record what you have seen If a patron displays two or more of these signs, consider whether an immediate response is required according to your venue's procedures
Behaviour during play <ul style="list-style-type: none"> Often gambles for long periods (three or more hours) without a proper break Plays very fast Gambles intensely without reacting to what's going on around him/her Sweats a lot while gambling 	Social behaviours <ul style="list-style-type: none"> Avoids contact or conversation with others Becomes angry or stands over others if someone takes their favourite machine/spot 	
Strong Signs		What to do
Length of play <ul style="list-style-type: none"> Gambles from opening to closing 	Money <ul style="list-style-type: none"> Tries to borrow money from customers or staff 	<p>It is highly probable that someone displaying any of these signs is experiencing problems with gambling.</p> <ul style="list-style-type: none"> Monitor the person's behaviour If you have an incident register record what you have seen Consider whether an immediate response is required according to your venue's procedures
Behaviour during play <ul style="list-style-type: none"> Shows obvious signs of distress (crying, holding head in hands, shaking) Has an angry outburst towards staff, customers or machine (shouting/swearing, kicking/hitting machine) 	Social behaviours <ul style="list-style-type: none"> Leaves children unattended Tells staff that gambling is causing them problems Significant decline in personal grooming and/or appearance over several days Friends or family raise concerns Conceals their presence at the venue (doesn't answer mobile phone, asks staff not to let others know they are there) 	