



# Gaming Plan of Management guidance



Fact sheet FS3160

This fact sheet provides guidance for venues preparing a Gaming Plan of Management.

A Gaming Plan of Management (GPOM) identifies a venue's responsible conduct of gambling (RCG) obligations and what the venue is doing to meet them. It provides guidance on the actions that will be taken to ensure compliance with gaming legislation and also to support best practice in your approach to RCG.

All staff involved with the conduct of gaming at your venue must be trained on your plan and their RCG responsibilities.

## Why have a Gaming Plan of Management?

Keeping gaming machines is a privilege and with that comes significant responsibility. Research has shown that:

- there is a significantly higher prevalence of problem gambling amongst gaming machine players at 5.4% compared to 0.4% of gamblers who do not play gaming machines, and
- 36% of EGM players indicate some degree of gambling problems (ie, low-risk, moderate-risk or problem gambling combined) compared to 19% of the gambler population as a whole.

To assist in managing the risk of gaming related harm The Authority requires the following applications to be accompanied by a GPOM:

- A new club or hotel licence
- Extended trading or the variation of

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existing authorisations or gaming machine shutdown periods

- Gaming machine threshold increases (via Local Impact Assessments or otherwise)
- Transfer of gaming machine entitlements and /or poker machine permits

The Authority may also request a GPOM in circumstances where the application may result in an increase of gaming activity.

Should such an application be granted the Authority will make the ongoing implementation of the GPOM a permanent condition on the venues licence.

If the Authority is not satisfied that a GPOM adequately address a venue's individual risks, they may choose to refuse the application or alternatively, impose targeted licence conditions focused on reducing gaming harm.

- *Cash, cheques and prizes* – How prizes will be paid, cheques will be cashed
- *Player reward/account schemes (if offered at your venue)* – how you are providing clear and accessible player activity statements
- *Venue staff* – how you will ensure that all gaming staff have current RCG certification and any additional or refresher training that you will provide
- *Venue layout* – a premises plan including the location of the gaming room, gaming machines and cash dispensing facilities (ATM, CRT).
- *Updates to your plan* – including when and how changes can be made to the Gaming Plan of Management (noting that Authority approves any changes to your plan)

## What to include in your Gaming Plan of Management – Basic Responsibilities

Your GPOM must set out your legislative RCG responsibilities and outline the procedures that your staff and management will follow to ensure that that these mandatory responsibilities have been met.

Your GPOM must cover:

- *Venue gambling signage and information* – what is in place and what steps will be taken to check and maintain this.
- *Player assistance* – how you will make information about self-exclusion schemes and counselling obvious and accessible, how you will ensure staff can assist patrons to access services and activate self-exclusions.
- *Minors* – what measures will be taken to ensure that minors don't use gaming machines.

## Other Measures

It's important that you have multiple targeted strategies in place appropriate for your venue's risk profile and local community.

Your GPOM is an opportunity to identify and implement other strategies to reduce gambling harm and demonstrate your commitment to the wellbeing of your patrons and community.

The Office of Responsible Gambling (ORG) has developed a fact sheet titled *Going above and beyond* which includes the following measures you should consider:

- Provide staff with additional training and resources in how to identify and act on problem gambling
- Support staff to proactively identify and assist patrons who may be displaying signs of problematic gambling
- Create a strong culture of gambling harm minimisation

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- Encourage breaks in play through venue and service design or by reducing food and drink service to patrons at gaming machines
- Promote local gambling support services at your venue and in your marketing
- Break down the stigma associated with gambling problems by promoting awareness campaigns or participating in awareness weeks
- Make sure self-exclusion is understood, available, supported and enforced
- Promote responsible gambling by sharing responsible gambling messages in your venue, online, and in other communications
- Enable and respond to customer complaints

The ORG factsheet includes details on individual strategies that support the above measures at foundational, intermediate and advanced levels.

## General Points

Your GPOM should:

- Be dated and include clear headings and page and paragraph numbers (eg. 1 of 4)
- Include the contact details of your local Licensing Police
- Be easily accessible and actively provided to staff
- Be available at your venue at all times and immediately produced for inspection upon request by NSW Police or L&GNSW inspectors. L&GNSW Inspectors may request evidence that the measures outlined in the gaming plan of management are being complied with.

Your gaming plan of management should not:

- Include wording which may conflict with

conditions imposed on your liquor licence

- Include gaming or trading hours which conflict with the hours allowed under your liquor licence.

## How We Will Assess Your GPOM

While all venue's circumstances are considered on merit, the Authority expects that venues take appropriate action to support harm minimisation.

When considering a venue's risk profile the Authority considers the venue's location, trading hours, size and SA2 banding. You can check your venue's Band online at [Find my LIA Band](#).

The standard expected of GPOMs are identified in the table below.

Minimum expected standard			
Measures from ORG Fact Sheet	Venue in Band 1-2 and <20 Machines	Venue in Band 3 or with >20 machines	If licensed past midnight in Band 3 or 2:00AM otherwise
Total foundational measures	4 or more	6 or more	6 or more
Total intermediate measures	2 or more	4 or more	5 or more
Total advanced measures	2 or more	3 or more	3 or more

## Gambling Incident Register

Your GPOM must include provisions for a gambling incident register. That register should identify how you will keep a record of RCG related incidents at your venue (generally it is preferred if this section of your GPOM

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reflects the Authority's preferred wording for a Gaming Incident Register).

## Responsible Gambling Officers

The Authority requires that GPOMs include:

- Venues with >\$1 million gaming revenue - a dedicated staff member whose primary focus is responsible gambling is on duty whenever gaming machines are operated.
- Venues <\$1 million gaming revenue and post-midnight trade - a dedicated staff member whose primary focus is responsible gambling is on duty whenever gaming machines are in operation after midnight.
- Venues <\$1 million gaming revenue and no post-midnight trade - a non-dedicated staff member who supports responsible gambling and oversees ongoing harm minimization at the venue.

If your GPOM does not include such provisions or if they differ from the Authority's preferred wording, a licence condition may be imposed on the licence.

In circumstances where the venue operates in a Band 3 SA2, the Authority may impose such condition on the licence.

*Note:* the responsible gambling officer measure provides that they may undertake minor additional gaming duties as long as those duties do not detract from their primary role. This can include (but is not limited to):

- Infrequent or sporadic servicing of a gaming machine
- Infrequent or sporadic drink services
- Cleaning of glasses and ashtrays or the straightening of chairs

- Processing payments of an infrequent nature (where the venue operates cash redemption terminals).

*The minor duties undertaken must not detract from the responsible gambling officer's primary role and function.*

## Current wording

To review the wording of strategies relating to the gambling incident register and responsible gambling officer, please visit the following link [Licence conditions approved by ILGA – December 2021](#).

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# Gaming Plan of Management Guidance

## Gaming Plan of Management Checklist

Venues are encouraged to consider a variety of gambling harm minimisation measures and to document the specific actions they will take to monitor these in their Gaming Plan of Management. The examples below demonstrate the differences between a good and a great Gaming Plan of Management.

Minimum requirements	
<input type="checkbox"/>	Venue gambling signage and information, and internal self-audit strategies
<input type="checkbox"/>	Procedure for assisting patrons with accessing self-exclusion schemes and counselling services
<input type="checkbox"/>	Strategies to prevent minors from gambling
<input type="checkbox"/>	Controls around gaming related advertising
<input type="checkbox"/>	Policies on cashing cheques, prize winning cheque procedures and limits
<input type="checkbox"/>	Players reward scheme controls including player activity statements, prizes and inducements
<input type="checkbox"/>	Staff training and qualifications
<input type="checkbox"/>	Premises plan including the location of the gaming room, gaming machines and cash dispensing facilities (ATM, CRT)
<input type="checkbox"/>	Plan updates and review strategies
Foundational	
<input type="checkbox"/>	Regular in-house training and refreshers on your policies and procedures
<input type="checkbox"/>	Have a strong presence of supervisors in gaming rooms
<input type="checkbox"/>	Make it clear to staff that patron welfare is of the utmost importance
<input type="checkbox"/>	Don't provide complementary food and snacks at gaming machines
<input type="checkbox"/>	Display information about local support services in strategic locations, like the bathroom and on digital displays
<input type="checkbox"/>	Promote gambling awareness campaigns in your venue and your marketing
<input type="checkbox"/>	Initiate self-exclusion when requested, regardless of the day or time
<input type="checkbox"/>	Have strong systems for staff to familiarise themselves with photos of self-excluders

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<input type="checkbox"/>	Include responsible gambling messages on your website, and in newsletters and loyalty program marketing provide information on how to make a complaint about RCG
<input type="checkbox"/>	Provide information on how to make a complaint about RCG

### Intermediate Measures

<input type="checkbox"/>	Training or resources on the signs of risky and problematic gambling behaviour
<input type="checkbox"/>	Provide feedback on the action taken by managers when an issue is reported
<input type="checkbox"/>	Discuss harm minimisation at all staff meetings and handovers
<input type="checkbox"/>	Maintain a Gambling Incident Register to record RCG related incidents and the actions taken to address them
<input type="checkbox"/>	Don't provide food or drink service at gaming machines
<input type="checkbox"/>	Place ATMs as far from the gaming room as practical
<input type="checkbox"/>	Promote local support services in direct marketing to patrons and members
<input type="checkbox"/>	Promote and hold events during relevant awareness weeks
<input type="checkbox"/>	Proactively talk to patrons about self-exclusion during welfare checks
<input type="checkbox"/>	Share responsible gambling messages over the public address system and on electronic displays
<input type="checkbox"/>	Have a robust customer complaint policy in place with specific arrangements for RCG-related complaints

### Advanced Measures

<input type="checkbox"/>	Communication skills training to support staff to approach patrons identified as at-risk
<input type="checkbox"/>	Have structured systems for staff to do welfare checks, encourage breaks in play and suggest alternatives to gambling available in the venue or beyond
<input type="checkbox"/>	Increase welfare checks and patron interactions after midnight to encourage breaks in play
<input type="checkbox"/>	Recognise staff who demonstrate a commitment to harm minimisation
<input type="checkbox"/>	Appoint dedicated staff (e.g. a responsible gambling manager or gambling contact officer) to provide specialist support to staff and patrons
<input type="checkbox"/>	Reduce the amount of cash that can be withdrawn from the ATMs in your venue
<input type="checkbox"/>	Host on-site visits from gambling counsellors
<input type="checkbox"/>	Organise periodic on-site information stalls staffed by gambling counsellors
<input type="checkbox"/>	Consider promoting or hosting local speakers with lived experience of gambling harm
<input type="checkbox"/>	Consider technology solutions to prevent breaches, such as facial recognition technology through your CCTV or through your sign-in systems
<input type="checkbox"/>	Make staff and patrons aware of how to report a breach in legislative and regulatory requirements to Liquor & Gaming NSW