Gaming Machine Harm Minimization Measures Consultation Paper
Response Form

Interested persons and organisations can make a submission on the issues raised in the Gaming Machine Harm Minimisation Measures Consultation Paper by completing this submission form.

This response form includes the questions from the Gaming Machine Harm Minimisation Measures Consultation Paper.

If you have any queries about this process, please email the following address with the subject heading – Harm Minimisation Consultation Paper.

Email: liquorgamingandracingenquiries@justice.vic.gov.au

Submissions must be received by 5pm, Monday 16 January 2017.

Your details

<table>
<thead>
<tr>
<th>Name</th>
<th>Rodney Beckwith</th>
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<tbody>
<tr>
<td>Organisation (If applicable)</td>
<td>Sebastopol Bowling Club Inc</td>
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<tr>
<td>Email address</td>
<td><a href="mailto:gm@sebasbowlingclub.com.au">gm@sebasbowlingclub.com.au</a></td>
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<td>213-219 Albert St Sebastopol VIC 3356</td>
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<tr>
<td>Telephone</td>
<td>03 5335 8839</td>
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Please note:

All submissions will be published on the Department of Justice and Regulation’s website.

Please ensure that your submission does not include confidential, commercial-in-confidence or personal information.

The department reserves the right to not publish information that could be seen to be defamatory, discriminatory or unrelated to the review.
Questions: Gaming Machine Harm Minimisation Measures

These questions should be read in conjunction with the Gaming Machine Harm Minimisation Measures Consultation Paper

**Q.1. Is the current $200 per EFTPOS transaction limit appropriate? If not, what other regulatory measures would support the objectives of the Act?**

The Sebastopol Bowling Club does not support additional limits on EFTPOS transactions, in fact we suggest the limit is too restrictive for our members. There are numerous other reasons why our members may wish to access cash at our club, including meals, drinks, raffles, green fees and entertainment.

In the suburb of Sebastopol access to banking services is limited, using EFTPOS facilities at the club maybe the only viable access our members too their bank. For example, at our venue the nearest ATM is across the road, only about a 200 metre walk, but one which they must cross a two-lane dual highway (The Midland Highway). This possesses a significant safety risk for our members who are of an older demographic. In December 2016, the NAB Mt Clear branch closed its doors, resulting in our members having to travel into Ballarat to access their money at a NAB branch. The EFTPOS facility at our club provides a convenient and secure environment to access their money. Our members have indicated that the $200-dollar limit is too restrictive and should be relaxed.

**Q.2. Is the current $1,000 threshold for the payment of winnings by cheque appropriate? If not, what should be the limit and why?**

The Sebastopol Bowling Club Members and guests prefer winnings to be paid in cash as they have used cash to play initially. The limit acts as an encouragement to continue gambling even though player’s time or other boundaries for gambling may have been met. Players just continue to play until their credits are under the cheque limit so their winnings will be paid in cash.

Some of our members have played down their credits above 1000 to ensure they receive cash winnings. With modern technology advancing so rapidly, the payment by cheque is an antiquated option.

In the past the Sebastopol Bowling Club has had issues with cheques and patrons whom are from overseas and do not have an Australian Bank Account. At the time this issues has escalated to the point where staff have been abused and a scene has been made at the Club.

In the past, some members and patrons who receive cheques have gone to 3rd party lenders to present their cheques, this method often results in them not receiving the full amount and incurring significant costs.

A change in the cheque limit would also dramatically reduce the number of cheques, cut red tape and costs, as cheques are the highest cost payment for our Club. Clubs like the Sebastopol Bowling Club are often under resourced in administration. In December 2016,
the Sebastopol Bowling Club issued 51 cheques, if you extrapolate that out over a year, the amount of cheques issued and cost is significant, those costs include, the wages involved to administer the cheque and the actual cost of the cheques.

The Government should give consideration too allowing our members and patrons to take part of their win as a cheque and another part as cash. In the case where someone wins $1,500, at present the entire amount must be paid as a cheque which is inconvenient for the patron, especially if their last cash was used to play. Our members and patrons would then have a choice to break the payment of their winnings into different payment methods (i.e. $1,000 in cheque and $500 in cash).

Thus, the Sebastopol Bowling Club, supports a change to the cheque limit to $2,000 to enable our members and patrons to more quickly and easily finish play and be paid their winnings instead of continuing to gamble beyond their time and expenditure limits.

**Q.3. Should payment by EFT be permitted in addition to, or as a replacement for, payment by cheque?**

Consideration may need to be given to the current identification requirements for cheque payments and how they would apply in the case of EFT. AUSTRAC requirements, Gaming reconciliation and human error need to be considered as well.

The Sebastopol Bowling Club believes that payments by EFT with a swipe of a debit card should be allowed for those venues who wish to offer this option to their members and patrons.

**Q.4. Are there other payment methods that should be considered for the payment of credits / winnings?**

Please refer to question 3 answer.
Q.5. Should venue operators be able to exchange personal cheques for cash?

The exchange of personal cheques for cash in venues or offering credit contravenes our club's Responsible Gambling Code of Practice, so the Sebastopol Bowling Club does not offer this service.

The current system has been in place for a while and it is rare, virtually non-existent for our members or patrons to even request it.

The Sebastopol Bowling Club believes the current system is adequate and cheques should not be exchanged for cash.

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Q.6. If cashless gaming and or TITO is introduced, how should they be regulated so that they are consistent with other measures that limit access to cash? What harm minimisation measures should apply?

The Sebastopol Bowling Club supports the introduction of cashless gaming and Ticket In, Ticket Out (TITO). If it is, in a cost-effective manner with competition amongst approved equipment providers without additional monitoring, controls, harm minimisation or fees.

The Sebastopol Bowling Club believes such an introduction would empower players to take a break and removes cash from the gaming floor, creating less risk of robbery.

Cashless gaming or TITO would allow the Sebastopol Bowling Club staff to spend more of their time focussing on service with more opportunity for staff to interact with players, so that when a winning player wants to complete play, they walk away from the machine and payment is made from a central cashier.

The option for our Club to adopt cashless gaming does not require additional infrastructure (due to the introduction of voluntary pre-commitment, thus loyalty) or monitoring and would assist in reducing the cash and coins from the gaming floor, thus creating less of a security risk and will improve OH&S issues within our Club.
Q.7. What opportunities are there to improve the way codes operate in Victoria?
- Are there other models that would be more effective? If so, what are they?
- Would a more prescriptive approach for all venue operators be better? Could the operation of codes be simplified?
- Are there other matters that should be provided for in the Ministerial Direction for codes?
- What requirements for loyalty schemes should be included in a code to promote responsible gambling?
- Does the annual review process contribute to fostering responsible gambling? If not, why not? Are there other options to ensure that the codes meet this aim?

The Code of Practice for Responsible Gambling ensure responsible gambling awareness amongst club management, boards, staff and club members. The Codes are displayed to members and visitors at the Club and on our website, providing a platform for conversations around the responsible conduct of gambling within our club.

The Sebastopol Bowling Club understands its role in delivering responsible gaming. Its level of compliance is high and promotes responsible gambling where possible, we are an active member of the Ballarat Responsible Gambling Committee. Our approach would be in line with most Victorian Clubs, so there is no evidence nor a case to support a more prescriptive approach to the Codes, to the Ministerial Direction for codes or to loyalty at this stage.

Q.8. Should the requirement to interact with customers who are showing signs of distress from gambling be part of codes, or should a separate offence be created for venue operators who fail to respond to suspected problem gambling?

The Sebastopol Bowling Club by its nature ensures our staff interact with our members, whom we know. Our staff understand their requirement to interact with members and patrons who show signs of distress, within the Codes and via other regulatory requirements.

The Sebastopol Bowling Club staff have training on and approach members and patrons displaying the signs of problematic gambling and starting a respectful conversation to enquire about the patron’s welfare and where necessary offering them assistance such as self-exclusion or referral to appropriate help services.

The Sebastopol Bowling Club supports staff intervention and we believe that staff interventions create an additional level of safety that is unique to land-based gaming operators and is lacking in the online environment.

The increased involvement of our Venue Support Worker has also increased the training and awareness for our staff be conscience of potential problematic gambling.

A punitive approach to suspected problem gambling is not supported as this is a highly subjective, complex and judgement based interaction.
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<tr>
<th>Q.9. Are self-exclusion programs best administered by the industry or by another body?</th>
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<tr>
<td>The Sebastopol Bowling Club believes the self-exclusion program to be a valuable tool to assist those with a gambling problem, especially when used in conjunction with other vital aids such as, support from our Venue Support Worker and face-to-face counselling.</td>
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<td>Self-exclusion operates by self-identified problem gamblers voluntarily surrendering the right to enter the gaming area of our Club. This helps them overcome their impulsive urges to gamble.</td>
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<td>The Sebastopol Bowling Club believes the Industry is best placed to continue to administer self-exclusion. Our staff engagement is critical to the successful implementation of the service. Changing the body who administers self-exclusion will just add additional cost and complexity to systems that have been successfully run by the industry for more than 15 years.</td>
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<th>Q.10. Should there be one self-exclusion program in Victoria?</th>
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<td>For the enhanced service and experience able to be provided for those who are self-excluding the Sebastopol Bowling Club supports a single self-exclusion program in Victoria.</td>
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<th>Q.11. How could self-exclusion programs be improved?</th>
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<td>For the enhanced service and experience able to be provided for those who are self-excluding the Sebastopol Bowling Club supports a single self-exclusion program in Victoria. Over the past few years, the relationship between the Sebastopol Bowling Club and our Venue Support Worker has been extremely productive, with both parties working towards a common goal. Our Venue Support Worker is familiar with many of the staff at the Sebastopol Bowling Club which makes a collaborator approach much more effective.</td>
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Q.12. Is the annual review useful or are there other ways to report on program trends and compliance?

The Sebastopol Bowling Club supports the annual review process under the current system as it is useful to evaluate system operations regularly and provides opportunities to improve. It is a good process for club staff to revisit every year and promotes customer engagement, highlighting that the Sebastopol Bowling Club takes its commitment to responsible gambling seriously.

Q.13. Should there be a separate offence for venue operators who knowingly allow self-excluded persons to enter or remain in the venue?

The Sebastopol Bowling Club has never knowingly allowed a self-excluded person to enter or remain in the gaming room. The nature of our Club, in fact all clubs, ensures the welfare of our members and patrons far outweighs any financial contribution. Our responsibility to our community and our standing in it is paramount.

The self-exclusion system relies on staff members’ goodwill, strong staff engagement with our members and memory to identify self-excluded patrons seeking to breach their self-exclusion to gamble. To create this type of offence as part of a voluntary, industry instituted program would cause a great deal of staff angst, causing staff engagement to drop. This type of punitive measure has the potential to reduce the number of breaches identified, which is a substantial increase in harm to those people who have self-identified as problem gamblers.

It is critical that venues are empowered under this program and engage fully in its implementation collaboratively with regulators, venue support workers, specialist counsellors to ensure that the best and most sensitive intervention is provided to patrons in support of formal treatment rather than making it another punitive, unproven compliance measure.

Technological improvements to the system identification processes and making breach detection easier for staff will yield greater harm minimisation outcomes than additional regulatory measures which are not likely to assist one problem gambler or increase the rate of help-seeking.
Q.14. Should a new requirement to undertake advanced responsible service of gaming training be introduced?

The Sebastopol Bowling Club believes the new change to the RSG training, that is, the training is conducted in a two-step program and administered by our Venue Support Worker will be significant and adequate. Only time and a review will determine how much the new training has been effective and we do not support further changes until those just implemented have been reviewed.

Q.15. If so, who should be required to complete the advanced training and what content should the training include?

Q.16. Who should be responsible for the development and provision of the advanced training?

Advanced training should be a collaborative approach, developed by the Club sector, AHA, Counsellors, academics, experience educators and Industry partners ensuring it is cost effective and fit for purpose.

Q.17. Do you think regional caps and municipal limits should be maintained? Why?

The Sebastopol Bowling Club has not formed a position on this issue, as we have no desire to alter our current EGM’s in any form.

Q.18. Should regional caps be extended beyond the existing capped areas and if so, why?

The Sebastopol Bowling Club believes most of the State is covered by the capped area and therefore there no need for an extension.
Q.19. Are the current regional cap and municipal limit levels appropriate?

The Sebastopol Bowling Club has not formed a position on this issue, as we have no desire to alter our current EGM’s in any form.