

Responsible Service of Gaming

Position Statement

A comparison between the licensee requirements through the *Gambling and Racing Control (Code of Conduct) Regulation 2002* and the CSCC's position statement.

January 2021

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Licensee Requirement	Canberra Southern Cross Club Position
Licensee Obligations	
Conduct the facility honestly, responsibly and in accordance with the code of practice.	The Canberra Southern Cross Club ('CSCC') has for a considerable time been seen and recognised as an industry leader in respect to its conduct, provision of facilities and responsibility to its members.
Not give or make available to patrons information about gambling or gambling facilities which is false or misleading.	The CSCC provides 'chances of winning' and 'promotion game rules' information, which is available to members at all times.
Not allow a gambler to use the Club's facilities if the gambler appears not to fully understand the consequences of gambling and the potential for financial loss.	CSCC Staff and management promote their duty of care to members through ongoing RSG and GCO training. A culture of preventing gambling harm is promoted by continuous agenda items at meetings and regular board reporting.
Not allow a gambler to use the Club's facilities if the gambler appears to be intoxicated to the extent the gambler could not reasonably be expected to exercise rational judgement while gambling.	CSCC Staff and management promote their duty of care to members through ongoing RSG and GCO training. Staff are also trained in RSA to assist in identifying those gamblers whose judgement may be impaired.
Staff Care and Training	
Each staff member who is directly involved in providing gambling services to patrons and their supervisors must have completed an approved training course (RGS) within the previous 5 years.	The CSCC enforces this policy and has procedures in place to ensure certification and training remain current and of the highest standard. GCOs undertake the mandatory refresher training. We have more staff trained as GCOs than needed to assist creating a culture around care and responsibility.
Staff involved directly in the provision of gambling services are not allowed to, or allow others to take part on their behalf, in gambling activities.	The Club enforces this policy that all staff are not allowed to undertake any form of gambling in the venue they work in. The Club does not allow any staff member, at any venue, to participate in gaming promotions or to use TAB facilities.
Staff directly involved in the provision of gambling services are aware of their obligations under the code.	CSCC staff are aware of their obligations through the induction process. All gaming staff complete the RCG training that reinforces their obligations and provides approved certification.

Problem Gambling

<p>Maintain a record of anyone in the gaming area who shows signs of having a gambling problem, has a voluntary deed of exclusion or has been excluded involuntarily. The record is to include any action taken by the licensee in relation to the person, the date and nature of the incident, the name and address (if known), a description of the person (if unknown) and the staff member(s) involved.</p>	<p>The CSCC maintains a record of all gambling incidences and exclusions with all details required. The Club has a very strong process to deal with problem gamblers, including formalized steps to carry out exclusions and 'information packs' available to staff and patrons at each venue. CSCC goes over and above in terms of displaying warning signs to both staff and patrons.</p>
<p>Persons must not be encouraged to gamble beyond their means.</p>	<p>There are no promotions carried out based on gaming turnover or requiring gamblers to increase bet amounts.</p>
<p>Reasonably provide information to any patron who enquires about counselling and advisory services from support agencies.</p>	<p>All venues have information available for members in the gaming and service areas and in the 'information packs'. Respective signage is place appropriately and checked regularly.</p>
<p>At least one Gambling Contact Officer must be appointed to each facility, and they must have completed an approved training program within the previous five years.</p>	<p>The CSCC currently has 30 staff members who have completed approved training and listed as Gambling Contact Officers across the organization. All venues meet the requirement. The policy is that Gaming Service Managers, General Managers, and Gaming Analyst are certificated. The CSCC pays for all GCO training. CSCC makes sure that there is a GCO onsite at all of their venues while they are open</p>
<p>GCO functions generally include providing help to persons requiring information or counselling, handle and record complaints, inform complainants about action taken or further avenues open to them, inform the licensee of any complaints, ensure excluded peoples details are entered in the register and maintain privacy of information. When dealing with persons with a gambling problem the licensee must ensure the GCO is informed of any person who may have a gambling problem, details of the person's behaviour. The GCO must keep a record of this and the person's name or decryption. The GCO must take reasonable steps to discuss the behaviour with the person, provide information or advice or take appropriate action including exclusion.</p>	<p>The GCO will be aware of persons who have a gambling problem and the details of the problem through the Gaming Incident Form and the daily Gaming Service Managers Report (Duty Managers Report) which is checked by all GCO's at the start of their shift. The CSCC uses the Gaming Service Managers Report as a back up to the Incident Form.</p> <p>GCOs will take steps required to discuss the behaviour with the person in question and provide information or advice to assist the situation.</p>

Exclusion of Gambling Generally

<p>Persons may sign a deed of exclusion from a gambling facility or facilities and the exclusion must include the name and address of the facility, the period of exclusion and preventative actions. The licensee ensure the gambler provides all details within one day and must sign the deed immediately once signed by the gambler and provide a copy to the gambler. If you are a receiving licensee you must sign the deed on receipt. Any person the licensee has reasonable grounds to believe that the welfare of the person or their dependents are at risk the licensee must exclude. The Commission has the right to review exclusion decisions.</p>	<p>The GCO will ensure the deed of exclusion is completed fully and dealt with as per training provided which covers all areas of the requirements for this role and is backed up by the effective systems and processes the CSCC has in place to assist staff and the efficient use of administrative support.</p> <p>The CSCC perform monthly routine audits on venues by the Gaming Analyst to ensure GCO's are reminded and aware of exclusion procedures and signage is correct.</p>
<p>The licensee must prepare written procedures in how to deal with excluding persons, ensure the person complies with the decision, informs the gambler about support services, the details of the deed, provide a copy of the deed and ensure the staff are competent to carry out the function. An excluded person cannot use another person's account or be provided with promotional material directly.</p>	<p>The CSCC GCO's follow written procedures in how to deal with excluding persons and this is reiterated by training provided.</p>

Financial Controls

<p>The licensee must ensure that a cash facility (ATM or EFTPOS) is not located in a gaming area.</p>	<p>ATMs are located in the foyers.</p>
<p>The licensee must ensure that cash winnings to patrons do not exceed \$1,500 on any single win on an EGM or \$1,000 in housie or Keno.</p>	<p>CSCC ensures these provisions are maintained and offer patrons the opportunity to take higher ratio of winnings by cheque.</p>
<p>Non cash winnings must be paid within 3 days of the winning event.</p>	<p>CSCC will supply non cash winnings within three business days.</p>
<p>A licensee must ensure that cheques are not cashed within a gaming area or allow the person to buy back the cheque, unless arrangements have been made through a pre-approval process from the CEO and COO. The approval period will be valid for a maximum of 3 months before review is needed.</p>	<p>CSCC does not allow any cheques to be cashed at their venues.</p>

Licensees must ensure that information and signage is displayed in the facility that people under 18 years old or intoxicated persons are not allowed to gamble. Also signage for cheque cashing restrictions and chances of winning should be displayed indicating where to find the information including rules for each type of gambling, exclusion information, the gambling contact officer, a copy of the Code and information about counselling and interpreter services.	CSCC venues have signage placed at all entries including foyers and gaming rooms.
The licensee must prominently display the correct time in the facility and adequate lighting so that it is visible to patrons.	CSCC has provided highly visible clocks in each gaming area and every EGM displays the time on the illuminated service console.
Advertising, promotions and inducements	
A licensee must not publish advertising that encourages anyone to contravene a gambling law, shows people under 25 gambling, encourages anyone under the age of 18 to gamble or targets them, provides false or misleading information including the chances of winning or returns, suggests gambling is financial investment, suggests skill can influence the outcome of gambling or shows or promotes consumption of alcohol while gambling.	The CSCC has a strong marketing and communications department ensuring all requirements are met. All gaming staff are aware of alcohol issues through RSG and RSA training supported by Club policy and procedures. The gaming department is governed by policy and procedure to ensure promotions are carried out in accord with the requirements.
Gambling advertising must contain the name and telephone number of an approved gambling counselling service.	CSCC ensures all gambling related materials provide details of the Relationships Australia help hotline and Gambling Help Online.
A licensee must not conduct a promotion that encourages or requires gamblers to gamble for a minimum time or amount to qualify or include free or discounted alcohol as an offer.	CSCC does not place any minimum or maximum qualifying periods of gambling time for promotion and does not offer free or discounted alcohol in the provisions of gaming services at any time.
A licensee that is operating a player reward scheme must not conduct a promotion that encourages people to increase the frequency or amount of betting. Cash, discounted gambling credits, free or discounted alcohol can only be offered if the offer is available to all patrons all of the time as part of the facility's usual prize schedule.	CSCC has a player reward scheme that provides equal opportunity to participate for all members and does not require members to increase the frequency or amount of gambling and does not make any offer that is not available to all members.
A licensee must ensure that all promotions contain rules and conditions, or state where the rules or conditions are available in the facility and produce them on request.	The rules and conditions of all promotions are displayed and available to patrons at any time in each venue.

