

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

EXECUTIVE SUMMARY

- Western Suburbs League Club (Campbelltown) Ltd ("West's") operates Wests 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 has a gaming machine threshold of 84 approved gaming machines, thus an increase of 20 poker machines would bring this total to 104.
- An increase of 20 poker machines would result in a variety of positive outcomes for NSW and particularly the Campbelltown and surrounding community.
- The Club has been guaranteed by Wests to remain open until February 2018. Anything which increases its profitability shall increase the likelihood of the club remaining open beyond that date.
- Most importantly, the Club would increase its current CDSE Category 2 spend by \$40,000, above our legal obligation by contributing this amount to the Healthy Kids Foundation, an organisation committed to promoting health and preventing obesity in children in the Macarthur Region.
- 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, 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 a serious commitment to responsible gaming and ensures all gaming staff complete a Liquor Administration Board approved Responsible Conduct of Gambling course.
- The Club has committed to provide a voluntary pre commitment system, so all members may set their own maximum spend limits. This is a very serious investment to address harm minimisation.

1 INTRODUCTION

The following submission outlines an application for a threshold increase of 20 poker machines for Wests Tennis Club pursuant to the 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 thirteen synthetic courts and one hard court and offers one of Sydney's premier tennis locations with a reputation for a strong junior programs. 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. We consider the local community to include not just the Campbelltown LGA but suburbs within Liverpool and Camden Council areas. Further, the Club has 1287 members from the Liverpool LGA and 3764 members from the Camden LGA.

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 considers itself as the

Home of Sport, is located only 150 metres from the Tennis Club and wanted to ensure local tennis continued to be available in the region. Also and very importantly, the Board of Wests Leagues Club wanted the Tennis Club to remain. It was certainly not amalgamated with because we thought it would be a profit making exercise. Wests doubts that the Tennis Club will ever make sizeable returns. For the eleven months of this financial year the Club has traded at a loss of \$51,098.

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 7 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 will be self sufficient and not be a drain on the Leagues Club. Gaining an additional 20 gaming machines will assist with this endeavour. Over the last ten months the Club has operated at a loss of \$51,098. 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 13 staff. 11 live in the local LGA while the other 2 live in the Camden LGA. 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 2009, Wests Tennis Club paid \$203,974 in gaming taxes including gst and with additional gaming machines income and therefore taxes are expected to rise.
- The Productivity Commission calculated the net benefit of gambling ranged between \$3.7 billion and \$11.1 billion, even after the negative consequences were considered.
- 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 could provide further scope to diversify the Club's service and entertainment mix and thus attract visitors from outside the region which will create further revenue injections into the community. A more attractive entertainment and gaming venue could also prevent Campbelltown residents from visiting venues outside the area and thus spending their money in other regions. For these patrons it is important that we maintain and possible expand our promotional offering.

2.2 Increased Spend on Community Grants

The projected increase in revenue from an extra 20 poker machines would provide the Club with the means to increase community expenditure in order to support the local community.

Provided this application is approved, Wests Tennis Club will contribute \$40,000 to the Healthy Kids Foundation (ACN 125 069 678) (Annexure B), in CDSE (Cat 2) spend over our legal obligations. That Foundation was established with the principal objective of promoting childhood health and preventing childhood obesity in the local Macarthur region.

This extra contribution will further aid the Foundation in achieving its objectives, which include:

- Providing education directly to children suffering from obesity, including information on dietary issues and healthy lifestyle choices;
- Providing information to schools and canteens to raise local community awareness of obesity in children;
- Engaging in programs and activities to encourage, motivate and enable obese children to lose weight by making healthier food choices and engaging in daily physical activity;
- Encouraging and supporting canteens that promote the availability of a variety of low-fat, high-fibre foods;
- Promoting policies in the local community that provide children with obesity with opportunities to engage in sport and other physical activities, including facilitating participation by means of payment of sports accident insurance and first aid for participants and subsidising costs of participation in a range of sports; and
- Any ancillary activities that are consistent with promoting healthy kids in the Macarthur region.

Close to 30% 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, it is clear that this substantial amount will greatly benefit the families of Macarthur. (see Annexure C)

2.3 Overall Decrease in Poker Machines in NSW

Pursuant to the current legislation, to gain an increase of 20 poker machines, the Club 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*.

The NSW government has released the results of the NSW Population Health Survey which has found that NSW has the lowest rate of problem gambling prevalence of any state in Australia, equal with South Australia and Queensland.

The study interviewed over 9,400 NSW adult residents making it the largest problem gambling prevalence study ever completed in NSW.

The study found:

- A problem gambling prevalence rate of 0.4% down from 0.8% in 2006. Victoria now has the highest rate of problem gambling at 0.7%.
- That 70 percent of respondents engaged in at least one type of gambling in the previous 12 months. Gaming machines were played by 25% of respondents, compared with lotteries at 51% and raffles at 44%;
- 89% of respondents never bet more than they can afford to lose, 95% never chase their losses and 97% never have financial problems of their gambling; and
- 95.8% of NSW's adult population are non-problem gamblers, 2.5% are low risk gamblers, 1.3% are moderate risk gamblers and 0.4% are problem gamblers.

Gaming and Racing Minister Kevin Green said in a recent media release, "this study shows that gambling does not negatively impact on most NSW residents. These findings are very encouraging and we hope it's a sign that our high-quality counseling services and strict harm minimization laws are making a real difference".

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).
- "Think about your choices" 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 has 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 Self-Exclusion Scheme

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 does not allow a participant to withdraw from the undertaking without the consent of *ClubSafe* who will ensure the participant undergoes a rigorous assessment process to ascertain the progress the person has made in managing their gambling problems. 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.

3.6 Voluntary Pre Commitment.

The Club's Board of Directors recently signed off on a significant piece of capital equipment which is a new poker machine system. One of the compelling reasons to change providers and go with International Gaming Technology is that their company is the first and only provider in NSW to offer patrons the opportunity to set their personal daily spend limit on cash based poker machines. From an ability of harm minimization, this is a very serious commitment to our players.

3.7 Advertising, Promotions and Inducements to Gamble.

"Pre-commitment remains the key"

The most targeted and potentially effective measure is to give people the capacity to control the behavior of their future selves - to pre-commit - since lack of control, impulsiveness and periodic guilt are commonplace among regular gaming machine gamblers. The essential element of an effective pre-commitment system is the capacity of gamblers to set a binding spending limit that, when exceeded, no longer enables them to play." (Productivity Commission, Overview XXX)

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.

3.8 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.

3.9 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.

3.10 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 emphasising 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. From a projected increase in profits Wests Tennis Club, subject to receiving this Approval, shall provide \$40,000 more to CDSE via the Healthy Kids Foundation than our legal obligation

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 a new voluntary pre commitment system, 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.