

# Caboolture Sports Club Ltd Group

## RESPONSIBLE GAMBLING POLICY

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Venues included in this policy:

- Caboolture Sports Club
- North Lakes Sports Club
- Sports Central Caboolture
- Centenary Lakes Sports Club & Function Centre

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# OVERVIEW

The CSC Group has developed the Responsible Gambling Policy, in consultation with management, employees, responsible gambling community partners, and patrons to minimise harm associated with problem gambling.

In developing the Responsible Gambling Policy, the CSC Group has realistically considered:

- The local community concerns on potential harm associated with gambling
- The role of our venues in providing a responsible gambling environment
- The duty of care for patrons and patrons who may have a problem with gambling
- The rights and responsibilities of patrons and patrons who may have a gambling-related problem
- That the Responsible Gambling Policy is a self-regulatory and voluntary instrument
- That the Responsible Gambling Policy demonstrates the CSC Group's commitment to minimising harm associated with gambling on its employees, patrons and local community

To ensure that the CSC Group's Responsible Gambling Policy remains consistent and effective, it is regularly reviewed to ensure it is up to date on changes to regulations, improvements in technology, and industry best practices.

## Purpose

The CSC Group offers a range of gambling and entertainment experiences, maximising our patrons' enjoyment of our Clubs and facilities. The CSC Group's purpose is to provide an industry best practice responsible gambling environment by not only understanding gambling is a popular recreational pastime, but also a risk-taking activity; and that the overarching responsibility is to minimise harm to individuals and the wider community.

The CSC Groups ensures that the Responsible Gambling Policy:

- Manages any potential harm associated with gambling by creating a responsible gambling environment
- Educates and informs board/committee, management, employees, patrons and the local community about the potential harm associated with gambling
- Creates awareness of significant benefits that arise where employees, patrons, and the local community assist the CSC Group in its endeavours to minimise potential harm associated with gambling
- Complies with the Gaming Machine Act 1991, Liquor Act 1992 provisions on responsible service of alcohol, the Queensland Responsible Gambling Code of Practice, and the Anti-Money Laundering and Counter-Terrorism Financing Act 2006

This policy applies to all employees of the CSC Group and its venues.

## Scope

This policy is to provide consistent guidance for responsible gambling practices across all CSC Group venues.

## Background

This policy replaces all previous versions of our Responsible Gambling Policy.

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## *Policy Statement*

Most patrons enjoy gambling as a part of their entertainment experience. The implementation of this policy empowers management and team members to ascertain the requirements of our patrons with a focus on those patrons who are impacted by either their own or significant other's gambling behaviour.

## *Harm Minimisation*

The CSC Group recognises the potential for harm that can be caused by problem gambling, and has designated harm minimisation strategies to minimise the risk of excessive gambling behaviour. The CSC Group's strategies focus on:

- A defined understanding of problem gambling, potential harm, and responsible gambling
- Early intervention and preventative measures
- The team's actions and responsibilities
- Working with the community
- Exclusion provisions and the welfare of excluded patrons
- Compliance with laws and industry regulations including those related to minors, financial responsibilities, information provisions, responsible service of alcohol, marketing, and privacy

## **Problem Gambling**

Problem gambling can occur when people have difficulty in limiting and/ or comprehending the amount of money and time they spend gambling. This can result in a range of adverse consequences including but not limited to:

- Negative impact on the individual's financial and/or psychological wellbeing
- Persons connected to the individual could also be placed at risk, and face similar consequences
- Impacting the broader community

## *Identifying Behaviours*

There are a variety of signs which can be associated with problem gambling. Generally clusters of three or more of these behaviours could be an indicator, or simply one that is demonstrated at an extreme level. These identifying behaviours include but are not limited to:

- Self-identified problem gambler and/or requests to complete a self-exclusion
- Frequency, duration, and intensity of gambling activities
  - This could relate to time spent at a machine without breaks, being unaware of their surroundings whilst gambling, increases in spending, or gambling every day of the week
- Impaired control
  - This could relate to difficulties ceasing gambling activities at closing time, gambling through usual meal times, or obsessively trying to win on a particular machine
- Anti-social behaviours
  - Examples include overbearing requests to not let other people know that they are there, negative interactions to venue staff that relate to gambling activities, or standing over other patrons whilst waiting for their favourite gaming machine

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- Raising funds fanatically and chasing losses
  - This could include excessive use of ATM's, declined transactions in other areas of the venues, requests to borrow money from patrons/employees, searching for residual credits on machines, or relentless requests for complimentary products
- Emotional psychological and/or physical responses during gambling activities
  - Examples could relate to visible displays such as shaking, striking out at machines, personal remorse, or distress after experiencing losses
- Irrational attributions and correlations
  - This could be a patron blaming the venue for losses, or compulsive behaviours such as rubbing areas of the machine for perceived good luck

### *Comorbidities Associated with Problem Gambling*

Comorbidities are the presence of one or more additional condition(s) that coexist with a primary condition. In this example, problem gambling could be a cause for other conditions, or other conditions could be a cause for problem gambling. Certain individuals can be more at risk with developing a pathological gambling problem. Some of the more prevalent comorbidities that coexist problem gambling include but are not limited to:

- Substance use disorders or substance dependencies
- Mood disorders such as depression or suicidality
- Anxiety disorders such as posttraumatic stress or obsessive compulsive disorders
- Psychotic disorders like schizophrenia or delusional disorders
- Psychological distress caused by domestic violence, relationship breakdowns, loneliness, grief, trauma or financial stressors

As per industry best practice, the CSC Group does not provide counselling or psychological assessment for identifying behaviours or comorbidities which could link to problem gambling. Employees that work in gambling areas of our venues are provided with training on how to respond respectfully, and also how to confidentially refer problem gambling triggers accordingly.

### **Potential Harm**

The CSC Group engages this policy to assist in outlining the potential harm that could correlate to problem gambling, in an effort to help better understand how to try and negate those risks in a responsible gambling environment. The types of potential gambling harm are identified as:

- Relationship difficulties
  - This is the most commonly reported type of harm, impacting partnerships and family units
- Health problems
  - This includes stress, sleep deprivation, depression, and anxiety disorders
- Psychological distress
  - Regret, anger, feelings of hopelessness, vulnerability, worthlessness, and suicidality are all types of psychological distress harm

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- Financial problems
  - Reduced spending on other recreational activities is an early indicator; with reductions in spending on food, medication, and increases in debt or even bankruptcy at the more severe end of the scale
- Issues with work or study
  - Absenteeism, reduced performance, conflicts, and loss of job or study are all risks of harm
- Cultural problems
  - In cultures where gambling is against their beliefs, the potential harm can include the dismantling of links between family and culture as well as a reduced connection to their cultural community. This can trigger further harm such as aspects of psychological distress
- Criminality
  - The three main types of criminality that correlate to problem gambling harm are crimes of negligence, crimes such as trafficking to repay debts, and crimes of opportunity such as theft or fraud. Criminality can result in considerable long-term harm.

## Responsible Gambling

Responsible gambling occurs in a regulated environment where the potential for harm associated gambling is minimised and people make informed decisions about their participation in gambling. It is also the provision of a safe, socially responsible, and supportive gambling environment.

Responsible gambling occurs as a result of the collective actions and shared ownership by individuals, communities, the gambling industry local Government, State Government, and Federal Government to achieve outcomes that are socially responsible and responsive to community concerns.

## Identifying Behaviours

There are a variety of signs that positively correlate to responsible gambling behaviour including but not limited to:

- Associate gambling as a form of entertainment, not for financial gain
- Gambling within their fiscal means, including setting spending limits in advance
- Stick to a time limit, and take breaks
- Avoid gambling activities when under emotional or psychological distress
- Balance gambling activities with other non-gambling activities
- Never chase losses
- Don't gamble whilst under the influence of drugs or excessive amounts of alcohol

## Early Intervention and Preventative Measures

The CSC Group is committed to early intervention and prevention of the potential harm that can be associated with problem gambling behaviour. Our team are trained and encouraged to be vigilant of behavioural indicators and confidentially provide information to a Customer Liaison Officer on duty and/or management in line with the CSC Group's privacy policy.

The SmartPlay program is unique to the CSC Group and designed to provide patrons with honest information about how to manage their gambling activities responsibly. This includes information about:



- How to go about talking with our team who handle responsible gambling initiatives
- Accessing various counselling services
- Establishing a voluntary pre-commitment for limits on a patron's membership card
- Non-gambling related activities that you can access through our sporting clubs and community partners
- Support through confidential active monitoring

## Team Actions and Responsibilities

It is the shared responsibility of all team members to demonstrate an awareness of responsible gambling practices and know where to access further information.

### *General Team Member Responsibilities*

All team members are to:

- Have knowledge of the CSC Group's Responsible Gambling Policy and associated procedures
- Attend all required responsible gambling training
- Interact at regular intervals with members
- Offer complimentary hot beverages (where applicable) or soft drink to encourage breaks in play
- Direct customers to relevant information, such as our Sm program
- Immediately report patrons discussing self-exclusion
- Report unduly intoxicated patrons attempting to gamble
- Recognise and report any problem gambling identifying behaviours and/or suspected comorbidities
- Report any unattended minors
- Know where to obtain further information or clarification
- Not to encourage gambling patrons to give them gratuities
- Not to, or permit any other person to, play the gaming machines on their behalf

### *Management Responsibilities*

Those in non-customer liaison officer management positions are to:

- Enrol team members into appropriate internal responsible gambling training
- Provide support and development to team members with regards to responsible gambling
- Refusing gambling services to unduly intoxicated patrons
- Ensuring patrons requesting self-exclusion are referred to the customer liaison officer on duty immediately

### *Customer Liaison Officer Responsibilities*

All loyalty team members, gaming supervisors, duty managers, operations managers, venue managers and gaming nominees have been formally trained in the customer liaison role.

Team members who have completed the required training are to:

- Facilitate communication between patrons and the CSC Group on responsible gambling issues

- Handle gambling-related complaints and record details in the gambling-related incident report
- Escalate unresolvable complaints to the appropriate senior manager(s)
- Provide appropriate information to assist customers with gambling related activities
- Offer support to team members in assisting those customers
- Complete early intervention conversations
- Supporting management on responsible gambling matters
- Perform self-exclusion provisions

### *Group Loyalty Manager Responsibilities*

The group loyalty manager will be the CSC Group's nominated community liaison and manages the CSC Group's responsible gambling practices, initiatives, policies, and related activities including but not limited to:

- Active monitoring
- Engage with the community by facilitating discussions related to responsible gambling
- Establish networks between the club and community support agencies on responsible gambling
- Perform self-exclusions
- Perform venue-initiated exclusions in line with gaming nominees and venue managers
- Complete responsible gambling and customer liaison officer refresher training
- Ensure the CSC Group is compliant for all responsible gambling matters
- Perform six-monthly reporting to OLGR for exclusions
- Support early intervention and prevention strategies to mitigate harm associated with problem gambling

## **Working with the Community**

The CSC Group has a nominated community liaison, with a focus to work and consult with gambling related support services, community groups, relevant tiers of government, industry groups, and expert researchers. The CSC Group is committed to a positive, working relationship with the broader community on all responsible gambling matters.

## **Exclusion Provisions & Welfare**

All exclusion provisions from this Responsible Gambling Policy relate to all CSC Group venues. The CSC Group regularly reviews the effectiveness of its exclusion provisions.

### *Self-exclusion*

The CSC Group will implement self-exclusion provisions as an option to assist patrons and patrons who think they may have a problem with gambling to control their gambling habits and will make them, aware of the existence of self-exclusion provisions by placing signage in the gambling areas (or other suitable locations) in the venues. The venues will provide a list of local community support agencies for patrons or patrons who request self-exclusion from the CSC Group and encourage them to exclude themselves from other gambling venues in the area.

Patrons can also engage in remote self-exclusion through a gambling help service, like Relationships Australia, by authorising them to act on their behalf.

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## *Venue-initiated exclusion*

If a patron refuses self-exclusion and/or the customer liaison officer on duty believes that the patron is at significant risk of being a problem gambler they can refer this for review to the group loyalty manager, venue manager, and gaming nominee. At their discretion, they may issue a venue-initiated exclusion. The CSC Group will provide a list of local community support agencies for patrons on exclusion from the venues and encourage them to exclude themselves from other gambling venues in the area.

## *Approach by a third party*

The CSC Group will suggest to any third party approach (for example family members) that an exclusion may only be put in place either by the individual concerned (self-exclusion) or by the club (venue-initiated exclusion).

The third party cannot sign, or enter into an exclusion, on someone else's behalf. The CSC Group can provide the third party with a copy of a self-exclusion notice and details of our local gambling help service. The CSC Group will also assess whether it is responsible to discreetly approach the patron concerned to organise a confidential discussion about the patron and their gambling activities.

## *Welfare of excluded patrons*

The CSC Group will take all reasonable steps to ensuring that excluded patrons have access to ongoing support from counselling services, and that partially self-excluded patrons are protected from entering areas they aren't permitted to enter as per their self-exclusion order.

## **Compliance to Laws and Industry Regulations**

The CSC Group has a responsibility to ensure that the Gaming Machine Act 1991, Liquor Act 1992 provisions on responsible service of alcohol, the Queensland Responsible Gambling Code of Practice, and the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 are strictly adhered to in the provision of gambling products and services. The CSC Group will also ensure that the physical environment complies with laws and industry regulation to ensure it provides a responsible gambling environment.

The CSC Group will maintain gaming machines in premium conditions for patrons and patrons, enjoyment and will clearly mark unplayable machines. The CSC Group will also ensure that all venues offer a pleasant gambling environment for patrons. The club has placed numerous clocks within designated gambling areas to make patrons aware of the passage of time.

## *Minors*

The CSC Group will prohibit all persons under the age of 18 years from gambling or being present in the gaming room and will alert patrons and patrons on these prohibitions by placing signage at the entrance to gambling areas (or other suitable locations) in the venues.

## *Financial Responsibility*

The CSC Group will not locate ATMs in designated gambling areas or in the entry to designated gambling areas, where safe and practical. The CSC Group will not extend credit for the purpose of gambling under any

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circumstances. The club will not cash personal cheques. A maximum cash limit for payouts applies and reflects the agreed maximum amount approved by the Queensland Office of Gaming Regulation and Gaming for Keno for the venues. If the winning amount is greater than this limit, either the whole amount can be paid by cheque or paid partly in cash to the maximum limit with the balance paid by cheque. Any cheque for winnings will not be cashed by the venues until the next trading day and then only by prior arrangement.

Maximum cash and/or electronic deposit payout limits are:

Gaming machines	\$5,000
Keno	\$5,000

### *Information Provisions*

The CSC Group will make available responsible gambling information including the CSC Group's Responsible Gambling Policy, player information guide outlining odds/win rates of major prizes, signage on potential harm associated with gambling brochures, and the information contained in our [insert name once chosen] program that provides patrons with information on where to seek further help.

The CSC Group will encourage breaks in play by making patrons aware of other alternative forms of entertainment available at the club, or non-gambling related activities through our sporting clubs and community partners, and where possible providing self-service coffee and tea facilities. The CSC Group will not encourage extended, intensive and repetitive play.

The CSC Group will inform patrons about procedures for lodging complaints and will strive to deal with complaints in a timely manner. Where the outcomes are not to the satisfaction of the complainant, the CSC Group will inform the complainant that they can escalate this to the CSC Group's Board of Directors. If this is still not of satisfaction, the CSC Group will inform the complainant of other avenues of redress such as the Queensland Office of Gaming Regulation, Liquor Licensing Division, Clubs Queensland or their solicitor.

### *Responsible Service of Alcohol*

The CSC Group will not use free alcoholic drinks, discounted alcoholic drinks, or happy hours to promote gambling. Patrons who are unduly intoxicated are not permitted to continue gambling.

### *Marketing*

The CSC Group will ensure that any advertising or promotion complies with the Advertising Code of Ethics as adopted by the Australian Association of National Advertisers and the Queensland Responsible Gambling Code of Practice. The CSC Group confirms that advertising and promotions are:

- Not false, misleading or deceptive
- Not implicitly or explicitly misrepresenting the probability of winning a prize
- Not to give the impression that gambling is a reasonable strategy for financial betterment
- Not including misleading statements about odds, prizes or chances of winning
- Not offending prevailing community standards

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- Not focussing exclusively on gambling, where there are other activities to promote
- Not implicitly or explicitly directed at minors or vulnerable or disadvantaged groups
- Not involving any external signs advising of winnings paid
- Not depicting or promoting the consumption of alcohol while engaged in activity of gambling
- Only publishing or causing to be published anything which identifies a person who has won a prize with their explicit consent

Further to this the CSC Group will ensure that all social media accounts are monitored, and at its discretion the CSC Group may choose to restrict access to those social media accounts for persons who are currently in an exclusion period.

## *Privacy*

The CSC Group will ensure all activities relating to gambling by patrons shall remain confidential and not be discussed with other patrons, third parties, or the broader community.

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