

Class 1 Application Local Impact Assessment

Toronto R S L Memorial Club Ltd t/as Toronto Diggers Club 41 The Boulevarde **Toronto NSW 2283**

Licence Number: LIQC300241181

LGA: Lake Macquarie SA2: Toronto-Awaba

4 March 2025

1. LIA1 Application:

- Toronto R S L Memorial Club Ltd (the "Club") submits this Class 1 Local Impact Assessment application ("LIA1") with respect to the GMT increase application for Toronto R S L Memorial Club Ltd located at 37-41 The Boulevarde, Toronto NSW 2283 (LICQ300241181).
- The Club Premises is in the Band 2 SA2 of Toronto-Awaba and the Local Government Area of Lake Macquarie.

2. Low Range GMT Increase:

The Club is seeking an increase in its GMT of twenty (20) GMEs being a "low range" increase. The Club currently has 85 GMEs on its Club Licence with a corresponding GMT of 85. If approved this low range increase would lift the GMT for the venue from its current 85 to 105.

3. SEIFA Ranking:

• The Toronto-Awaba SA2 has an Index of Relative Socio-Economic Advantage and Disadvantage (IRSAD) of 4 at an SA2 level and 7 at a LGA level.

4. Positive Community Contribution: The Club can demonstrate the following benefits:

- Ten (10) Gaming Machine Entitlements Forfeited by the GME Transfer Transaction reducing available GMEs in the community.
- Supports Financial Viability of the Club. The now closed Wallsend Bowling Club, is unlikely to ever reopen as the building has sustained major structural damage due to mine subsidence and the purchase price of \$250,000 will assist the Club which owns it to deal with losses of \$300,000.
- Continuation of Funding for Community Organisations. The Club provides significant funding and support to community groups, schools and sporting organisations.
- Adoption of Harm Minimisation measures, and a Gaming Plan of Management, in excess of legally-required harm minimisation requirements.
- Responsible Gaming Fund Contribution of \$175,200 to promote harm minimisation and being a positive contribution in excess of legal requirements.

5. Current Harm Minimisation and Responsible Gambling Practices and Services:

 Legislative requirements will be complied with. Self Exclusion Program and Gaming Duties staff hold RCG qualifications. Proposed additional Harm Minimisation measures in excess of legislation including Senior Management and Gaming Supervisors have Advanced RCG Training, maintaining Responsible Gambling Program, Player Pre-Commitment Player Cards and a Gambling Incident Register.

6. Office of Responsible Gambling (ORG) Identified Risk Factors:

- The proportion of the total population 15 years and over who have completed Year 12 or equivalent in the SA2 is 42.8% a rate that has increased by 25% since 2011.
- The proportion of lone person households in the SA2 is 28.3% which is only slightly above the rate of 25% for all of NSW and is due to the higher percentage of retirees and elderly people in the SA2.
- Indigenous population is higher than the NSW average, being 7.8% of the SA2 population, however, regional areas tend to have higher indigenous populations.
- The proportion of the population aged 20-24 years of age in the SA2 of 4.9% which is lower than the NSW average of 6.50%.
- The average weekly income per household in the SA2 is \$895 which is below the NSW average of \$1,096 due to 44% of the resident population relying on smaller fixed incomes from government payments, superannuation and other payments.
- Residents in skilled occupations in the SA2 is 59.7%, which is slightly lower than the NSW average of 65.3%. Health care sector is experiencing high demand and is currently the largest source of employment.

2. DETAILS OF THE VENUE AND LOCAL COMMUNITY

2.1 BACKGROUND AND HISTORY OF THE CLUB

- 2.2 The Toronto RSL Memorial Club (known as "Toronto Diggers") has a proud history that dates back to 1952 and has grown to become a popular meeting place for locals and visitors in the Lake Macquarie area. The Club aims to provide members and guests with first-class services including dining, live music and sport whilst supporting key community initiatives including cost of living help for the local community, domestic violence services and funding and support for people experiencing homelessness.
- 2.3 The Club prides itself on its rich history and the Club's gaming machines remain only one aspect of the services and facilities provided at the Club for members and their guests.
- 2.4 The Club offers a bistro, bar and sports lounge.

2.5 **VENUE DETAILS**

Venue Size	2,200m2
Venue Floor Space	1,600m2 (less back of house area)
Venue Gaming Area Floor Space	339m2
Venue Gaming Area Location	Rear of venue near main carpark and top entrance. A distinct separate entrance and monitored by reception staff.
Other Facilities and Services	Bistro, Function room, Lounge Bar, Raffles and Badge Draws Mezzanine sports bar
Current GMT	85
Current GMEs	85

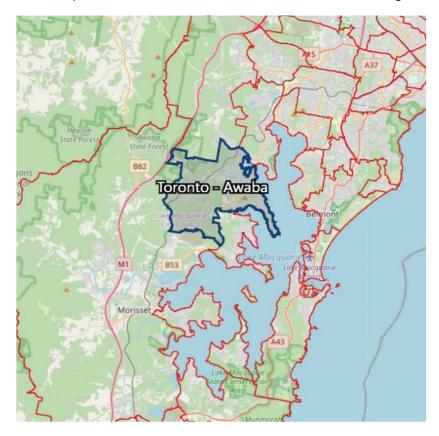
2.6 LOCAL COMMUNITY

Population

- 2.7 The Local Community is the Toronto-Awaba SA2 with an estimated current population of 14,101 which has remained steady with minimal growth since 2018. This SA2 has an area of approximately 43 sq km with a population density of 324 people per square kilometre with an estimated 2.3 people living per dwelling
- 2.8 The maps below show that the Toronto-Awaba SA2 is bordered to the north by the West Wallsend-Barnsley-Killingworth SA2. Newcastle Council has committed \$50m in funding over the next 5 years to upgrade roads, reduce flood risks and create safer, more connected active transport links. According to the ABS the West Wallsend-Barnsley-Killingworth SA2 as at 2023 has an estimated population of 7,383.
- 2.9 The West Wallsend-Barnsley-Killingworth SA2 is a Band 2 SA2 and has one Club with 49 GMEs and two Hotels with 18 GMEs. Due to the Club's distance from the West Wallsend-Barnsley-Killingworth SA2 clubs and pubs, patrons from this SA2 are not likely to frequent the Club.

Maps

2.10 Map 1 – This map below shows the Toronto-Awaba SA2 and surrounding SA2s for 5km.



2.11 Map 2 – This map below shows the location of the Club's premises within the Toronto-Awaba SA2.



SEIFA Ranking

2.12 The Census of Population and Housing: Socio-Economic Indexes for Areas (SEIFA), Australia, 2021 shows the following scores in the Toronto-Awaba SA2 and illustrates that the population in the area is relatively disadvantaged. The IRSAD scores of 4 at an SA2 level and 7 at an LGA level are low-medium scores and according to the ABS indicate a relative lack of advantage and lower advantage in general. The IEO scores of 4 at an SA2 level and 7 at an LGA level are again low-medium scores and according to the ABS indicate relatively lower education and occupation status of people in the area in general.

INDICATOR	Toronto- Awaba SA2 Score	West Wallsend SA2 Score	Toronto- Awaba SA2 Decile	SA2	Lake Macquarie LGA Score	Lake Macquarie LGA Decile
Index of Relative Socio- economic Advantage and Disadvantage (IRSAD)	956	994	4	3	981	7
Index of Relative Socio- economic Disadvantage (IRSD)	975	995	4	5	1004	7
Index of Economic Resources (IER)	981	1027	4	7	1011	8
Index of Education and Occupation (IEO)	946	895	4	2	963	7

- 2.13 The ABS states that IRSAD is the best measure to be used as a general measure of advantage and disadvantage, to understand disadvantage, and advantage, and to offset advantage or disadvantage in analysis. The Toronto-Awaba SA2 figures are based on a small population sample and are not necessarily representative of the type of members that attend and use the Club's services. It is submitted that the Lake Macquarie LGA figures with a wider sample range gives a more accurate picture of the disadvantage/advantage score and suggests a more advantaged score on all measures.
- 2.14 The Lake Macquarie LGA is complex as it has been, and continues to, attract wealthier retirees who are settling in the area to access new housing developments and retirement living options. Many of these retirees are self-funded with a higher level of disposable income and are more inclined to spend at local clubs, restaurants and other facilities. In contrast, the LGA has a legacy of some residents who live in public housing and have a lower income and spend proportionately less on club services and facilities.
- 2.15 Accordingly, the SEIFA Rankings support the position that the SA2 of Toronto-Awaba and the adjoining SA2 of West Wallsend are both relatively disadvantaged SA2s and the proposed low range increase in the GMT at the Club will not increase the availability to gaming machines in a disadvantaged or vulnerable SA2.

Gaming Machine Data

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usual resident population of 14,101)	
Club Net Profit per Gaming Machine Ranking (Club Ranking - Net Profit per	204
Gaming Machine 31 May 2024)	
Club Net Gaming Machine Profit Overall Ranking (Club Ranking - Net Profit	205
Overall 31 May 2024)	
Gaming Machine Expenditure Ranking by LGA (based on Gaming Machine Bi-	85
Annual Report 1/12/23 to 31/05/24)	

2.16 A gaming performance data report for the Club shows the revenue for a 12-month period, from 1 December 2023 to 30 November 2024, to be approximately \$6.69million, with the average revenue per machine (based on 85 on the gaming floor) of \$78,000, and an average per GME based on the 85 GMEs on the Club Licence of approximately \$67,000, for that 12-month period which is only slightly above the average for the combined club and

hotel revenue.

- 2.17 There are only three (3) Clubs in the Toronto-Awaba SA2 with gaming machines being Toronto RSL Memorial Club ("the Club"), Toronto District Workers Club and Royal Motor Yacht Club, together operating as at 31 May 2024, as recorded by Liquor and Gaming NSW, 258 gaming machines. The Club has 85 of the 258, so it is not statistically appropriate to use the SA2 gaming performance data for comparison purposes. Considering the Lake Macquarie LGA gaming machine revenue data it is apparent that gaming machines at the Club are played less intensely than other Clubs in the Lake Macquarie LGA achieving revenues 38% below the Lake Macquarie LGA club gaming machine average revenue (based on an average yearly revenue of \$107,878 per machine for the LGA and \$67,000 for the Club as outlined above). Figures from Clubs: Gaming Machine Annual Report by Local Government Area (LGA) for the Period 1 September 2023 to 31 August 2024.
- 2.18 The Club currently has approximately 7,138 members with 3,704 members living within the Toronto-Awaba SA2 and 3,484 members living outside the SA2.

Other relevant Demographic Information

2.19 Relevant SA2 Demographic Information extracted from the ABS website as generated with 2021-2023 Census data:

	Toronto-Awaba SA2	NSW Average
18 Years and Over Population	14,101 approx	
Population Growth	1% approx. p.a.	
Male Population Age (approx.)	6,953	4,059,953
• 18-19	48 (2.4%)	1.2%
• 20-24	357 (5.1%)	6.6%
• 25-29	386 (5.6%)	7.1%
• 30-39	718 (6.4%)	14.5
• 40-49	710 (10.2%)	12.7
• 50-59	831 (12%)	14
• 60-69	1017 (14.6%)	10.6
• 70-85+	1,356 (19.4%)	11.6
Female Population Age (approx.)	7,148	4,105,778
• 18-19	160 (2.2%)	1.1%
• 20-24	334 (4.7%)	6
• 25-29	278 (3.9%)	6.8
• 30-39	802 (11.2%)	14.5
• 40-49	730 (10.2%)	12.8
• 50-59	951 (13.3%)	12.2
• 60-69	1,046 (14.6%)	11.1
• 70-85+	1,533 (21.5%)	13.3
Education		
 Persons 15 Years and Over Completed Year 12 or equivalent Post-graduate Degree, Graduate 	42.8%	58.9
Diploma/Graduate Certificate, Bachelor Degree, Advanced Diploma, Certificate	61.7%	64.1
Occupation	Total employed – 5,660	
ProfessionalsClerical & AdministrativeManagers	19.5% 13% 11.4% 15.8%	25.8 13 14.6 11.9

	Toronto-Awaba SA2	NSW Average
Technicians/Trade	13.1%	10.6
Community/Personal Service	8.5%	8
Sales	9.6%	8.2
 Labourers 	7.4%	6
 Machinery operators/drivers 		
Main areas of employment:		
 Health Care and Social assistance 	1,430	
Retail	829	
 Construction 	818 755	
Administrative & Support services	720	
Education & Training	529	
Manufacturing	586	
 Professional 		
Unemployment rate	5.7%	4.9
Not in the Labour force	44.6%	35.5
Ethnicity – language		
Speaks a language other than English at home	3.8	26.6
Income Distribution	0.0	20.0
Individual (weekly) (%)		
• \$1-\$499 ´´	28.7%	22.7
• \$500-\$999	25.9%	21.9
• \$1000-\$1999	23%	25.6
\$2000-\$2999	5.8%	7.9
 \$3000 or more 	3.6%	5.7
 Nil income 	6.2%	8.5
Household (weekly) (%)		
\$1-\$499	19.6%	15.8
• \$500-\$999	31%	24.8
\$1000-\$1999	29.9%	33.5
\$2000-\$2999	7%	11.3
 \$3000 or more 	3.9% 1.7%	6.3
Nil income	\$895	1,096
Median equivalised total household income	ψοσσ	1,090
Employment		
 Employed 	5,660	
 Unemployed 	340	
Not in labour force	44.6%	35.5
Housing costs		
Median Weekly Rent Payment	\$340	420
Median Monthly Mortgage Payment Tanana Tanana	\$1,733	2,167
Housing Tenure Type	14.404	0.1.5
Owned outright	41.1%	31.5
Owned with a mortgage	30.9%	32.5
Rented Heusehold Type	25.1%	32.6
Household Type	4.500 (00.000)	050/
Lone person	1,563 (28.3%)	25%
Group	106	1.9%
 Family 	3,841	69.7%

^{2.20} We refer to point 6 of the Executive Summary for an analysis of the demographic data against the ORG identified risk factors.

3. HARM MINIMISATION AND RESPONSIBLE GAMBLING PRACTICES AND SERVICES

- 3.1 Toronto RSL Memorial Club's profit per machine is significantly less than the LGA's profit per machine for the reported corresponding 12-month period as set out above.
- 3.2 **Mandatory Harm Minimisation Measures:** The Club's measures include:

Counselling Services	 display problem gambling brochures at critical points within the venue and have a wide range of these brochures in many languages to help with our culturally diverse community brochures contain details about the ClubSAFE Counselling Service and Gambling Help Line management team are proactive in providing relevant information to patrons in need display information about local support services in strategic locations, like the bathroom, gaming floor and on digital displays.
Welfare Checks	 management and frontline team monitor patrons undertaking gambling activity for any signs of extended play or distress if so, a duty manager will conduct a welfare gauge their mood, stress level and assertiveness and if required undertake the steps necessary, whether that be encouraging them to take a break, explaining our exclusion or counselling services or asking them to leave the environment. All encounters are recorded in our gaming incident register. Indirect interactions such as daily announcements are made over the Clubs PA system to encourage customers to take regular breaks from gaming machines.
Signage	 Monthly internal signage checks to ensure regulatory compliance Advertising within Club complies with Liquor & Gaming NSW guidelines Promotion of gambling harm awareness on website, newsletters, electronic displays and public address system Counselling services information made available Chance of winning information Gaming machine notice.
Gambling Help wording	 on all player activity statements (patrons are directed to the ClubSAFE NSW website) displayed on ATMS, cash-back terminals and cash-back terminals operated by a player card.
ClubSAFE Self- Exclusion Program	 Prominent signage where patrons can contact the Club's Duty Manager for assistance Online Self-Exclusion tool that enables gamblers to initiate self-exclusion from the Club's gaming area or areas of multiple venues. Patron referred to trained counsellors for assessment and support.
Gaming Area	 Gaming area is restricted to persons over the age of 18 years and is not in a part of the Club where minors will pass through or see the gaming area. No externally visible signage or advertising visible outside the gaming area Patrons are not compelled to pass through the gaming area to access other areas of the Club and cannot see any of the gaming machines from any public areas of the Club.
Payments,	Prizes will only be issued to the person playing the machine

Transactions and	at the time of the win. Cash payments are limited to \$5,000
Lending	 amounts above are issued as a cheque or by EFT
	ATMs are located outside the gaming area and patrons are
	not permitted to make withdrawals using a credit card
	account
	 CRTs have a limit of \$5,000 per payment. All winnings
	above this amount need to be paid by the cashier with
	supervision
	 The Club has a policy not to provide advances to patrons
	by either cash or cheque
	Club staff are prohibited from lending money to patrons
	Patrons are prohibited from borrowing money from other
	patrons.
Player Accounts	The Club issues player account cards and provides player
	activity statements to patrons upon request free of charge
	with total amount of turnover, total wins and net
	expenditure, the total points earned and redeemed through
	the club's rewards program as a result of playing gaming
	machines, the entire length of time the player's card was
	inserted into gaming machines, and gambling help
	information.
Staff RCG	All staff involved in gaming duties hold current Responsible
Qualifications	Conduct of Gambling (RCG) qualifications available at all
	times for inspection by the Authority when on duty.
	Senior Management and Gaming Supervisors of the Club
	have undergone Advanced RCG Training
	 In addition to the mandatory RCG training, team members
	undergo training sessions appropriate to their role:
	Multi Venue Self- Exclusion
	 Advanced Responsible Gambling Training
	Compliance Officer Training.
Mandatory Gaming	Monday-Friday 3:00am to 9:00am
Machine Shutdown	Saturday-Sunday 3:00am to 9:00am
	Public Holiday 3:00am to 9:00am

- 3.3 All legislative requirements, including those set out in the Gaming Plan of Management which is Annexure 2, will be complied with.
- 3.4 Additional Harm Minimisation and Responsible Gambling Measures: The Club will also voluntarily provide the following additional harm minimisation measures in excess of what is legally required which represent a positive benefit for the community:

Advanced RCG	 ensuring two Responsible Gambling Officers, who hold a current RCG Certificate with an Advanced Certificate of Gaming accreditation, are on duty at all times during gaming machine operating hours (including after midnight). This is effective as a harm minimisation measure as a properly trained person will feel more comfortable approaching gaming patrons and enquiring about their wellbeing. distributing leaflets and flyers that are designed to inform patrons of the risks of gambling harm and of the availability of counselling and the self-exclusion scheme. These will be language appropriate and provide a way for people to exercise self-responsibility in a non-confronting way.
Harm Minimisation Program	 assists patrons to understand the risks of gambling harm and to assist them to manage their gaming activity in a

	responsible manner and provide a suite of tools and assistance to family members who may be concerned
	about another person's level of gaming activity and the
	risk of gambling harm.
Community Support	 contribution of the required amount or above every year,
	through ClubGRANTS and community contributions.
	 donations to a number of local sporting clubs include Soccer and Baseball.
	 provision of Club premises for social and hobby clubs.
	Club provides an education program for vulnerable
	groups about the risks of gambling harm
	Club will support Gambling Aware week moving forward.
Player support	provide pre-commitment player cards where requested by patrons free of charge
	 management and frontline team monitor patrons
	undertaking gambling activity for any signs of extended play or distress
	Indirect interactions such as daily announcements are
	made over the Clubs PA system to encourage customers to take regular breaks from gaming machines.
	maintain a Gambling Incident Register to record any incident where a patron of the Club displays behaviour or
	engages in behaviour where there is a risk of gambling
	harm as observed by our dedicated Responsible
	Gambling Officers and management team.
Gaming Plan of	The adoption of a Gaming Plan of Management which
Management	goes above and beyond the Club's legislative obligations,
	demonstrating a positive contribution to the local
	community in relation harm minimisation and operation of
	ALL gaming machines at the Club.
	3

3.5 Please see at Annexure 1 the current Gaming Plan of Management which has been adopted at the Club from approval of the GME Transfer and associated GMT increase.

4. POSITIVE CONTRIBUTION TO COMMUNITY

- 4.1 The Club can demonstrate below how if approved the GME Transfer application and associated GMT increase will have a positive contribution on the community (as required by clause 33(b) of the *Gaming Machines Regulation* 2019).
- 4.2 **Ten Gaming Machine Entitlements Forfeited:** Gaming Machine Entitlements are being purchased from another Club and as a result of this GME Transfer a total of 10 Gaming Machine Entitlements will be forfeited reducing the total GME in the State of NSW. Forfeiture is a major harm minimisation benefit that is derived from GME transfer and the associated GMT increase, and is a key harm minimisation measure of the relevant legislation.
- 4.3 **Supports Continuation of Funding for Community Organisations and Schools:** The Club provides significant funding and support to community groups, schools and sporting organisations in the Toronto and Lake Macquarie area. Examples include:

Schools

- Toronto High School Breakfast Club and other cost of living pressure support; funding scholarships and pathways programs
- Blackalls Park Public School Breakfast Club and cost of living pressure support
- Coal Point and Biriban Public Schools

Sporting Organisations

Toronto Amateur Sailing

- Toronto Sailability
- Watagans Equestrian
- Toronto Awaba Stags Soccer full club support and sponsorship. Please see Annexure 2 for a letter of appreciation from Toronto Awaba Stags thanking the Club for its support and what the contributions have been able to achieve.
- Toronto Tigers Baseball full club support and sponsorship. Please see Annexure 3 for a letter of appreciation from Toronto Tigers thanking the Club for its support and what the contributions have been able to achieve.
- Newcastle Women's Baseball. Please see Annexure 4 for fliers from Newcastle Women's Baseball confirming our sponsorship.

Please see Annexure 5 for photographs of various sporting organisations that are sponsored by the Club showing the Club logo on sports uniforms.

Community Groups

- NourishED Homelessness and cost of living support. Please see Annexure 6 for a letter of appreciation from NourishED thanking the Club for its support and what the contributions have been able to achieve.
- Rotary, Probus and Lions Clubs
- Californian Car Club
- 217 Cadets
- National Service "Nashos"
- Toronto Brass Band
- Toronto Meals on Wheels
- NSW Justice of the Peace
- 4.4 The Club is committed to continue the funding and support of these vital local organisations and plans to increase funding if possible following approval of the GME Transfer. The Club's vision is to build on existing collaborations such as NourishED and to work with other organisations to provide services to those in need in the Toronto local community.
- 4.5 Supports Financial Viability of the Club: The Club has a successful trading history and continues to grow and improve on its services to members and guests. The Club's vision is to use the extra funds generated to increase its support of community organisations, sporting teams and schools. A major focus for the Club is to increase its support of local sporting programs by investing in local teams across the sporting spectrum so that participation increases for the wellbeing of members of the local community.
- Adoption of Harm Minimisation Measures and a Gaming Plan of Management which exceeds legally required harm minimisation measures and relevant guidelines: See at Annexure 1 the current Gaming Plan of Management adopted at the Club in July 2024. This will benefit the local community with the adoption of harm minimisation measures that go above and beyond that required by the Gaming Machines Act and Regulations. A Gaming Plan of Management is not a legal requirement of GME transfer and GMT increase and therefore its adoption, and the harm minimisation benefits it brings, are in addition to legally required harm minimisation measures. The Club also has relationships with local problem gambling counselling services and actively promotes such services within the Club on its website and in the provision of marketing material. The Club has identified in its recent review of funding priorities that it is now placing higher importance on supporting community groups that support community needs and objectives.
- 4.7 **Responsible Gambling Fund Payment:** The Club proposes to make a financial contribution of \$175,200.00 per year for 5 years (being a total of \$876,000 over 5 years) in the event the Authority approves this application. The proposed contribution will be made to the Responsible Gambling Fund and has been calculated in accordance with GL4014 Class 1 Local Impact Assessment process guidelines, such that the donation will constitute a positive contribution for the purposes of section 36(3)(c) of the Gaming Machines Act. This payment advances harm minimisation as the Responsible Gaming Fund supports research into

individual and community level gambling harm minimisation, regulation of gambling products, practices and environments, gambling among vulnerable groups, emerging technologies and new trends, measuring and understanding gambling prevalence and harm and the efficacy and effectiveness of treatment. The research helps build the evidence base for responsible gambling policy, interventions and programs. This proposed financial contribution is a payment which is in addition to the legally required obligations of the Club on a GME Transfer and GMT increase and is, pursuant to section 36A of the Gaming Machines Act, to be treated by the Authority as if it were a contribution to the local community where the Club is located.

5. COMMUNITY CONSULTATION

- 5.1 The Club is committed to fulfilling its consultation obligations with respect to community consultation. We understand the importance of this process in ensuring that the local community's views and concerns are heard and addressed effectively. To this end, we will initiate the required community consultation process immediately after submitting our GMT increase application. This will include notifying relevant local authorities, health services, and community organisations. We will also place advertisements in local newspapers and display notices at the venue, inviting community members to submit their feedback within a 60-day period.
- 5.2 Our approach to this consultation is grounded in transparency and a genuine willingness to engage constructively with the community. We recognise that the impact of additional gaming machines on the community is a matter of public interest and concern. Therefore, we will diligently consider all feedback received during the consultation period. This includes addressing any issues raised by local residents, community groups, and other stakeholders.

6. CONCLUSION

- 6.1 The Club has applied to increase the GMT of the Club by a "low range" 20 GMEs. This document is the required Class 1 LIA application for a Band 2 SA2. The Club seeks approval of this Class 1 LIA application in conjunction with its approval of the associated threshold increase lodged concurrently with this LIA.
- 6.2 This LIA demonstrates as required by section 36(3)(b) of the Gaming Machines Act, that gambling activities at the Club will be conducted in a responsible manner. The Board of the Club take their gambling harm minimisation obligations seriously and are committed to going above and beyond what is legislatively required as demonstrated in this LIA including as set out in its revised and updated Gaming Plan of Management for the Club.
- 6.3 This LIA also demonstrates as required by section 36(3)(c)(i) of the Gaming Machines Act that the proposed increase in the gaming machine threshold for the relevant venue will provide a positive contribution towards the local community where the Club venue is situated. These positive benefits are set out in sections 4.1–4.7 above.
- 6.4 This LIA satisfies and addresses the criteria as set out in the applicable guidelines and the Gaming Machines Act and Regulations. It is respectfully submitted that this application has met the requirement that a positive contribution to the local community be demonstrated and that on balance there are not risk factors arising from the demographic characteristics of the local community, or the intensity of play at the venue, which on balance are sufficient to justify any other action than approval of this application. Additionally, the Club is fully committed to implementation of its Responsible Conduct of Gambling Program and its Gaming Plan of Management.

Should ILGA be of the view that there are grounds to reject this application, then the Club would appreciate a face-to-face meeting with the ILGA Board to discuss such concerns and this application generally. Should you have any questions or queries in relation to this application please do not hesitate to contact us.

TORONTO DIGGERS

GAMING PLAN OF MANAGEMENT

REVIEWED: July 2024

Contents

1.	INTE	RODUCTION	3
2.	CLU	B SAFE MEMBER	3
3.	OUF	R VENUE	3
4.	OUF	R CUSTOMERS	3
	4.1	Self-Exclusion	4
	4.2	Partial Self-Exclusion.	4
	4.3	Counselling Services	4
	4.4	Welfare Checks	4
	4.5	Signs of Problem Gambling	5
5	OUR	R TEAM	6
	5.1	Staff Training and Awareness	6
	5.2	Responsible Gambling Officer	6
	5.3	Gambling Incident Register	7
	5.4	Staff Gambling Policy	8
6	NSV	V LEGISLATION	8
	6.1	Minors/Persons Under 18 Years	8
	6.2	Financial Transactions	8
	6.3	Venue Gambling Signage and Information	9
	6.4	Player Activity Statements	9
	6.5	Gaming Floor Shut Down	9
	6.6	Community Contributions	9
	6.7	Venue Layout	10
	6.8	Review of Toronto Diggers Gaming Plan of Management	10
	6.9	Local Liquor Licensing Police Contact Details	10
7	ADD	ENDLY A _ ELOOP DI AN	11

Page **2** of **11**

1. INTRODUCTION

Toronto Diggers is committed to responsible gambling and as such have developed a plan of management in consultation with Toronto Diggers board and management team to promote responsible service and delivery of gambling products.

This plan highlights our current initiatives and support services that are available to our customers and team to improve the overall standard of customer care and encourages a responsible gambling culture.

This Gaming Plan of Management has been adopted at:

Toronto Diggers (LIQC300241181) 37 - 41 The Boulevarde, TORONTO. NSW. 2283

A copy of this document can be found on the Club website and in-house upon request at reception.

Toronto Diggers is located in the SA2 of Toronto - Awaba, which at the time of updating is a Band 2 and is licenced to operate 85 gaming machines.

For more information, please email matt@torontodiggers.com.au

2. CLUB SAFE MEMBER

Toronto Diggers is a member of Club Safe which is the club industry's leading best practice and preferred responsible gaming program in NSW. It is based on a Multi-Venue Self-Exclusion (MVSE) program designed to assist people with a gambling problem by self-excluding them from multiple venues around which they live, work and socialise.

3. OUR VENUE

Toronto Diggers has an electronic gaming system installed which allows for the reporting of meters in fifteen minutes increments and gives management visibility of activity occurring on each gaming machine throughout the day.

Toronto Diggers has CCTV cameras located at the entrance to the venue, the entrances to the gaming floor and throughout the gaming floor.

Toronto Diggers offers a loyalty rewards program in-venue. This rewards program allows members to earn points for purchases in all areas of the Club as well as for gaming machine play.

4. OUR CUSTOMERS

The decision to gamble lies with the individual and represents a choice, and in order to properly make that choice individuals must have the opportunity to be informed.

Toronto Diggers is committed to providing appropriate information to all individuals including those from different cultural and linguistic backgrounds, so they are able to make informed decisions consistent with their personal preferences and individual circumstances.

Toronto Diggers takes the issue of responsible gambling very seriously and actively promotes the following initiatives to ensure all patrons to our club are aware of such services available to them.

Page **3** of **11**

4.1 Self-Exclusion

The ClubSAFE Multi-Venue Self-Exclusion (MVSE) Program is an online system designed to enable people with a gambling problem to self-exclude from our venue as well as multiple venues around where they live, work and socialise. Toronto Diggers will initiate self-exclusion when requested by a patron at any time during its opening hours.

The ClubSAFE MVSE Program removes barriers for people with a gambling problem such as the difficultness of visiting multiple venues or the embarrassment of visiting their local club to place the exclusion and makes the process easier for a person with a gambling problem.

A patron can self-exclude by speaking to a duty manager at the club, via clubsafe, or by contacting a gambling help counsellor.

The minimum period for a self-exclusion is six months. Once a patron agrees to stay away from the club for a specific time, our venues have processes in place to help them honour that commitment. If a patron breaches their self-exclusion, it is reported through the MVSE program for assessment by trained counsellors. Toronto Diggers is considering procuring facial recognition technology to assist in identifying self-excluded patrons entering the premises.

Toronto Diggers has an electronic sign in system at reception which assists with identifying and preventing breaches of self-exclusion.

4.2 Partial Self-Exclusion

A partial self-exclusion allows a patron to exclude themselves from gambling activities at the club such as TAB/KENO and/or gaming machines, but still allows them access to other club facilities including restaurants, bars and other entertainment.

A patron can self-exclude by speaking to a duty manager at the club or by contacting a gambling help counsellor.

The minimum period for a self-exclusion is six months. Once a patron agrees to stay away from the gaming activities of the club for a specific time, our venues have process in place to help them honour that commitment.

If a patron breaches their self-exclusion, it is reported through the MVSE program for assessment by trained counsellors.

4.3 Counselling Services

As required by law, Toronto Diggers display problem gambling brochures at critical points within the venue and have a wide range of these brochures in many languages to help with our culturally diverse community. These brochures contain details about the ClubSAFE Counselling Service and Gambling Help Line:

ClubSAFE Counselling Service – 1800 997 766 GambleAware Helpline – 1800 858 858

The management team at our venue are proactive in handing out the relevant information to patrons in need. Toronto Diggers will display information about local support services in strategic locations, like the bathroom, gaming floor and on digital displays.

4.4 Welfare Checks

Toronto Diggers aims to ensure all our patrons have a positive experience this includes undertaking welfare checks on any guests who may be at risk of problem gambling. Our management and frontline team are vigilant in monitoring our patrons undertaking any gambling activity. If they are showing signs of extended play or distress, a duty manager will conduct a welfare

Page **4** of **11**

check to gauge their mood, stress level and assertiveness and if required undertake the steps necessary, whether that be encouraging them to take a break, explaining our exclusion or counselling services or asking them to leave the environment.

All encounters are recorded in our gaming incident register.

Indirect interactions such as daily announcements are made over the Clubs PA system to encourage customers to take regular breaks from gaming machines. Such announcements are regarding other events, promotions or services (such as courtesy bus departures) that are underway.

4.5 Signs of Problem Gambling

Some of the signs of problem gambling are listed below. Staff are to remain vigilant in detecting any of the indicators mentioned below whilst on duty. If uncertain whether a patron is exhibiting any of the signs of problem gambling, the staff member is encouraged to speak with the duty manager and/or the Responsible Gambling Officer.

GENERAL WARNING SIGNS		WHAT TO DO	
Length of play Starts gambling when the venue is opening, or only stops when the venue is closing Gambles most days Behaviour during play Gambles on more than one machine 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)	Money - Asks to change large notes before gambling - Uses coin machine at least four times	On their own, these may be early warning sign A patron showing several of these signs could be experiencing problems with gambling. Monitor the patron's behaviour. If you notice a patron who is showing two or more of these signs, record what you have noticed and tell your manager.	
PROBABLE WARNING SIGNS		WHAT TO DO	
Length of play Finds it difficult to stop gambling at closing time	Money Gets cash out more than once through ATM or EFTPOS Avoids cashier, and only uses cash facilities Puts large wins back into the machine EFTPOS repeatedly declined	A patron showing any of these signs is much more likely to be experiencing problems with gambling. Monitor the patron's behaviour. Record what you have noticed and tell your manager, who will speak with the patron. If a patron shows two or more of these warning signs, follow the steps for strong	
Behaviour during play Often gambles for long periods (three or more hours) without a proper break Plays very fast Gambles intently without reacting to what's going on around them	Social behaviours Becomes angry or stands over others if someone takes their favourite machine/ spot	warning signs (below).	
STRONG WARNING SIGNS		WHAT TO DO	
Length of play Gambles from opening to closing	Money Tries to borrow money from other patrons or staff	A patron showing any of these warning signs is probably experiencing problems with gambling . Monitor the patron's behaviour	
Behaviour during play Shows obvious signs of distress or anger (crying, holding head in hands, shaking, outburst towards staff or machine)	Social behaviours Tells staff that gambling is causing them problems Significant decline in personal grooming and/or appearance over several days Friends or family raise concerns Tries to hide their presence at the venue (doesn't answer mobile phone, asks staff not to let others know they are there)	 Record what you have noticed, and tell you manager, who will speak with the patron, n them to support and counselling services, offer them the opportunity to self-exclude recommend an exclusion order if the patro is at risk of harm or at risk of causing harm others. 	

Page **5** of **11**

5 OUR TEAM

Toronto Diggers are committed to facilitating staff training so that we can continue to improve the way we provide a responsible environment for gambling and customer care. Our staff regularly undertake in-house training and refreshers on our policies and procedures.

5.1 Staff Training and Awareness

Toronto Diggers employees undergo regular Responsible Conduct of Gambling (RCG) training to equip them with the skills and knowledge to identify the signs of risky and problematic gambling behaviour and assist problem gamblers.

In addition to the mandatory RCG training, team members undergo training sessions appropriate to their role:

Multi Venue Self- Exclusion
Advanced Responsible Gambling Training
Compliance Officer Training

These training sessions are vital in keeping our team up to date with industry updates, legislation and most importantly methods to ensure we are adhering to customer care and making it clear to staff that patron welfare is of the utmost importance.

Such training sessions give our team the forum to discuss and establish appropriate policies, procedures and lines of responsibility to provide customer care. These include house policies, clear accountability, reporting mechanisms and follow up procedures for dealing with responsible gambling issues.

Non-gaming staff are required to complete induction to RCG training to ensure that every staff member in the venue is trained to respond appropriately to any customer seeking help or displaying signs of gambling harm.

The Board of Directors are required to complete RCG Oversight training to ensure that there is a structured top down approach to harm minimisation.

The Licensee, Responsible Gaming Officers and any staff employed to undertake the management of gaming machines are required to participate in Advanced RCG training.

Harm minimisation is discussed at all staff meetings, encouraging and recognising staff who are being proactive in recognising at-risk customers, ensuring that all staff understand that patron welfare is of the utmost importance.

Any additional information pertaining to harm minimisation on a daily basis, outside of information recorded in the gambling incident register, is communicated via internal team communications such as shift reporting, emails and online meetings. This ensures that any relevant handover information is passed on to the next person coming onto shift.

5.2 Responsible Gambling Officer

5.2.1 The Licensee shall ensure that two Responsible Gambling Officers, being staff member who hold a current RCG Certificate and Advanced RCG Certificate, are on duty and monitoring the gaming machines of the venue whenever gaming machines are operating.

Page **6** of **11**

- 5.2.2 The Licensee shall ensure that one Nominated Responsible Gambling Officer, being a dedicated staff member who holds a current RCG Certificate and Advanced RCG Certificate, is on duty and monitoring the gaming machines of the venue at any time that the gaming machines are operating between the hours of midnight and 8am.
- 5.2.3 The Responsible Gambling Officer's duties include:
 - Proactively check-in on and engage with patrons where the RGO suspects they may be experiencing gambling harm
 - (i) Record gambling Incidents in the Gambling Incident Register
 - (ii) Escalate serious instances of gambling harm to senior management
 - (iii) Facilitate the provision of gambling help information and requests for selfexclusion
- 5.2.4 At all times, the Duty Manager or other senior manager responsible for gaming machine operations will assist the Responsible Gambling Officer in carrying out the duties described in this condition.

5.3 Gambling Incident Register

- 5.3.1 The licensee must keep and maintain a gambling incident register.
- 5.3.2 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
- 5.3.3 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.
- 5.3.4 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.
- 5.3.5 The information recorded in a gambling incident register must be retained for at least 3 years from when the record was made.
- 5.3.6 The licensee must, at the request of a police officer or L&GNSW inspector, make any gambling incident register available for inspection.

Page **7** of **11**

5.4 Staff Gambling Policy

Toronto Diggers have a staff gambling policy in place. The main objectives of this policy are:

- To foster a healthy environment for people who could be at risk of developing gambling problems or are recovering from gambling addictions;
- To assure patrons and guests that gambling operations of the Club are conducted in a fair and equitable manner; and
- To ensure the Club complies with its legal obligations

Employees are not permitted to participate in any form of gambling on the Club's premises, either whilst on duty or during meal breaks, regardless of whether employees are members of the Club or not

Toronto Diggers is committed to supporting and advancing employee wellbeing through appropriate information and training, the provision of employee assistance programs and the implementation of a wellbeing initiative that fosters healthy outcomes and advance diverse, inclusive, safe and responsible working environments.

6 NSW LEGISLATION

6.1 Minors/Persons Under 18 Years

Toronto Diggers is a licensed venue, and as such, no person under the age of 18 is permitted entry into any part of the club, unless they are in the company of an adult or guardian.

Gambling by minors is prohibited. Failure to comply will result in the person being asked to leave. Signs are displayed at all gaming room entrances banning minors from entering the room. All Toronto Diggers employees share the responsibility for asking for proof of age if they are uncertain whether a customer is at least 18. If relevant verification cannot be produced, the customer will be asked to leave the gaming room.

6.2 Financial Transactions

Toronto Diggers adhere to the strict rules and regulations relating to the positioning of ATM and EFTPOS Terminals around the gaming floor.

Toronto Diggers does not cash cheques for customers.

Winnings \$5,000 and below can be claimed in either cash, cheque or EFT. By law any winnings over \$5,000 will be issued as a cheque or EFT only. Winnings will only be issued to the person playing the machine at the time of the win.

The Cash Redemption Terminals (CRTs) are set up with a limit of \$5,000 per payment. All winnings over this amount need to be paid via the cashier with staff interaction.

Keno winnings up to \$5,000 will be issued in cash. Any winnings over \$5,000 are handled by Keno and the club will be contacted to arrange remaining payment to the player as per Keno terms and conditions

TAB winnings are paid by cash or into the players account as per TAB terms and conditions.

Appendix A provides a floor plan indicating the positioning of all ATMs and CRTs located within the venue.

Page **8** of **11**

6.3 Venue Gambling Signage and Information

Monthly internal signage checks are undertaken by our team at Toronto Diggers using the Liquor & Gaming Self-Audit Checklist to ensure all gaming compliance signage is up to date and maintained.

All advertising and promotions related to gaming undertaken within our club comply with the Liquor & Gaming NSW advertising guidelines.

Toronto Diggers includes and promotes responsible gambling messages on its website, in its newsletters, via electronic displays throughout the venue and over the public address system.

Toronto Diggers promotes gambling awareness campaigns in venue and in marketing campaigns to members, including promotion of local support services.

Toronto Diggers is committed to promoting and assisting with gambling awareness events during relevant awareness weeks.

6.4 Player Activity Statements

Toronto Diggers is required by law, to present members with a Player Activity Statement free of charge, should they request it. A Player Activity Statement show in a chosen month the player's total amount of turnover, total wins and net expenditure, the total points earned and redeemed through the club's rewards program as a result of playing gaming machines, the entire length of time the player's card was inserted into gaming machines, and gambling help information. If you wish to request a player activity statement, please speak to a Duty Manager.

6.5 Gaming Floor Shut Down

All venues are required by law to shut down their gaming floor operations for a minimum of 6 hours per 24-hour period, to facilitate machine audits and cleaning. Toronto Diggers gaming machine shut down hours are identified below, meaning that gaming machines will not be operated within the times specified:

Gaming machine shutdown hours		
Day	Start Time	End Time
Monday	03:00 AM	- 09:00 AM
Tuesday	03:00 AM	- 09:00 AM
Wednesday	03:00 AM	- 09:00 AM
Thursday	03:00 AM	- 09:00 AM
Friday	03:00 AM	- 09:00 AM
Saturday	03:00 AM	- 09:00 AM
Sunday	03:00 AM	- 09:00 AM
Public holiday	03:00 AM	- 09:00 AM

6.6 Community Contributions

All licensed venues in NSW are required by law to return a minimum 2.25% percentage of all gambling profits to the community.

Toronto Diggers contributes the required amount or above every year, through ClubGRANTS and community contributions.

Page **9** of **11**

6.7 Venue Layout

A current plan of Toronto Diggers showing the gaming machine areas and surrounding areas is attached as Appendix A.

The plan indicates the location of the:

- gaming rooms
- current layout of gaming machines
- cash dispensing facilities (being ATM and CRT)

This Gaming Management Plan, for the avoidance of doubt, does not need to be updated if there is a change to:

- the gaming machine layout within the gaming areas or CRT location within the club (subject to any applicable legislative requirements); or
- a change to the location of the ATM within the non-gaming areas of the of the Club (subject
 to any applicable legislative requirements).

6.8 Review of Toronto Diggers Gaming Planof Management

This Gaming Plan of Management will be available to customers on the website and at reception. This Gaming Plan of Management will be available to all staff via the staff notice board and on the private staff Facebook page.

The operation and effectiveness of this strategy is reviewed regularly. The review process includes an opportunity for feedback from all relevant stakeholders including venue staff, customers and problem gambling support services.

Toronto Diggers welcome feedback at any time, by writing to:

Mail: Matt Johnston Toronto Diggers PO Box 190 Toronto NSW 2283

Email: matt@torontodiggers.com.au

This plan of management will be reviewed and updated annually to ensure all sections are current with the latest legislative requirements and/or any changes to venue operations or personnel. Outside of the scheduled review period, this plan of management will be updated for the following reasons:

- When there are changes to regulations which require immediate updating of the plan
- Upon advice from the regulator
- If there are operational changes which require immediate updating
- If there are increased risk factors (internally or externally) which trigger an update

6.9 Local Liquor Licensing Police Contact Details

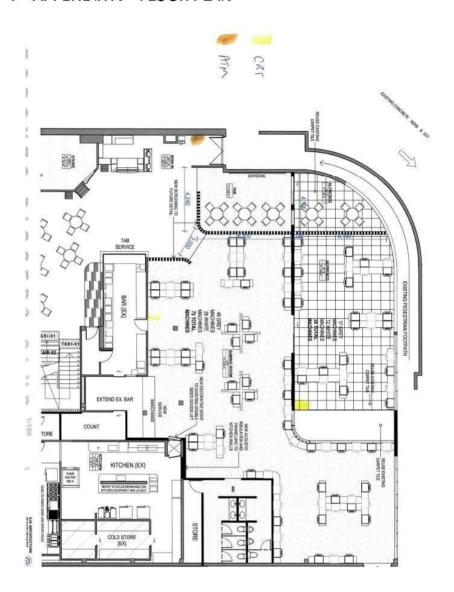
Name: Trevor Willemsen Contact Number: 0416025810 Station Name: Belmont Police Station

Station Address: 2 Herbert Street Belmont 2280 Station Telephone Number: (02) 49228899 Email: Imlicensing@Police.Nsw.gov.au

This Gaming Plan of Management will be immediately produced for inspection upon request by NSW Police or L&GNSW inspectors.

Page 10 of 11

7 APPENDIX A – FLOOR PLAN



Page 11 of 11



TORONTO AWABA

FOOTBALL CLUB INCORPORATED
ABN 14 349 112 043

P.O. Box 1043, Toronto NSW 2283 Email: torontoawabastags@gmail.com www.facebook.com/TorontoAwabaStagsFootballClub

To whom it may concern

I hope this message finds you well. On behalf of the Toronto Awaba Stags Football Club, I would like to extend our sincere appreciation for the generous support you have provided us over the years. Your contributions have been vital to the success of our club, particularly in supporting our junior teams and enhancing our community engagement.

The financial assistance from the Toronto Diggers has enabled us to maintain and improve our facilities, ensuring they are safe and welcoming for all our players. This support has allowed us to invest in new equipment and resources, which are essential for the development of our young athletes and assists the club in providing pathways for locals to play sport at a higher level. The opportunities provided to our junior teams are invaluable, as they not only foster skill development but also promote teamwork, discipline, and a sense of belonging.

Our players benefit from quality training environments that contribute to their growth and success on and off the field. It is through this partnership that we are able to nurture future talent and teach and encourage important life skills in our youth. Toronto Awaba Stags appreciates the in-kind donations of functions spaces to hold fundraising events throughout the year

Your commitment to the Toronto Awaba Stags Football Club reflects a deep understanding of the importance of community and the role sports play in bringing people together. We are grateful for the relationship we have built with the Toronto Diggers and look forward to continuing our collaboration in the future.

Thank you once again for your invaluable support.

Regards

Shaun Paterson President Toronto Awaba Football Committee

Annexure 3 - Letter of Appreciation from Toronto Tigers Baseball Club



41/43 Fennell Crescent, Blackalls Park, NSW 2283 28/02/25

To Whom It May Concern,

Over the last 4+years the Toronto Diggers has become a huge supporter of our organisation. From providing meeting and function space to providing grants for equipment.

We would not have the training and ground maintenance equipment we have today without their support of our small, but growing sporting club.

Over the last few years, the grants have gone towards new playing equipment for Juniors and Seniors, specifically Catchers & Umpires' equipment and a Super Sooper that help us get more games on in bad weather.

We have also had use of a meeting space to conduct our monthly meeting in a quite cool/warm space.

We have also had the use of the function space for our Season Launch, Trivia and Presentation nights.

Without this support, as a non-for-profit organisation, we would need to increase our fees to be able to cover these expenses.

Regards

Christina Frost - Secretary on behalf of

Toronto Tigers Baseball Club

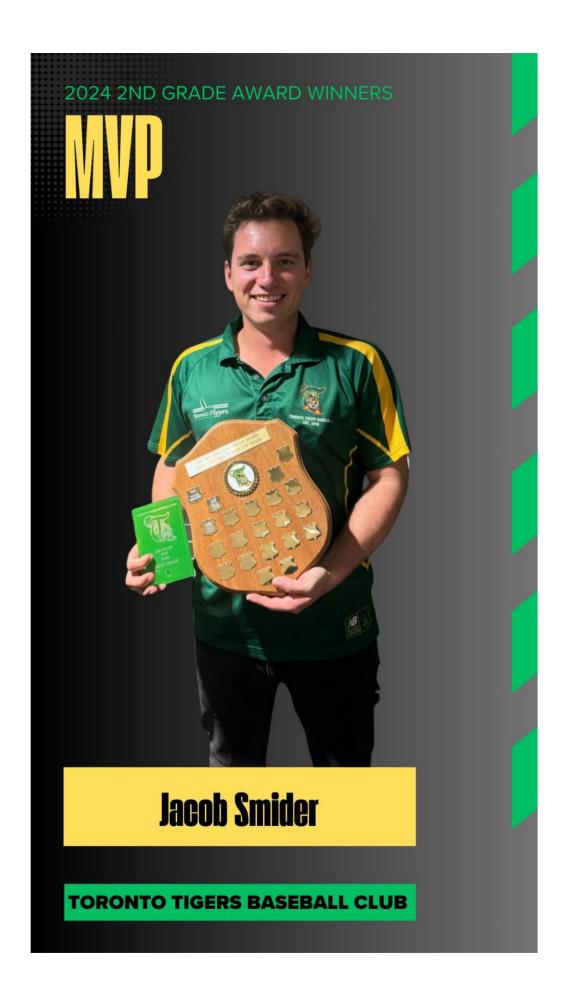


Annexure 4 - Fliers from Newcastle Women's Baseball









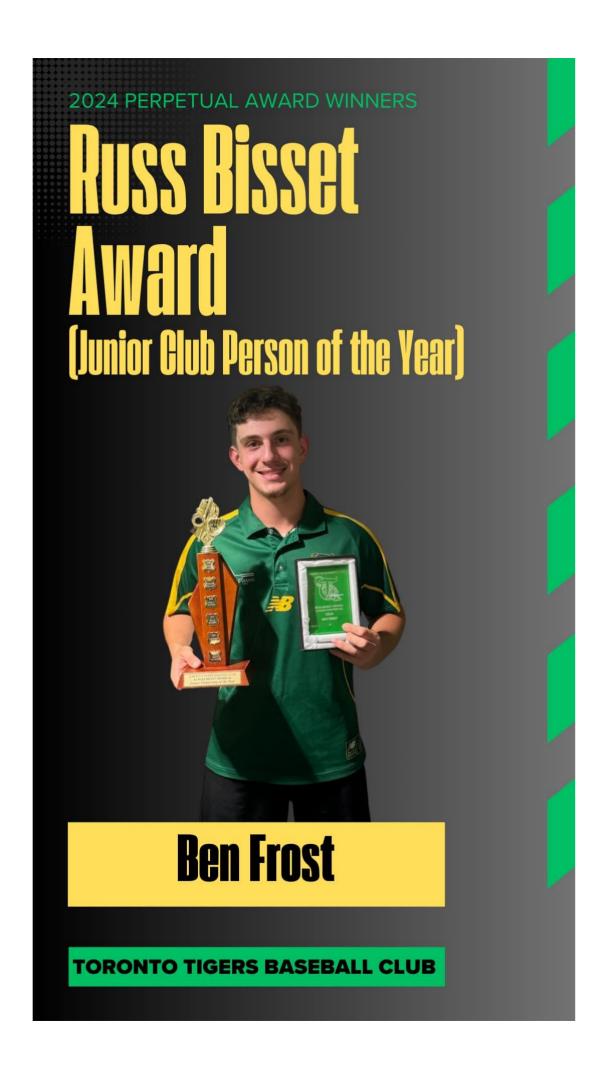














Annexure 6 - Letter of Appreciation from NourishED

From: NourishEd Australia <info@nourished.org.au> Thursday, 9 January 2025 12:03 PM Sent: Matt Johnston To: Subject: Re: Cafe Hey Matt, Since opening in September we have distributed 844 hampers to roughly 500 households across our community. Additionally, we have distributed countless food and hygiene items from our free open pantry. Our cafe service has led to dozens of impactful conversations shared over coffee with disadvantaged and at risk individuals. Please let me know if this testimonial works: The Toronto Diggers have provided critical funding and supplies to NourishEd Australia that has directly impacted countless lives. Their incredible generosity has allowed us to provide essential food and hygiene support to our local community and have kept our doors open. Through their actions they have shown an unwavering dedication to supporting our local communities most vulnerable and at risk. We are deeply thankful to Toronto Diggers for the partnership that has benefited the lives of hundreds of locals in and around Toronto. We look forward to continuing to work together in 2025. Here's some quotes form our guests that you can use also: "The warmth and kindness I experienced at the door of NourishEd Australia blew me away. The volunteers were incredible, encouraging me every step of the way and reminding me that it's okay to seek help. I'm so grateful I found the courage to go in." "I'm pregnant, about to give birth, and I have nothing. This food is keeping me alive" "I'm so glad I came here, the young man working there was so lovely, patient and welcoming, he was very helpful and I was exceptionally pleased with the hampers I got, this is an awesome service" "I've got 4 kids, I'm a single mum, coming here gets me through the week" Please let me know if you need anything else. Thanks Nic