

Gaming Code of Practice Implementation Plan

Howlong Golf Club 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 (The Code)

Responsible Gambling Policy (section 19 of the Code)

- The Responsible Gambling Policy was approved by the Board of Directors on 26th June 2023
- The Responsible Gambling Policy is made available to members, staff and Directors via the Club's Notice Board and Website or by request to the General Manager - 1 July 2023

Responsible Gambling Officer (RGO) (Section 22-25 and 30 of the Code)

- The Responsible Gambling Officer (RGO) is Alannah Cusack
- Clubs NSW was notified of the contact details of the RGO on 26th June 2023
- The RGO is still to complete the required training before 01 June 2024.
- The Club's provider of RGO training is ClubSAFE.

Responsible Gambling Oversight Training (section 26 – 29 of the Code)

(General Manager / Directors)

- The Club's provider of Director Training is ClubSAFE
- 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 Managers)

- The Club's provider of Advanced Responsible Conduct of Gambling (RCG) Training is ClubSAFE.
- 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 are offered access to the Responsible Gambling Staff Induction training via the Clubs staff induction process.

Refresher Training (section 34 of the Code)

- Refresher Training is required every 5 years.

Player Welfare Checks (sections 35 – 37 of the Code)

- Information outlining the player welfare check process to staff via training sessions and staff noticeboard.

Counselling and Support Services (Section 38 of the Code)

- The club's provider of counselling and support services is "GambleAWARE - Gambling Counselling Service".
- Counselling service information is made available to players via postcards, contact cards and signage within our gaming room.

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

- The club will attend any locally held club and counselling service providers forums as required.
- The club allows outreach activities to occur with GambleAWARE counsellors when or if required.

Exclusions (sections 41 – 50 and 53 of the Code)

- The club's provider of multi – venue exclusion is ClubSAFE and BetSafe.
- Information on exclusions (including family – initiated exclusions) is provided to patrons via information on posters, brochures and contact cards from ClubSAFE, which can be found in the gaming room.
- The club's policy for family- initiated and club-initiated exclusions will be accessible on our website in the near future.
- The club will notify members of the club's Policy in relation to family – Initiated and club-initiated exclusions in our website, newsletters, and information on our members Notice Board once the policies have been approved.
- If a patron / member breaches or attempts to breach their exclusion agreement, the club will notify their multi – venue scheme, ClubSAFE and it will be documented and recorded in the Gaming Incident Register.

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

- The club's provider of facial recognition & digital sign once installed will be linked to the exclusion database.

Gambling Incident Register (GIR) (section 57 – 60 of the Code)

- The Gambling Incident Register (GIR) is kept by the Responsible Gaming Officer.
- The RGO reviews the GIR weekly with the Results of the GIR review reported to the Board each month.

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

- All staff are informed of the prohibition to provide credit for gambling as per the club's Employee manual & policies.
- All measures have been taken to ensure the club's ATMs are located outside the gaming area of the club and not visible from the gaming room.
- The club's ATMs are located in the club's foyer / lounge and provides service to all areas of the club.

Player Information (sections 63-64 of the Code)

- Staff check the gaming room on a daily basis 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 of the Code)

- The club adheres to all legislation and regulations surrounding the prevention of minors accessing the club's gaming room and gaming machines. The club provides up to date signage and have staff on duty to monitor this issue.

Advertising, Promotions and Player Reward Schemes

(Section 67-72 of the Code)

- All gaming – related advertising and promotion approvals must be reviewed and approved by the RGO.
- The club will review the Player Rewards Scheme for compliance with the Code (section 69-72 of the Code) on an annual basis.

AML/CTF (sections 73 – 77 of the Code)

- The General Manager and all New Directors must complete the "Executive / Board Oversight" Training within twelve months of being appointed to a new role.
- The General Manager and all current Directors must complete the AML/CTF Oversight Training within twelve months from the date of this policy.
- The AML/CTF Compliance Officer is Alannah Cusack
- The AML / CTF Compliance Officer has completed all required training.

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

- The Club maintains a register of the completion of all AML/CTF awareness training for staff. The Compliance Officer maintains the register.
- "Lighthouse Safety" provide training for all club staff as required and when policies are amended.

AML/ CTF Bans (sections 81 – 82 of the Code)

- The club will adopt a policy of banning patrons suspected of money laundering as per the Code.

Assurance (sections 83-88 of the Code)

- The Operations Manager will conduct an annual internal audit of compliance with the Code using the ClubsNSW online self- audit checklist and provide the report to the Board for consideration and approval.
- The Club will engage Lighthouse Safety as an external auditor to conduct an annual audit of the Club's compliance with the Code and to provide a report for the Board to consider.