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CLASS 1 LOCAL IMPACT ASSESSMENT

**TO INCREASE THE GAMING MACHINE THRESHOLD FOR
THE BATH ARMS HOTEL FROM 25 TO 30**

**AT 348 PARRAMATTA ROAD,
BURWOOD**

**PREPARED FOR
DHI HOTELS PTY LIMITED
BY
D P RIPPINGILL**

**OCTOBER 2018
Ref: 171082.1LIA**

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1.0 EXECUTIVE SUMMARY

This Class 1 Local Impact Assessment (*LIA*) has been prepared for the Bath Arms Hotel (*the Hotel*) to obtain an increase in the Gaming Machine Threshold (*GMT*) from 25 to 30. The current threshold is met with 25 deployed Gaming Machine Entitlements (*GMEs*). The Hotel is located in the Burwood-Croydon SA2, within the Local Government Area (*LGA*) of Burwood. A floor plan of the Hotel is attached at **Annexure 1**.

Burwood LGA is an established but fast-growing suburb, with significant growth in population and housing. Between 2001 and 2016, the population of the LGA increased by 25% from 29,381 persons to 36,809 persons. In addition, since the 2016 Census there have been another 1400 dwellings approved in the LGA.

There are 11 licences in the SA2 that provide gaming machines, from a total of 12 permitted to do so. There are seven hotel licences with 145 gaming machines and five club licences with 474 gaming machines. The SA2 has one gaming machine for every 43 residents. The LGA has one gaming machine for every 59 residents. NSW has one gaming machine for every 81 residents.¹

The SEIFA data shows that the Hotel is located in an area that is well-advantaged. The SA2 has an IRSAD score of 1044 and the LGA 1043. A score of 1000 is set as the datum for the National average SEIFA score.

The Applicant is proposing to observe the enclosed Gaming Plan of Management (**Annexure 2**) which incorporates all of the relevant provisions of the *Gaming Machines Act, 2001* (*GM Act*) for the day-to-day operation of the gambling facilities. Additional proposed measures beyond the minimum legal requirements are shown highlighted in the Plan of Management.

The Hotel will make significant payment to the Responsible Gambling Fund to meet the positive contribution requirements of the GM Act. The calculations are provided at **Annexure 3**.

No community consultation has been carried out at this stage. Once the Application is lodged it will be notified to the local community for 60 days on the website of the Independent Liquor and Gaming Control Authority. The relevant stakeholders will be notified by way of mail, on-site notification and advertising in a locally distributed newspaper. A list of those stakeholder is provided at **Annexure 4**.

¹ The SA2 has a population of 24,649 and 573 gaming machines. LGA has a population of 36,809 residents and 619 gaming machines NSW has a population of 7,480,228 and 92,077 gaming machines. The population is derived from the 2016 census; the number of gaming machines at 31 December 2017 from Liquor and Gaming NSW.

2.0 LOCAL COMMUNITY

The Hotel is shown below in an aerial photograph, which shows its relationship with the surrounding area. Notably, there is a significant level of construction being undertaken for high density residential flat buildings in the suburb of Burwood in which the Hotel is located. The subject premises is located on the northern periphery of the CBD of Burwood which is the primary commercial precinct for the Burwood Local Government Area.



Figure 1 – Site and Surrounding Area (source Nearmap)

The Hotel is located approximately 850 metres to the north of Burwood Railway Station which can also be seen in Figure 2 below. That is an approximately 10 minute walk.

Hotels and clubs located in the larger surrounding area are identified in the following map. All of the liquor licences below were granted prior to 1960.

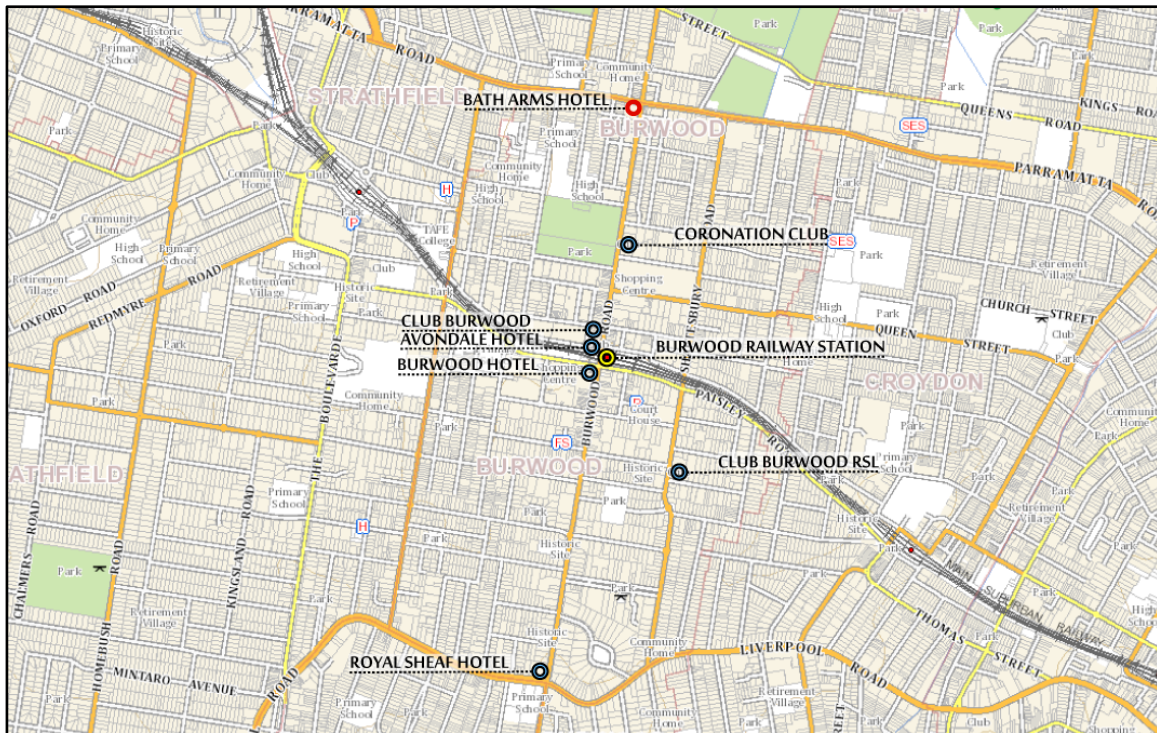


Figure 2 – Location of licensed premises in Burwood area (Source: SIX Maps)

There is a total of 573 gaming machines listed as being in the SA2² and 619 in the LGA. The Club Burwood RSL provides 294 of those gaming machines.

² It is noted however if the gaming machines for each venue are added individually, the total is 545 gaming machines.

3.0 THE HOTEL

A plan of the ground floor of the Hotel is attached at **Annexure 1** to this assessment. It is also reproduced below at **Figure 3**. It shows the internal areas of the Hotel, which comprise the gaming room, central bar, bar areas and dining areas. The first floor of the Hotel provides accommodation rooms.

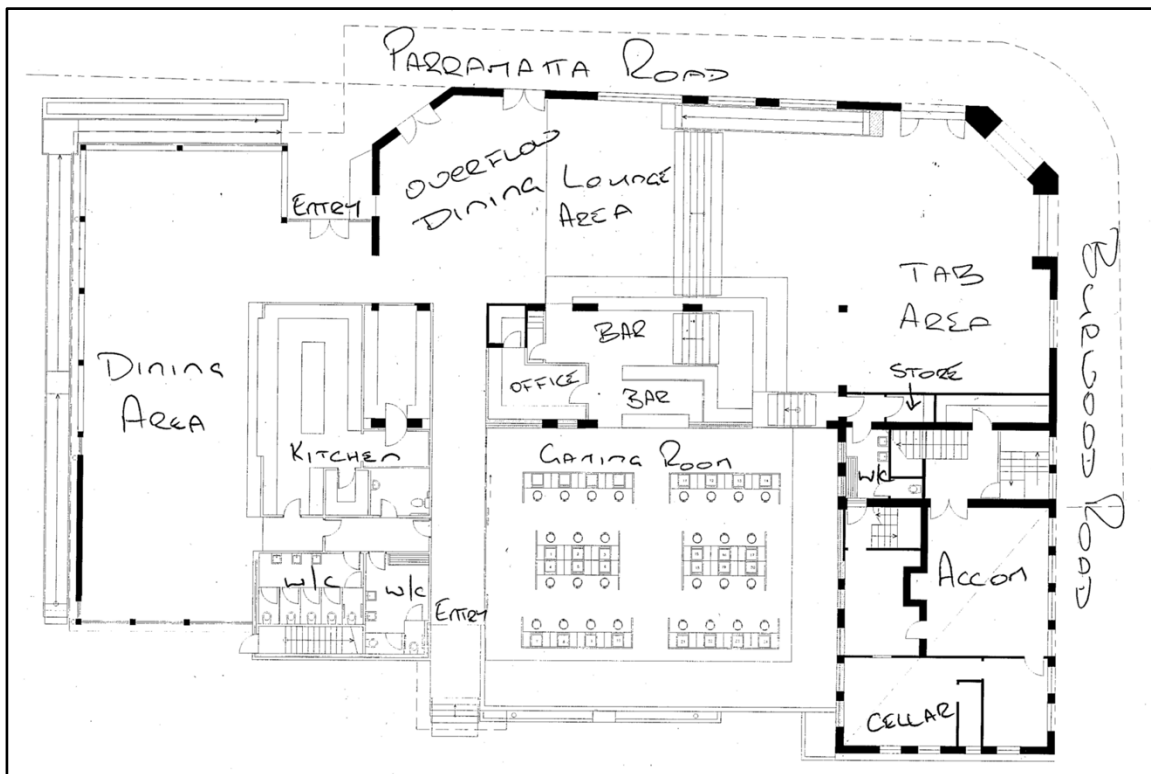


Figure 3 – Hotel Floor Plan

The Hotel sits on an approximately 2400sqm site, with frontages to Parramatta Road to the north and Burwood Road to the east. The remainder of the site provides parking for 32 vehicles for patrons, two stacked parking spaces for staff and access for delivery and waste removal.

The Hotel is permitted to trade 24 hours a day, Monday to Saturday and 10am to midnight Sunday. It is subject to the standard 6-hour gaming machine shutdown period on all days of the week. It has a GMT of 25 machines and 25 GMEs.

The ground floor of the Hotel comprises 700sqm and the first floor 400sqm.

Whilst ever the gaming room is in operation, other areas of the Hotel are also available. During the day, the Hotel provides a popular restaurant, known as Phillipe's. Modest food options are available late at night, as well as bar facilities.

A variety of other attractions are provided throughout the week, such as trivia, heavily discounted food (a range of \$10 meals), accommodation, sports viewing and betting.



Figure 4 – Hotel Aerial Photograph (Source: nearmap)

3.1 HARM MINIMISATION AND RESPONSIBLE GAMBLING MEASURES

The Hotel's existing and proposed harm minimisation and responsible gambling measures are provided for in the attached *Gambling Plan of Management* at **Annexure 2**. The purpose of the Plan is to comprehensively document the relevant requirements of the Gaming Machines Act 2001, Gaming Machine Regulation 2005 and the Liquor Act 2007 and any additional measures proposed by the Applicant.

The additional measures proposed beyond the minimum legal requirements are shown highlighted in the Plan of Management.

4.0 RELEVANT STATISTICS SUMMARY

SEIFA statistics show that the SA2 and LGA are advantaged.

Demographic statistics show better than NSW averages for the SA2 for:

- Lower proportion of males in the population;
- Significantly higher levels of tertiary education;
- Higher proportion of white-collar workers and comparable levels of blue collar workers; and
- Lower personal incomes, but comparable household income levels arising from shared living;
- Higher part-time and unemployment levels, reflected in the higher proportion of younger population engaged in study and recent immigrants;
- Rapidly growing population, of which a significant proportion is made of immigrants, primarily of Chinese background. The SA2 has almost comparable levels of Australian born and Chinese born residents.

The data which indicates a higher propensity for harm include:

- Higher number of gaming machines per person in the SA2 compared to the State of NSW;
- Higher proportion of the population aged between 18-29 years;
- Lower personal income levels;
- Higher unemployment; and
- High proportion of non-English (primarily Chinese) background speaking persons.

Having regard to the above positive and negative indicia, it is considered that the positive indicia readily outweigh the negative.

For example, the highest risk groups are those of Chinese background, students and young people.

However, this younger demographic is under undertaking higher education in the local community was three times that for NSW. This is likely attributable to the higher levels of study by international (presumably Chinese) students. Once a person graduates from tertiary education, they fall into one of the lowest risk categories for gambling related harm.

Moreover, gambling on gaming machines is unlikely to be attractive to this younger demographic of Chinese international students and they are more ready to seek assistance with problem gambling.

Research has found that:³

³ Anna Thomas et al, *International Student Gambling: The role of acculturation, gambling cognitions and social circumstances*, Gambling Research Australia, June 2011.

- International students' preferred gambling games are cards, lotteries and casino based games. Most do not gamble very often, but there is a small core of frequent gamblers for most of the gambling activities.
- International students are significantly more likely to be problem gamblers (6.7%) than domestic students (4.2%) and these rates are high in comparison with the Australian population in general.
- Chinese and other Asian international students, particularly the males, show stronger levels of many of the risk factors for problem gambling. They also show high rates of problem gambling.
- However, male international students from English speaking western countries had the highest rate of problem gambling, despite relatively low rates of all psychosocial risk factors except alcohol consumption
- Most international students identified as moderate or high risk of gambling had sought informal or formal help for problems in general in the past 12 months (not necessarily gambling-related help).
- Reasons international students gave for not accessing professional support for a troubling issue included a belief that they did not need it, not knowing what services were available or that they were free or low cost, or concerns that they would not be understood.
- Students expressed interest in learning more about responsible gambling practices, gambling risk and sources of support.

The above findings suggest that international Chinese students are less likely to be susceptible to gambling on poker machines and of the problem gambling international student demographic, they are not the most serious concern. Moreover, the findings suggest that students are more willing than most to seek support for gambling problems.

Appropriate measures are proposed through the Plan of Management to ensure any gamblers are aware of sources of free support to address concerns related to problem gambling and responsible gambling practices.

Based on the assessment above, it is our view that there is limited indicia that the SA2 population is particularly susceptible to gambling related harm. Whilst there are risk factors in the high proportion of the population such as young Chinese students, they are highly educated or undertaking study, and research suggests they are most ready to seek help if needed.

The potential for harm is therefore readily balanced by ensuring adequate signage and advice within the Hotel, in appropriate languages regarding the availability of free problem-gambling services.

In addition to the above, the Applicant will also meet the positive contribution requirement through a donation to the Responsible Gambling Fund, as required by the Gaming Machines Act.

5.0 ADDITIONAL HARM MINIMISATION AND RESPONSIBLE GAMBLING MEASURES

The Hotel's existing and proposed harm minimisation and responsible gambling measures are provided for in the attached *Gambling Plan of Management* at **Annexure 2**. The purpose of the Plan is to comprehensively document the requirements of the *Gaming Machines Act, 2001* and the additional measures proposed by the Applicant.

The additional measures proposed are shown highlighted. They are as follows.

- Clause 15(c) – requiring availability of Player Information Brochures approved by L&G NSW in Arabic, Chinese, Korean, Turkish and Vietnamese;
- Clause 18(a) – requiring a Counselling Signage Notice at every entrance, not just the main entrance.
- Notices erected in the gaming room advising patrons of problem gambling counselling services and the self-exclusion scheme must also include reference that these services are free for patrons;
- Problem gambling and help information to also be erected in Chinese including:
 - Counselling Signage Notice;
 - ATM Notice;
 - Internal Problem Gambling Services;
 - Self-Exclusion Scheme Signage; and
 - Gambling Contact Cards.

6.0 COMMUNITY BENEFITS

The Authority may only approve an LIA if it is satisfied that the gaming machine threshold will provide a positive contribution toward the local community where the venue is situated.⁴ This “community benefit requirement” may only be satisfied by payment of money to the Secretary under the *Casino Control Act, 1992* into the Responsible Gambling Fund.⁵

In addition to the above payment, the Authority may also have regard to additional positive contributions, and, may treat those additional positive contributions as being in partial satisfaction of a community benefit requirement.⁶ However, the additional positive contributions are limited to the putting in place of harm minimisation and responsible gambling measures that are in addition to measures already required by law.⁷

In order to demonstrate a positive (monetary) contribution to the community, it is assumed that contribution would be calculated on the basis of a formula set out in the guideline for the preparation of Class 1 LIAs. That formula is:

$$\text{Amount payable} = 15\% \text{ of the average profit of existing gaming machines before tax} \times \text{GMT increase} \times 5 \text{ years}$$

Enclosed at **Annexure 3** is the Bath Arms Hotel CMS Gaming Tax Invoice for the period for January to March. It lists the net profit. Enclosed with that document is the relevant calculations and the required monetary contribution.

Further to the above, the operator has offered up a Gaming Plan of Management. The purpose of the Plan is to summarise the relevant harm minimisation and responsible gambling measures found in the Gaming Machines Act.

This is the first such instance of such a document being created, for which we are aware. It is considered to be of substantial benefit to the Authority in examining the controls to which the Hotel is subject and the additional controls which are proposed to be offered. It is considered that a discount should be offered that, at the very least, reflects the costs of its production.

Because the proposed Gaming Room Plan of Management goes further than simply listing out the Hotel’s obligations under the GM Act the Applicant is entitled to a discount to the above community benefit requirement as per s 36B of the Gaming Machines Act. The additional measures are listed in Part 5 of this LIA, above.

Whilst a discount is available, how that might be calculated is not included in the LIA1 Guidelines.

The summary provided under Part 4 of this LIA demonstrates that for what risk there might be, it is considered low. Notwithstanding, additional measures are proposed, that have been

⁴ Gaming Machines Act, 2001, s 36(3)(c)(i).

⁵ Ibid, s 36A.

⁶ Ibid, s 36B(1).

⁷ Ibid, s 36B(2).

specifically designed to target at-risk groups identified through detailed demographic profiling of the SA2 and available research.

Having regard to the provision of the Gaming Plan of Management, the offering of additional measures targeted specifically to address the demographic profiles using the latest research and the large donation required, it is considered that a discount of **50%** is warranted.

It is considered that notwithstanding the discount, the remaining donation is substantial and sufficient to meet the requirements of the Gaming Machines Act to demonstrate a positive contribution to the local community as a result of the Application.

8.0 CONSULTATION

Before, or within two working days after, the application is lodged with Liquor and Gaming NSW, a notice will be posted at the hotel and an advertisement placed in '*The Sydney Morning Herald*' and the '*Daily Telegraph*' (there being no specific local newspaper). Within the same period, copies of the application and this LIA will be provided to the Burwood Council and the Burwood Local Area Command of the NSW Police Force.

Notification that the application has been made will also be sent to:

- The NSW Council of Social Service
- The Western Sydney Local Health District
- Organisations in Burwood Local Government Area which receive funding from the Responsible Gambling Fund; and
- Any organisation that provides services in Burwood Local Government Area relating to welfare, emergency relief, financial assistance, Aboriginal health and legal assistance, or gambling and addiction counselling or treatment and which are listed as providing these services by the Burwood Council.

The organisations provided with the documents or notified of the making of the application will be advised that they have 60 calendar days after the date the application is posted on the Liquor and Gaming NSW website to make a submission to the Independent Liquor and Gaming Authority.

A list of those organisations is provided at **Annexure 4**.

9.0 DETAILED REVIEW OF RELEVANT STATISTICS

This final section of the LIA provides the detailed data for the local community to ascertain whether the population displays characteristics that may indicate that it is susceptible to problems with gambling. It informs the summary provided under Part 4 of this Local Impact Assessment.

9.1 STUDY AREAS

The “local community” is the SA2 in which the Hotel is located. That is the Burwood-Croydon SA2, shown in Figure 5 below. The surrounding SA2s are also noted.

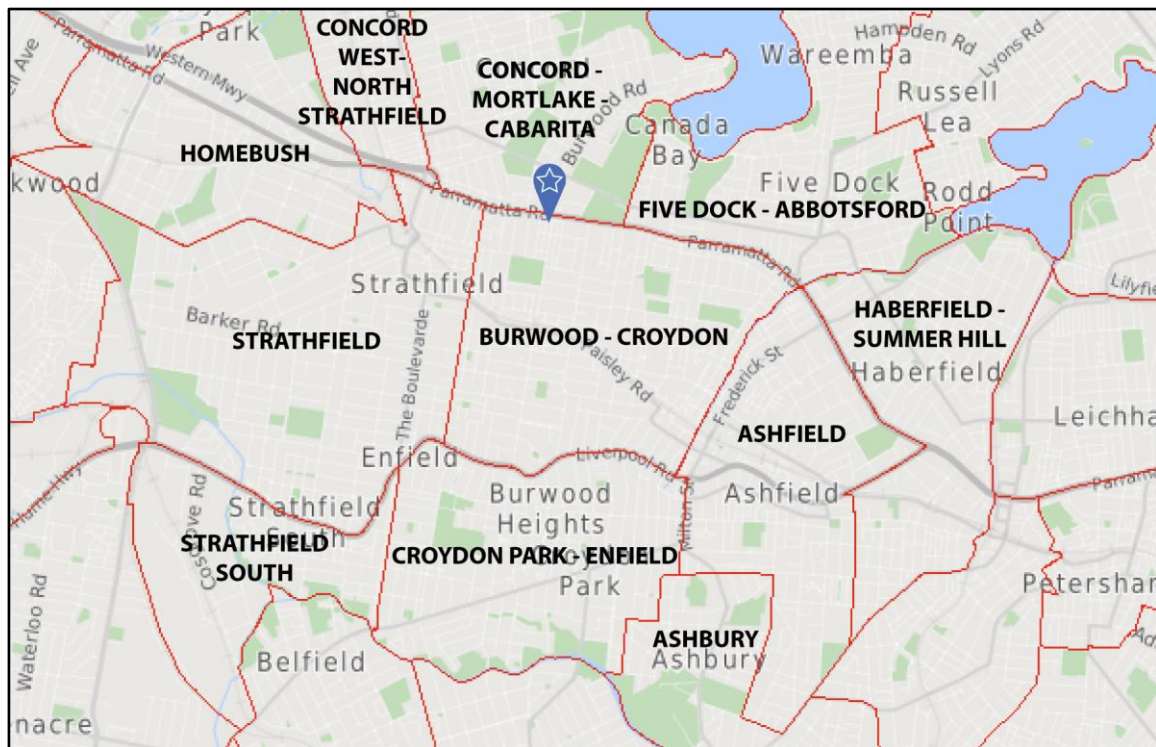


Figure 5 – Local Community: SA2 Area of Burwood (Source: ABS) [Location of Hotel marked]

9.2 SOCIO-ECONOMIC INDEXES FOR AREAS (SEIFA) DATA

It is often argued that people who are disadvantaged in terms of social status are more likely to be adversely affected by any increased availability in gambling facilities. The best measures of social status that are available are the Australian Bureau of Statistics’ SEIFA (*Socio-Economic Indexes for Areas*) derived from the 2016 Census.

The following relies on the IRSAD SEIFA data. Index of Relative Social Advantage and Disadvantage (IRSAD) summarises variables that indicate either relative advantage or disadvantage. An area with a high score on this index has a relatively high incidence of advantage and a relatively low incidence of disadvantage.

The SEIFA data below demonstrates that SA2 and LGA are ranked in the top 30% of Australia in terms of social and economic advantage. Neither can be considered

disadvantaged. Consequently, on this basis they should be less susceptible to the harms associated with problem gambling.

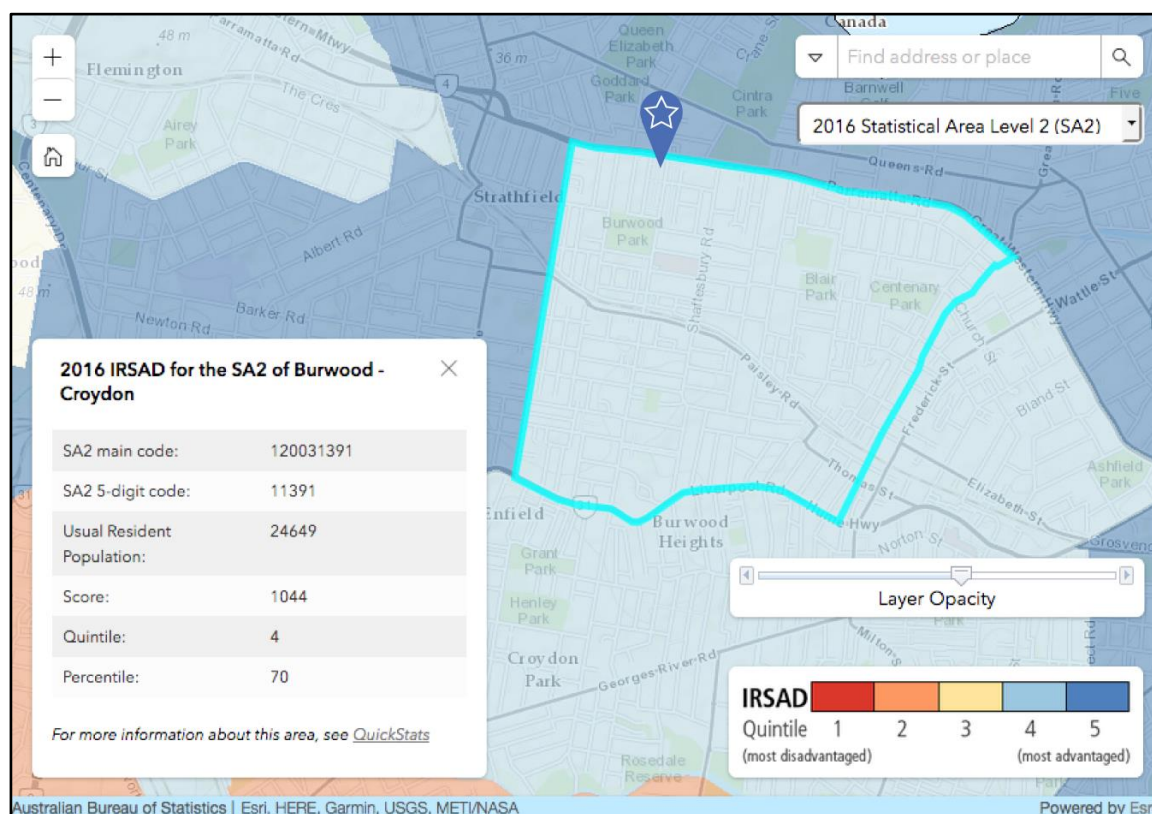


Figure 6 – 2016 IRSAD for the SA2 Area of Burwood (Source: ABS) [Location of Hotel marked]

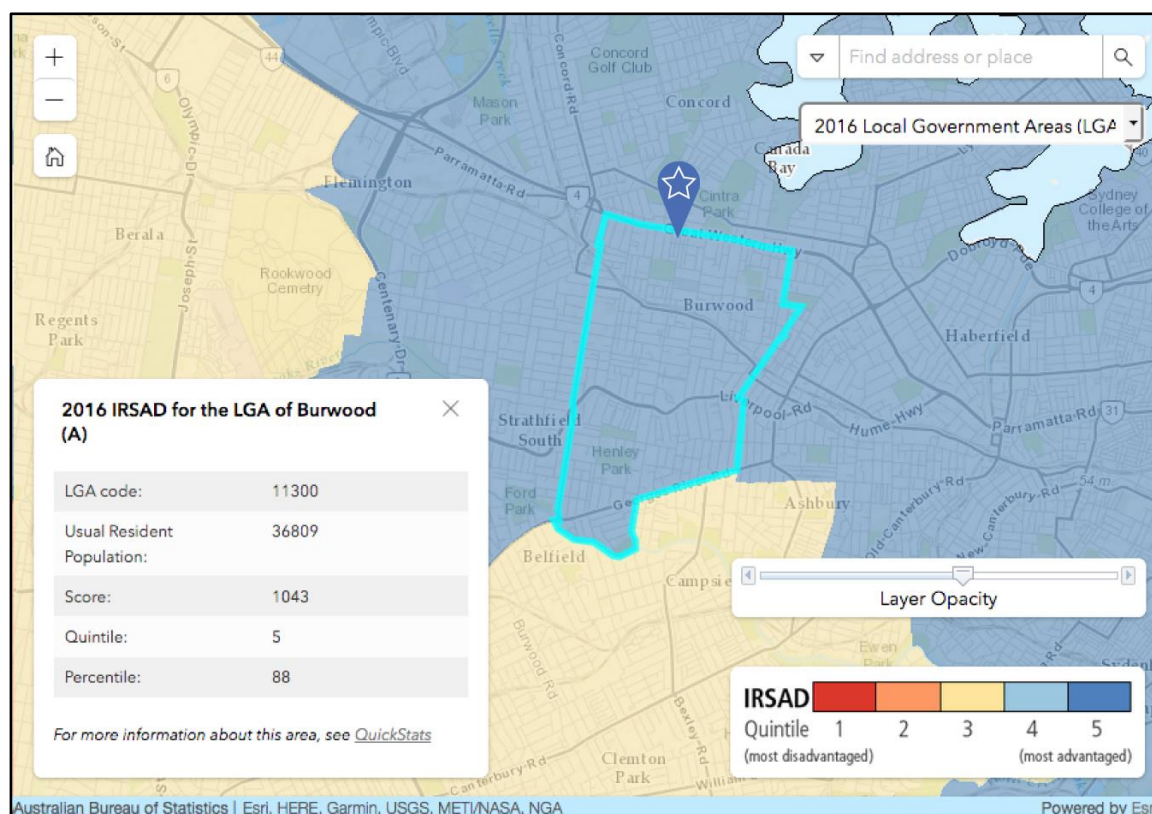


Figure 7 – 2016 IRSAD for the LGA Area of Burwood (Source: ABS) [Location of Hotel marked]



Figure 8 – 2016 IRSAD SA1 with Burwood SA2 shown highlighted (Source: ABS) [Location of Hotel marked]

9.3 DEMOGRAPHIC INFORMATION

In addition to taking a high level review of the available data for advantage and disadvantage, the following section takes a detailed review of demographic data for any indicators for susceptibility to gambling related harm. All of the following demographic data has been sourced from the Australian Bureau of Statistics Census data for 2011 and 2016 as noted.

9.3.1 Age and Sex Distribution

Age	Burwood-Croydon %	New South Wales %
Median age	32	38
0-4 years	4.3	6.2
5-9 years	4.0	6.4
10-14 years	3.9	5.9
15-19 years	5.8	6.0
20-24 years	13.1	6.5
25-29 years	13.5	7.0
30-34 years	8.5	7.2
35-39 years	6.3	6.7
40-44 years	5.6	6.7
45-49 years	5.5	6.6

50-54 years	6.1	6.5
55-59 years	5.6	6.3
60-64 years	4.4	5.6
65-69 years	3.7	5.1
70-74 years	2.6	3.9
75-79 years	2.4	2.9
80-84 years	2.2	2.1
85 years and over	2.3	2.2

47.78% (10,007) of the over 18 population were male. 52.09% (10,910) of the over 18 population were female. The male population for the SA2 is lower than that for the State by nearly an entire percentage point, which is considered significant. There is fewer 700 or so men in the SA2 than should be expected. Men are more susceptible to gambling related harm than women.

The over 18 male percentage of the NSW population is at 48.68% (2,837,131). The over 18 female population is 51.31% (2,989,991).

9.3.2 Population over 18 years of Age

20,943, or 84.96% of the population of 24,649 persons is aged over 18 years in the SA2. That is 7.06% higher than the portion of the population of NSW that is over the age of 18 years.⁸

The median age for the SA2 is 32. The median age for NSW is 38.

Taking into account the above two statistics, it suggests that there is a high proportion of persons in the lower but, adult age bracket in the SA2. This lowers the median age whilst maintaining a higher proportion of persons over the age of 18 years. This is evident in the statistics above, which show double the percentage of population in the 20-29 years range for the SA2 compared to the State. This is likely due to the high student population in the area. More data points are provided below on this point.

Problem gambling is more prevalent among men aged 18-24 (2.4%). It is noted above that the SA2 has a lower percentage of men in its population. Problem gambling is also least associated with those who have university degrees (0.1%) and highest amongst those who left school before year 10 (2.6%).⁹ As noted below, the SA2's population is highly educated and has high levels engaged in higher education.

9.3.3 Population Growth

Between 2011 and 2016, the population for the SA2 increased by 17% from 21,014 to 24,649. Data is not available for the SA2 for the 2006 and 2001 census. It is available for the LGA, in which the SA2 is located, and from where the majority of the population is located. The Burwood LGA population increased over the following years:

⁸ 5,827,157 or 77.9% of the population of 7,480,228 persons is aged over 18 years in NSW.

⁹ Sproston K, Hing N and Palankay C, *Prevalence of Gambling and Problem Gambling in New South Wales*, April 2012, page v.

- Burwood LGA 2001 – 29,381
- Burwood LGA 2006 – 30,926; an increase of 5.2% over 2001
- Burwood LGA 2011 – 32,423; an increase of 4.8% over 2006
- Burwood LGA 2016 – 36,809; an increase of 3.5% over 2011 (and 25.2% above 2001).

In addition to the above, within the Burwood LGA there has been 1,591 dwelling approvals to 30 June 2016. It can be assumed that at least 66% of these are in within the SA2.¹⁰ Even if they were all one-bedrooms, this would equate to a further 1.8% increase in the population of the SA2 since the 2016 Census.

9.3.4 Ethnicity

Overseas Born Population - % of Population	SA2-2011	SA2-2016	NSW 2016
Born in Oceania and Antarctica (excluding Australia)	2.4	1.7	2.4
Born in North-West Europe	2.9	2.2	5
Born in Southern and Eastern Europe	6.9	5.2	2.9
Born in North Africa and the Middle East	2.4	2.1	2.5
Born in South-East Asia	6.4	7.4	4
Born in North-East Asia	25.8	33.8	4.8
Born in Southern and Central Asia	6.2	6.1	3.6
Born in Americas	1.3	1.2	1.4
Born in Sub-Saharan Africa	0.4	0.4	1
Total born overseas	54.8	60.1	27.6

Ancestry, top responses -% of population	SA2 (2011)	SA2 (2016)	NSW 2016
Chinese	27.5	35.2	5.2
English	10.3	9.6	23.3
Australian	10.3	8.2	22.9
Italian	6.3	5.0	2.8
Irish	4.8	4.3	7.5

¹⁰ Between 2001 and 2016 the population of Burwood LGA increased 25% from 29,381 persons to 36,809. 66% of this increase of 7428 persons, or 4900 persons, was located in the State suburb of Burwood.

Country of birth	SA2 2011 %	SA2 2016 %	NSW 2016 %
Australia	39.6	34.5	65.5
China (excludes SARs and Taiwan)	19.4	26.7	3.1
India	3.3	3.0	1.9
Korea, Republic of (South)	3.2	2.9	0.7
Italy	3.0	--	-- N/A
Vietnam	--	2.5	1.1
Hong Kong (SAR of China)		2.3	0.6

Year of Arrival in Australia - % of Population Born Overseas	2011	2016	NSW 2016
Persons born overseas who arrived less than 5 years ago (%)	24.7	30.3	17.7
Persons born overseas who arrived 5 to 10 years ago (%)	15.8	16.3	14.2
Persons born overseas who arrived over 10 years ago (%)	55	49.3	64.5
Year of Arrival in Australia - Not stated (%)	4.5	4.1	3.6

The above shows that a significant portion of the population are recent immigrants, with 60.1% of the SA2 population born overseas compared to 27.6% for NSW. Of those, 30.3% arrived less than five years ago and an additional 16.3% arrived in the five years beforehand.

The primary background of those new arrivals is Chinese, which comprises around 35% of the population.

The following quote acknowledges the higher incidence of problem gambling in the Chinese community. *“The prevalence of problem gambling in the Australian population is reported to be in the vicinity of 1.7% (Productivity Commission 1999). However, Blaszczyński, Huynh, Dumlao and Farrell (1999) found a higher rate of 2.9%, for the Australian Chinese community and 4.9% for Asian males. Studies on other minority groups and indigenous populations suggest there are much higher problem gambling rates in these populations (The Wager 1997; Volberg 1994)”*.¹¹

The hypothesis for this high rate was the lack of services for problem gamblers who do not speak English, cultural predispositions, a strong preference for family responsibility for solving problems and an apparent lack of cultural understanding by therapists.

Since the previously referred to research was published the *Gaming Machines Act, 2001* has been made. It includes provisions for requiring problem gambling material in local languages. The Gambling Plan of Management reflects its requirements, including problem gambling material in Chinese. Moreover, the NSW gambling help line as well as

¹¹ Beattie L et al, *Gambling Problems in a Multicultural Society*, 9th National Association of Gambling Studies Conference, 2011.

other community organisations provide culturally sensitive therapy and feedback in Chinese.

9.3.5 Education

Persons with Post School Qualifications (15 years and over)	2011	2016	NSW 2016
With Post School Qualifications (%)	61.5	61.4	60.9
With Postgraduate Degree (%)	9.3	11.1	5.7
With Graduate Diploma/Graduate Certificate (%)	1.7	1.7	1.7
With Bachelor Degree (%)	20.7	24	16
With Advanced Diploma/Diploma (%)	9.7	8.5	8.9
With Certificate (%)	8.9	7.9	18.1
Post School Qualifications - Inadequately described, not stated (%)	11.2	8.2	10.5

The above information shows that population is highly educated. Ignoring certificates (which are generally issued for short courses of up to a year in duration), nearly half the population (at 45.3%) has completed a degree or diploma. It is 13% higher than the State (at 32.3%).

Highest Year of School Completed (15 years and over)	2011	2016	NSW 2016
Completed Year 12 or equivalent (%)	65.7	72	52.1
Completed Year 11 or equivalent (%)	3.8	3.5	5.8
Completed Year 10 or equivalent (%)	9.9	8.2	21.6
Completed Year 9 or equivalent (%)	3.4	3	6.3
Completed Year 8 or below (%)	5.8	4.7	4.6
Did not go to school (%)	2.3	2.3	1
Highest Year of School Completed - Not stated (%)	9.1	6.3	8.5

The above shows that a significantly higher proportion of the population in the SA2 completed Year 12. At 72% it is 20% higher than the State. Based on the two foregoing tables, it demonstrates that the level of education undertaken in the SA2 is at a substantially higher level than the State with higher levels of advanced degrees and completion of high school certificates. The percentage of the population that completed Year 10 or Year 9 (a more common attribute of problem-gamblers) is less than half that for the State of NSW.

The high proportion of persons likely to be enrolled in higher education is demonstrated in the following table, which outlines the attendance at educational institutions. 35.9% of the SA2 population were attending an education establishment, and of that, nearly 40% were attending tertiary education. That was more than nearly three times the 16% for the same figure in NSW.

Education (2016)	Burwood - Croydon %	New South Wales %
Technical or further education institution	7.2	6.2
University or tertiary institution	39.5	16.2
Other	5.8	2.7
Not stated	16.0	23.0

9.4 INCOME AND EMPLOYMENT

9.4.1 Individual and Household Income Distribution

Median weekly incomes	SA2 (2016)	NSW (2016)
Personal	532	664
Family	1,698	1,780
Household	1,545	1,486

The above information shows with median household income exceeding that for NSW. Personal income is however lower. This is considered to be a reflection of the high number of students who would have less time to work, or undertake work cash in hand.

9.4.2 Employment, Unemployment and Not in Labour Force

Occupation as % of Total Employed	2011	2016	NSW 2016
Managers (%)	11.6	11.8	13.5
Professionals (%)	30	30.3	23.6
Technicians and trades workers (%)	10.6	9.6	12.7
Community and personal service workers (%)	8.8	10.1	10.4
Clerical and administrative workers (%)	15.5	13.2	13.8
Sales workers (%)	9.6	10.5	9.2
Machinery operators and drivers (%)	3.7	3.4	6.1
Labourers (%)	7.6	8.3	8.8
Occupation of Employed Persons - Inadequately described (%)	2.5	2.7	1.8

The number of high-skill workers (managers / professionals) is 42.1%, which is around 5% higher than the 37.1% for NSW. Consequently, the SA2 has lower percentage of blue collar workers than NSW which is reflected in the lower percentages for machinery operators, drivers and comparable rates of labourers.

Labour Force Status (15 years and over)	SA2 2016	NSW 2016
Unemployment rate (%)	8.6	6.3
Participation rate (%)	57.3	59.2

Employment – 15 years and over	SA2 (2011)%	SA2 (2016) %	NSW 2016 %
Worked full-time	58.7	55.7	59.2
Worked part-time	29.2	31.1	29.7
Away from work	4.7	4.6	4.8
Unemployed	7.3	8.6	6.3

The above tables show a lower personal income level, but higher median household income and higher levels of unemployment and part-time work. This is considered to be likely related to a high student, young person and recent immigrant population. Younger people, students and recent immigrants have higher levels of unemployment, part-time work and lower levels of income. They also tend to live in share houses; when compared to households they likely to have higher levels of working adults, leading to higher median household income notwithstanding the lower personal incomes levels. This is demonstrated below.

9.5 HOUSING AND SPENDING

9.5.1 Housing Costs

Rent and Mortgage Payments - Census	SA2 2016	NSW 2016
Average monthly household rental payment (\$)	2 163	1736
Average monthly household mortgage payment (\$)	2 414	2146

Average rent and mortgage payments are higher in the SA2 than for NSW on average.

Household Stress - Census	2011	2016	NSW 2016
Households with mortgage repayments greater than or equal to 30% of household income (%)	9.1	7.2	7.4
Households with rent payments greater than or equal to 30% of household income (%)	18.9	23.7	12.9

The proportion of the community in “stress” is not materially greater than that for NSW for mortgages. It is approximately double for those paying rent at 24% versus 13%. This is a reflection of the higher rental and property prices in this location (typical for the wider Sydney region) against the Australian median household income. This is considered to be

a result of the high student and recent immigrant populations which can be anticipated to have lower personal incomes levels.

9.5.2 Housing Tenure and Landlord Type

Tenure Type - Occupied private dwellings	2011	2016	NSW 2016
Owned Outright (%)	33	28.5	32.2
Owned with a mortgage (%)	24.3	22.1	32.3
Rented (%)	39	45.7	31.8

The above shows a higher proportion of renters versus owners of property (with or without a mortgage). This is expected given the high proportion of students, young people and recent immigrants in the SA2.

The substantial number of units that have recently been constructed have evidently been constructed by developers and investors, rather than owner-occupiers.

9.5.3 Household Type

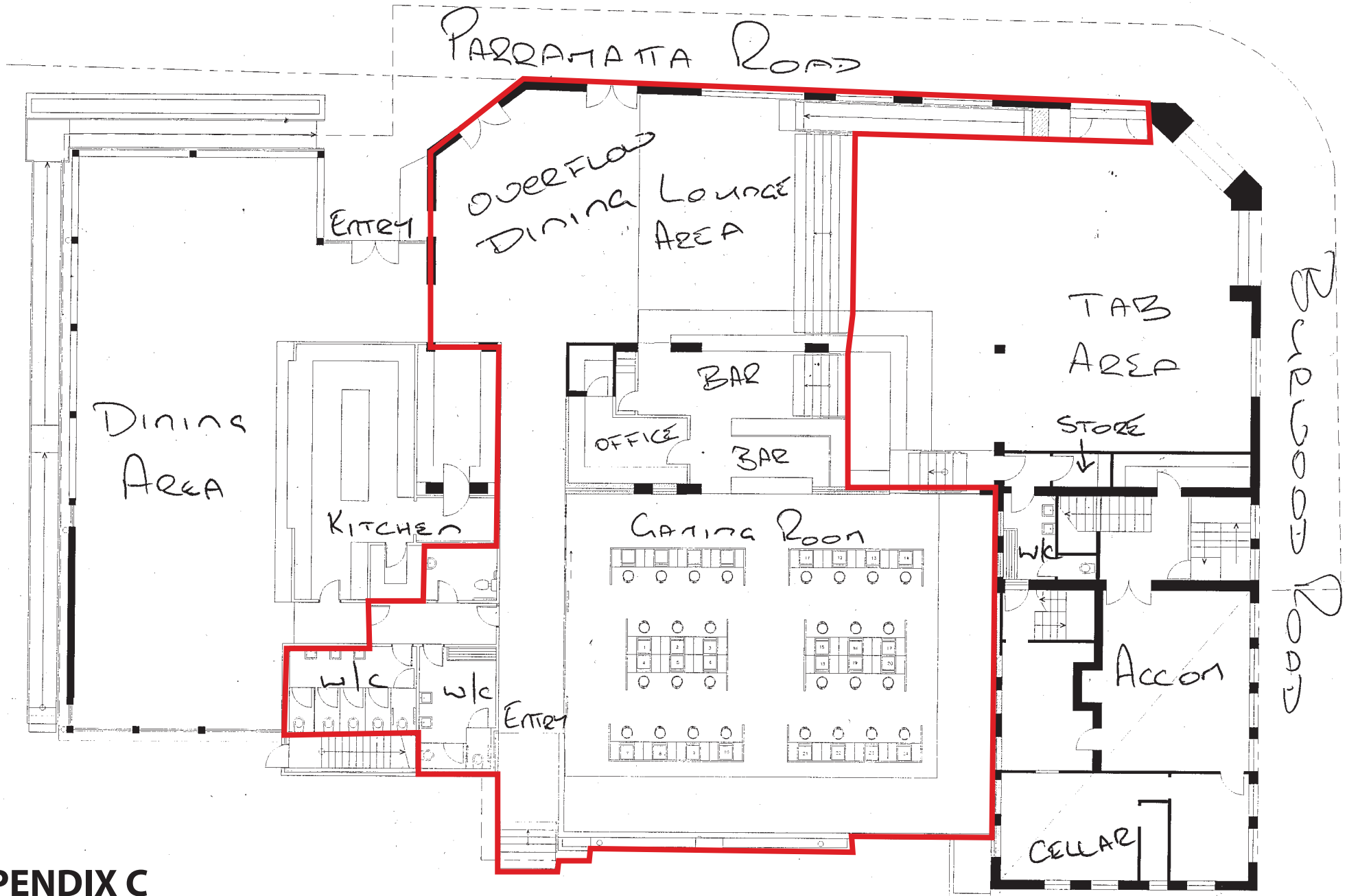
Households by Type - Census	2011	2016	NSW 2016
Lone person households (%)	21.5	20.3	23.8
Group households (%)	8.3	12.4	4.2
Family households (%)	70.1	67.2	72%
Average household size (no. of persons)	2.8	2.8	2.6

The above demonstrates a that there was three times the proportion of group households in the SA2 compared to the State. This is consistent with the conclusions above regarding the high proportion of students considered to be reflected in the lower personal but higher median household income, younger average age and higher unemployment.

9.5.4 Conclusion

A summary of the above data is provided under Part 4 of this LIA. It concludes that the Hotel is located in an area that is well-advantaged and that there are limited indicators of concern with respect to susceptibility to gambling related harm in the local community.

— MINIMUM AREA
TO OPERATE WHEN GAMING IS AVAILABLE



APPENDIX C
HOTEL FLOOR PLAN



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GAMING MACHINE PLAN OF MANAGEMENT

FOR THE BATH ARMS HOTEL

LOCATED AT 348 PARRAMATTA ROAD, BURWOOD

October 2018
Ref: 171082.2GP

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Appendix A – Hotel Licence

Appendix B – Current Self-Exclusion List

Appendix C – Hotel Floor Plan

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This Plan of Management has been prepared for the Bath Arms Hotel in support of a Local Impact Assessment application and to guide the operation of the Hotel. You may make unaltered copies of this document, which must include this notice, for this purpose only. No part of this document may be altered, reproduced or copied for an alternate purpose without the express permission of the copyright holder.

1.0 INTRODUCTION

- 1) The purpose of this Plan of Management (*the Plan*) is to outline operational criteria and requirements for the gaming room and gaming facilities at the Bath Arms Hotel (*the Hotel*), having regard to the relevant matters under the *Gaming Machines Act, 2001* and *Gaming Machine Regulation 2008*.
- 2) All staff involved with the operation of gaming machines including the overview, management or CMS system shall be made familiar with this Plan and are to sign a register stating they have been made familiar with this Plan.
- 3) A copy of this Plan shall be available on site at all times and immediately produced for inspection, upon request by NSW Police and Special Inspectors of Liquor and Gaming NSW.
- 4) Reference in this Plan to the Duty Manager is a reference to the most senior Hotel management person on duty, unless the role of Duty Manager has been delegated by the Licensee.
- 5) An obligation or responsibility under this Plan assigned to a Duty Manager may be delegated to another member of staff.

2.0 OPERATIONAL DETAILS

2.1 ORGANISATIONAL OVERVIEW

- 6) The liquor licence for the Hotel is attached at **Appendix A** which outlines the operational requirements under the Liquor Act 2007.
- 7) The Hotel floor plan is attached at **Appendix B**. Shown highlighted is the minimum area of the Hotel which must operate at all times gaming facilities are accessible to patrons. It comprises the gaming room plus bar and toilet facilities external to the gaming room.

2.2 OPERATING HOURS AND USE OF PREMISES

- 8) The Hotel is permitted to trade between 10am and 3am the following day, Monday to Saturday and, 10am to 10pm, Sunday.

- 9) The primary purpose of the Hotel must at all times be the retail sale of liquor.¹ However, at the discretion of the Licensee, liquor is only required to be made available for purchase between 10am and midnight Monday to Saturday and 10am to 10pm Sunday.²
- 10) The Hotel will not deploy more than 30 gaming machines at any time.
- 11) Minors are not permitted to operate gaming machines or enter the gaming room unless passing through it in the company of a responsible adult³ or engaged in employment in relation to servicing, repair or maintenance of gaming machines.

3.0 HARM MINIMISATION MEASURES

3.1 SIGNAGE AND ADVERTISING

- 12) The Licensee will not publish, advertise or promote the presence of gaming machines at the Hotel.⁴ This prohibition does not extend to internal promotional material prepared solely for the purpose of, and only, distributed internally at the Hotel.⁵
- 13) The Licensee will not erect any signage visible from outside the Hotel that draws attention to, or can reasonably be taken to draw attention to, the presence of gaming machines.
- 14) The Licensee must ensure the following notices (obtained from Liquor and Gaming NSW) about the chance of winning a major prize from gaming machines are erected in the Hotel:
- a) On each gaming machine, so as to be clearly visible whilst playing:
 - i) **What are the odds of hitting the jackpot? No better than a million to one.**
 - b) Conspicuously at the entry to the gaming room:

¹ GM Act, s 59.

² Liquor Act, s 15A.

³ **Responsible adult** in relation to a minor, means an adult who is: (a) a parent, step-parent or guardian of the minor, or (b) the minor's spouse or de facto partner, or (c) for the time being standing in as the parent of the minor.

⁴ GM Act, s 43(1).

⁵ GM Act, s 43(5B).

- i) **Think! What are the odds of hitting the jackpot? Your chance of hitting the jackpot on a gaming machine is not better than a million to one.**
- 15) The Licensee must ensure that player information brochures, approved by Liquor and Gaming NSW, are available:
 - a) In the gaming room;
 - b) Displayed in such a manner and in such a place that persons entering the gaming room would be alerted to their presence.⁶ and
 - c) **Any pamphlet approved by the Authority in Arabic, Chinese, Korean, Turkish and Vietnamese.**⁷
- 16) The Licensee must not publish anything which identifies any person who:
 - a) Wins a prize of more than \$1,000 in value from playing gaming machines; and
 - b) When claiming the prize, requests in writing that anything disclosing the person's identity not be published.
 - c) The Licensee may publish details inside the Hotel, information regarding the type or value prizes won.⁸
- 17) Each gaming machine is to have affixed to it a **problem gambling notice** and a **gambling warning notice**. Those notices must meet the following requirements.⁹
 - a) The gaming warning notice must contain one or more of the following statements:
 - i) **Think! About tomorrow**
 - ii) **Think! About getting help**
 - iii) **Think! About your family**
 - iv) **Think! About your limits**
 - b) The problem gambling notice must contain the following:
Call Gambling Help
1800 858 858
www.gamblinghelp.nsw.gov.au

⁶ GM Regulation, cl 23.

⁷ GM Regulation cls 22(3) and 23.

⁸ GM Regulation, 58.

⁹ GM Regulation cl 25.

- c) Each notice must be positioned so as to enable a person to clearly see the notice while playing the machine.
- d) The notices must be in a form approved by the Authority. The notices must be obtained from the NSW Office of Liquor, Gaming and Racing unless the signs consist of a permanent visible light emitting display that forms part of the gaming machine.

18) A **counselling signage notice** is to be erected at the Hotel.¹⁰ The notice is subject to the following requirements.

- a) The notice must be displayed in the vicinity **of every** entrance to the Hotel in a conspicuous location such that any person using the entrance would be alerted to its contents;
- b) The notice must contain the following:

Think! About your choices

Gambling More, enjoying it less?

**For free and confidential information and advice about problem gambling,
please contact Gambling Help**

1800 858 858

www.gamblinghelp.nsw.gov.au

- c) The notice must be in a form approved by the Authority and be obtained from Liquor and Gaming NSW.

19) The following ATM and cash-back terminal notices must be displayed as follows on each device.¹¹

- a) The notices must contain the following:

Think! About your choices

Call Gambling Help

1800 858 858

www.gamblinghelp.nsw.gov.au

- b) Cash back terminals must also contain the following statement:

¹⁰ GM Regulation, cl 26

¹¹ GM Regulation, cl 27

Your player activity statement is available from the cashier

- c) Font used must be no less than 0.2cm in height.
- d) The notice may consist of a permanently visible light emitting display that forms part of the ATM or cash-back terminal.

20) A notice is required to be erected in the gaming room advising patrons of the availability of problem gambling counselling services and the self-exclusion scheme.

¹² It must contain:

- a) The name and contract details of the Hotel's problem gambling counselling service providers;
- b) A statement advising patrons that a self-exclusion scheme is available to prevent patrons from entering or remaining in any nominated area of the Hotel to assist in controlling their gambling
- c) The name and contract details of a person or body who is able to assist patrons with becoming participants in a self-exclusion scheme.¹³
- d) That the Hotel's gambling counselling services are free to access.

21) Gambling contact cards which provide the name and contact details for the Hotel's gambling counselling service and the availability of self-exclusion from any part of the Hotel are to be placed in a clear plastic card holder, securely attached to each bank of gaming machines in a position that enables a person to clearly see the gambling contact cards while playing the machines or when approaching the bank of machines. The cards are to be in a form approved by the Authority and obtained from Liquor and Gaming NSW.¹⁴

22) Signage and notices required under the following clauses (whether or not available from L&G NSW) will also be provided in Chinese in the same locations.

- a) Clause 18 – Counselling signage notice;
- b) Clause 19 – ATM Notice (part (a) only);
- c) Clause 20 – Signage notifying availability of problem gambling services and the self-exclusion scheme; and
- d) Clause 21 – Gambling contact cards.

¹² GM Act, s 49(b).

¹³ GM Regulation, cl 52(4)-(5).

¹⁴ GM Regulation cl 54(1)-(2).

3.2 HANDLING OF PROMOTIONAL PRIZES, REWARD SCHEMES, CASH AND WINNINGS

23) The Hotel may offer a **player reward scheme** which is a system used in connection with the operation of gaming machines in which players accumulate reward points to obtain a **promotional prize** from playing gaming machines.¹⁵

24) Promotional prizes are not permitted to be:

- (a) Cash;
- (b) Greater than \$1000 in value;
- (c) Indecent or offensive;
- (d) Exchanged for cash.¹⁶

25) Participants in the scheme must be advised of the availability of player activity statements.¹⁷ A player activity statement is to be made available on request on a monthly basis¹⁸ and must include the following:¹⁹

- a) The total amount of turnover by the participant during the monthly period covered by the statement;
- b) The total wins recorded during the monthly period;
- c) The net expenditure (i.e., turnover less wins) during the monthly period;
- d) The total points earned and redeemed during the monthly period as a result of playing gaming machines under the scheme;
- e) The total length of time over each 24 hour period during the monthly period when the participants player card was inserted in gaming machines under the scheme
- f) The total length of time that the participants player card was inserted in gaming machines under the scheme during the monthly period.
- g) A statement that the above information:
 - i. Only relates to the occasions on which the participant used his or her player card under the reward scheme;

¹⁵ GM Act, s 45(1).

¹⁶ GM Act, s 45(2).

¹⁷ GM Act, s 45(4)-(5).

¹⁸ GM Regulation 48(2).

¹⁹ GM Regulation 48(3).

- ii. Does not necessarily relate to all of the participants gaming machine activity; and
- iii. May not include information about wins from a linked gaming system.
- iv. The ***gambling warning notice***: viz:
Call Gambling Help
1800 858 858
www.gamblinghelp.nsw.gov.au

26) Information to the effect that player activity statements are available on request must:

- a) Be given to each participant at the time of joining the scheme; and
- b) Be included in any promotional material relating to the player reward scheme.

27) Player activity statements are to be provided free of charge. Subsequent requests in respect of a monthly period may be charged in accordance with the scale of charges approved by the Authority.

28) The Licensee must not cash cheques unless they are made out to the hotelier or hotel owner on the face of the cheque (and not by endorsement). Cheques must not be cashed if:

- a) The value is more than \$400;
- b) A person seeks to cash more than one cheque in the same day;
- c) The same person has had a cheque “bounce” (dishonoured) (unless later cleared).
- d) All cheques must be banked within two working days.²⁰

29) The Licensee must pay any prize money that exceeds \$5,000,²¹ or the entire amount if so requested, by either:

- a) A cheque crossed with the words ‘Prize Winning Cheque – Rules Apply’²² payable to the person; or
- b) If requested, and available to the hotelier, by an electronic funds transfer to an account nominated by the patron.

30) Within the gaming room, a sign with the following words must be purchased from Liquor and Gaming NSW and erected in a conspicuous position:

²⁰ GM Regulation, cl 29.

²¹ GM Regulation, cl 30.

²² GM Regulation, cl 31.

PERSONS UNDER THE AGE OF 18 YEARS ARE NOT PERMITTED IN THIS AREA BY LAW²³

3.3 DESIGN AND USE OF HOTEL GAMING ROOMS AND RELATED FACILITIES

- 31) All gaming machines will be located within a “gaming room” (or rooms) which will confirm to the following specifications.
- a) It must be located in a **bar area**²⁴ of the Hotel;
 - b) It must be physically separated from the remainder of the Hotel by a permanent floor to ceiling wall. If the wall is made of glass, the bottom half must be opaque.
 - c) Patrons must not be compelled to pass through the gaming room in order to enter or leave the Hotel or gain access to another part of the Hotel;
 - d) Gaming machines must be suitably spaced to facilitate access.
 - e) The gaming room must provide a doorway for access to another part of the Hotel, where, at least one other operating bar and one toilet for each gender is available (see **Appendix C**). This other part of the Hotel must be accessible through the Hotel. This doorway is to be marked accordingly. If an additional door provides access directly to the street it must also be marked.²⁵
- 32) Gaming machines in a gaming room are not to be visible from any public place outside the Hotel²⁶ and not be located in a manner that is designed to attract the attention of members of the public who are outside the Hotel.²⁷
- 33) Entry to the gaming room must be free of charge.²⁸
- 34) The gaming room must at all times be under the supervision of the Licensee by way of CCTV or physical presence.²⁹
- 35) Cash dispensing facilities are not permitted to be installed in the gaming room or any part of the Hotel where gaming machines are located.

²³ Liquor Regulation, cl 33 and GM Regulation cl. 56.

²⁴ A **bar area** is one in which liquor is ordinarily sold for consumption on the premises and does not include a dining area, where residents reside or an area in which a minors area or function authorisation applies.

²⁵ GM Regulation, cls 8 (2)(a),(b),(c),(f),(h), (i) and (4).

²⁶ GM Regulation, cl 8(e).

²⁷ GM Act, 44A.

²⁸ GM Regulation, cl 8(d).

²⁹ GM Regulation cl 8(g).

- 36) Any cash dispensing facility in the Hotel is prohibited from providing cash from a credit card account.³⁰
- 37) A clock or clocks in good working order, set to within 10 minutes of the correct time, must be erected within the gaming room. As many clocks as necessary are to be installed so that the time can be readily viewed by any person operating a gaming machine.³¹

3.4 SELF-EXCLUSION SCHEMES

- 38) The Hotel must operate a self-exclusion scheme in which patrons may be prevented, at their request, from entering or remaining in any area of the Hotel or the entire Hotel.³² A list of persons excluded from the Hotel or the relevant area must be available to the supervisor of the gaming room. A copy is attached at **Appendix B**.
- 39) The Licensee may use no more force than is reasonable in the circumstances to prevent a participant in the self-exclusion scheme from entering, or remaining in, the nominated area of the Hotel.³³
- 40) Any person who participates in a self-exclusion scheme must be provided with the name and contact details of the Hotel's problem gambling counselling service (see cl 44 of this Plan)³⁴ a Player Information Brochure (see cl 15 of this Plan) and a Gambling Contact Card (see cl 21 of this Plan).
- 41) The Hotel's self-exclusion scheme must make provision for the following:
- a) Neither the Licensee nor staff shall refuse a request to participate in the scheme;
 - b) Requiring the participant to give a written and signed undertaking not to gamble in the Hotel for the time specified;
 - c) Requiring the participant to be given the opportunity to seek independent legal or other professional advice at their expense as to the meaning of the undertaking;

³⁰ GM Act, s 47C and GM Regulation cl 32.

³¹ Gm Regulation, cl 28.

³² GM Act, s 49(1)-(2).

³³ GM Act, s 49(4).

³⁴ GM Regulation 52(3).

- d) Provision of the name and contact details of the Hotel's problem gambling counselling service;
- e) Requiring the participant to provide a recent photograph to assist in their identification by staff;
- f) Ensuring the immediate availability, to any patron on request, of any standard agreement referred to in (b) above;
- g) Prohibition on withdrawing from the scheme in the first 6 months.³⁵

3.5 GAMBLING HELP AND LOCAL FACE-TO-FACE COUNSELLING SERVICES

42) The Licensee must enter into arrangement for problem gambling counselling services to be made available to the patrons of the Hotel.³⁶ Those services may be provided by any of the following bodies:

- a) Australian Hotel's Association (NSW);
- b) Clubs NSW
- c) Betsafe; or
- d) Any other body that receives funding from the Responsible Gambling Fund under the Casino Control Act, 1992 for the specific purpose of providing gambling-related counselling services.³⁷

43) The name and contact details of name and contact details of the Hotel's problem gambling counselling service must be provided to all patrons on request.³⁸

Wesley Mission 83 Milton Street ASHFIELD NSW 2131
1300 827 638

Co.As.It (Italian Specific) 67 Norton Street LEICHHARDT NSW 2040
02 9564 0744

CatholicCare 2C West Street LEWISHAM NSW 2049
02 9509 1148

University of Sydney Gambling Treatment Clinic Suite 12, Sky Gardens Plaza, 186
Queen Street CAMPBELLTOWN NSW 2560
1800 482 482

³⁵ GM Regulation cl 53(1)(a)-(g).

³⁶ GM Act, s 46.

³⁷ GM Regulation, cl 52(1).

³⁸ GM regulation, cl 52(3)(b).

Gambling help line – 1800 858 858 or www.gamblinghelp.nsw.gov.au or www.gamblinghelponline.org.au and multicultural line 1800 856 800

4.0 RESPONSIBLE CONDUCT OF GAMBLING

- 44) The Licensee and all staff whose duties concern the conduct of gaming machines in the Hotel must have undertaken an approved RCG training course from an approved training provider.³⁹
- 45) The Licensee and any staff whose duties concern the conduct of gaming machines in the Hotel, must have at all times a copy of the recognised competency card. The competency card must be produced on request of a police officer or special inspector.⁴⁰
- 46) The Licensee must not employ any person whose duties concern the conduct of gaming machines unless they hold current recognised RCG certification.⁴¹
- 47) The Licensee shall not offer or supply any free or discounted liquor as an inducement to play, or to play frequently, gaming machines in the Hotel.⁴²
- 48) The Licensee shall not offer free credits to players, or as an inducement to person to become players of gaming machines by means of letter box flyers, shopper dockets or any other similar means.
- 49) Any Code of Practice approved by the Minister and published in the Gazette will be observed by the Hotel.⁴³
- 50) In the event staff are questioned by patrons about their behaviour, some indicators of problem gambling include:
- Gambling every day of the week;
 - Gambling continuously without taking a break for extended periods of time;
 - Getting cash out from an ATM on multiple occasions for the purpose of gambling;
 - Trying to borrow or “scam” money or sell valuables to others for gambling;
 - Putting large win amounts back into the machine and keep playing;

³⁹ GM Act, s 49A

⁴⁰ GM Regulation, cl 58.

⁴¹ GM Regulation cl 59(4)

⁴² GM Regulation cl 55(a)

⁴³ GM Act, s 48. (At the time of writing, no such Code of Practice exists).

- Friends or relatives call or arrive to ask if the person is still in the hotel gambling;
- Blaming the Hotel, the staff or gaming machines because they lost;
- Having an unrealistic perception about the chance/odds of winning;
- Suffering from depression and/or have thoughts of suicide due to gambling;
- Displaying anger, kicking machines, looking sad and/or crying;
- Trying obsessively to win on a particular machine; or
- Spending what they consider to be too much time and/or money gambling.

5.0 REGULATION OF GAMING MACHINES

- 51) If the Licensee finds a fault that affects the playing or result of any game, or the accuracy of any reading of any meter, the Licensee must:
- a) Switch off the machine, rendering it inoperable by the public until the fault has been rectified; and
 - b) Attach a notice to the machine indicating that it is faulty.
- 52) The value of prizes won by players must not be less than 85% of the total money paid by the players of the gaming machine.
- 53) Monitors used to display the jackpot prize from a linked gaming system are not permitted to be displayed anywhere but the Hotel gaming room.⁴⁴

6.0 OTHER RELEVANT MATTERS

6.1 AMENDMENT TO THIS PLAN

- 68) If, in circumstances where better management or improved amenity outcomes can be achieved by amendments to this Plan such amendments must only be made following consultation with Liquor and Gaming NSW.

6.2 LICENSEE'S STATEMENT OF UNDERSTANDING

The Licensee of the Bath Arms Hotel hereby acknowledges that the above provisions have been read and are understood.

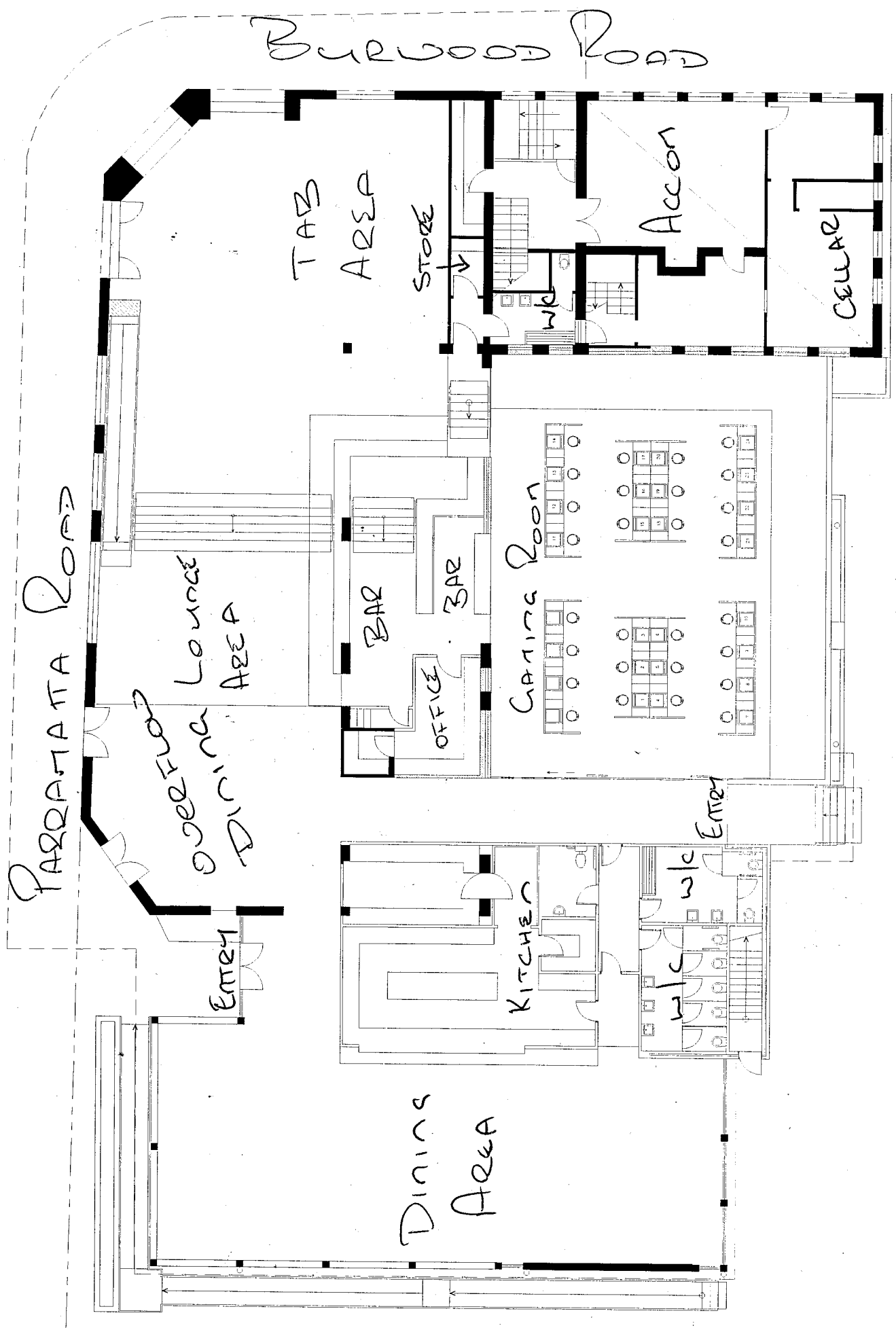
Licensee Signature:..... Date:

⁴⁴ GM Regulation, cl 57.

APPENDIX A – Hotel Licence

APPENDIX B – Current Self-Exclusion List

APPENDIX C – Hotel Floor Plan



APPENDIX D – Gaming Machine Regulation, Part 6 – Player Cards and Accounts

Gaming Machines Regulation 2010

Current version for 3 April 2018 to date (accessed 10 October 2018 at 12:42)

Part 6

Part 6 Player cards and accounts

94 Definitions

In this Part:

account card has the meaning it has in section 45B of the Act.

electronic payment gaming machine has the meaning it has in section 45B of the Act.

player account has the meaning it has in section 45B of the Act.

player card has the meaning it has in section 45B of the Act.

Smartcard has the meaning it has in section 45B of the Act.

95 Compliance with requirements of this Part

A hotelier or registered club must comply with the requirements of this Part.

Maximum penalty: 50 penalty units.

96 Issuing of player cards

- (1) A player card must not be issued to a person who is under the age of 18 years.
- (2) A player card must not be issued to a person unless the person provides a responsible person for the hotel or registered club with documentary proof of the person's identity.
- (3) Only one player card per person may be issued by a hotelier or registered club. However, this subclause does not prevent a hotelier or club from issuing a person with another player card as a replacement for one that has been lost, stolen or destroyed.
- (4) A hotelier or registered club must not issue a player card to a person unless the warning and information contained in the gambling warning notice and problem gambling notice under clause 25 is provided to the person.
- (5) A hotelier or registered club must not issue a player card to a person unless the Gambling Help Line referred to in clause 25 (7) appears on the card.

97 Participation in player reward schemes

- (1) If:
 - (a) a hotelier or registered club conducts a player reward scheme within the meaning of section 45 of the Act, and

(b) any of the approved gaming machines used in connection with the player reward scheme are electronic payment gaming machines,

any person to whom the hotelier or club issues a player card must be given the option of choosing whether or not to participate in the player reward scheme.

(2) The option must be made available at all times to the person.

98 Player accounts

- (1) A hotelier or registered club must not allow a person to open more than one player account with the hotelier or club at the one time.
- (2) The hotelier or registered club must not extend a cash advance or any other form of credit in respect of a player account.
- (3) The following information must be provided to a person in writing at the time the person opens a player account: The security of money in player accounts is the responsibility of the both the *hotelier/*registered club (**delete whichever is inapplicable*) and the account holder. The government and its agencies take no responsibility for any losses that might occur from the account.

An account holder is solely responsible for ensuring that the account holder's personal identification number ("PIN") is kept confidential and that no other person has access to the account holder's player card. The account holder is liable for any losses that might arise from, or in connection with, the account holder's failure to comply with such responsibilities.

- (4) Player information (within the meaning of clause 22) must be provided to a person when the person opens a player account.
- (5) Any money that is held by a hotelier or registered club in a player account must:
 - (a) be kept separate from any other funds or accounts held or maintained by the hotelier or registered club, and
 - (b) not be used by the hotelier or registered club for any purpose.

99 Maximum amount held in player accounts or stored on Smartcards

The amount of money that can be held in a player account or stored on a Smartcard must not exceed \$5,000.

100 Transaction records—player accounts

- (1) A transaction record must be provided on each occasion any money is paid into or withdrawn from a player account.
- (2) The transaction record must include the following information:
 - (a) the type of transaction completed,
 - (b) the amount of money involved,
 - (c) the time and date of the transaction,

(d) the current balance in the player account.

(3) Subclause (2) does not limit the information that may be included in a transaction record.

101 Player activity statements—player accounts

(1) Information to the effect that player activity statements are available on request must:

- (a) be given to each person at the time the person is issued with a player card, and
- (b) be included in any promotional material displayed in the hotel or registered club in relation to electronic payment gaming machines.

(2) A player activity statement must, on the request of a person who has a player account with a hotelier or registered club, be provided by the hotelier or club on a monthly basis.

(3) The following information, provided in the form approved by the Authority, is the minimum information that must be included in a player activity statement for the period covered by the statement:

- (a) the total amount of turnover by the player during the monthly period covered by the statement,
- (b) the total wins recorded during the monthly period,
- (c) the net expenditure (ie turnover less wins) during the monthly period,
- (d) the total length of time over each 24-hour period during the monthly period when the person's player card was inserted in electronic payment gaming machines in the hotel or on the premises of the club (*the daily record*),
- (e) the total length of time that the person's player card was inserted in electronic payment gaming machines in the hotel or on the premises of the club during the monthly period.

(4) In addition to subclause (3), the following information in relation to the period covered by a player activity statement must be kept by the hotelier or club and be provided to the player on request:

- (a) a list of each transaction involving the depositing of money into the player account at the cashier,
- (b) a list of each transaction involving the paying of credits into the player account as a result of playing electronic payment gaming machines,
- (c) a list of each transaction involving the withdrawal of money from the player account at the cashier.

(5) The daily record is required to be included in the player activity statement only in respect of those days that the person's player card was used.

(6) A player activity statement is to also include a note stating that the information detailed in the statement:

- (a) only relates to the occasions on which the player used his or her player account to play an electronic payment gaming machine, and
 - (b) does not necessarily relate to all of the player's gaming machine activity during the monthly period, and
 - (c) may not include information about wins from playing gaming machines that are part of a linked gaming system within the meaning of Part 10 of the Act.
- (7) A player activity statement, if requested to be provided, is to be available from the cashier or other appropriate outlet at the hotel or club concerned.
- (8) A player activity statement is to be provided in respect of a monthly period only if the player account has actually been used during that period.
- (9) Player activity statements must be provided free of charge by the hotelier or registered club. However, if a player requests a subsequent player activity statement to be provided in respect of a monthly period, the hotelier or club may charge for providing the subsequent statement in accordance with the scale of charges approved by the Authority.

102 Requirement to keep record or copy of player activity statement under this Part

A hotelier or registered club must keep a record or copy of any player activity statement made available by the hotelier or club under this Part.

Maximum penalty: 50 penalty units.

103 Weekly account limits

- (1) A person who opens a player account may, by written notice to the hotelier or registered club, set a limit on the amount of net expenditure (ie turnover less wins) per week from the account (***weekly account limit***). The setting of a weekly account limit may also include arrangements for the deactivation of the account card.
- (2) The person is to be advised in writing at the time the player account is opened that a weekly account limit may be set.
- (3) If a weekly account limit is set, the person may alter the limit by written notice to the hotelier or registered club.
- (4) If the notice is to decrease the weekly account limit, the hotelier or registered club is to give effect to the alteration as soon as practicable (but not later than 24 hours in any case).
- (5) If the notice is to increase the weekly account limit, the increase does not take effect until 48 hours after the notice is given to the hotelier or registered club.
- (6) Information about altering the weekly account limit is to be provided to the person in writing at the time the player account is opened.

104 (Repealed)

APPENDIX E – NAME AND SIGNATURE OF STAFF



DESIGN COLLABORATIVE

Pty Limited

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Planning and Development Consultants

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List of Organisations Notified on Making of Application

The following organisations were notified on the making of the Application.

Organisation	Address
Burwood Local Council	PO Box 240 Burwood NSW 1805
Burwood Local Police Area Command	Belmore Street Burwood NSW 2134
NSW Council of Social Service	Level 3, 52-56 William Street Woolloomooloo NSW 2011
Sydney Local Health District	Post Office Box M30 Missenden Road NSW 2050
St Anthony's Family Aged Care	9 Alexandra Avenue Croydon NSW 2132
Sydney Dental Hospital, Paediatric Dentistry Department	2 Chalmers Street Surry Hills NSW 2010
Rivendell Child, Adolescent and Family Mental Health Service	Thomas Walker Hospital Hospital Road Concord West NSW 2138
Co.As.It (Italian Specific)	67 Norton Street Leichhardt NSW 2040
CatholicCare	2C West Street Lewisham NSW 2049
University of Sydney Gambling Treatment Clinic	Suite 12, Sky Gardens Plaza 186 Queen Street Campbelltown NSW 2560
Wesley Gambling Counselling Services	83 Milton Street Ashfield NSW 2131