

Gaming Code of Practice Implementation Plan

Club North Haven board, management and staff make a commitment to deliver best practice responsible gambling for our members, guests and our industry by adhering to this Gaming Code of Practice (Code).

[Responsible Gambling Policy](#) (Section 19 of the Code)

- The Responsible Gambling Policy was approved at a Board Meeting on 29th September 2023.
- The Responsible Gambling Policy is made available to members, staff and directors via the club website, www.clubnorthhaven.com.au

[Responsible Gambling Officer \(RGO\)](#) (Sections 22-25 and 30 of the Code)

- The Responsible Gambling Officer (RGO) is Tim Harris.
- Clubs NSW was notified of the contact details of the RGO on 6th June 2023.
- The RGO completed training on 15/09/2023
- The club's provider of RGO Training is Clubs NSW.

[Responsible Gambling Oversight Training](#) (Sections 26-29 of the Code) (Secretary Manager/Director)

- The club's provider of Director Training is Clubs NSW.
- The club will maintain a register of Directors that have completed the Responsible Gambling Oversight Training.

[Advanced Responsible Conduct of Gambling Training](#) (Section 31 of the Code) (Duty Manager)

- The club's provider of Advanced Responsible Conduct of Gambling (RCG) Training is Clubs NSW.
- The club will maintain a register of Duty Managers that have completed the Advanced RCG training.

[Responsible Gambling Staff Induction Training](#) (Section 33 of the Code) (Non-Gaming Staff)

- All non-gaming staff have undertaken approved Staff induction training on responsible gambling upon commencement of employment.

[Refresher Training](#) (Section 34 of the Code)

- Refresher training is required every 5 years.

Player Welfare Checks (Sections 35-37 of the Code)

Staff will perform a player welfare check in the following circumstances;

- Where staff observe a player displaying strong indicators of problem gambling; or
- A family member raises concerns about a player's gambling; or
- A player reaches any voluntary pre-commitment limit set; or staff observe a player gambling for three (3) or more hours continuously.

When performing a welfare check, a club staff member or Responsible Gambling Officer will enquire about the player's welfare and in the event of player distress or hardship, will either;

- Offer counselling or self-exclusion; and / or
- Ask the player to take a break from gambling for a period of 24 hours or more; and
- Make a record of the interaction in the club's gambling incident register (record of conversation).

Counselling and Support Services (Section 38 of the Code)

- The club's provider of counselling and support services is ClubSAFE.
- Counselling service information is made available to players via Posters, Contact Cards in the gaming areas.

Forums and Outreach Programs (Sections 39-40 of the Code)

- The club attended the locally held club and counselling service provider forums.
- The club allows outreach activities to occur with Gamble Aware counsellors.

Exclusions (Sections 41-50 and 53 of the Code)

Club North Haven participates in the ClubSAFE Multi Venue Self-Exclusion Scheme and allows for Self-exclusion, family-initiated exclusion or club-initiated exclusion where;

- An individual can partially exclude or exclude from the entire venue(s) for a period of between six (6) months and four (4) years.
- A family-initiated exclusion - where a family member may;
- Provide the full name and contact details of the family member
- Provide evidence of family harm due to the gambling behaviour
- Provide evidence that the player has refused to undertake a self-exclusion
- Be endorsed by a qualified gambling counsellor as being necessary to protect the family from experiencing serious gambling-related harm; and
- Seeks an exclusion period of at least twelve (12) months.

Club North Haven will ensure that a registered gambling counselling provider will contact the player and provide them with an opportunity to respond to the application. At all times, Club North Haven will ensure the privacy of the family member making the application and will not disclose their identity without the family member's consent.

Electronic Exclusion Detection (Sections 51-52 of the Code)

- The club's provider of digital sign in linked to the exclusion database is Infosign.

Gambling Incident Register (GIR) (Sections 57-60 of the Code)

- The Gambling Incident Register (GIR) is kept online, in the Incident Register, a designated Gambling Incident Register.
- The RGO reviews the GIR weekly. Results of the GIR review are reported quarterly at the March, June, September, and December Board meetings.

Access to Money (Sections 61-62 of the Code)

- All staff are informed of the prohibition to provide credit for gambling via staff manual
- The following measures have been taken to ensure the ATM is located 15m outside the gaming area and visibility from gaming machines is not possible.

Player Information (Sections 63-64 of the Code)

- Staff check the gaming area weekly to ensure the following brochures are available:
 - Brochure 1 - Info about the odds - Betting on gaming machines
 - Brochure 2 – ClubSAFE or Bet Safe Counselling and Support
 - Brochure 3 – Information about Responsible Gambling Behaviours

Minors (Section 65-66 Code)

- The club adheres to the legislations and regulations surrounding the prevention of minors from accessing the gaming machines areas and by doing this utilises the correct signage and has put in place policies and procedures. This is checked monthly via in-house audits checks.

Advertising, Promotion and Player Reward Schemes (Sections 67-72 of the Code)

- All gaming-related advertising and promotion approvals will be reviewed and approved by the RGO. A copy of the relevant approvals will be kept for a period of 5 years.
- The Club will review the Player Rewards Scheme for compliance with the Code (Sections 69-72) at least annually.

AML/CTF (Sections 73-77 of the Code)

(For Clubs with 16 or more gaming machine entitlements)

- The Secretary Manager and all Directors completed (Executive/Board Oversight Training) within 12 months of commencement on the board or taking the role of Secretary Manager.
 - For existing Secretary Managers and at least 50 per cent of the existing board have completed AML/CTF Oversight Training within 12 months.
 - All remaining existing directors must complete AML/CTF Oversight Training within three (3) years.
- The AML/CTF Compliance Officer (ACO) Officer is Tim Harris
- The AML/CTF Backup Compliance Officer is Jess Rocca.
- The ACO and ACO Backup completed the approved ACO training.

AML/CTF Staff Awareness Training (Sections 67-72 of the Code)

- A register of the completion of AML/CTF Awareness Training (for those involved in the gaming machine operations and wagering) can be found via Lighthouse Safety & Compliance.
- All other staff outside of gaming were offered access to AML/CTF Staff Awareness training.

AML/CTF Bans (Sections 81-82 of the Code)

- The club adopted a policy on banning people suspected of money laundering.

Assurance (Sections 83-88 of the Code)

- The General Manager will conduct an annual internal audit of compliance with the Code using the ClubsNSW online self-audit checklist and report to the board for consideration.
- The club will engage Lighthouse Safety & Compliance as an external auditor every 5 years to audit the club's compliance with the Code and report to the board for consideration.