



# Gaming Plan of Management

## Factsheet



Hotels and registered clubs with Gaming Machine Entitlements or permits will be required to create and maintain a Gaming Plan of Management (GPOM).

Your GPOM must be specific to your venue and detail your responsible conduct of gambling requirements, including how your venue will meet those requirements.

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### When do the requirements begin?

You must create a GPOM that meets these new requirements by 1 September 2024.

These new requirements override licence conditions to have a GPOM. You will need to create a GPOM, or update your old GPOM, that aligns with the new requirements.

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### Summary

- A GPOM provides guidance on the actions that your venue will take to ensure compliance with gaming legislation and to support best practice in your approach to responsible conduct of gambling (RCG).
- A GPOM must be updated at least every 12 months. It must also be updated if there are any changes to your venue, legislative requirements, or emerging risks.
- You do not need to have your GPOM approved by the ILGA.
- All staff involved with the conduct of gaming at your venue must be trained on

your GPOM, their RCG responsibilities and, where applicable, their Responsible Gambling Officer responsibilities.

- A GPOM is designed to be a 'living document' that is accessed, reviewed and updated regularly.

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## Why have a Gaming Plan of Management?

Creating and maintaining a GPOM is a requirement under the *Gaming Machines Regulation 2019*.

Keeping gaming machines comes with significant responsibilities, noting that research has shown that they can contribute significantly to gambling harm.

GPOMs are designed to make sure that venues have a plan for how gaming operations are run, including controls to address potential and actual gambling harm and measures to ensure compliance with the law.

Therefore, a GPOM should be reviewed and updated regularly and all staff must be familiar with it.

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## What to include in your Gaming Plan of Management

- Your GPOM sets out your venue's legislative RCG obligations and what you are doing to meet those obligations.
- Your GPOM must include procedures and processes that you and your staff will use.

- Your GPOM must contain clear paragraph titles, paragraph numbers and page numbers.
- You may include additional relevant information in your GPOM that is not covered here.

The required format and content of a GPOM is contained below at **Attachment A**. This outlines the sections, subsections and statements that your GPOM must contain.

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## Preparing your Gaming Plan of Management

You have two options:

1. Use the '**Gaming Plan of Management standard template**'. The information in **Attachment A** will guide you in completing the standard template.
- OR
2. Use the information in **Attachment A** to create your own GPOM.

If you prepare your own, you must make sure it includes all the required headings, pre-filled text and information contained in the L&GNSW template.

If you already have a GPOM, you should review it to make sure that it meets the required format and content outlined below.

# Attachment A – Required GPOM content

## Your GPOM must include:

### 1. Version control information

- Date of the latest version
- Who approved the GPOM
- The next upcoming review date
- For example:

Version	Date	Approved by	Next review date
1.0	20 July 2023	Jo Manager	19 July 2024
2.0	4 October 2023	Jo Manager	3 October 2024

- An attachment with a table that records any plan updates including what was changed (numbered paragraph and topic description), the date and by whom, signature of the licensee/approved manager/club secretary approving the changes

### 2. Contents page

### 3. Venue details

- Name of premises
- Liquor licence number
- Street address
- Licensee/approved manager/club secretary/club manager (as applicable)
- Number of GMEs held and EGMs operated
- Statistical Area 2 (SA2)

### 4. Venue licensed hours and shutdown period

- A table that details the hours in which your venue is permitted to operate. For example:

	Mon	Tue	Wed	Thu	Fri	Sat	Sun
Open							
Close							

- A table that details the hours that your venue observes the ‘shutdown period’, which is required under the *Gaming Machines Act 2001* as a ‘break in play’ for patrons. For most venues this will be 4am to 10am. For example:

The Gaming Machine Shutdown Period for the venue is:

	Mon	Tue	Wed	Thu	Fri	Sat	Sun
From							
Until							

## 5. Gaming related licence conditions (if applicable)

An excerpt of any gaming related licence conditions on your venue's liquor licence.

You can find conditions on your liquor licence. Some conditions are recorded in the NSW Government licence database which can be accessed [here](#).

## 6. The floorplan of the premises that includes the location of the gaming room, gaming machines and cash dispensing facilities (ATM and CRT)

## 7. Information on measures to address gambling harm, including:

- a description of the shared responsibility of all staff working in gaming areas to prevent gambling harm.
- a section on the minimum required training for different levels of staff.
- procedures on monitoring competency card expiry dates so that all staff competencies remain current.
- an attachment with record of all venue staff competency cards for RCG and ARCG (Note – updates to the competency cards appendix does not need to go through the process for a full version controlled update)

## 8. Information on Responsible Gambling Officers (if required by legislation or offered voluntarily at your venue)

- The Responsible Gambling Officer (RGO) requirements for your venue, e.g. how many RGOs must be on duty, the nomination of one or more dedicated RGO(s) if your venue operates EGMs after midnight.
- The training requirements for RGOs, i.e. Advanced Responsible Conduct of Gambling
- RGO duties under clause XX of the *Regulation*.
- The responsibilities of the manager/s on duty under clause XX of the *Regulation*, noting that the hotelier or registered club holds the key responsibility for ensuring RGO requirements are met under the *Gaming Machines Regulation 2019*
- How your venue will meet its responsibilities, both in ensuring the required number of RGOs will be on staff and what procedures are in place to ensure managers are taking 'reasonable steps' to ensure RGOs are fulfilling their duties and can carry out their duties without impediment.
- The following text must be in your GPOM:

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"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."

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- The contact information and web address of the Liquor & Gaming NSW complaints form.

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Email: [contact.us@liquorandgaming.nsw.gov.au](mailto:contact.us@liquorandgaming.nsw.gov.au)

Phone: 1300 024 720

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





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## 9. Venue gambling signage and mandatory gambling information

- Images and descriptions of all mandatory gambling signage and brochures for your venue, with a list of locations in your venue where the signs are located.

For example,

MANDATORY: Sign 1G - Gambling Warning	
	<p><i>“What’s gambling really costing you?”</i> (4 available options)</p> <p>This sign must be prominently displayed in each gaming area:</p> <p>[List area(s) in which the sign is displayed]</p>
MANDATORY: Sign 6G – Gambling Counselling	
	<p><i>“Help is close at hand”</i> (6 available options)</p> <p>This sign must be prominently displayed in each gaming area:</p> <p>[List the area(s) in which the sign is displayed]</p>
MANDATORY: Sign 3G – Chances of winning sign	
	<p><i>“A million to one”</i></p> <p>This sign must be prominently displayed in each gaming area:</p> <p>[List the area(s) in which the sign is displayed]</p>
MANDATORY: Brochure 1 – Info about the odds – Betting on gaming machines	
	<p>These brochures are prominently displayed and available in each area with gaming machines.</p> <p>[List the area(s) in which the sign is displayed]</p> <p>Translated versions are supplied to patrons from non-English speaking backgrounds upon request.</p>
MANDATORY: Contact card 2G – Self-exclusion contact card	

	<p>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.</p>
<p>MANDATORY: Sticker 4G – Gambling counselling sticker</p>	
	<p>These stickers are prominently displayed on each gaming machine.</p>
<p>MANDATORY: Problem gambling message</p>	
	<p>This message is prominently displayed on or near all ATMs and cash-back terminals.</p> <p>[List the area(s) in which the sign is displayed]</p> <p>The message is also included on any player activity statements, all betting tickets, and all gaming machine tickets (TITO tickets).</p>
<p>MANDATORY: Sign 2L – No Under 18s</p>	
	<p>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:</p> <p>[List the area(s) in which the sign is displayed]</p>

- A statement that gaming signage and information is available upon request in the following languages: [Arabic](#), [Simplified Chinese](#), [Traditional Chinese](#), [Greek](#), [Hindi](#), [Italian](#), [Korean](#), [Macedonian](#), [Nepali](#), [Spanish](#), [Thai](#), and [Vietnamese](#).
- Procedures for checking all venue signage and brochures to ensure they are current and intact including when they are checked and by whom

## 10. Information on player assistance

- Information about your venue’s self-exclusion scheme or any multi-venue exclusion scheme that your venue participates in.
- The procedure for assisting patrons to sign up for self-exclusion.
- The procedure for ensuring all staff members are aware of the identity of self-excluded patrons and what action will be taken if a self-excluded patron is identified in the venue.

- Requirements for recording requests for information about self-exclusion, processed self-exclusion paperwork or instances where a patron enters the venue contrary to their self-exclusion, i.e. recording these events in the Gambling Incident Register and any other database used for the self-exclusion scheme.
- Use of facial recognition technology and procedures to enforce exclusions using such technology (where applicable).
- Contact information of local gambling counselling services.

## 11. How at-risk gambling behaviours will be identified

- The following text must be in your GPOM:
 

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  - “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.”

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- A list of the types of support that can be offered to patrons, drawing on strategies taught in the Advanced Responsible Conduct of Gambling course (and in the participant workbook).
- A description of how at-risk gambling behaviours will be recorded in the Gambling Incident Register.
- Reference to and an attachment with [Appendix 3 of the Advanced Responsible Conduct of Gambling training participant workbook - ‘Warning signs of at-risk gambling behaviour and how to act on them.’](#)
- A section encouraging all staff to discuss instances of ‘at risk gambling behaviour’ with the Responsible Gambling Officer, duty manager, or other senior staff members.
- Procedures for incident escalation.

## 12. How minors will be prevented from using gaming machines

- Strategies that will be put in place to prevent minors (those under 18 years of age) from entering the gaming room such as signage, gaming room monitoring, ID checks and the venue layout.

## 13. Information about how prizes will be paid and cheques cashed

- The following statements must be in your GPOM:

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“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.

### 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.”

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- Procedures relating to prize payouts, as required by legislation

## 14. Information on player reward schemes (if applicable for your venue)

- The following text must be in your GPOM:

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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.

### 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.

- How your venue will ensure that player activity statements will be provided promptly, where they are available.
- The restrictions on a player reward scheme and promotional prizes under section 45 of the *Gaming Machines Act 2001*.

## 15. Information on the Gambling Incident Register

- The following text must be in your GPOM:

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 [X]**.

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. **[insert venue name]** is subject to the *Privacy Act 1988* (Cth) and related Australian Privacy Principles in the collection and use of information for the incident register.

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- Where the Register is kept (digital or physical).
- The requirement for the hotelier or club secretary to review the incident register on a monthly basis and consider what harm minimisation actions can be taken in response to trends in the register.

## 16. The venue's compliance with legislation

- The following text must be in your GPOM:

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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 docketts
- 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.

**[If your venue has an approval from the Secretary under clause 28(4) of the *Gaming Machines Act 2019*, insert requirements for the location of cash dispensing facilities]**

## **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.

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### 17. A statement that staff must not use gaming machines

- The following text must be in your GPOM:

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“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.”

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- Or, if your venue has stricter restrictions on staff using gaming machines at the premises, a statement that describes the restrictions.

### 18. A procedure for gaming-related customer complaints

- How patrons will be informed how to make a complaint
- The procedure for gaming related complaints, e.g. who will take the complaints, how they will be recorded, time periods for complaint resolution.

### 19. How misconduct will be reported

- The following text must be in your GPOM:

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

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- The contact information and web address of the Liquor & Gaming NSW complaints form.

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Email: [contact.us@liquorandgaming.nsw.gov.au](mailto:contact.us@liquorandgaming.nsw.gov.au)  
Phone: 1300 024 720  
Web:  
<https://www.liquorandgaming.nsw.gov.au/community-and-stakeholders/have-your-say/complaints/make-a-complaint>

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- How the hotelier or club secretary will ensure staff are aware of their ability to make complaints.

### 20. Information on familiarity with and availability of the GPOM

- The following text must be in your GPOM:

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“Staff must be familiar with the 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.”

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- An attachment to record staff who have read and declared that they understand the GPOM – names, signatures and date of signature.

### 21. How the GPOM will be reviewed

- The following text must be in your GPOM:

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“This GPOM must be reviewed at least annually, as well as periodically when modifications are required to reflect changes at [insert venue name], legislative changes or emerging risks.”

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- Note: updates to the Appendix for competency card records do not need to go through the process for a full version controlled update.
- An attachment with a table to record GPOM review and updates, including when the review occurred, who reviewed it, what (if any) changes were made, and the signature of the hotelier or club secretary as final approver.

## **22. Contact information for local licensing Police**

## **23. Any other GPOM content required by ILGA**

## **24. The following attachments:**

- A table to record staff who have read and declared that they understand the GPOM - staff names, signatures and date of signature
- A record of plan reviews and updates – a table that details the date of review, whether any changes were made and what they were (paragraph number and topic), who undertook the review and the signature of the licensee, approved manager or club secretary (as applicable)
- A record of the venue staff’s competency cards, including RCG and ARCG endorsements and expiry dates. (Note – updates to the attachment for competency card records does not count as an update to the GPOM content and does not need to go through the process for a full version controlled update)
- The venue’s liquor licence.
- Premises plan, with the location of the gaming room/gaming area/gaming machines, and cash dispensing facilities (ATMs, cash redemption terminals and/or cashier) and gambling incident register location.
- Appendix 3 of the Advanced Responsible Conduct of Gambling training participant workbook - ‘Warning signs of at-risk gambling behaviour and how to act on them’