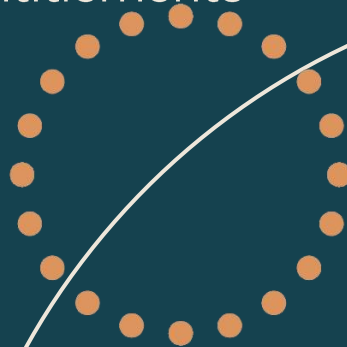




Gaming Plan of Management

Heathcote Services & Citizens Club Ltd
Trading as The Arbour Heathcote
Registered Club
LIQ300243966
40 Gaming Machine Entitlements





Gaming Plan of Management – The Arbour Heathcote

Version control

Version	Date	Changes made to content	Approved by	Next review date
1.0	16/08/24	Initial Submission	Stephanie Vincent	Annually
2.0	17/2/25	Design, Gaming Licence Condition Update and Specified Entry Location to Gaming Machine Area	Stephanie Vincent	In line with annual review

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1. Venue details

Street address	24 Oliver Street, Heathcote NSW 2233
Licensee / Club Secretary	David Andrew Moorcroft
Approved manager/Club manager	Shawn William Hayter Morris
Number of GMEs	40
Number of gaming machines operated	40
Statistical Area 2 (SA2)	SA2

2. Venue licensed hours and shutdown period

Venue licensed hours

	Mon	Tue	Wed	Thu	Fri	Sat	Sun
Open	10:00	10:00	10:00	10:00	10:00	10:00	10:00
Close	00:00	00:00	00:00	00:00	02:00	02:00	00:00

Venue gaming machine shutdown hours

	Mon	Tue	Wed	Thu	Fri	Sat	Sun
From	03:00	03:00	03:00	03:00	03:00	03:00	03:00
Until	09:00	09:00	09:00	09:00	09:00	09:00	09:00

3. Gaming related licence conditions

There is no gaming related licensed conditions.



Gaming Plan of Management – The Arbour Heathcote

4. Measures to address gambling harm

Welfare Checks

The Arbour Heathcote aims to ensure all our patrons have a positive experience; this includes undertaking welfare checks on any guests who may be at risk of problem gambling. 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 Responsible Gambling Officer 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 digital Gambling Incident Register.

Indirect interactions such as daily announcements are made over the Clubs PA system to encourage customers to take regular breaks from gaming machines. Such announcements are regarding other events, promotions or services (such as courtesy bus departures) that are underway. The Arbour Heathcote also have harm minimization strategies implemented through our Societie Safeplay program helping to identify and manage any problem gambling behaviours.

5. Responsible Gambling Officers

Number of Gaming Machine Entitlements	Number of Responsible Gambling Officers (RGOs) Required	Requirements between midnight and 8am ('late-night')
Between 21 – 99	One (1) RGO on duty when gaming machines are in operation	One (1) nominated RGO to be primarily focused on RGO duties

The Arbour Heathcote has all Managers trained as an RGO role to fulfil the requirements required under the regulation as stated above. Most gaming staff members have also had additional Advanced RCG training to ensure we are able to commit to the RGO role should there be any unforeseen staff shortages.

RGO duties are:

1. to identify patrons who are at risk of or experiencing gambling harm
2. to identify patrons who are displaying behaviour related to gambling harm
3. to make inquiries with a patron if the officer suspects the patron is at risk of or experiencing gambling harm
4. to notify senior management of serious instances of patrons at risk of or experiencing gambling harm for the purposes of enabling senior management to intervene
5. to facilitate requests by patrons for information about or to participate in self-exclusion schemes conducted by the hotelier or registered club
6. to record, in the hotel's or registered club's gambling incident register, incidents relating to persons who are at risk of or experiencing gambling harm, or who display behaviour related to gambling harm, observed by the officer

Gaming Plan of Management – The Arbour Heathcote

7. to assist staff and management in ensuring the hotel or registered club meets its harm minimisation obligations under the Act and this regulation
8. to promote harm minimisation measures within the hotel or registered club.

The responsibilities of manager/s on duty are to:

1. take reasonable steps to ensure responsible gambling officers for the hotel or registered club carry out the duties of a responsible gambling officer
2. ensure work health and safety procedures and policies are followed to support responsible gambling officers in exercising their duties as responsible gambling officers
3. ensure responsible gambling officers have had an opportunity to raise issues with the hotel or club manager about the role and its responsibilities
4. ensure the issues raised by responsible gambling officers in relation to paragraph 3. are addressed
5. ensure responsible gambling officers are not impeded by the hotel or club manager or other staff of the hotel or registered club in carrying out the duties of a responsible gambling officer
6. inform responsible gambling officers about the duties of a responsible gambling officer
7. inform responsible gambling officers of patrons reasonably suspected to be at risk of or experiencing gambling harm
8. assist patrons who are at risk of gambling harm or displaying behaviour related to gambling harm.

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.

Complaints and reports of potential breaches of the law can be made to Liquor & Gaming NSW:

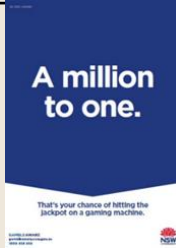
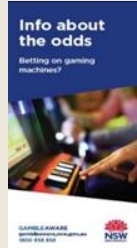
Email: contact.us@liquorandgaming.nsw.gov.au
 Phone: 1300 024 720
 Web: www.liquorandgaming.nsw.gov.au/community-and-stakeholders/have-your-say/complaints/make-a-complaint

6. Venue gambling signage and mandatory gambling information

Mandatory gaming machine signage and brochures include:

MANDATORY: Sign 1G - Gambling Warning	
	"What's gambling really costing you?" (4 available options) This sign must be prominently displayed in each gaming area: At the entry to each smoking gaming area and at the cashier

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MANDATORY: Sign 6G – Gambling Counselling	
	"What's gambling really costing you?" (4 available options) This sign must be prominently displayed in each gaming area: At the entry to each smoking gaming area and at the cashier
MANDATORY: Sign 3G – Chances of winning sign	
	"A million to one" This sign must be prominently displayed in each gaming area: At the entry to each gaming area
MANDATORY: Brochure 1 – Info about the odds – Betting on gaming machines	
	These brochures are prominently displayed and available in each area with gaming machines. At the entry to each gaming area and at the cashier Translated versions are supplied to patrons from non-English speaking backgrounds upon request.
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: Problem gambling message	
	This message is prominently displayed on or near all ATMs and cash-back terminals. The message is also included on any player activity statements, all betting tickets, and all gaming machine tickets (TITO tickets).

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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: At the entry to each gaming area

Signage and information for patrons from non-English speaking backgrounds

The Arbour Heathcote makes gaming signage and information available upon request in the following languages: Arabic, Simplified Chinese, Traditional Chinese, Greek, Hindi, Italian, Korean, Macedonian, Nepali, Spanish, Thai, and Vietnamese.

Procedures to check signage and brochures

The Arbour Heathcote complete fortnightly audits of all gaming compliance including signage and brochures.

7. Information regarding player assistance

Hotels and clubs that operate gaming machines must establish and conduct a self exclusion scheme. This allows patrons to voluntarily exclude themselves from nominated areas of a gaming venue or the entire venue.

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. The Arbour Heathcote 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 discomfort 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, visiting the ClubsNSW self-facilitated website or by contacting a gambling help counsellor.

The minimum period for a Self-Exclusion is six months. Once a patron agrees to exclude from the club for a specific time, our venues have 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. The Arbour Heathcote also has facial recognition technology to assist in identifying self-excluded patrons entering the premises.



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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 them 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, visiting the ClubsNSW self-facilitated website or by contacting a gambling help counsellor.

The minimum period for a Self-Exclusion is six months. Once a patron agrees to exclude from the gaming activities of the club for a specific time, our venues have process 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.

Counselling Services

- As required by law, The Arbour Heathcote display problem gambling brochures at critical points within the venue and have a wide range of these brochures in many languages to help with our culturally diverse community. These brochures contain details about the ClubSAFE Counselling Service and Gambling Help Line:
- ClubSAFE Counselling Service – 1800 997 766
- GambleAware Helpline – 1800 858 858

The management team at our venue are proactive in handing out the relevant information to patrons in need. The Arbour Heathcote will display information about local support services in strategic locations, like the bathroom and on rolling digital displays.

8. Identifying at-risk gambling behaviours

At-risk gambling behaviour is gambling behaviour that leads to gambling harm because it involves:

- spending more money on gambling than the 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.

For further information, see Attachment F – Warning signs of at-risk gambling behaviour and how to act on them.

9. Preventing minors from using gaming machines

Minors (persons under 18 years of age) must not:

- operate gaming machines, or
- enter areas where gaming machines are located.



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The Arbour Heathcote 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. Failure to comply will result in the person being asked to leave.

Signs are displayed at all gaming room entrances banning minors from entering the room. The Arbour Heathcote's employees share the responsibility for asking for proof of age if they are uncertain whether a customer is at least 18. If relevant verification cannot be produced, the customer will be asked to leave the gaming room.

10. Payment of prizes and cashing cheques

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. The following requirements apply:

- Prizes may be paid as money or in a non-monetary form, but the prizewinner 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 prizewinner from playing the relevant gaming machine
- A non-monetary prize must not consist of or include:
 - Liquor in any form, or
 - Tobacco in any form, or
 - Knives or knife blades, or
 - 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:
 - The nature or form of prizes offered
 - The terms on which the prizes are awarded or paid
 - The right of the prizewinner to choose to receive money instead
 - Any option available to the prizewinner to transfer a non-monetary prize for another non-monetary item or right
 - 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.



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Prizes over \$5,000

If a person claims a prize of more than \$5,000, the amount that exceeds \$5,000 must be paid within 48 hours in one of two ways:

- crossed cheque made payable to the prize winner - clearly marked with the words: Prize-winning 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 more than \$5,000 and the prize-winner requests to have the entire amount paid by crossed cheque or EFT, not just the amount over \$5,000, you must do so.

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

Procedures for processing prize payments

- The Arbour Heathcote does not cash cheques from customers under any circumstance.
- Winnings \$5,000 and below can be claimed in either cash, cheque or EFT. By law any winnings over \$5,000 will be issued as a cheque, EFT or PayID only. Winnings will only be issued to the person playing the machine at the time of the win.
- 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.

11. Information on player reward schemes

- 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.



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

Societie Rewards Loyalty Program

A loyalty program is offered at The Arbour Heathcote which allows members the opportunity to accumulate points for the purchase or use of eligible goods and services. The number of status points earned by members over a rolling 3- month period determines their eligibility for rewards tiers during the period of the membership of the program.

Upon becoming a member, patrons are presented with the following information about their respective rewards loyalty programs:

- The rules of the loyalty program including where bonus points can be accrued and redeemed;
- How rewards are achieved;
- How rewards expire;
- How to opt-out of the program

Members have the opportunity to 'opt-out' of the loyalty program at any time in writing or in person.

Our loyalty program is compliant with all responsible gambling legislation. The Arbour Heathcote is constantly reviewing our loyalty program on offer to ensure we continue to act responsibly whilst giving our members a great customer experience.



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12. 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 Attachment E. Incidents must be recorded as soon as practicable, but no longer than 24 hours after they happen. The venue's gambling incident register is located digitally.

The Arbour Heathcote's digital Gambling Incident Register is reviewed weekly by the RGO and any matter requiring escalation or review is directed to the Responsible Gaming Manager. The register is also reviewed and reported to the board monthly and quarterly.

A gambling incident register must be kept for three years and made available to police and inspectors. The Arbour Heathcote is subject to the Privacy Act 1988 (Cth) and related Australian Privacy Principles in the collection and use of information for the incident register.

13. Compliance with legislation

The venue is subject to the requirements of the Gaming Machines Act 2001, the Gaming Machines Regulation 2019, the Liquor Act 2007, and other legislation that establishes basic harm minimisation and responsible conduct of gambling requirements.

Inducements

Inducements are incentives that provide benefits to encourage gambling. Your venue 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.

Cash dispensing facilities

- must not provide access to cash from a credit card account
- must not be located in an area where gaming machines are located
- must not be visible from any part of a gaming machine or jackpot prize monitor
- must not be visible from a gaming machine, or entry to the room or area where gaming machines are located
- must be located no less than 5 metres from:
 - For a hotel – an entry to the gaming room if the hotel has a gaming room, and
 - For a hotel – an entry into the room or area where gaming machines are located, and
 - For a registered club – an entry to a room or area where gaming machines are located. For Societie Group venues – entry to the gaming areas are from the gaming entry signage.



Gaming Plan of Management – The Arbour Heathcote

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.



Gaming Plan of Management – The Arbour Heathcote

14. Staff use of gaming machines prohibited

No staff member is permitted to use gaming machines at any Societie Group venue at any time.

The Arbour Heathcote staff are permitted to use TAB or Keno facilities, on days off and not in uniform.

The Arbour Heathcote is 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 foster healthy outcomes and advance diverse, inclusive, safe and responsible working environments.

15. Procedures for gaming-related customer complaints

Should a customer have any gaming-related complaint they can pass this on to our Management team at any time, contacting the club or by emailing them through to;

- responsiblegambling@thearboursheathcote.com.au

These complaints are then recorded in our GIR, managed by our Gaming Management team and dealt with on a case-by-case basis.

16. Reporting misconduct

Anyone may make an anonymous complaint to Liquor & Gaming NSW about liquor or gaming law breaches.

Complaints and reports of potential breaches of the law can be made to Liquor & Gaming NSW:

Email: contact.us@liquorandgaming.nsw.gov.au

Phone: 1300 024 720

Web: www.liquorandgaming.nsw.gov.au/community-and-stakeholders/have_your_say/community-and-stakeholders/have-your-say/complaints/make-a-complaint

Our staff have the knowledge and ability to make complaints should they wish and are informed of their options on our Staff Intranet and in the staff room, along with a copy of the Clubs GPOM.



Gaming Plan of Management – The Arbour Heathcote

17. Staff familiarity with GPOM

Staff must be familiar with this GPOM. All staff who work in the gaming room, gaming area, or with gaming machines, must regularly read this GPOM.

Whenever there are changes to the GPOM, staff must read and familiarise themselves with the modified document.

The GPOM must always be available and accessible to all staff.

18. Review of GPOM

This GPOM must be reviewed at least annually, as well as periodically when modifications are required to reflect changes at The Arbour Heathcote, legislative changes or emerging risks.

See version control

19. Contact information for local licensing Police

Sutherland Shire Police
Sergeant Casey Beldon
Interim Licensing Officer
E: beld1cas@police.nsw.gov.au

20. Any other GPOM content required by ILGA

N/A

21. Attachments

Attachment A – Record of staff review of GPOM

For privacy reasons, the Record of staff review of GPOM is available on-site.



Gaming Plan of Management – The Arbour Heathcote

Attachment B – Record of staff competency cards

For privacy reasons, the Record of staff competency cards is available on-site.



Gaming Plan of Management – The Arbour Heathcote

Attachment C – Venue liquor licence

The venue liquor licence is available on-site.



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Attachment D – Premises plan

For privacy reasons, the Premises plan is available on-site.



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Attachment E – Warning signs of at-risk gambling behaviour and how to act on them

Extracted from the [Advanced Responsible Conduct of Gambling participant workbook](#)

Appendix 3: Warning signs of at-risk gambling behaviour and how to act on them

GENERAL WARNING SIGNS		WHAT TO DO
<i>Length of play</i> - Starts gambling when the venue is opening, or only stops when the venue is closing Gambles most days <i>Behaviour during play</i> - Gambles on more than one machine at once - Rushes from one machine to another - Significant increase in spending pattern - Complains to staff about losing, or blames venue or machines for losing - Rituals or superstitious behaviours (rubbing or talking to machine)	<i>Money</i> Asks to change large notes before gambling	On their own, these may be early warning signs. A patron showing several of these signs could be at risk of gambling harm. - Monitor the patron's behaviour. - If you notice a patron who is showing two or more of these signs, record what you have noticed and tell your manager.
PROBABLE WARNING SIGNS		WHAT TO DO
<i>Length of play</i> - Finds it difficult to stop gambling at closing time <i>Behaviour during play</i> - Often gambles for long periods (three or more hours) without a proper break - Plays very fast - Gambles intently without reacting to what's going on around them	<i>Money</i> - Gets cash out more than once through ATM or EFTPOS - Avoids cashier, and only uses cash facilities - Puts large wins back into the machine - EFTPOS repeatedly declined <i>Social behaviours</i> - Becomes angry or stands over others if someone takes their favourite machine/ spot	A patron showing any of these signs is much more likely to be at risk of gambling harm. - Monitor the patron's behaviour. - Record what you have noticed and tell your manager, who will speak with the patron. - If a patron shows two or more of these warning signs, follow the steps for strong warning signs (below).
STRONG WARNING SIGNS		WHAT TO DO
<i>Length of play</i> - Gambles from opening to closing <i>Behaviour during play</i> - Shows obvious signs of distress or anger (crying, holding head in hands, shaking, outburst towards staff or machine)	<i>Money</i> - Tries to borrow money from other patrons or staff <i>Social behaviours</i> - Tells staff that gambling is causing them issues - Significant decline in personal grooming and/or appearance over several days - Friends or family raise concerns - Tries to hide their presence at the venue (doesn't answer mobile phone, asks staff not to let others know they are there)	A patron showing any of these warning signs is probably at risk of gambling harm. - Monitor the patron's behaviour - Record what you have noticed, and tell your manager, who will speak with the patron, refer them to support and counselling services, offer them the opportunity to self-exclude, or recommend an exclusion order if the patron is at risk of harm or at risk of causing harm to others.

Source: Developed by the Office of Responsible Gambling, based on international and Australian best practice and informed by key research, including Delfabbro, P., Thomas, A. and Armstrong, A.R. (2016), 'Observable indicators and behaviours for the identification of problem gamblers in venue environments', *Journal of Behavioral Addiction*, 0, 1–10. DOI: 10.1556/2006.5.2016.065; and Thomas, A., Delfabbro, P. and Armstrong, A.R. (2014). 'Validation study of in-venue problem gambler indicators', report prepared for Gambling Research Australia