KEMPS CREEK SPORTING AND BOWLING CLUB LTD

GAMING PLAN OF MANAGEMENT

Version	Date	Approved By	Next Review Date
1.0	August 2024	John Henry	August 2025
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1. INTRODUCTION

Kemps Creek Sporting and Bowling Club is committed to providing a safer gambling environment and as such has developed a plan of management in consultation with Kemps Creek Sporting and Bowling Club board and management team to promote the safe service and delivery of gambling products.

This plan highlights our current measures and support services that are available to our customers and team to improve the overall standard of customer and staff care and encourages a safer gambling culture.

This Gaming Plan of Management has been adopted at:
Kemps Creek Sporting and Bowling Club Ltd
(LIQC300231240)
1490 Elizabeth Drive
Cecil Park NSW 2178

For more information, please email:
David Want
Chief Operating Officer
davidw@penrithrsl.com.au

A copy of this document can be found on the Club website and in-house upon request at Cash Desk/TAB.

2. ABOUT OUR CLUB

Kemps Creek Sporting and Bowling Club is located in the LGA of Liverpool in the SA2 of Austral - Greendale which at the time of updating is a Band 2. Kemps Creek Sporting and Bowling Club is licenced to operate 100 electronic gaming machines, which includes three multi-terminal gaming machines.

The Club is part of the Penrith RSL Club Ltd. Both the Kemps Creek Sporting and Bowling Club and Penrith RSL Club sites are managed together with oversight from the same board. The Kemps Creek Club operates under a separate ABN.

Kemps Creek Sporting and Bowling Club has an electronic gaming system installed which allows for the reporting of meters in fifteen minutes increments and gives management visibility of activity occurring on each gaming machine throughout the day.

Kemps Creek Sporting and Bowling Club has CCTV cameras located at the entrance to the venue, the entrances to the gaming floor and throughout the gaming floor.

Kemps Creek Sporting and Bowling Club offers a loyalty rewards program in-venue which is the same program that applies at the Penrith RSL Club. Also known as a player reward scheme, this rewards program allows members to earn points for purchases in all areas of the Club as well as for gaming machine play across both Penrith RSL club sites.

ClubSafe Member

Kemps Creek Sporting and Bowling Club is a member of ClubSafe which is the Club industry's leading best practice and preferred responsible gaming program in NSW. It is based on a Multi-Venue Self-Exclusion (MVSE) program designed to assist people with a gambling problem by self-excluding them from multiple venues around which they live, work and socialise.

2.1 Operating hours

Kemps Creek Sporting and Bowling Club is permitted to operate during the times listed below:

Trading Hours

Consumption on premises

Unrestricted on premises hours	Start date: 1/7/2008

Take away sales

Monday to Saturday	05:00 AM	- 12:00 midnight
Sunday	10:00 AM	- 10:00 PM
Good Friday	Not permitted	
December 24th	Normal trading Monday to Saturday, 10:00 AM to 12:00 midnight on a Sunday	
Christmas Day	Not permitted	
December 31st	Normal trading Monday to Saturday, 10:00 AM to 12:00 midnight on a Sunday	

2.2 Gaming shutdown period

All venues are required by law to shut down their gaming floor operations for a minimum of six hours per 24-hour period. Penrith RSL Club gaming machine shut down hours are identified below, meaning that gaming machines will not be operated within the times specified:

Monday	04:00 AM – 10:00 AM
Tuesday	04:00 AM – 10:00 AM
Wednesday	04:00 AM – 10:00 AM
Thursday	04:00 AM – 10:00 AM
Friday	04:00 AM – 10:00 AM
Saturday	04:00 AM – 10:00 AM
Sunday	04:00 AM – 10:00 AM
Public Holiday	04:00 AM – 10:00 AM

2.3 Gaming related licence conditions

Kemps Creek Sporting and Bowling Club does not currently have any gaming related licence conditions.

2.4 Venue layout

A current plan of Kemps Creek Sporting and Bowling Club showing the gaming machine areas and surrounding areas is attached as **Appendix A**.

The plan indicates the location of the:
- gaming rooms
- current layout of gaming machines
- cash dispensing facilities (being ATM and CRT).

3. MEASURES TO ADDRESS GAMBLING HARM

The decision to gamble lies with the individual and represents a choice, and in order to properly make that choice individuals must have the opportunity to be informed.

Kemps Creek Sporting and Bowling Club is committed to providing appropriate information to all individuals including those from different cultural and linguistic backgrounds, so they are able to make informed decisions consistent with their personal preferences and individual circumstances.

Kemps Creek Sporting and Bowling Club takes the issue of responsible gambling very seriously and actively promote the following initiatives to ensure all patrons to our Club are aware of such services available to them.

3.1 Self-exclusion

The ClubSafe Multi-Venue Self-Exclusion (MVSE) Program is an online system designed to enable people with a gambling problem to self-exclude from our venue as well as multiple venues around

where they live, work and socialise. Kemps Creek Sporting and Bowling Club will initiate self-exclusion when requested by a patron at any time during its open hours.

The ClubSafe MVSE Program removes barriers for people with a gambling problem such as the difficultness of visiting multiple venues or the embarrassment of visiting their local Club to place the exclusion and makes the process easier for a person with a gambling problem.

A patron can self-exclude by speaking to a Duty Manager at the Club or by contacting a gambling help counsellor.

ClubSafe also offers self-facilitated self-exclusion. Self-facilitated self-exclusion allows patrons to exclude themselves without having to attend a gaming venue or waiting to meet with a counsellor.

The minimum period for a self-exclusion is six months. Once a patron agrees to stay away from the Club for a specific time, our venue has processes in place to help them honour that commitment.

If a patron breaches their self-exclusion, it is reported through the MVSE program for assessment by trained counsellors and recorded in the Gambling Incident Register. Kemps Creek Sporting and Bowling Club is considering procuring facial recognition technology to assist in identifying self-excluded patrons entering the premises.

Kemps Creek Sporting and Bowling Club has an electronic sign in system at reception which assists with identifying and preventing breaches of self-exclusion.

3.2 Partial self-exclusion

A partial self-exclusion allows a patron to exclude themselves from gambling activities at the Club such as TAB/KENO and/or gaming machines but still allows the patron access to other Club facilities including restaurants, bars and other entertainment.

A patron can self-exclude by speaking to a Duty Manager at the Club or by contacting a gambling help counsellor.

ClubSafe also offers self-facilitated self-exclusion. Self-facilitated self-exclusion allows patrons to exclude themselves without having to attend a gaming venue or waiting to meet with a counsellor.

The minimum period for a self-exclusion is six months. Once a patron agrees to stay away from the gaming activities of the Club for a specific time, the patron’s request is recorded and the Club personnel actively monitor the gaming area for the presence of excluded persons.

If a patron breaches their self-exclusion, it is reported through the MVSE program for assessment by trained counsellors and recorded in the Gambling Incident Register.

3.3 Counselling services referral

Kemps Creek Sporting and Bowling Club partners with local counselling and other help services such that customers that ask for assistance with their gambling or are otherwise identified as needing referral have help available close by. Depending on the customer's circumstances, referrals could be to gambling help services, men's and women's support services, veteran's support services, financial counselling, community support services or other relevant assistance.

Customers will also be provided with details about the ClubSafe counselling service and GambleAware Helpline:

ClubSafe Counselling Service – 1800 997 766
GambleAware Helpline – 1800 858 858

Duty Managers are trained to respond in a respectful, non-judgmental and confidential manner.

3.4 Regular customer interactions and welfare checks

Customer interactions

Customer interactions are conducted throughout a customer's experience at the Club as part of our customer service approach. We regularly check-in with our customers to ensure they are enjoying their time at the Club.

Customer interactions are also conducted by a Duty Manager or Responsible Gambling Officer (RGO) if a member engaging in carded play has been playing gaming machines for three hours or more. Members are encouraged to take a break of at least 15 minutes from the gaming machines.

The relevant Club personnel that conducts the interactions makes notes about the conversation in the Club's paging and alerting system. These notes will be referred to if members are subject to further long play alerts and/or to support general welfare checks.

Welfare Checks

Kemps Creek Sporting and Bowling Club aims to ensure all our patrons have a positive experience. We recognise that despite our gambling harm prevention aims and proactive customer care, gambling harm can still occur. In those circumstances, the Club seeks to ensure that our team responds early, respectfully and appropriately.

Our management and frontline team are vigilant in monitoring our patrons undertaking any gambling activity. If they are showing signs of extended play or distress, a Duty Manager will conduct a welfare check to gauge their mood, stress level and assertiveness and if required undertake the steps necessary whether that be encouraging them to take a break, explaining our exclusion or counselling services or asking them to leave the environment.

All encounters are recorded in our Gaming Incident Register.

After midnight, welfare checks as well as direct and indirect interactions with customers will be increased to provide more opportunities for breaks in play and assessing the welfare of the patrons engaging in gambling activities after midnight.

3.5 Identifying signs of at-risk gambling behaviours

At-risk Gambling Behaviour is gambling behaviour that leads to gambling harm because it involved:

- Spending more money on gambling than a person can afford based on their income and financial commitments: and/or
- Spending so much time on gambling that it interferes with the person's relationships, social life and/or work responsibilities.

Gambling Harm refers to difficulties or other negative consequences that result from excessive gambling and affect the wellbeing of the person and/or their loved ones in many areas of their daily lives. Gambling harm can affect people's physical and mental health as well as their financial wellbeing, relationships, education and employment, social and psychological wellbeing.

Some of the signs of at-risk gambling behaviour are listed in **Appendix B**.

Club personnel are to remain vigilant in detecting any of the indicators mentioned whilst on duty. If uncertain whether a patron is exhibiting any of the signs of at-risk gambling, the staff member is encouraged to speak with the Duty Manager and/or the Responsible Gambling Officer.

3.6 Affected others

Kemps Creek Sporting and Bowling Club is committed to helping those affected by a customer's gambling as much as helping the customer themselves. If Club personnel are approached by a person concerned about a family member or friend's gambling at our venue, the matter is referred to a Duty Manager or a RGO who will, depending on the nature of the approach:

- Provide information about self-exclusion processes
- Provide information about information and tools available within the Club as well as control strategies to help the person with their gambling
- Provide information about local help services including counselling services (for the gambling customer as well as the affected other).

If an affected other is seeking a third party exclusion of a family member or friend, the person will be referred to ClubSafe to consider the request and follow the established ClubSafe process. The Club will consider a third party exclusion request directly in instances where there is an obvious and significant risk of gambling harm to a customer as observed by a RGO, and as required and in accordance with the law.

3.7 Caring for our staff

Our staff play an important role in supporting safer gambling and customer wellbeing. We are committed to providing our staff with the knowledge, training and support they need to recognise and respond appropriately to gambling-related risks and harms.

Taking preventative action

Kemps Creek Sporting and Bowling Club provides staff with regular responsible/safer gambling training and encourage open discussion about gambling risks, wellbeing and available support.
The Club has a staff gambling policy in place. The main objectives of this policy are:

- To foster a healthy environment for people who could be at risk of developing gambling problems or are recovering from gambling addictions
- To assure patrons and guests that gambling operations of the Club are conducted in a fair and equitable manner; and
- To ensure the Club complies with its legal obligations.

No staff member is permitted to use gaming machines at the venue during their hours of employment while on shift, including during breaks. Staff who participate in any form of gambling outside their hours of employment are subject to the same requirements as other patrons.

Providing support and assistance

Kemps Creek Sporting and Bowling Club are committed to supporting and advancing employee wellbeing through appropriate information and training, the provision of employee assistance programs and the implementation of a wellbeing initiative that fosters healthy outcomes and advance diverse, inclusive, safe and responsible working environments.

Kemps Creek Sporting and Bowling Club recognises that staff may experience gambling-related harm. Where concerns arise, we will provide appropriate information, support and assistance and encourage staff to access available professional support services.

Monitoring

The Club regularly reviews staff wellbeing and safer gambling practices to identify emerging risks and ensure appropriate measures are in place to support our staff.

3.8 Staff training and awareness

Kemps Creek Sporting and Bowling Club personnel undergo regular Responsible Conduct of Gambling (RCG) training to equip them with the skills and knowledge to identify the signs of risky gambling behaviour and to assist patrons displaying those behaviours.

In addition to the mandatory RCG training, team members undergo training sessions appropriate to their role about:

- Multi Venue Self- Exclusion
- Advanced Responsible Gambling Training
- Board Oversight Training.

These training sessions are vital in keeping our team up to date with industry updates, legislation and emerging research and evidence about gambling behaviour and safer gambling practices.

Non-gaming staff are provided with induction to RCG training to ensure that every staff member in the venue is trained to respond appropriately to any customer seeking help or displaying signs of gambling harm.

The Board of Directors are required to complete RCG Oversight training to ensure that there is a structured top down approach to harm minimisation.

The Licensee, Responsible Gaming Officers and any staff employed to undertake the management of gaming machines are required to participate in Advanced RCG training.

Harm minimisation is discussed at all staff meetings, encouraging and recognising staff who are being proactive in recognising at-risk customers, ensuring that all staff understand that patron welfare is of the utmost importance.

Any additional information pertaining to harm minimisation on a daily basis, outside of information recorded in the Gambling Incident Register, is communicated via internal team communications such as shift reporting, emails and online meetings. This ensures that any relevant handover information is passed on to the next person coming onto shift.

Appendix C provides a list of all staff competency records for RCG and ARCG. This list includes expiry date of these competencies and is reviewed monthly to ensure that staff remain current in their training requirements.

3.9 Safer gambling campaigns

Kemps Creek Sporting and Bowling Club takes proactive measures to advertise safer gambling practices to customers and run safer gambling campaigns, in addition to the mandatory signage requirements. This includes:

- Providing information to members through direct mail-outs/emails with articles about safer gambling practices and where to get help
- General in-venue promotions around safer/responsible gambling practices, tools and gambling harm awareness
- Engagement in and promotion of GambleAware Week each year
- Displaying gambling help information on our website.

4 GOVERNANCE

4.1 Key roles - Responsible Gambling Officers, senior management and board

Responsible Gambling Officers

The Licensee shall ensure that three Responsible Gambling Officers, being staff members who hold a current RCG Certificate and Advanced RCG Certificate, are on duty and monitoring the gaming machines of the venue whenever gaming machines are operating.

The Licensee shall ensure that two Nominated Responsible Gambling Officers, being dedicated staff members who hold a current RCG Certificate and Advanced RCG Certificate, are on duty and monitoring the gaming machines of the venue at any time that the gaming machines are operating between the hours of midnight and 8am. Nominated RGO's are permitted to perform gaming-related tasks that allow them to interact with, and monitor, gaming patrons.

The Responsible Gambling Officer's duties include:
(i) Proactively check-in on and engage with patrons where the RGO suspects they may be experiencing gambling harm
(ii) Record gambling Incidents in the Gambling Incident Register
(iii) Escalate serious instances of gambling harm to senior management
(iv) Facilitate the provision of gambling help information and requests for self-exclusion.

At all times, the Duty Manager or other senior manager responsible for gaming machine operations will assist the Responsible Gambling Officer in carrying out the duties described in this condition.

Responsible Gambling Officers may make complaints to Liquor & Gaming NSW about harm minimisation breaches at this venue or if they are impeded from undertaking their duties.

Senior management
Management plays an active role in overseeing the operation and execution of this Gaming Plan of Management. This includes from local venue management as well as from the senior management team of Penrith RSL. Venue management has primary responsibility for the localised execution of this plan, however some elements of the Plan, such as ensuring safer gambling campaign material and marketing and promotions adhere to the law, are executed by the central management of Penrith RSL.

Venue management of the Club receives reporting from the RGOs of serious instances of patrons at risk of or experiencing gambling harm, and monitors themes and trends identified from the Gambling Incident Register. Any identified high risk areas or emerging concerns result in an examination of existing controls and consideration around whether new or enhanced controls are required. This occurs in consultation with central management of Penrith RSL. If it is determined that control enhancement is required, this is undertaken by relevant venue management or central management of Penrith RSL, depending on the nature of the matter. All control enhancement is overseen by the Penrith RSL Chief Operating Officer.

Venue management liaises with the Gaming and Compliance Manager to assist, as required, in the compilation of Safer Gambling Reports for the Board.

Board

The Board that oversees the operations of the Kemps Creek Sporting and Bowling Club is the Board of Directors of Penrith RSL Club Ltd. The Board performs a high-level governance and oversight role over this Gaming Plan of Management including setting the high-level safer gambling direction for the Club.

The Board receives Safer Gambling Reports from management which includes information about:

- The types of matters being recorded in the Gambling Incident Register including any themes or trends identified
- Self-exclusions
- Welfare checks and other customer interactions/interventions in higher risk scenarios
- Any themes or trends arising from customer complaints or whistleblower matters
- Staff responsible/safer gambling training and competency
- Identified areas of control weakness
- Identified areas of non-compliance with legislative or regulatory requirements
- New and emerging safer gambling initiatives or new initiatives being considered by the Club.

The Board will be provided with further information from management as requested and can provide direction on control enhancements to support a safer gambling environment for the Club's customers and those around them.

4.2 Gambling Incident Register

The incidents that must be recorded in a Gambling Incident Register include:
a) a patron displays behaviour that indicates the patron is experiencing or at risk of gambling harm
b) a patron, or a person who identifies themselves as a family member of the patron, asks for information about a self-exclusion scheme or some form of intervention for the patron
c) a breach or attempted breach of a self-exclusion scheme
d) an offence, alleged offence or incident involving a minor
e) details of action taken in response to an incident mentioned in paragraph (a)–(d).

Behaviour that indicates someone is at risk of or experiencing gambling harm is at section 4 of this plan.

Incidents must be recorded as soon as practicable, but no longer than 24 hours after they happen.

A Gambling Incident Register must be kept for three years and made available to police and inspectors. Kemps Creek Sporting and Bowling Club is subject to the *Privacy Act 1988* (Cth) and related Australian Privacy Principles in the collection and use of information for the Incident Register.

Kemps Creek Sporting and Bowling Club keeps a digital Incident Register

The licensee is required to review the Gambling Incident Register on a monthly basis and

consider what harm minimisation actions can be taken in response to trends in the register.

5 COMPLIANCE WITH LEGISLATION

The venue is subject to the requirements of the *Gaming Machines Act 2001 No 127* (NSW), the *Gaming Machines Regulation 2019* (NSW), the *Liquor Act 2007 No 90* (NSW), and other legislation that establishes basic harm prevention, minimisation and safe conduct of gambling requirements.

5.1 General compliance requirements

Inducements

Inducements are incentives that provide benefits to encourage gambling. The Club must not offer:

- or supply any free or discounted liquor as an incentive to play gaming machines
- free credits through letterbox flyers, shopper dockets
- any other form of incentive to play gaming machines.

To support ongoing adherence to inducement requirements, the Club runs all proposed marketing and promotions through Penrith RSL management that uses a Gaming Promotions and Marketing Checklist to check that advertising, marketing and promotions are in accordance with the law before being released. The proposed advertising, marketing or promotion is reviewed per the Checklist and is signed by a member of the Compliance team or the Gaming and Compliance Manager. A member of the Compliance team or the Gaming and Compliance Manager also reviews the terms and conditions proposed for compliance before release.

In addition, the Gaming and Compliance Manager will continually monitor external developments to ensure any promotional offerings remain in line with community and the RSL's customers' expectations.

Cash dispensing facilities Cash dispensing facilities are *any* facility for the withdrawal or transfer of money from a bank/authorised deposit taking institution e.g. an ATM, EFTPOS.

The *Gaming Machines Regulation 2019* (NSW) requires the RSL to ensure cash dispensing facilities:

- must not provide access to cash from a credit card account
- must not be in an area where gaming machines are located and must be located outside a five metre radius from an entry to or an exit from a room or area where gaming machines are located
- must not be visible from a gaming machine, or entry or exit to the room or area where gaming machines are located
- must not be visible from any part of a gaming machine or jackpot prize monitor.

When changes are proposed to the gaming area or ATM location, the following actions will be taken to ensure compliance with the above obligations:

- Prioritising cash dispensing facility location requirements in the floor design process
- Measuring out the distance of the cash dispensing facility to gaming area entry and exit points
- Using temporary site blocking sheeting for temporary movements of cash dispensing facilities.

To support ongoing compliance, a signage and compliance checklist is completed at least monthly by a Compliance team member or venue management and includes the location of cash dispensing facilities, alongside other signage and gaming regulatory requirements.

Signage for cash dispensing facilities

Signage that advertises or gives direction to cash dispensing facilities must not be visible from:

- a gaming machine, and
- the gaming entry, which includes the room or area where gaming machines are located, and the hotel gaming room.

Gaming machine signage

Signage or advertising for gaming machines must not be:

• Visible from a cash dispensing facility

• Located on, or part of, a cash dispensing facilities, including on a digital display of a cash dispensing facility.

A hotel or club must not display, or cause to be displayed, any gambling-related sign outside of in the vicinity or the premises, or inside the premises so that it can be seen from outside the premises.

A 'gambling-related sign' is a sign with anything that:

- draws attention to, or can be reasonably taken to draw attention to, the availability of gaming machines in a hotel or club premises, or
- uses a term or expression frequently associated with gambling, or
- that relates to a gambling franchise or gambling business.

Gaming machine advertising

By law, hotels and clubs must not publish any gaming machine advertising. This means any advertising that gives publicity to or promotes participation in gambling activities involving gaming machines.

Publish means to disseminate in any way, including:

- audio: radio
- visual: cinema, video, TV
- written: electronics, internet, promotional.

Advertising that is exempt from the ban includes:

- any advertising that appears in a gaming machine industry trade journal or in a publication for a trade convention involving gaming machines

- any advertising, including signage, that is inside a club or hotel and can't be seen or heard from outside the venue
- the approved name of a club if the name was being used as at 2 April 2002
- promotional material provided by a club to club members that contains gaming machine advertising – if the member has expressly consented to receiving the promotional material and that consent has not been withdrawn.

Promotional material sent by the club must advise the member that:
- their player activity statements are available on request
- they may withdraw their consent, or unsubscribe, to receiving any future promotional material.

It must also include information or advertising that is not gaming machine related.

5.2 Minors/persons under 18 years

Kemps Creek Sporting and Bowling Club is a licensed venue, and as such, no person under the age of 18 is permitted entry into any part of the Club, unless they are in the company of an adult or guardian.

Gambling by minors is prohibited. All Kemps Creek Sporting and Bowling Club personnel share the responsibility for asking for proof of age if they are uncertain whether a customer is at least 18. If relevant identification verification cannot be produced, the customer will be asked to leave. If a minor is otherwise detected gambling or in the gaming area, they will be immediately asked to leave.

Signs are displayed at all gaming area entrances advising that no one under 18 is allowed in the area.

5.3 Prize payments

Staff must award or pay a prize won on a gaming machine to a player who is entitled to the prize in accordance with the *Gaming Machines Regulation 2019* (NSW). The following requirements apply:

- Prizes may be paid as money or in a non-monetary form, but the prize winner must be given the choice to be paid money
- If a prize is awarded in money, the prize must be equal to (but not exceed) the value of the credits accumulated by the prize winner from playing the relevant gaming machine
- A non-monetary prize must not consist of or include:
  - o Liquor in any form, or
  - o Tobacco in any form, or
  - o Knives or knife blades, or
  - o Firearms or ammunition within the meaning of the *Firearms Act 1996*.
- If you offer non-monetary prizes, you must make the following information readily accessible in any area with gaming machines:
  - o The nature or form of prizes offered
  - o The terms on which the prizes are awarded or paid
  - o The right of the prize winner to choose to receive money instead

o Any option available to the prize winner to transfer a non-monetary prize for another non-monetary item or right
o If the non-monetary prize will not be made within 48 hours of the request for the prize – the time in which the prize will be awarded.

- Monetary prizes must be paid within 48 hours of the request (note- any statewide links may have different rules)
- Non-monetary prizes must be awarded within 48 hours, or within the timeframe stated on the information made available to patrons.

The Club does not offer non-monetary prizes from the playing of gaming machines. Credits from gaming machine play or prizes may be transferred to a membership card or on to a ticket which can be cashed out for money.

Prizes over $5,000

Section 26 of the *Gaming Machines Regulation 2019* (NSW) has requirements about the payment of prizes where the total prize money payable to a person exceeds $5,000. There are also obligations that apply under the Commonwealth *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* when payment of gaming machine winnings exceeds **$5,000 or more**. As a result, the obligations set out in section 26 of the Gaming Machines Regulation are applied by the Club for payments of $5,000 or more.

If a person claims a prize of $5,000 or more, those amounts are paid within 48 hours in one of two ways:

- crossed cheque made payable to the prize winner - clearly marked with the words: Prizewinning cheque – cashing rules apply.
- electronic funds transfer (EFT) to a nominated account - if those means are available – but no sooner than 24 hours after the prize is won.

If the total prize money is $5,000 or more and the prize-winner requests to have the entire amount paid by crossed cheque or EFT, the entire amount will be paid in that way.

If the prize is being paid through electronic transfer, the account must be with a financial institution, such as a bank.

Kemps Creek Sporting and Bowling Club adhere to the strict rules and regulations relating to the positioning of ATM and EFTPOS Terminals around the gaming floor.

Kemps Creek Sporting and Bowling Club does not cash cheques for customers.

Kemps Creek Sporting and Bowling Club has an in-house limit on cash payments for gaming machine winnings of $4,999 due to anti-money laundering requirements.

Winnings $4,999 and below can be claimed in either cash, cheque or EFT. Winnings will only be issued to the person playing the machine at the time of the win and in accordance with the Club's Gaming Machine Playing Conditions.

The Cash Redemption Terminals (CRTs) are set up with a limit of $4,999 per payment. All winnings over this amount need to be paid via the Cash Desk with staff interaction.

Keno winnings up to $5,000 will be issued in cash. Any winnings over $5,000 are handled by Keno and the Club will be contacted to arrange remaining payment to the player as per Keno terms and conditions.

TAB winnings are paid by cash or into the players account as per TAB terms and conditions.

5.4 Player reward schemes and associated promotions

A **player reward scheme** means a system, used in connection with the operation of gaming machines at a hotel or club, in which players of gaming machines accumulate bonus or reward point from playing the gaming machines.

A **promotional prize** means prizes or rewards (including bonus points) offered by the hotel or club to their patrons in connection with a player reward scheme or any other marketing or promotional activity that involves gaming machines.

A hotel or club must not offer or permit promotional prizes:

- in the form of cash
- that exceed $1,000 in value
- that are indecent or offensive (including free giveaways), or
- to be exchanged for cash.

You must not allow bonus or reward points accumulated under a player reward scheme to be redeemed for cash.

Penrith RSL Cub management develops promotions supporting the player reward scheme which is then rolled out to Kemps Creek Sporting and Bowling Club patrons.

Localised promotions are run through Penrith RSL management that uses a Gaming Promotions and Marketing Checklist to check the promotion is in accordance with the law before being released.

Player activity statements

If you conduct an electronic player reward scheme or provide player account cards, you must let your player reward scheme participants and account card holders know that player activity statements are available.

If requested, you must provide them with a monthly player activity statement free of charge. Monthly activity statements must include:

- the player's total amount of turnover, total wins, and net expenditure
- total points earned and redeemed as the result of playing gaming machines
- the total length of time during which a participant's player card was inserted in gaming
- machines during each 24-hour period in the month, and the total length of time during the
- whole month
- a note advising that the statement only relates to the gaming machine play while the player's
- card was inserted into the machine
- GambleAware information: 'Help is close at hand.
  Call GambleAware 1800 858 858 or visit the GambleAware website'.

You must keep a record or copy of any player activity statement made available to patrons.

You must only disclose information in a player activity statement to:
• The person to whom the information relates, or
• Persons lawfully entitled to have access to the information.

5.5 Venue gambling signage and information

Weekly internal signage checks are undertaken by our team at Kemps Creek Sporting and Bowling Club using the Liquor & Gaming Self-Audit Checklist to ensure all gaming compliance signage, as outlined below, is up to date and maintained.

All advertising and promotions related to gaming undertaken within our Club comply with the Liquor & Gaming NSW advertising guidelines.

The following table outlines all of the current compliance signage requirements for Kemps Creek Sporting and Bowling Club.

MANDATORY: Sign 1G - Gambling Warning	
	"What's gambling really costing you?" This sign must be prominently displayed in each gaming area: This sign is displayed in the following locations: • Main entrance into gaming lounge • Entrance into gaming via bar • Indoor players information board • Outdoor players information board
MANDATORY: Sign 6G – Gambling Counselling	

	"Help is close at hand" This sign must be prominently displayed in each gaming area. This sign is displayed in the following locations: • Entrance into gaming • Indoor players information board • Outdoor players information board
MANDATORY: Sign 3G – Chances of winning sign	
	"A million to one" This sign must be prominently displayed in each gaming area. This sign is displayed in the following locations: • Main entrance into gaming • Entrance to outdoor gaming.
MANDATORY: Brochure 1 – Info about the odds – Betting on gaming machines	
	These brochures are prominently displayed and available in each area with gaming machines. Translated versions are supplied to patrons from non-English speaking backgrounds upon request. These brochures are displayed in the following locations: • Cash Desk • At the end of select indoor gaming banks.
MANDATORY: Contact card 2G – Self-exclusion contact card	
	Contact cards are securely attached to each bank of gaming machines in a card holder so they can be clearly seen when playing a gaming machine or approaching the bank of gaming machines.
MANDATORY: Sticker 4G – Gambling counselling sticker	
	These stickers are prominently displayed on each gaming machine.
MANDATORY: Gambling help message	
	This message is prominently displayed on or near all ATMs and cash-back terminals. This message is displayed in the following locations:

	• ATM: Venue front foyer • Cash Back Terminal in outdoor gaming The message is also included on any player activity statements, all betting tickets, and all gaming machine tickets (TITO tickets).
MANDATORY: Sign 2L – No Under 18s	
	Sign 2L (minors not permitted in this area) is prominently displayed at or close to the entrance to the restricted area in which gaming machines are kept: This sign is displayed in the following locations: • All entrances to the gaming areas.

To support ongoing compliance, a signage and compliance checklist is completed at least monthly by a Compliance Team member or a member of venue management who physically views that the signage and brochures are in place as required.

5.6 Player activity statements

Kemps Creek Sporting and Bowling Club is required by law, to present members with a Player Activity Statement free of charge, should they request it. A Player Activity Statement shows, in a chosen month, the player's total amount of turnover, total wins and net expenditure, the total points earned and redeemed through the Club's rewards program as a result of playing gaming machines, the entire length of time the player's card was inserted into gaming machines, and gambling help information.

A Player Activity Statement can be requested at any time during trading hours, if you wish to request a player activity statement, please speak to a supervisor or manager on duty.

5.7 Review of the Gaming Plan of Management

This Gaming Plan of Management will be available to customers on the Club's website and at the Cash Deck/TAB.

Staff must be familiar with the Gaming Plan of Management. All staff who work in the gaming room, gaming area, or with gaming machines, must regularly read this Gaming Plan of Management. Staff must also attend in-person training sessions on this Plan of Management when conducted, which usually occur after updates are made to the Plan. They must also review summary sheets showing their key obligations under this Plan when issued.

The Gaming Plan of Management must always be available and accessible to all staff.

Appendix D provides a list of all staff who have read the Gaming Plan of Management.

This Gaming Plan of Management must be reviewed at least annually, as well as periodically when modifications are required to reflect changes at Kemps Creek Sporting and Bowling Club, legislative changes or emerging risks. The review process includes an opportunity for feedback from all relevant stakeholders including venue staff, customers and gambling support services.

6 Gaming-related Complaints Management

Kemps Creek Sporting and Bowling Club welcomes feedback or complaints at any time by writing to:

Mail: David Want
Chief Operating Officer
Penrith RSL Club
8 Tindale Street Penrith NSW 2750
Email: davidw@penrithrsl.com.au

Feedback and complaints will be investigated and recorded by David Want. If a response is required, this will be done within fourteen days in writing.

Complaints from venue staff
Club personnel can make a complaint about the handling of gambling harm matters, safer gambling environments or about any matter concerning gaming machines by raising this directly with the Venue Manager or with the Chief Operating Officer.

Where personnel do not feel comfortable to do this or would like to make an anonymous complaint, the Penrith RSL's Whistleblower Policy encourages the reporting of any suspected instances of unethical, illegal, corrupt, fraudulent or undesirable conduct and can be used for this purpose. Conduct reported through the Whistleblower Policy is investigated by the Chief Operating Officer who will determine what action/s should be taken, depending on the nature of the disclosure.

RSL personnel are informed about their ability to make gaming-related complaints as part of staff training and by the requirement to read this Gaming Plan of Management.

Complaints to Liquor and Gaming NSW
Kemps Creek Sporting and Bowling Club strongly encourages any person with a concern about gaming-related conduct to raise this directly with the RSL, so that any concerns can be resolved or actioned promptly.

Anyone may nevertheless make an anonymous complaint to Liquor & Gaming NSW about liquor or gaming law breaches under section 129 of the *Gaming Machines Act 2001 No 127* (NSW). Complaints to Liquor & Gaming NSW can be made in the following ways:

Email: contact.us@liquorandgaming.nsw.gov.au
Phone: 1300 024 720
Website:*https://www.liquorandgaming.nsw.gov.au/community-and-stakeholders/have-your-say/complaints/make-a-complaint*

7 Local Liquor Licensing Police Contact Details

The local liquor licensing policy contact details are:

Name: Aaron Abela
Contact Number: (02) 9607 1723
Station Name: Liverpool
Station Address: 193-195 Wilson Road Green Valley NSW 2168 Station
Telephone Number: (02) 9607 1723
Email: abel1aar@police.nsw.gov.au

This Gaming Plan of Management will be immediately produced for inspection upon request by NSW Police or L&GNSW inspectors.