

**WESTS TENNIS CLUB (245012)  
LOCAL IMPACT ASSESSMENT (CLASS 1)**

**EXECUTIVE SUMMARY**

- Western Suburbs League Club (Campbelltown) Ltd ("West's") operates West's Tennis Club ("the Club") and is located in the Campbelltown Local Government Area (LGA), classified as in Band 2 by the Casino, Liquor and Gaming Control Authority as part of the *Gaming Machines Amendment Act 2008 No 99*. As such, a Class 1 Local Impact Assessment is submitted requesting a poker machine threshold increase of 20 poker machines, which constitutes a *low range increase* according to this same Act.
- The Club currently holds 64 approved gaming machines, thus an increase of 20 poker machines would bring this total to 84.
- A low range approval will result in a positive outcome for talented junior tennis players. If these juniors are to become elite tennis players, they need to practise on hard court surfaces similar to the surfaces which the Australian Open and US Open Championships are played upon. Practising on synthetic grass is not ideal as there are no international tournaments played on that type of surface. The increase in revenue from an extra 20 poker machines would allow the construction of one hard court surface.
- The Club has been guaranteed by West's to remain open until February 2018. Anything which increases its profitability shall increase the likelihood of the club remaining open beyond that date.
- The people of NSW would benefit through a decrease of ten poker machines in the overall NSW pool. The State Government has set up this process with an objective of reducing the number of poker machines in NSW and we are happy to participate in this process.
- The Club adheres to all harm minimisation and responsible gambling measures stipulated in the *Gaming Machines Regulation 2002* and the *Gaming Machines Act 2001*. Furthermore, West's has adopted the Clubs NSW *Registered Clubs Responsible Conduct of Gambling Code of Practice – Best Practice Guidelines* principles and is a member of the *ClubSafe* Responsible Gambling Program.
- The Club has a serious commitment to responsible gaming and ensures all gaming staff complete a Liquor Administration Board approved Responsible Conduct of Gambling course.



## 1 INTRODUCTION

The following submission outlines an application for a threshold increase of 20 poker machines for Wests Tennis Club pursuant to the recently amended *Gaming Machines Act 2001*.

The Tennis Club was incorporated on 27 October 1966 and after a number of years dedicated to building the Club's membership, raising funds and finding a suitable location for the Club's construction, the doors opened for trading on 22 July 1972. The Club has 14 synthetic courts and offers one of Sydney's premier tennis locations with a reputation for a strong juniors program. The Club conducts the usual activities of a licensed club, including the operation of gaming machines, the sale of liquor and other beverages, the provision of catering and function facilities. At time of amalgamation the Club had 3,826 members and in 2008 had approximately 800 registered tennis competition players.

In accordance with sections 32 to 37 of the *Gaming Machines Amendment Act 2008 No 99*, a Class 1 Local Impact Assessment is submitted herewith, detailing the benefits the Club will provide to the local community as well as the range of harm minimisation and responsible gaming measures employed by the Club. A copy of this Local Impact Assessment is available for public inspection at both Clubs during operating hours.

Threshold increases, according to the LIA Guidelines from the Casino, Liquor and Gaming Control Authority can only approve an LIA where the following requirements are met:

- the LIA complies with the requirements of the (Gaming Machines) Act 2001 and the (Gaming Machines) Regulations (2008)
- the LIA demonstrates that gambling activities will be conducted in a responsible manner.

Further, the applicant must demonstrate that the proposed increase in gaming machines for the venue will create a positive contribution to the Local Community.

### 1.1 The Club

Wests Tennis Club is located in the Campbelltown City Council Local Government Area, classified in Band 2 by the Casino, Liquor and Gaming Control Authority as part of the *Gaming Machines Amendment Act 2008 No 99*. The Club is located at 16 Old Leumeah Road, Leumeah, NSW 2560.

Campbelltown Tennis Club amalgamated with Wests in February 2008 due to financial difficulties. Campbelltown Tennis Club lost \$162,342 in 2007 and was tracking for a much greater loss in 2008 when Wests agreed to the amalgamation in February 2008. Wests made this decision as it is a community-based organisation that sees itself as the Home of Sport, is located only 150 metres from the Tennis Club and wanted to ensure local tennis continued to be supported in the region.

In a Deed of Amalgamation, Wests for at least ten years has committed to paying annually the Southern Districts Tennis Association \$12,000, a further \$20,000 annually for ten junior



scholarships and a further \$30,000 annually for a Sub Committee to spend on the enhancement of tennis. Therefore Wests supports tennis directly to the value of \$62,000 annually and would like to further provide one hard court for elite juniors.

A study of community impacts of the introduction of gaming machines was conducted by Arthur Andersen (1997). They found that:

- many gaming machine venues support local sports teams, cultural events and donate to charity
- gaming machine venues provide a location for day outings; and
- gaming machine venues make available new and improved facilities for entertaining and socialising.

Gambling Industries have been found to provide a wide range of social benefits to local communities. These benefits are largely dependent upon the level of gaming revenue they provide from their patrons. IPART (1988) advise that duties from gaming enable the government to fund a broad range of community services. The NSW Treasury also advised IPART that the gambling industry generates social benefits as follows:

- The total revenue taken from gambling equates to about 20 percent of the health budget.
- Gaming is enjoyed by a wide cross section of the community. Most consumers of gaming products do not have a problem controlling their gambling behaviour. For these people gaming offers one of many alternative ways in which to spend their leisure dollar.
- Clubs and Hotels provide a range of community benefits. They offer a community meeting point and a venue for many social occasions. Gambling helps to maintain the viability of these venues (IPART 1988, p. 70).

## **2 BENEFITS TO THE LOCAL COMMUNITY**

### **POSITIVE OUTCOMES**

Granting the gaming machine threshold increase shall improve the social and economic benefit for the Local Community:

- The objective is for Wests Tennis Club to trade profitably so that in 9 years time when the Wests Guarantee to operate Wests Tennis Club expires, the Board and members of that day, have confidence that the Tennis Club is not a drain on the Leagues Club. Gaining an additional 20 gaming machines will assist with this endeavour. To date Wests has invested \$870,000 into the Tennis Club in 15 months, however, this rate of expenditure is not sustainable and the current Board would like the Tennis Club to become self sufficient. However, over the last six months the Club has operated at a loss of \$40,000. An extra twenty gaming machines will hopefully reduce such losses.
- The Tennis Club is small regarding its turnover of \$2,000,000 per annum. It employs only 20 staff. Extra revenue means greater security for current jobs and greater prospects of more jobs and more shifts for existing casuals, which make up most of



the workforce. Even the Productivity Commission Chairman (2002, p5) suggests additional employment in gambling related industries in “areas where unemployment is very high” may be considered a positive contribution to economic activity.

- In 2008, Wests Tennis club did not have to contribute to the CDSE program because its revenue was too small. In 2009 and hopefully in future, it will be a financially contributing participant to the CDSE Committee.
- In 2008, Wests Tennis Club paid \$22,685 in gaming taxes and with additional gaming machines expect to pay an extra \$106,200 per annum.
- According to the Productivity Commission’s 1999 Report into Gambling the greatest benefit to gaming machine play was in fact consumer benefit, via access to entertainment. The net effect is positive, even after considering problem gamblers.
- As per our attached Club flyer (Annexure A), Wests Tennis Club provides five bingo sessions and three cash housie sessions per week. The importance of such promotions to most of those who attend as their regular social outing should not be understated.

## **2.1 Encourage Spend in the Local Region**

Increased revenue from extra gaming machines and patronage from parents of tennis players attracted to the Club because of the hard court will provide further scope to diversify the Club’s service and entertainment mix and thus even attract visitors from outside the region which will create further revenue injections into the community. There are very few hard court surfaces in Western Sydney and if an investment is made in such a court, juniors from further than just Campbelltown will be attracted to practise here.

## **2.2 Supporting talented junior tennis players**

Tennis Australia and many ex tennis champions have been very vocal about how many backyard tennis courts have been turned into sub divided parcels of land and developed into residential unit blocks. As a result, many families and neighbours no longer have direct access to a local tennis court. (See Annexure A).

The cost to maintain tennis courts and to replace such tennis court surfaces is often cost prohibitive. However, if an increase of 20 poker machines is approved, Wests is prepared to resurface a tennis court with a hard court. The cost to replace a hard court costs approximately \$30,000 more than simply replacing it with a synthetic surface. (See Annexure B).

Wests Tennis Club has two permanent tennis coach professionals and a further seven casual coaches. They have many talented juniors (See Annexure C) and feel that these juniors would benefit greatly by being able to practise on a hard court surface. Since most of the international tournaments are played on these hard court surfaces, the future of Australian tennis is reliant on juniors growing up being able to practise Western style handle grips on surfaces where the balls bounce much higher and juniors need to be able to practise hitting top spin ground strokes at “head height” which is not always possible on



synthetic grass. The introduction of synthetic grass has seen the demise of Australia being a dominant force in world tennis.

### **2.3 Less traffic on main roads**

A more appealing surface to talented juniors means that parents will stay local rather than adding to the traffic congestion on highways between Campbelltown and the Homebush Tennis Centre.

### **2.4 Enhanced local facilities**

Investing in one hard court shall send a very clear message to tennis players that reinvesting in the Club gives confidence that tennis shall be supported in the longer term.

### **2.5 Encourage children to exercise by playing Tennis**

Close to 30 per cent of children in Macarthur suffer from obesity, which is almost double the state average. Given such dire statistics, and the extremely harmful effects of childhood obesity, any enhanced facilities that encourage the participation of sport is immensely valuable. All Junior members play for free. (See Annexure D).

### **2.6 Overall Decrease in Poker Machines in NSW**

Pursuant to the current legislation, to gain an increase of 20 poker machines, Wests would be required to buy 30 and thus relinquish 10 to the State Government. This would lead to a decrease of 10 poker machines operating in the State.

## **3 HARM MINIMISATION AND RESPONSIBLE GAMBLING MEASURES**

In order to provide a responsible gambling environment and comply with the relevant legislation, Wests has adopted the Clubs NSW *Registered Clubs Responsible Conduct of Gambling Code of Practice – Best Practice Guidelines* principles and is a member of the ClubSafe Responsible Gambling Program. The Club has lodged a *Responsible Gambling Affidavit* with the Liquor Administration Board. Furthermore, it has made all necessary changes to comply with the requirements of *Gaming Machines Regulation 2002* and the *Gaming Machines Act 2001*.

### **3.1 Gaming Machines Regulation 2002**

The Club has adopted the following responsible gaming practices to comply with the above regulation:

- One of each of the six permissible gambling warning notices and one of two permissible problem gambling notices is located on each gaming machine in suitably sized letters (Clause 25).
- Notices supplying information on the chances of winning prizes on gaming machines are displayed in each part of the Club where gaming machines are located (Clause 21).



- Counselling signage notice is clearly displayed in the vicinity of the Club's main entrance (Clause 26).
- An approved problem gambling notice is clearly presented on each of the club's automatic teller machines (Clause 27). Moreover, the Club as located all ATM and EFTPOS machines in areas where there are no gaming machines.
- A fully functional clock is visible to any person playing a gaming machine.
- Approved Player Information Brochures are readily available and noticeably displayed in all gaming machine areas in English. A Player Information Brochure is made available in any of the twelve required languages as soon as practicable after a request. The Club has signage directing patrons to approach supervisory staff if they require a brochure in a language other than English.

### 3.2 Cheque Handling Procedures

In terms of cashing cheques and making cheque payments, the Club has adopted the following procedures in accordance with legislation:

- Cheques are not cashed by the Club at all, despite legislation allowing a maximum of one cheque to be cashed per person per day.
- All cheques presented for prizes that exceed \$2,000 or more are paid by crossed cheques payable to the patron. The Club uses ClubNet cashier system that facilitates the use of cheques being written for this purpose. When a gaming machine cancel credit of greater than \$2,000 is processed, the system automatically prints a receipt for the appropriate cheque value. This receipt is then transferred to administration where a cheque is written and available to the player within two working days.

### 3.3 The Payment of Prizes

All prizes are awarded or paid to a prize winner on request or in the following manner:

- Monetary prizes: within 48 hours of request;
- Non Monetary prizes: within the time undertaken in any material specifying available non-monetary prizes. If the Club has stated no such time in any relevant material, the prize will be awarded within 48 hours.

### 3.4 Cash Advances or Credit

The Club does not provide any cash advances or other forms of credit to any member or guest for the purposes of gambling.

### 3.5 Advertising, Promotions and Inducements to Gamble

The Club does not offer any unlawful inducements to gamble such as free or discounted liquor promotions to gamblers or any schemes that allow free gambling credits to be distributed to gaming machine players.

The Club does not use the word *Casino* in any description or promotion of the Club in signs, advertising or promotional material which is visible or audible from outside the premises. The Club's gaming machine signs comply with Section 44 of the *Gaming Machines Act*



2001. The Club will not publish in any form information that identifies a winner of a prize of more than \$1,000 in value, if requested not to do so in writing.

### 3.6 Problem Gambling Counselling

The Club has adopted the *ClubSafe* self exclusion scheme. Appropriate staff training has ensured that staff know when to talk to patrons about self-exclusion and how to process their request. As part of this scheme, the Club:

- Does not refuse any person requesting self-exclusion to be excluded from participation in the scheme. If a request is made, the Duty Manager will explain the process to the person and present the relevant documentation.
- Ensures that all participants sign a written undertaking not to gamble in the Club which clearly states the period of exclusion. Furthermore, the Club ensures all members returning after a period of self exclusion, sign a Statutory Declaration acknowledging completion of their self exclusion period and control of their gambling spend. The Club employs a minimum three month exclusion period as per the *ClubSafe* model.
- Allows a participant to obtain independent legal or professional advice before signing the appropriate forms.
- Ensures all appropriate information about gambling related counselling and treatment services available to patrons is displayed on relevant signage or in brochures within the Club.
- Ensures staff are equipped to identify participants by displaying a recent photograph in areas accessible only to gaming staff as well as a folder with the details of all participants in it. The importance of identifying and removing participants is emphasised in staff training.
- Displays signs in the gaming area and reception foyer advertising the availability of the self-exclusion scheme.
- Wests in 2009 has committed to assist with gambling counseling via a \$10,000 contribution to Lifeline.

### 3.7 Staff Training and Rostering

All staff who undertake any gaming-related duties have all completed a Liquor Administration Board approved Responsible Conduct of Gambling course. Furthermore, as a member of *ClubSafe*, all staff have been trained in the *ClubSafe* program and additional training has been provided for gaming area staff and Duty Managers in assisting problem gamblers and processing self exclusions. This training goes beyond the minimum requirements of the legislation and focuses on how staff can properly assist problem gamblers.

The Club has prepared three helpful workbooks which are distributed to all Club employees and regularly maintained and updated to reflect changing legislation and operating requirements, including:

- The Employee Handbook, which provides detailed information on responsible conduct of gambling, responsible service of alcohol and a range of other relevant work policies.



- Job Descriptions and Training Manuals, which outlines and describes the responsibilities, duties and skills required to complete tasks in all areas of the Club. This ensures all staff understand all aspects of their work, including those duties relating to the responsible conduct of gambling.
- ClubSafe Manual, which is available to all staff for training and revision purposes for responsible gaming procedures.

### **3.8 Monitoring Procedures**

To ensure that all the above procedures are maintained so that the Club provides a safe gambling environment, regular and thorough monitoring checks are completed as follows:

- Gaming machine sticker warnings are checked on a daily basis by gaming staff
- The Gaming Manager completes a monthly compliance checklist
- A full audit based on the Office of Liquor and Gaming and Racing's Club Audit Program is conducted on an annual basis and the local police are invited to participate.

This monitoring process is thorough and exceeds the minimum requirements, further emphasizing the Club's commitment to ensuring a safe gambling environment to its patrons.

## **4 CONCLUSION**

As a result of the introduction of indoor smoking bans, increasing economic problems and an increase in poker machine taxes, Wests and the Tennis Club have been experiencing declining profits over the past few years. This decline has directly impeded the Club's ability to provide support to local organisations, which is a practice the Club takes great pride in. The extra revenue expected from an increase of 20 poker machines would aid in stemming this decline in profit, and allow the construction of one hard surface tennis court to benefit the community.

As evidenced by the preceding information, the Club has undertaken a number of measures to ensure that gambling activities are conducted in a responsible manner. In addition to joining the *ClubSafe* program, Wests and the Tennis Club have gone beyond the legislative requirements by undertaking a number of voluntary initiatives such as warning signage in car parks, help signage in bathrooms and telephone areas and providing no cheque cashing. Wests takes its commitment to responsible gaming extremely seriously.

The potential positive impacts to the community of Campbelltown (and also NSW more generally) in combination with the extensive harm minimisation and problem gambling initiatives undertaken by Wests and the Tennis Club indicate a low range increase of 20 poker machines in the Club will result in a net positive outcome to the region.

The Legislation and Guidelines provide that for the Threshold Application to be approved, that the applicant must show that the Club will operate gaming machines in a responsible manner and we believe over an extended period of time we have proven this. Further that



there must be a benefit to the local community and we also believe the details within this submission outline the same.

Therefore, we firmly believe that the criteria on both counts has been met and respectfully request that the Threshold Application be approved.



Tony Mathew  
General Manager

By Order of the Board of Directors.