
Advanced Responsible Conduct of Gambling

ARCG COURSE



Participant Workbook

Advanced Responsible Conduct of Gambling ARCG Course

Office of Responsible Gambling

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The content reflects legislation and regulatory guidance current as at the date of publication. While every effort has been made to ensure the accuracy and relevance of the information at the time of publication, gaming machine laws and regulatory requirements are subject to change. This workbook does not constitute legal advice and should not be relied upon as a substitute for seeking current legislative guidance or advice from your employer or a relevant regulatory authority.

You are responsible for keeping your knowledge up to date and for complying with the current legal obligations applicable to your role, workplace, and jurisdiction.

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Glossary of terms

Acronyms, abbreviations and definitions used in this course

Acronym

ARCG

ATP

EGM

GPOM

H&R

L&GNSW

NSW

ORG

RAAR

RCG

RGO

Description

Advanced Responsible Conduct of Gambling

Approved Training Provider

Electronic Gaming Machine

Gaming Plan of Management

Hospitality and Racing

Liquor & Gaming NSW

New South Wales

Office of Responsible Gambling

Rapport, Approach and assess, Assist, Report

Responsible Conduct of Gambling

Responsible Gambling Officer

Term

At-risk gambling

Competency card

Duty of care

Electronic Gaming Machine

Gambling harm

Gambling incident

Gambling incident register

Gambling warning signs

Definition

Gambling behaviour that is at-risk of leading to gambling harm.

Proof that a person has completed mandatory liquor and/or gaming industry training and is qualified to work in licensed venues in NSW.

The legal and ethical obligation to take reasonable steps to ensure the safety and wellbeing of patrons and the public.

A device that is designed for the playing of a game of chance or a game that is partly a game of chance and partly a game requiring skill, and for paying out money or tokens or for registering a right to an amount of money or money's worth to be paid.

Harm caused by, or associated with, gambling.

An incident (*reportable gambling incident*) that occurs at a hotel or registered club that must be recorded in a gambling incident register as soon as practicable but no later than 24 hours after the incident occurs.

A register kept by a hotel or registered club to record information about reportable gambling incidents that occur in the premises.

Any behaviour that suggests that someone might be experiencing some level of gambling harm.

Gaming area	An area or room in a hotel or registered club where approved gaming machines are located.
Gaming Plan of Management	A plan relating to the management of gaming for a hotel or club premises that address how the hotelier or registered club will comply with the <i>Gaming Machines Act 2001</i> in relation to specific provisions, and other matters the hotelier or registered club considers relevant.
Harm minimisation	Strategies designed to reduce the risk of gambling harm and supporting safe gambling environments.
Industry training	Mandatory training requirements to work in the liquor and gaming industries in NSW.
Liquor & Gaming NSW	The NSW government agency responsible for regulating the liquor and gaming industries, including RSA enforcement.
Patron	A customer, client, or guest who uses the services or facilities of a business. A person who is on a licensed premises (other than staff or contractors) to be served, entertained, or accommodated.
Patron care	Practices used to protect patrons' health, safety, and wellbeing including offering water, slowing service, and arranging transport.
Responsible conduct of gambling	The legal and practical approach to providing responsible gambling services, and to assist those customers who may be at risk of or are already experiencing harm from gambling.
Responsible Gambling Officer	A person appointed by a hotel or registered club to promote harm minimisation measures and ensure harm minimisation obligations under the Act and regulation are met. This includes identifying and making inquiries with patrons who are or are at risk of experiencing gambling harm.
Responsible gambling manager	A person employed or contracted by a hotelier or registered club who, when on duty supervises the responsible gambling officers for the hotel or club who are on duty at the time, or is the person to whom a Responsible Gambling Officer for the hotel or club reports.
Self-exclusion	A voluntary agreement in which a patron chooses to exclude (or 'ban') themselves from one or more gambling venues, or areas inside a gambling venue for a certain period of time (minimum 6 months).

ARCG Course Introduction



Introduction

Key to pictograms



Discussion



Activity



Case study



Important note



Video



Role Play

Welcome to the Advanced Responsible Conduct of Gambling (ARCG) course. This course equips Responsible Gambling Officers (RGOs), gaming operations supervisors, and venue leaders of hotels and clubs with gaming machines to proactively minimise gambling harm. Advanced responsible gambling practices are critical to maintaining safe and responsible gambling venues.

While the foundational Responsible Conduct of Gambling (RCG) course provides the essential compliance knowledge required for all gaming staff, Responsible Gambling Officers (RGOs), gaming operations supervisors, and responsible gambling managers are often required to respond in situations where the challenges extend beyond identifying warning signs or following standard RCG procedures. Venue leaders need to understand these challenges to support gaming operations staff by designing policies and operational plans that shape a venue-wide culture of safe and responsible gambling.

This course recognises these challenges and is designed for participants who already understand the responsible gambling foundations and are now required to extend those skills to a more advanced level.

Building on the RCG foundation, ARCG focuses on:

1. **complex patron interactions** in high-intensity situations
2. **application of behavioural models** to guide effective decision-making
3. **ethical judgment** in circumstances where legislation alone cannot provide operational guidance
4. **leadership responsibilities** in designing and implementing harm minimisation systems, culture, policies and procedures.

The ARCG course recognises that not all participants perform the same functions. For this reason, the course provides practical learning for distinct ARCG learner cohorts:

- **Gaming operations:** RGOs, gaming operations supervisors, and responsible gambling managers who interact directly with patrons on the gaming room floor.
- **Venue leadership:** Venue leaders who shape policies, oversee compliance, and lead organisational culture in venues with gaming machines.

Shared responsible gambling foundations in the opening module ensure all participants start ARCG training with a common understanding before focusing on role-specific contexts in the real-world gambling environment.

By completing this course, you will be equipped as skilled harm minimisation leaders who protect patrons, support staff, and uphold the integrity of gaming operations in NSW.

About this course

Who should complete ARCG training

ARCG training is mandatory for:

- Responsible Gambling Officers (RGOs)
- Staff responsible for the supervision of gaming machine operations and RGOs (if not undertaking RGO duties), for example, responsible gambling managers, gaming operations supervisors.
- Club secretaries
- Club directors, unless they have completed Responsible Gambling Board Oversight (RGOB) training
- Directors of a company that owns one or more hotels, where those directors have an operational role in the hotel business
- Hotel licensees
- Hotel 'approved managers' (as defined in section 91(1A) of the *Liquor Act 2007*).

This course is also suitable for staff with an existing RCG endorsement on their NSW competency card to improve their knowledge and skills in managing challenges that extend beyond identifying warning signs or following standard RCG procedures.

Course objectives

The ARCG course will enable you to:

- **interpret and respond** to complex behaviours using behavioural models and decision-making frameworks.
- **build** the confidence to manage high-intensity situations, including interactions with aggressive or distressed patrons.
- **practise** ethical decision-making where multiple obligations must be balanced including patron safety, commercial responsibilities, and staff wellbeing.
- **understand** how venue leadership roles contribute to shaping a culture of responsible and safe gambling within venues, ensuring that compliance is not just a rule to follow, but a standard of practice embedded across the organisation.
- **strengthen** leadership skills, enabling you to guide, mentor, and support staff in implementing harm minimisation strategies.

Course structure

This course contains 3 modules:

Module 1: Advanced Responsible Gambling Practice

Module 2: Advanced Gaming Operations

Module 3: Venue Leadership in Responsible Gambling



CONTENT WARNING

This course includes discussions on potentially triggering content including self-harm, mental health, and related topics. We acknowledge and respect the diverse backgrounds and experiences of participants and allow you to make informed choices about your engagement with this content, ensuring a supportive and safe training environment.

However, learning about these topics is critical to your role in providing a safe and responsible gambling environment for patrons and your venue.

Please speak to your trainer if you require further discussion or support.

Module 1

Advanced Responsible Gambling Practice



Module 1

Advanced Responsible Gambling Practice

Gaming operations and venue leadership

The Responsible Conduct of Gambling (RCG) course introduced the fundamentals of gaming operations and gambling harm. Advanced Responsible Conduct of Gambling (ARCG) takes the next step and is designed to help you put that learning into practice and strengthen your response skills.

Module 1 provides a shared foundation for all ARCG participants, whether your role is in gaming operations or venue leadership. It's about stepping up: moving from RCG compliance to ARCG competence in order to operate a safe and responsible gambling venue.

In this module, you will explore the foundation of responsible gambling, social responsibility, moving from RCG to ARCG, harm minimisation legal framework and the latest reforms. The following modules will then address the distinct ARCG learner cohorts – Gaming Operations and Venue Leadership.

Why this matters

This module sets the foundation and develops the mindset required for effective gaming harm minimisation in order to protect patrons, support staff, and safeguard the reputation and integrity of your venue.

Module one covers:

- Why responsible gambling matters
- Corporate social responsibility
- Compliance to competence (RCG to ARCG)
- Responsible gambling legal framework and reforms

By the end of this module, you will:

- reinforce your understanding of why responsible gambling matters
- understand social responsibility
- be able to differentiate between foundational RCG knowledge and advanced RCG practice
- know where to locate responsible gambling legislation
- know the latest gaming reforms

1.1. Why responsible gambling matters

Responsible gambling is the foundation of safe and sustainable gaming environments. At the advanced level, responsible gambling goes beyond meeting legal requirements. It's about shaping an environment where patron safety, staff wellbeing, and venue integrity are aligned and actively working together to proactively minimise gambling harm.

This responsibility doesn't rest solely with venue managers. Gaming operations staff such as Responsible Gambling Officers (RGOs), gaming floor supervisors, and responsible gambling managers are at the frontline of harm minimisation. These roles are leadership roles in practice. RGOs have distinct legal responsibilities to assist staff and management in ensuring the venue meets its harm minimisation obligations under the law. RGOs are also legally required to promote harm minimisation measures within the hotel or registered club.

Every interaction, observation, and decision you make can influence patron outcomes and shape the gaming culture of the venue.

Responsible gambling matters because:

- patron wellbeing depends on proactive action, not just compliance
- early intervention can prevent harm before it escalates
- staff confidence grows when responsible practices are modelled consistently, especially in complex or high-pressure situations
- venue reputation and sustainability rely on trust, which is built through ethical behaviour and proactive harm minimisation.

For gaming operations staff, this means recognising that harm minimisation is not an 'extra task' but a core part of your role. Every conversation with a patron, every decision under pressure, and every report you complete contributes to a safer gambling environment and a stronger venue harm minimisation culture.

For other venue leadership roles, this means designing policies, operational plans, and staff training and support pathways that create and sustain a strong and proactive culture of gambling harm minimisation.

Understanding why responsible gambling matters helps us see how the concept of 'social responsibility' fits into your role as a practical commitment to patrons, staff, and the community.

Activity 1: Responsible gambling in our venue

Reflective writing

"What does *Responsible Gambling* look like in our venue? What is one thing a patron would see, hear, or feel that tells them we take harm minimisation seriously?"



1.2. Social responsibility in gaming venues

What is 'social responsibility' and why does it matter?

Social responsibility is when an organisation takes responsibility for the impact it has on people, communities, and the environment, and works to make a positive difference. In the context of advanced responsible conduct of gambling, social responsibility refers to a venue's commitment to operate ethically, comply with legal and regulatory obligations, and take proactive steps to reduce gambling harm. It involves balancing the pursuit of profit with responsibilities to customers, employees, and the wider community in proactively promoting safe and responsible gambling practices.

The benefits of a gambling venue taking social responsibility seriously can include:

- **long-term sustainability:** patrons may be more likely to return when they trust the venue provides a safe and responsible gambling environment.
- **a positive reputation:** the venue is recognised by the public as a socially responsible business.
- **community acceptance:** by acting responsibly, the venue helps the gambling industry be seen as socially responsible.



Case study: Balancing profit and social responsibility

A company that operates venues with gaming machines was reviewing its social responsibility policy. While the company's primary responsibility to shareholders and members was to remain profitable and competitive, it also recognised its social responsibility: balancing business success with the potential harm its activities could cause patrons and the wider community. Failure to meet this social responsibility may lead to long term failure of the company's primary responsibilities.

The challenge was clear: maintain a profitable business while actively minimising harm and contributing positively to the community.

To address this, the company's board of directors implemented several initiatives:

- Train all venue staff to recognise and support patrons showing warning signs of gambling harm.
- Encourage senior staff to model and promote responsible gambling practices to all employees, both on paper and in person.
- Limit promotions that encourage prolonged gambling.
- Build relationships with local counselling and support services.

At the venue level, the company also:

- Sets targets to reduce the number of patrons experiencing gambling harm.
- Demonstrated social responsibility to patrons and the public by reporting, in their annual reports, entries from their gambling incident registers, including self-exclusion records and harm minimisation interventions with patrons.

Activity 2: Social Responsibility

Can you think of one other initiative to support social responsibility in a venue?



Your role in social responsibility

Being involved in gaming operations means you have a greater social responsibility to assist and support patrons and other staff. As an RGO or gaming operations staff member, you are often the first point of contact for patrons who may be experiencing gambling harm. Your actions can make a real difference.

This includes:

- promoting a proactive approach to gambling harm minimisation at your venue
- managing and de-escalating situations involving aggressive or distressed patrons
- maintaining accurate reporting and compliance
- providing support to staff managing difficult situations.

Every conversation, observation, and report contributes to a safer gambling environment and your venue's social responsibility to minimise gambling harm. Taking social responsibility seriously helps prevent harm, protects patrons, and strengthens your venue's reputation for care and compliance.

1.3. Advancing responsible gambling: RCG to ARCG

RCG training establishes the foundation of legal compliance, how gaming machines work, and basic patron intervention. It ensures that staff can recognise, respond, and record instances of gambling harm in accordance with legislative and regulatory standards.

ARCG extends this legal foundation and moves beyond compliance to competence including the ability to manage high intensity situations, make ethically informed decisions, and lead proactive harm minimisation effectively. Competence is displayed by understanding not only **what** to do, but **why and how** to do it in a way that supports patrons, protects staff, and strengthens the venue's harm minimisation culture.

While RCG asks, 'Did you follow the rule?', ARCG asks, 'Did you make the best ethical and strategic decision in a complex or unpredictable situation?'

Some key differences between RCG compliance and ARCG competence include:

	RCG compliance	ARCG competence
Purpose	Meet compliance obligations, follow the law, align with the national unit of competency SITHGAM022 Provide responsible gambling services.	The advanced requirement to lead harm minimisation in your venue and create a proactive culture of responsible gambling and continuous improvement.
Approach	Apply the RAAR framework step-by-step in straightforward situations.	Coordinate RAAR framework flexibly in complex, sensitive, and sometimes unpredictable interventions.
Communication	Establish rapport and use standard procedures to engage patrons.	Model advanced interpersonal skills and demonstrate rapport and patron management professionally under pressure.
Decision-Making	Follow prescribed procedures and checklists.	Use situational judgment, ethics, and leadership to guide appropriate, context-specific responses.

Scope of Responsibility	Individual-level focus on direct patron interactions.	Contribute to team and venue level harm minimisation. Contribute to venue harm minimisation policies, staff training and escalation pathways.
Outcome	Compliance achieved, incident documented.	Harm reduced, learning captured, and responsible gambling culture strengthened.

1.4 Responsible gambling legal framework

Both RCG and ARCG training are built on the legal framework under:

- *The Gaming Machines Act 2001* (NSW)
- *The Gaming Machines Regulation 2019*

Part 3 of the Regulation - *Responsible Gambling Practices and Other Harm Minimisation Measures* - focuses on the requirements to implement harm minimisation practices including:

- provisions related to player information
- cheques and cash dispensing facilities
- gaming machine threshold schemes
- miscellaneous harm minimisation measures
- Responsible Gambling Officers (RGOs)
- gambling incident registers
- Gaming Plans of Management
- Responsible Conduct of Gambling (RCG) training.

Gaming legislation can be found in [Appendix 1](#).

There have been several recent regulatory updates to responsible gambling requirements in NSW. These reforms help venues strengthen patron safety and improve harm minimisation practices. Here are some of the most important changes you need to be aware of:

- Responsible Gambling Officers (RGOs) are mandatory in venues with more than 20 gaming machine entitlements.
- Venues must maintain a gambling incident register, either in bound book format or digitally.
- All venues must have a completed Gaming Plan of Management (GPOM)
- Updated Responsible Conduct of Gambling training requirements
- Internal signage and ATM placement rules including:
 - hotels and clubs are prohibited from placing any signage or advertising relating to gaming machines where it is visible from a cash dispensing facility
 - any sign that advertises or gives direction to a cash dispensing facility is not allowed to be visible from a gaming machine or any part of a gaming area
 - cash dispensing facilities must be located outside of a 5-metre radius of any entrance to, or exit from a gaming area in a hotel or club
 - cash dispensing facilities must not be visible from a gaming machine or entry to a gaming room or area or room where gaming machines are located
 - a gaming machine or jackpot sign must not be visible from a cash dispensing facility.

Gaming reform updates can be found on the Liquor & Gaming [website](https://www.nsw.gov.au/business-and-economy/liquor-and-gaming/whatsnew/policy-reforms#toc-gaming-reform) (URL: <https://www.nsw.gov.au/business-and-economy/liquor-and-gaming/whatsnew/policy-reforms#toc-gaming-reform>)

Module wrap-up

You've just completed Module 1, which focused on the foundation of responsible gambling. You learned about:

- why responsible gambling matters
- social responsibility: explored through real-world examples and a case study showing how venues balance profit with patron care
- RCG vs ARCG: compared compliance and competence, highlighting why leadership matters in complex situations
- gambling harm minimisation legal framework and the latest reforms.

Reflective questions:

- How will you help embed social responsibility in your venue beyond ticking compliance boxes? What specific actions can you take this month?
- How will you ensure you stay up to date with ongoing gaming reforms?

Let's move on to Module 2: Advanced Gaming Operations.

Module 2

Advanced Gaming Operations



Module 2

Advanced Gaming Operations

Gaming operations

Gaming operations staff play a critical role in protecting patrons and supporting colleagues. While all gaming staff have a duty of care, RGOs, gaming operations supervisors and responsible gambling managers are often the first responders in high-intensity situations involving gambling harm and often face situations that challenge routine RCG procedures.

Module 2 focuses on advanced, hands-on gaming operations, responding effectively to complex, high-risk, and volatile situations while maintaining professional standards and patron safety.

The module focuses on advanced interpersonal and operational skills required to engage effectively with patrons who may be resistant, aggressive, distressed, or in crisis. It also explores strategies for managing the personal and professional impact of repeated exposure to patrons experiencing gambling harm.

Why this matters

Gaming operations staff are the eyes, ears, and voice of harm minimisation in gaming venues. By applying advanced interpersonal and operational skills, you are not only protecting patrons but also supporting your colleagues, building resilience, and strengthening the reputation and compliance of your venue.

This module covers:

- Supporting the journey toward change
- Behavioural models
- Responsibilities of Responsible Gambling Officers (RGOs)
- Advanced application of the RAAR framework
- De-escalation under pressure
- Incident escalation and documentation
- Resilience and peer support

By the end of this module, you will be able to:

- adapt the RAAR framework for complex, high-intensity situations where patrons may resist or decline assistance
- apply de-escalation techniques to engage patrons who are aggressive, distressed, or at risk of self-harm
- accurately document, escalate, and report gambling harm incidents using factual, professional communication
- apply personal resilience and peer-support strategies to protect your wellbeing in high-stress environments.

2.1 Supporting the journey toward change

Understanding gambling harm isn't just about recognising warning signs. It's about understanding where a person is in their journey toward change.

In advanced responsible gambling practice, staff in gaming operations often engage with patrons who are experiencing gambling harm but are at different levels of awareness or readiness to act. Some may deny there's a problem. Others may be struggling but unsure what to do. A few may be ready to take steps toward help or self-exclusion.

The goal isn't to force change, but to support patrons to move towards it. In ARCG, supporting patrons to move toward behavioural change is essential in minimising gambling harm. You want to shift your work from reactive compliance ('I must respond if I see harm') to proactive, person-centred support ('I can guide this person toward help in a way that fits their readiness').

Stages of Change behavioural model

The Stages of Change model (also known as the Transtheoretical Model) is a behavioural model that explains how people move through stages when changing behaviour (Raihan & Cogburn., 2023).

The Stages of Change model was developed by psychologists James Prochaska and Carlo DiClemente (Prochaska J. O. DiClemente C. C. Norcross, 1992). The behavioural model shows that change doesn't happen all at once. People move through a series of stages as they think about, prepare for, and take action to change their behaviour.

The Stages of Change model gives a clear framework for recognising these differences and adjusting your approach with patrons on the gaming room floor. Instead of applying one response to every situation or patron, it encourages you to meet patrons where they are, offering the right type of support at the right time.

The Stages of Change behavioural model has 5 stages.

Stage 1: Pre-contemplation: "I don't have a gambling problem"

Stage 2: Contemplation: "Maybe I should do something about it"

Stage 3: Preparation: "I'm thinking about making a change"

Stage 4: Action: "I'm taking steps to change"

Stage 5: Maintenance: "I'm trying to stay on track"

By understanding where a patron is on their journey of change and adjusting your approach, you can:

- tailor communication and intervention strategies to each stage of readiness
- have a better chance at reducing defensiveness and conflict
- increase the chance of genuine, lasting behaviour change
- build stronger, more trusting relationships with patrons and staff
- strengthen your venue's reputation for care, safety, and community responsibility.

Let's take a look at the model in the context of gambling practice, focusing on what you can do at each stage to support patrons effectively. This means recognising their readiness for change, adjusting your communication style, and offering practical options without pressure.

Stage 1	Description
 Pre-contemplation “I’m not experiencing any harm from gambling”	Pre-contemplation is the hardest stage when approaching a patron because they often don’t see an issue and can feel irritated by any intervention. At this stage, the patron doesn’t see their gambling as harmful. The goal here is zero confrontation, maximum rapport, and planting a seed for future reflection without triggering defensiveness. Your approach • “Hi, just checking in - how’s your night going?” Example patron phrases • “Just having a slap” • “I’m fine, why are you asking?” Tone or behaviour cues • relaxed or dismissive tone • laughs off concern • annoyed you approached them Best next step Keep it light. Build rapport. Offer information casually: • “We check in with everyone from time to time - it’s just part of keeping things safe.” • “Enjoy your night and let me know if you need water or a would like to take a break.” Why this works ✓ Normalises the check-in so it doesn’t feel targeted. ✓ Affirms autonomy (“no pressure at all”) to reduce resistance. ✓ Keeps it light and casual. You’re not diagnosing a problem, just offering care. ✓ Plants a thought without forcing action (mentioning “keeping play safe” subtly introduces harm minimisation).
Stage 2	Description
 Contemplation “Maybe I should do something about it.”	Here, the patron starts to recognise that gambling might be an issue but feels uncertain. They may feel conflict between wanting to stop and wanting to keep going. They might express guilt, confusion, or fear about how change might impact them. Your approach • “Hi, just checking in - how’s your night going?” Example patron phrases • “Maybe I should slow down.” • “I’m starting to worry about how much I’ve spent.” • “Do you know if self-exclusion is hard to undo?” Tone or behaviour cues • Hesitant or conflicted tone • Mentions guilt or uncertainty • Pauses before answering • Avoids eye contact or looks worried

	Best next step Listen actively. Reflect what you hear without judgment. Offer information gently: • “It sounds like you’re not sure what to do next.” • “Lots of people feel this way, it’s normal.” • “If you’d like, I can share some options like taking a break or finding the right support. Totally your choice.” Why this works ✓ Shows empathy and validates feelings without pressure ✓ Keeps control with the patron, reducing defensiveness ✓ Introduces help as an option, not an obligation ✓ Builds trust by normalising uncertainty
Stage 3	Description
 Preparation “I’m thinking about making a change.”	The patron is now considering or planning specific steps, such as talking to a counsellor, setting spending limits, or signing up for self-exclusion. They’re still uncertain but are beginning to take ownership of their gambling behaviour. Your approach • “Hi, just checking in - how’s your night going?” Example patron phrases • “I think I need to make a change.” • “I’ve been looking at options.” • “Can you tell me how self-exclusion works?” Tone or behaviour cues • Curious or hopeful tone • Asks practical questions • Mentions planning or next steps • Appears more relaxed than before Best next step Provide clear, practical information. Offer privacy for the conversation. Encourage small, achievable goals: • “We can go through the process together. It’s straightforward and confidential.” • “That’s a great step. What would make this easier for you?” • “Would you like some info on self-exclusion or support services?” Why this works ✓ Supports motivation without overwhelming the patron ✓ Gives practical steps at the right time ✓ Reinforces autonomy and dignity ✓ Builds confidence in taking action

Stage 4	Description
 Action “I’m taking steps to change.”	At this stage, the patron is actively changing their behaviour, for example, taking a break from gambling, seeking professional help, or setting financial boundaries. Your approach • “Hi, just checking in - how’s your night going?” Example patron phrases • “I want to self-exclude today. I’ve already called the helpline.” • “I really need some help; I’m in financial trouble.” • “I need to talk to someone; I can’t stop playing!” Tone or behaviour cues • Determined tone • Direct requests for help • Calm but focused behaviour • Engages openly with staff Best next step Act promptly and respectfully. Ensure privacy and explain the process clearly: • “We’ll do this together. It’s confidential and I’ll make sure you understand each step.” • “Good on you for taking this step. It’s a positive move.” • “Let’s make sure you have everything you need.” Why this works ✓ Reinforces positive behaviour and commitment ✓ Maintains trust and dignity during a sensitive process ✓ Provides immediate support without delay ✓ Strengthens the venue’s harm minimisation culture
Stage 5	Description
 Maintenance “I’m trying to stay on track.”	The patron has made changes and is working to maintain them. They may face challenges such as relapses, stress, or temptation to return to old gambling habits. Your approach • Recognise that relapse is part of the process, not a failure. • Reinforce positive behaviours and offer encouragement if they return to old habits. • Continue to treat the person with dignity and respect. Your attitude can influence whether they feel comfortable seeking help again. Why this works ✓ Reinforces progress, acknowledging the patron’s efforts ✓ Normalises setbacks, treating lapses as part of the process ✓ Maintains dignity and trust ✓ Keeps support available, reminding patrons they are not alone

By applying this model, gaming operations move beyond identifying harm to supporting real, sustainable change in patrons and across the venue's broader culture of patron care and gambling harm minimisation.



“Change is a process, not an event. In ARCG practice, this means shifting from a compliance mindset only (‘I must respond to gambling harm’) to an ARCG leadership mindset (‘I can guide and support people through change’).”



Activity 3: “Meeting people where they are at”

Applying the stages of change to gambling harm situations

The purpose of this activity is to explore how understanding a patron's readiness for change can guide the way you communicate, respond, and support them effectively.

Read each scenario below. For each one:

- Identify which stage of change the patron seems to be in.
- Describe how you would respond in a way that matches their readiness for change.
- Note what you would avoid doing (things that might make the situation worse).

Scenario A - “Trying to Stay on Track”

A former regular returns after several months away from the venue. They say they've been doing better but admit they feel “tempted to play again for old times' sake”.

Stage of change	Best way to respond	What to avoid



Scenario B - “The Turning Point”

A patron tells you they’re starting to worry about how much they’ve been spending and asks if self-exclusion is “hard to undo”. They seem nervous but open.

Stage of change	Best way to respond	What to avoid

Scenario C - “The Lucky Streak”

A regular patron insists they’re “just unlucky lately” and becomes defensive when staff check in. They often laugh off concern and say, “I know what I’m doing”.

Stage of change	Best way to respond	What to avoid



Scenario D - “Taking Steps”

A patron comes to the desk asking for information about self-exclusion and mentions they’ve already called a gambling help line.

Stage of change	Best way to respond	What to avoid



“Effective gambling harm minimisation means meeting patrons where they are, not where we wish they were. Each conversation is a chance to build trust and help them move one small step closer to change.”

2.1.1 Stages of Change and self-exclusion

Self-exclusion is a formal, voluntary agreement where a patron chooses to ban themselves from part or all of a hotel or club that has gaming machines for a specific period of time. The minimum period for self-exclusion from hotels and clubs is 6 months.

Under NSW legislation (*Gaming Machines Act 2001*, Section 49), every hotel and club with gaming machines must provide and promote access to a self-exclusion scheme. This means:

- patrons must be able to easily request self-exclusion
- the venue must make information available about how the process works
- the venue must act respectfully and in line with regulations when enforcing the exclusion.

Self-exclusion is always the patron’s choice. It cannot be forced on anyone. However, once a patron has enrolled, the venue is legally allowed to:

- prevent them from entering the nominated gaming area, or
- ask them to leave or remove them from the nominated area.

A responsible person (and the venue itself) cannot be held legally liable (civil or criminal) for performing the above actions if done in good faith, and in accordance with the regulations, or if a participant enters or remains in the nominated area.

Why self-exclusion matters in harm minimisation

Self-exclusion is one of the strongest protective tools for reducing gambling harm. It supports patrons who are ready to make a decision to change their gambling behaviour, a critical step often seen in the **Action** stage of the Stages of Change model.

However, you should recognise that not all patrons are ready for self-exclusion. Understanding the stages of change helps identify where a person might be in their readiness for self-exclusion, and how to respond accordingly.

Stage of change	Self-exclusion
Pre-contemplation	Generally, not discussed. Pre-contemplation is about building rapport, raising gentle awareness, no pressure to act.
Contemplation	Explore their concerns, provide info on self-exclusion without pushing.
Preparation	Offer clear, supportive information on self-exclusion, explain the process and next steps.
Action	Support and action self-exclusion immediately and respectfully, ensuring privacy and understanding.
Maintenance	Continue supportive contact if appropriate; never shame or judge if relapse occurs. Remember, once a patron has enrolled, the venue is legally allowed to prevent them from entering the nominated gaming area or ask them to leave if they do enter.

Ethical self-exclusion management means balancing respect for autonomy with duty of care. That means:

- never pressuring someone into self-exclusion
- always providing accurate information
- ensuring follow-up processes protect dignity and privacy

It is important that there are systems in place in your venue to support the self-exclusion process. To support the self-exclusion process, venues need clear procedures, confident staff, and a culture that sees self-exclusion as a positive step toward change rather than a punishment.



Video

Let's take a look at 3 videos showing patrons' responses to offering self-exclusion at different stages of change: Pre-contemplation, Preparation, and Action. While you are watching, think about whether patrons at your venue would respond in the same way. Would you raise self-exclusion any differently?

How to self-exclude

There are several ways a patron can self-exclude from a venue or part of a venue, they want to be excluded from:

- Your venue can run its own self-exclusion scheme if it meets the minimum requirements set by the Gaming Machines Regulation 2019. The patron must contact the venue directly and let them know they want to self-exclude. The patron will sign a gaming self-exclusion agreement identifying if they would like to be excluded from specific areas within the gaming venue (like the gaming room) or excluded from the entire venue.

- Your venue can use a self-exclusion provider, which may include the offer of counselling services. Examples of providers include:
 - **BetSafe** assisting patrons to self-exclude from up to 50 NSW hotels and clubs [online](https://www.betsafe.com.au/self_exclusion) (URL: https://www.betsafe.com.au/self_exclusion)
 - **ClubsNSW** offering ClubSAFE's Multi-Venue Self-Exclusion program enabling applicants to ban themselves from multiple venues [online](https://mvse.com.au/self-facilitation) (URL: <https://mvse.com.au/self-facilitation>)
- [GambleAware](https://www.gambleaware.nsw.gov.au/i-need-support) counsellors can explain options to patrons and help them self-exclude (URL: <https://www.gambleaware.nsw.gov.au/i-need-support>)
- any other body that receives funding from the [Responsible Gambling Fund](https://www.gambleaware.nsw.gov.au/) (URL: <https://www.gambleaware.nsw.gov.au/>) to provide gambling-related counselling or self-exclusion services.

You can find out more including the rules, responsibilities, and support options available for gaming self-exclusion in NSW [on the L&GNSW gaming self-exclusion web page](https://www.nsw.gov.au/business-and-economy/liquor-and-gaming/gaming/responsible-gaming/self-exclusion) (URL: <https://www.nsw.gov.au/business-and-economy/liquor-and-gaming/gaming/responsible-gaming/self-exclusion>).

Non-voluntary exclusion and banning orders

Under the NSW *Liquor Act 2007*, non-voluntary exclusion (refuse to admit a patron or remove them from the venue) and banning orders (a patron must not enter or attempt to enter, or remain on, the licensed premises) are available to licensed premises for patrons who:

- are intoxicated, violent, quarrelsome or disorderly, or
- whose presence on the licensed premises could result in the licensee receiving a penalty or fine under the *Liquor Act 2007*.

This includes the behaviour occurring in or outside of a prescribed gaming area as licensed premises are required to conduct their business activity in accordance with both NSW [liquor](#) and [gaming](#) laws.

Unlike gaming self-exclusion under the Gaming Machines Regulation, the *Liquor Act* non-voluntary exclusion or banning order is not voluntary on the part of the patron.

2.2 Responsible Gambling Officers (RGO)

As part of a suite of gaming reforms to identify and support patrons at risk of gambling harm, hotels and clubs with more than 20 gaming machine entitlements must have at least one Responsible Gambling Officer (RGO) on duty at all times while gaming machines are in operation. Certain venues in NSW are required to have an RGO on duty as a licence condition, even if they hold fewer than 21 gaming machine entitlements.

The role of an RGO represents more than compliance. It represents the venue's commitment to minimising gambling harm, and to patron care, integrity, and accountability. While regulations define what an RGO must do, advanced responsible gambling practice focuses on why those duties matter and how they create safer, more responsible gambling practices.

RGOs also have leadership responsibilities in a venue. Their legal duties include assisting staff and management in ensuring the venue meets its harm minimisation obligations under the Act and Regulation, and to promote harm minimisation measures within the hotel or registered club.

An effective RGO is the eyes and ears of the gaming room floor. They observe behaviour, support patrons, and ensure every action aligns with harm minimisation principles. Their work protects not only individual patrons at risk of gambling harm, but also the reputation of the venue.

At the advanced level, this means seeing each responsibility not as a task to complete, but as a professional ethical duty. Every observation, conversation, and report contributes to a culture where gambling is conducted safely, responsibly, and where patrons feel supported rather than judged.

2.2.1 RGO duties and responsibilities

The duties set out under the Gaming Machines Regulation 2019 Division 4A *Responsible gambling officers* provide a legal framework for RGO responsibilities.

An RGO must perform the following duties:

- a. identify patrons who are, or are at risk of, experiencing gambling harm,
- b. identify patrons who are displaying behaviour related to gambling harm,
- c. make inquiries with a patron if the officer suspects the patron is, or is at risk of, experiencing gambling harm,
- d. notify senior management of serious instances of patrons who are, or are at risk of, experiencing gambling harm for the purposes of enabling senior management to intervene,
- e. facilitate requests by patrons for information about, or to participate in, self-exclusion schemes conducted by the hotelier or registered club,
- f. record, in the hotel's or registered club's gambling incident register, incidents observed by the officer relating to persons who are, or are at risk of, experiencing gambling harm or who are displaying behaviour related to gambling harm,
- g. assist staff and management in ensuring the hotel or registered club meets its harm minimisation obligations under the Act and this regulation,
- h. promote harm minimisation measures within the hotel or registered club.

In carrying out RGO duties:

- An RGO may seek the assistance of another employee of the venue.
- When on duty, each RGO is fully accountable for performing all RGO responsibilities, regardless of whether other RGOs are also on duty.
- An RGO may carry out additional venue-related tasks provided the alternative duties are secondary and do not override or prevent them from performing their legislated RGO duties, except in an emergency.

RGO alternative duties prior to midnight

Prior to midnight, RGOs may perform additional venue-related tasks in or outside of the gaming room or gaming area while on duty, including (but not limited to) the responsible service of alcohol, venue cleaning, pack down procedures, re-stocking activity, general customer service of patrons, or any other appropriate work-related task, as long as they are secondary to their legislated RGO duties under section 50F of the Gaming Machines Regulation 2019.

RGO alternative duties midnight to 8am

Between midnight and 8am, RGOs on duty can only perform alternative venue-related tasks if they can maintain at all times visibility of approved gaming machines in

operation. Examples of duties may include clearing glasses from the gaming room floor without losing visibility of the gaming area, cleaning the gaming room, reviewing the gambling incident register in the gaming room area, or any other appropriate work-related task, as long as they maintain visibility of the approved gaming machines in operation and are able to perform their legislated RGO duties under section 50F of the Gaming Machines Regulation 2019.

A hotelier or registered club does not commit an offence if the Responsible Gambling Officer carries out other duties required under an Act or law.

2.2.2 RGO duties of a hotelier or club

The Gaming Machines Regulation ensures that RGOs are strongly supported by their venue leadership. Penalties apply if the following regulations are not upheld (maximum 50 penalty units or \$550).

Before appointing an employee as a Responsible Gambling Officer, the hotelier or registered club must:

- inform the employee about the duties of an RGO
- ensure the employee understands the duties, and
- ensure the employee has the opportunity to raise issues about the duties.

A hotelier or registered club must also:

- a. take reasonable steps to ensure the RGOs on duty perform RGO responsibilities
- b. ensure work health and safety procedures and policies are followed to support RGOs
- c. ensure RGOs have the opportunity to raise issues about their duties, and
- d. ensure any issues raised are addressed
- e. ensure the RGOs on duty are not hindered by hotel or club staff in carrying out their responsibilities
- f. inform the RGO on duty of any patrons who are reasonably suspected to be experiencing, or at risk of experiencing, gambling harm, and
- g. assist patrons who are at risk of experiencing gambling harm or who are displaying behaviour related to gambling harm.
- h. not direct, encourage, request, or assist an RGO to contravene the *Gaming Machines Act* or *Gaming Machines Regulation*.

2.2.3 RGO complaints and concerns pathway

RGOs must be able to perform these duties knowing they are supported by both the law and their venue's commitment to responsible and safe gambling conduct.

An RGO can make a complaint or raise a concern with the following people if something is preventing them from properly carrying out their duties:

- the Secretary (The Department of Creative Industries, Tourism, Hospitality and Sport (DCITHS), within which Liquor & Gaming NSW (L&GNSW) resides),
- the hotelier or registered club,
- the manager or supervisor.

An RGO can make a complaint or inquiry to The Department if:

- the RGO is being, or has been, hindered in carrying out their RGO duties by the hotelier or registered club or the manager or supervisor.
- the hotelier or registered club or the manager or supervisor have taken, or may take, adverse action against the RGO for carrying out RGO duties.

Ultimately, the effectiveness of an RGO is measured not only by compliance, but by the confidence and integrity with which they carry out their duties.

The Regulation's legal protection ensures that RGOs can lead with confidence, influencing standards, supporting patrons, and upholding the venue's ethical and legal obligations. Through independent, compassionate practice, RGOs strengthen a culture where harm minimisation is more than policy. It is active, accountable advanced responsible conduct of gambling leadership in practice.

You can find out more information about RGOs including venue requirements and FAQ on the [L&GNSW website](https://www.nsw.gov.au/business-and-economy/liquor-and-gaming/gaming/responsible-gaming/responsible-gambling-officer) (URL:https://www.nsw.gov.au/business-and-economy/liquor-and-gaming/gaming/responsible-gaming/responsible-gambling-officer).

2.3 Advanced application of RAAR framework

The RAAR framework (**R**apport, **A**pproach and assess, **A**ssist, **R**eport) taught in the RCG foundation course provides the framework for responsible gambling interactions. At the RCG level, RAAR is used as a step-by-step operational tool for staff to engage with patrons who may be at risk of gambling harm.

At the ARCG level, RAAR remains a step-by-step operational tool, but it also becomes a strategic framework. It can be used to coordinate staff responses, ensure consistency, and build gambling harm minimisation principles into venue culture, training, and reporting systems.

How RAAR changes at the advanced level:

RAAR	RCG use	ARCG use
Rapport R	Establish a respectful connection with the patron. Use professionalism and respect to create trust.	Lead by example in building rapport under pressure. Model for staff the tone and body language they should use. Model how to maintain rapport even in high-stress or repeat interactions.
Approach and assess A	Approach the patron discreetly, observe behaviour, and assess if there are signs of gambling harm.	Decide who should approach, when, and how, based on safety, risk, and context. Support staff in interpreting subtle or conflicting cues. Proactively focus on approaching and assessing to minimise gambling harm.
Assist A	Offer practical information such as helpline contacts or self-exclusion details.	Coordinate tailored assistance that integrates trauma-informed and culturally sensitive support. Ensure appropriate escalation to management.
Report R	Record the interaction according to policy and notify management if required.	Oversee reporting processes to ensure accuracy, confidentiality, and follow-up. Use report data to identify trends, staff training needs, and opportunities for staff learning and growth.

At the advanced level, RAAR is not just about what you do, it's about how you support others to do it well. Gaming operations and venue leaders can also apply RAAR to:

- **coordinate** complex cases involving multiple patrons or staff
- **analyse and improve** procedures based on reported gambling harm patterns
- **build learning** into staff development and team culture
- **mentor** staff through difficult or emotional interactions.

Advanced application of the RAAR framework focuses on handling situations that are volatile, high-risk, or ethically complex. It supports gaming operations staff to make rapid, informed decisions while maintaining professionalism and safety.

2.3.1 **R**APPORT: engaging resistant patrons

Building rapport is the foundation of every responsible gambling interaction but at the advanced level, gaming operations staff must know how to maintain connection when rapport is tested.

The foundations of building rapport with a patron in any situation include:

Warm, respectful approach

Treat every patron with courtesy, patience, and professionalism. A respectful tone immediately helps reduce defensiveness and signals that your intentions are supportive.

Use open and friendly body language

Maintain a calm posture, relaxed facial expression, and appropriate eye contact. Your non-verbal communication often sets the tone before you say anything.

Start with a neutral, non-judgmental check-in

Begin conversations casually and without assumptions. Simple lines like *"Hi, just checking in, how's your night going?"* help normalise interactions and avoid singling people out.

Listen actively

Show you are genuinely paying attention. Allow the person to speak without interruption and reflect back what you hear in plain language.

Validate feelings without agreeing or disagreeing

Validation shows understanding, not approval. Statements like *"I can hear this has been a tough night for you"* help build trust and reduce tension.

Maintain the patron's sense of control

Avoid telling the patron what to do. Offer choices, options, and information rather than instructing them. Allowing the patron to make their own decisions makes them less defensive and strengthens rapport.

Keep the interaction calm and well-paced

Speak slowly and clearly. Your calmness can help manage the patron's emotional state and help keep the conversation safe and constructive.

Be consistent and genuine

Patrons quickly sense when you are being insincere. Genuine concern, consistent tone, and professional behaviour create trust.

Responding to resistance

Some patrons may deny gambling issues, resist conversation, or deflect concern. These are moments when professionalism and confidence matter most.

Resistance doesn't always look like confrontation. It can appear as humour, avoidance, defensiveness, or sudden withdrawal. Recognising these verbal and non-verbal cues allows you to adjust your approach and keep the conversation constructive. In these situations, tone, body language, and timing are as important as the words used. The goal is not to convince the patron they have a problem, but to create an opening for reflection and support.

To effectively engage patrons who may be dismissive, defensive, or minimising their behaviour, you need to be able to apply these skills in a real-world gambling environment.

Action	Description
Recognise cues of resistance or minimising risk of harm behaviour	Resistance shows up verbally and non-verbally. Being able to spot it early helps you adjust your approach before the situation escalates.
	Common verbal cues: • "I'm fine." • "I can handle it." • "Everyone plays this much." • "Why are you asking me? I'm not doing anything wrong." Non-verbal cues: • Turning back to the machine quickly • Avoiding eye contact • Laughing or shrugging off concern • Body stiffening, crossed arms • Sudden change in tone or pace of speech
	Practical example: You approach a regular patron who's been playing for 3 hours. They force a laugh and say, "I'm just trying my luck, nothing to worry about." They immediately turn their shoulder away and start pressing the machine faster. These are clear cues of minimising and subtle resistance.
Adjust the approach, balancing firmness with empathy	The goal is to stay calm, respectful, and clear while maintaining boundaries. You are not trying to convince them they are at risk of gambling harm, you are creating a safe opening and rapport.
	What this sounds like: • "I hear you. I'm not here to pressure you. We check in with everyone just to make sure they're okay." • "I can see you'd prefer to keep playing. Before I go, I just want to make sure you're comfortable and have everything you need."
	Practical example: A patron snaps, " <i>Stop hovering, I'm fine!</i> " Instead of backing away abruptly or becoming firm, you can say: "I hear you. I'm not here to interrupt your night. We just like to check in when someone has been playing for a while. If you need water or want a break at any stage, I'm here to help." This keeps rapport without abandoning duty of care.

Action	Description
Use targeted, clarifying questions (not generic ones)	Generic questions like “Are you okay?” lack clarity and often trigger defensiveness. Targeted questions show you’ve noticed something specific and open a door for reflection.
	Instead of: • “Are you okay?” • “Is everything alright?” Try: • “I’ve noticed you’ve been here for a longer session than usual. How are you feeling so far?” • “You seem a bit stressed tonight. Is there anything I can do to support you?”
	Practical example: A patron looks frustrated and keeps muttering at the machine. You can say: “I’ve noticed you’re having a tough run and seem a bit stressed. Want to take a minute to chat or take a little break and grab some water?” This targeted acknowledgement invites them to talk without judgment.
Maintain a calm, confident presence	Your tone, posture, and pace will shape how the patron responds. Staying steady can prevent escalation and keep the conversation safe.
	Calm presence examples: • Speak slowly and evenly • Stand at a relaxed angle (not face-to-face) • Keep your hands visible and movements steady • Nod to show you’re listening • Avoid hovering or looming over a patron
	Practical example: A frustrated patron raises their voice and says, “<i>Why do you keep bothering me?</i>” Rather than matching their intensity or withdrawing abruptly, you respond in a calm, even tone: “I can see this is frustrating. I’m here to support you, not interrupt you. Let’s just take a moment.” Your calm presence helps regulate their emotional state.
Accept that resistance is normal	Patrons may minimise, deny, or avoid talking about gambling harm. This is part of the behavioural change process, not a failure of your approach.
	What acceptance looks like in practice: • You don’t push for a breakthrough • You leave the interaction on good terms • You offer options, not pressure • You plant a small seed for future reflection
	Practical example: A patron says, “<i>I don’t need help, just leave me alone.</i>” You respond calmly: “<i>No problem. If you ever want support or information later, come and find me. I’m here to help.</i>” Even if nothing changes now, you’ve created a safe starting point for next time and contributed to consistent harm-minimisation messaging.



Activity 4: Reading resistance

Scenario

A regular patron, Fiona, has been staying at the gaming machines much later than usual. She laughs off your attempt to chat and says, "I just need a bit of luck tonight, you know how it is." When you gently mention she's been playing a lot recently, she replies, "I'm fine, you don't need to worry about me," and turns back to her game.

Task

1. Identify two signs of resistance in this interaction (one verbal, one non-verbal).	
2. Reflect: What's the difference between <i>pushing a conversation</i> and <i>keeping the door open</i> for one?	
3. Write or discuss a way you could respond that: • Keeps rapport intact, and • Encourage reflection without causing defensiveness.	

2.3.2 **A**PPROACH and ASSESS: patron needs in volatile environments

Gaming operations staff often work in dynamic environments where emotions, alcohol, and financial stress can combine to create volatile or unpredictable behaviour. In RCG we covered the basics of approaching and assessing. Advanced responsible gambling practice requires the ability to quickly assess safety, risk, and readiness for engagement, even when conditions are uncertain or unpredictable.

In volatile situations, patrons may respond unpredictably, and your ability to *approach and assess* effectively becomes critical. This means identifying early signs of risk, choosing the right moment to engage, and using clear, calm communication to understand what the patron needs. The skills below help you navigate these moments safely and confidently so you can make sound, on-the-floor decisions to decide if, when, and how to intervene.

1. Reading the environment

Volatile environments aren't always loud or aggressive. They can be any situation where a patron's emotional, physical, or psychological state affects their judgment or increases risk. This may include:

- alcohol consumption
- emotional distress such as crying, agitation, sudden mood swings
- fatigue or disorientation
- overreacting to small wins or losses
- conflict or tension with other patrons.

You should scan for these indicators continuously, not to police patron behaviour, but to pre-empt potential gambling harm or escalation.

Reflection question:

Which environmental cues (emotional, physical, or social) do you tend to pick up on first? Are there any that you perhaps unintentionally overlook?

2. Making an assessment

When assessing a volatile situation, you will have to balance 3 priorities:

- Safety: protect patrons and staff.
- Respect: maintain dignity and avoid public humiliation.
- Accountability: act in line with venue policy and regulatory requirements.

Assessment often happens in a split second. It requires observing, pausing, and deciding:

- Is this situation safe to approach alone?
- Do I need a colleague or gaming operations supervisor present?
- What tone and distance are most appropriate for this conversation?

Advanced judgment also means knowing when **not** to engage immediately. For example, if a patron is visibly angry (but not violent, quarrelsome, or disorderly), waiting for a calmer moment may lead to a more effective and respectful conversation.

Reflection question:

When you think about recent patron interactions, how effectively did you balance safety, respect, and accountability? And where could your assessment be sharper?

3. Communicating well under pressure

How gaming operations staff communicate under stress sets the tone for everyone else on the gaming floor. In volatile moments, your communication must remain calm, clear, and purposeful.

- Use a steady, neutral, professional tone. Not overly friendly but never confrontational.
- Keep statements factual: *“I’m concerned about your wellbeing tonight,”* rather than *“You’ve spent way too much time on that machine.”*
- Be brief and clear. Patrons in heightened emotional states may struggle to process long explanations or complex instructions.
- Show understanding and create space with statements like: *“I can see you’re upset. Let’s step away from the machines for a minute.”*
- Prioritise safety. Always position yourself with an exit route and have a line of sight to other staff or security.

The purpose of communication in these moments is not to resolve everything immediately, but to stabilise the situation and keep everyone safe until a fuller conversation can occur.

Reflection question:

How effectively do you stay calm, clear, and factual when communicating under pressure, and what is one area you want to improve?

4. Gaming operations supervisor role in volatile situations

Gaming operations supervisors and responsible gambling managers play a critical role in supporting RGOs during high-pressure situations. They must:

- monitor situations where multiple staff are responding at once
- step in when patron behaviour becomes violent, quarrelsome, or disorderly
- debrief RGOs after difficult incidents to reinforce learning and maintain staff wellbeing.

In challenging moments, good supervision helps staff stay focused on what matters most; keeping everyone safe, showing empathy, and following proper procedures, even if it means pausing service or temporarily inconveniencing a patron.

Reflection question:

How confident are you in knowing when to step in during a volatile situation, and what support would help you strengthen this judgment?



Activity 5: Rapid assessment in action

Scenario

A patron, Jason, appears visibly upset after several large losses. He’s pacing near the ATM and muttering angrily to himself. Another patron looks uncomfortable and signals to you. Jason’s face is flushed, and his movements are jerky.



Task

1. Reading the environment.
List two emotional, physical, or psychological indicators that pre-empt potential gambling harm or risk of escalation?

2. Making an assessment.
Identify the **first 2 steps** you would take in balancing safety, respect, and accountability?

3. Communicating under pressure.
What would be your opening communication when approaching Jason?

2.3.2.1 Ethical decision making when assessing

At the advanced level of responsible gambling, you may face situations where the 'right' choice isn't always clear. You may need to balance competing responsibilities like respecting a patron's privacy while protecting their wellbeing.

This is where ethical decision-making becomes central to ARCG practice. It's not just about following rules, it's about using sound judgment, empathy, and integrity to act in the best interests of both patrons and the venue.

Common ethical challenges

Confidentiality vs duty of care

Responsible gambling work involves sensitive information including what patrons disclose, what staff observe, or what colleagues share during debriefs. Sometimes, keeping a patron's trust can seem to conflict with the need to act.

For example:

- A patron confides that they're in serious financial distress but asks you not to tell anyone.
- You know that continuing to gamble could cause further harm but sharing this with management might feel like a breach of confidence.

The ethical question:

When does our duty of care to act on signs of gambling harm take priority over a patron's request for confidentiality?

In practice:

- Respect privacy wherever possible but never at the expense of minimising gambling harm and patron safety.
- Explain clearly why information may need to be shared (*"I want to make sure you get the right support, and that means I may need to let my manager know"*).
- Follow venue procedures and escalate through approved channels.
- Record what was shared, when, and with whom in the gambling incident register as this protects both the patron and the staff member.

Patron self-sufficiency vs safety

Many patrons value their independence and may resist help, especially if they believe they can manage their gambling behaviour. However, when someone's behaviour shows clear signs of escalating harm, staff have a duty to intervene.

For example:

- A regular patron insists they don't need help, even as they're showing visible distress or often spend beyond their means.
- A friend or family member reports concern, but the patron refuses to engage.

The ethical question:

How do we respect a person's self-sufficiency while also fulfilling our responsibility to minimise gambling harm?

In practice:

- Approach respectfully, acknowledging the patron's right to choose.
- Offer information and support options without pressure.
- If safety is at risk, for example, signs of self-harming thoughts, extreme distress, or aggressive behaviour, escalate immediately.
- Always document the steps taken and the reasoning behind them in your venue's gambling incident register.

Concerned family members

If concerned family approach the venue to discuss a family member's gambling behaviour, this should also be documented in the gambling incident register and venue procedures for concerned family members are followed.

Do not record family member personal details to maintain privacy. Make sure you record:

- requests for the venue to intervene with a patron
- what action has been taken in response to the interaction with a concerned family member.

Ethical decision making involves understanding that self-sufficiency and care are not opposites. The goal is to support self-sufficiency and help patrons make safe, informed choices about gambling without removing their dignity.

Decision making framework

When you're faced with a challenging ethical situation, it's normal to feel unsure or emotional, and this can make it harder to think clearly. A clear, step-by-step decision-making framework helps staff and leaders make consistent, justifiable decisions.

Below is an example of a simple decision-making framework that can be used when assessing a potential gambling harm scenario.

Step 1: Identify the issue

- What's happening?
- Who is affected?
- What are the potential risks (to the patron, staff, or venue)?

Step 2: Check obligations

- What do gaming laws, venue policies, and the Gaming Plan of Management require?
- What are your responsibilities under ARCG and patron duty of care?

Step 3: Consider values and principles

- What ethical principles apply here? (e.g., respect, fairness, safety, integrity, transparency)
- How do these principles guide your next step?

Step 4: Explore options

- What are the realistic choices available?
- What are the possible outcomes or consequences of each option?
- Who else should be consulted (e.g., gaming operations supervisor, RGO, or external service)?

Step 5: Decide and act

- Make a decision that balances compliance, care, and ethical integrity.
- Take action calmly and document the reasoning behind your choice in your venue's gambling incident register.

Activity 6: Applying a framework in practice

Scenario

An RGO notices that a long-term regular, Sam, has recently been gambling for longer periods than usual. He seems tired and withdrawn, when he's normally chatty and upbeat. During a brief chat, he mentions he's "had a rough time since the breakup" and that he's "about to be let go" at work, but quickly changes the subject and says, "don't worry, forget I said anything and don't tell that to anyone else, I'm all good." Later that evening, another staff member reports that Sam has been asking other patrons for money.

The RGO feels conflicted. Reporting the situation might damage the trust they've built with Sam but ignoring it could allow harm to escalate - especially as Sam confided that he was about to lose his job.

Step 1: Identify the issue

- Sam's behaviour has changed noticeably (longer play, tired, withdrawn).
- He's showing personal stress factors (relationship breakdown, job loss).
- He may now be approaching others for money, a possible sign of escalating harm.
- There's a risk to Sam's wellbeing, financial safety, and possibly to venue integrity.





Step 2: Check obligations

- Under requirements in the Gaming Machines Regulation 2019, an RGO must *make inquiries with a patron if the officer suspects the patron is, or is at risk of, experiencing gambling harm and notify senior management of serious instances of patrons who are, or are at risk of, experiencing gambling harm for the purposes of enabling senior management to intervene.*
- Venue policy requires escalating serious or repeated concerns to management or the RGO lead or manager/supervisor.
- Duty of care outweighs the desire to protect rapport if harm or financial misuse is possible.

Step 3: Consider values and principles

- Safety: Sam's wellbeing comes first, as well as the wellbeing of other patrons (who would likely be feeling uncomfortable if Sam is asking them for money).
- Integrity: Acting transparently, even if it's uncomfortable, is key to ethical leadership.
- Respect: Sam's privacy should still be protected with only relevant details shared internally and to the right people and documents.

Now use the remainder of the decision framework to complete the case study below.



Step 4 : Explore options (Provide 2 options and explain the possible outcomes of each each, and whether anyone else should be consulted.)

- Option 1:

- Option 2:

Step 5 : Decide and act (Which option did you decide on? What are the action steps?)

- Decision:

- Action:



CONTENT WARNING

This section includes discussions on potentially triggering content including self-harm, mental health, culture, and related topics. We acknowledge and respect the diverse backgrounds and experiences of participants and allow you to make informed choices about your engagement with this content, ensuring a supportive and safe training environment.

However, learning about these topics is critical to your role in providing a safe and responsible gambling environment for patrons and your venue.

2.3.3 ASSIST patrons in serious distress or crisis

Up to this point in the RAAR framework, the focus has been on building rapport and assessing what a patron may be experiencing. Once you've identified that additional support is needed, the next step requires you to move from observation to practical, safety-focused assistance.

At the advanced level, assisting a patron isn't just about offering information. It means responding in a way that matches the seriousness of their situation, their emotional state, and their readiness for help. In some moments, assisting may be as simple as providing options for support or encouraging a break in play. In others, it involves navigating high-intensity disclosures.

The ASSIST stage is where your communication skills, judgment, and understanding of venue procedures come together. This is the point in the RAAR framework where your actions can make the most meaningful difference. The focus becomes supporting patrons with dignity, activating appropriate pathways, and ensuring safety for everyone in the venue.

In advanced responsible gambling practice, some interactions move beyond typical harm disclosure and move into serious distress or crisis. These moments require gaming operations staff to act decisively, compassionately, and within clear professional boundaries.

Patrons may disclose, directly or indirectly, that they are contemplating self-harm, feeling hopeless, or experiencing severe financial hardship linked to gambling. When disclosures of this nature occur, how gambling operations staff respond can make a significant difference to the patron's safety and trust in the venue's responsible and safe gambling practice.

2.3.3.1 Language, culture, and safety

Cultural background, language, neurodiversity, and personal circumstances such as domestic violence can significantly influence how gambling harm is experienced and how assistance is both offered and received. This can make it harder for people to ask for help or understand their options, and sometimes more challenging for you to assess patrons' needs to provide the appropriate assistance.

Advanced responsible gambling practice requires sensitivity to these factors to ensure engagement is respectful, effective, and safe. Venue leaders should ensure policies and training include cultural competency, trauma-informed practice, and clear referral pathways for specialist support services.

Assisting patrons from non-English-speaking backgrounds

Patrons from non-English-speaking backgrounds may experience additional barriers when engaging in conversations about gambling harm, including language differences and cultural expectations. These factors can affect how concerns are expressed, understood, or accepted. Advanced responsible gambling practice requires clear, respectful, and culturally aware communication to ensure all patrons can access support safely and with dignity.

- Use plain language and visual aids: Avoid jargon; use pictograms or official translated brochures.
- Access interpreter services: Know how to contact telephone interpreters or local language support services.
- Cultural awareness: Understand that gambling stigma may differ across cultures so avoid assumptions and maintain confidentiality.

GambleAware provides free, confidential and judgment-free support in more than 40 languages. You can provide patrons with the following phone number: 1800 858 858, and they'll be connected with a counsellor who speaks their language or understands their culture. Translation and Interpreting Service (TIS) are also available. You can provide patrons with the following GambleAware website address: www.gambleaware.nsw.gov.au/i-need-support/help-in-other-languages

Assisting First Nations patrons

First Nations patrons may have different preferences or needs when engaging with support services. Culturally safe engagement is essential to ensure interactions are respectful, non-judgmental, and supportive. Advanced responsible gambling practice requires staff to offer support options that recognise choice, dignity, and connection to culturally appropriate services.

- Culturally safe engagement: interaction should support the patron to feel respected, understood, and not judged - especially when they come from a different cultural background.
- Start with respect: Use a friendly tone, avoid assumptions about their culture, and don't make comments about cultural stereotypes.
- Connect to Aboriginal-specific services: Offer choice. Provide options for support services, including culturally specific ones.
- Avoid stereotypes: Focus on individual needs, not assumptions about cultural norms.

GambleAware provides a range of free and confidential culturally safe gambling support services for Aboriginal people. You can connect Aboriginal patrons to a counsellor anytime day or night by calling 1800 858 858, or let them know they can book a face-to-face appointment with a counsellor in their local area. You can also offer for them to chat to a counsellor online by visiting gamblinghelponline.org.au. If they are not ready to yarn with someone, they can still take steps to keep gambling under control including taking a break and learning how to gamble more safely. You can provide patrons with the following GambleAware website address: <https://www.gambleaware.nsw.gov.au/i-need-support/id-prefer-an-aboriginal-service>

Assisting neurodivergent patrons

Neurodivergent patrons (for example, people with autism, ADHD, acquired brain injury, or other cognitive or sensory differences) may experience the gaming environment differently. This can affect how they communicate, process information, or respond under stress. Presentation may vary from person to person and may

include difficulty processing verbal information quickly or following complex instructions, appearing overwhelmed by noise, lighting, crowds or sudden interruptions, limited eye contact or communication that seems blunt, needing more time to respond to questions or make decisions, or becoming distressed or shutting down when rushed, pressured, or overstimulated.

- Adjust communication style: Use clear, structured language; avoid sensory overload (e.g. communicating in loud environments when having private and confidential conversations).
- Offer written information: Provide step-by-step guides for self-exclusion or support services.
- Patience and flexibility: Allow extra time for processing and decision-making.

GambleAware provides free, confidential and judgment-free support. Options include counselling services in person and online 24/7. You can provide patrons with the following GambleAware website address: www.gambleaware.nsw.gov.au/i-need-support/i-need-to-talk-to-someone

Assisting patrons experiencing domestic violence

Patrons experiencing domestic violence may face increased vulnerability and complex safety risks that can affect their gambling behaviour and willingness to seek help. A discreet and safety-focused approach helps ensure support is offered without increasing risk, while respecting the patron's privacy, choice, and wellbeing.

- Recognise indicators: Discussions about financial control, distress linked to partner behaviour, or disclosures of abuse.
- Prioritise safety: Avoid escalating risk. Never confront the suspected abuser.
- Referral pathways: Know how to discreetly connect patrons to domestic violence helplines and crisis services.

GambleAware provides access to legal support for legal issues related to gambling as well as family law, facing criminal charges, and financial problems. Family law support includes information and resources to protect loved ones and manage property and finances during difficult times. If patrons disclose that they require support related to domestic violence, you can give them the NSW Domestic Violence Line phone number: 1800 65 64 63. You can also provide patrons with the following GambleAware website address: www.gambleaware.nsw.gov.au/i-need-support/i-need-legal-help/i-need-help-with-family-law

Supporting patrons with different needs is about creating a safe, respectful environment for everyone. When we use plain language, offer choices, and connect people to culturally appropriate or specialist services, we show that harm minimisation is for all patrons, not just some.

2.3.3.2 Recognising risk indicators

Disclosures of serious distress, self-harm, or financial distress are not always communicated directly. Patrons may communicate risk subtly through language, behaviour, or changes in presentation. Statements that express hopelessness, worthlessness, or an inability to cope should always be taken seriously, even if said casually or indirectly.

Gaming operations staff must listen for the meaning behind what is being said, observe shifts in mood or behaviour, and consider the broader context of the patron's situation. When multiple indicators are present, or when something "doesn't feel right", this should be treated as a potential risk and responded to in line with crisis escalation procedures. If something sounds concerning, it probably is.

Patrons may say things like:

- *"I don't see the point anymore."*
- *"I've lost everything."*
- *"I'm not sure how I'm going to get through this week."*
- *"It'd be easier if I didn't wake up tomorrow."*

Other indicators might include:

- Noticeable distress, shaking, crying, or visible exhaustion.
- Talking about losing a job, relationship breakdown, or significant debt.
- Mentioning borrowing or even stealing money to gamble.

Recognising risk indicators is about acting on concern. Gaming operations staff are not expected to assess intent or severity, but to notice patterns, trust professional judgment, and respond early. When indicators suggest heightened risk, timely escalation and documentation are protective actions that support patron safety, staff wellbeing, and responsible venue practice.

Assisting patrons in crisis

Assisting patrons in crisis requires a clear, calm, and safety-focused response. At this stage, the priority is immediate wellbeing, not problem-solving, reassurance, or counselling. Patrons may disclose, directly or indirectly, thoughts of self-harm, extreme distress, or a sense of hopelessness linked to gambling losses or broader life pressures. These situations demand prompt, decisive action within established venue procedures.

Gaming operations staff are not mental health professionals, but they play a critical role in recognising risk, maintaining safety, and activating appropriate escalation pathways. This includes staying present with the patron, responding with empathy and professionalism, and ensuring concerns are escalated to supervisors, management, or emergency services without delay where required.

Advanced responsible gambling practice means knowing when a situation has moved beyond routine harm minimisation and requires urgent support. Acting early, following procedure, and documenting actions taken protects the patron, the staff member, and the venue, and ensures that serious risk is managed appropriately and responsibly.

If a patron expresses thoughts of self-harm or intent:

1. Stay calm and professional

Maintain a steady tone, neutral body language, and a controlled pace. Your role is to provide stability and reassurance through your presence, not to react emotionally or attempt to resolve the situation. Remaining calm helps prevent escalation and supports the patron to feel safe and taken seriously.

2. Acknowledge the seriousness

Recognise and name the concern clearly. Avoid dismissive or overly reassuring statements such as *"you'll be okay"* or *"everything will work out."* Instead, acknowledge the difficulty of what the patron has shared and express concern for their safety. This validates the disclosure while reinforcing that the situation requires support and care.

3. Do not leave the patron alone

Ensure the patron remains supervised at all times. Discreetly signal or contact a gaming operations supervisor or manager while staying with the patron. Leaving a person alone after a disclosure of self-harm increases risk and must be avoided.

4. Escalate immediately according to venue procedures

Follow your venue's escalation protocols without delay. This includes notifying senior management and engaging external support services where required, including emergency services (000). Escalation is a protective action, not a failure of rapport or responsibility.

5. Record the incident accurately and sensitively

Once the patron is safe and appropriate supports have been engaged, document the incident in the gambling incident register as soon as practicable. Record observable behaviours, the patron's statements, actions taken, who was notified, and any follow-up required. Use factual, professional language and avoid assumptions or diagnoses.

Assisting patrons in crisis is one of the most serious responsibilities in advanced responsible gambling practice. It requires staff to act promptly, calmly, and within clear professional boundaries, prioritising safety over comfort or convenience.

By recognising risk early, following escalation procedures, and documenting actions accurately, gaming operations staff help protect patrons, support colleagues, and uphold the venue's duty of care. Consistent, confident responses to crisis situations reinforce a culture where patron wellbeing is taken seriously and harm minimisation is actively practised, not deferred.

Assisting patrons experiencing financial harm

Financial harm is a common and serious impact of gambling and may present through changes in behaviour, distress, or disclosures about money problems. Assisting patrons experiencing financial harm requires a respectful, non-judgmental approach focused on recognising risk, offering appropriate support options, and connecting patrons with practical assistance while maintaining dignity and confidentiality.

Financial harm can show itself as:

- borrowing from other patrons in the venue
- selling personal items to continue gambling
- using credit cards, mortgage line of credit, or payday loans excessively
- expressing guilt, shame, or desperation

RGOs should:

- speak privately where possible and express concern based on observed behaviour
- offer practical, non-judgmental support, such as information on:
 - self-exclusion programs
 - financial counselling and community support services
 - helplines for gambling and financial distress.
- avoid giving personal advice or financial opinions. The role is to connect, lead patrons to practical support, not counsel or advise.
- ensure all disclosure is recorded and reported in the gambling incident register and to operational management for follow-up if appropriate.

In financial harm cases, empathy and professionalism must be balanced. The patron's situation may evoke strong emotions, but your calm, measured response provides structure and support when they may need it most.

Gaming operations supervisors must ensure:

- the RGO is supported and debriefed after any crisis intervention
- the incident is properly recorded in the gambling incident register and follow-up actions are completed

2.3.3.3 Escalation pathways & external partnerships

Clear escalation pathways ensure that when you recognise gambling harm or crisis concern, you know exactly who to contact, and how to document your actions.

Escalation is not about shifting responsibility. It's about sharing accountability. It allows issues to be addressed at the right level, at the right time, by the right people. This requires systems that make it easy for staff to act quickly, confidently, and in line with both regulatory and ethical obligations.

Escalation pathways

An escalation pathway is a documented process outlining how information about gambling harm moves through the organisation, from gaming operations staff to venue leadership. Ensure that your venue has a documented escalation pathway, and all staff know where to locate and access escalation procedures.

Effective escalation systems include:

Clear triggers for escalation

- Examples: repeated incidents, signs of serious distress, third-party reports, or suspected financial harm.

Designated contact points

- Each stage of escalation should identify a responsible person (e.g., RGO to Duty Manager to Venue Manager to Senior Management).

Defined timeframes

- Critical incidents (e.g., threats of self-harm) require immediate escalation.

Documentation standards

- Every escalation must be recorded in the gambling incident register with time, date, incident, people involved, actions taken, and follow-up required.

Feedback loops

- Staff should receive confirmation that their incident report has been received and acted upon. This reinforces trust and compliance.

Regular auditing of escalation records helps ensure the reporting process works in practice, not just on paper. Gaps in follow-up, communication, or reporting information are strong prompts for governance review.

Partnering with external agencies

When harm escalates beyond the capacity of the venue, partnerships with specialist support services are essential. Key external partnerships may include:

External partner	Support service
GambleAware or local counselling providers	For patrons seeking advice, referrals, or self-exclusion assistance. Appendix 2 provided detailed support service options.
Financial counsellors	For patrons experiencing debt or financial crisis.
Mental health and emergency crisis services	For patrons expressing distress, hopelessness, or self-harm ideation.
Regulators bodies	For mandatory reporting or compliance follow-up.

Gaming operations supervisors and managers should ensure all staff know:

- **how** to contact these services (e.g., hotline numbers and contact details displayed in staff areas).

- **what** information can be shared within privacy and consent boundaries.
- **how** to document external referrals and confirm that patrons have been offered support.

Strong partnerships show that the venue is not just compliant but that it's connected and a part of a wider safety network that prioritises care and accountability.



Activity 7: Responding to crisis disclosure

Scenario

A patron, Simon, quietly tells you, "I'm in a lot of debt and I don't see how I'm going to get myself out of this mess." When you express concern, he adds, "It doesn't matter anyway, I really don't care about anything anymore." He looks tired and sounds emotionless.

Task

Identify risk indicators in Simon's statements and behaviour.	
List your immediate steps - who you would involve, what you would do, and what you would avoid doing.	
Reflect: How would you maintain rapport while also prioritising safety and procedure?	

2.3.3.4 De-escalation under pressure

In advanced responsible gambling practice, moments of confrontation or emotional escalation are inevitable. This can happen during any step of the RAAR framework. Even with the best prevention strategies, patrons may react with frustration, anger, or distress - particularly when gambling losses are combined with personal or financial pressures.

De-escalation is about reducing emotional intensity, maintaining safety, and preserving dignity for the patron, staff, and others nearby. Gaming operations staff must be able to observe the situation, regulate themselves, and guide the interaction to a calm state where possible.

Recognising escalation signals

Escalation rarely happens suddenly; it builds through predictable behavioural stages. Recognising early warning signs allows intervention before behaviour becomes unsafe. Common escalation signals include:

- rapid or shallow breathing, clenched fists, pacing
- sharp tone or raised voice
- intense eye contact or refusal to make eye contact
- overly personal or accusatory language (“You people don’t care”)
- fixation on a grievance e.g. losses, staff actions, perceived unfairness.



“In high pressure settings, the RGOs calm and professional presence can often prevent escalation by simply being visible on the gaming room floor.”

Active listening and validation

When emotions run high, what you say and how you listen can make the difference between calming a situation or making it worse. Two of the most effective skills for de-escalation are active listening and validation. These techniques help patrons feel heard and respected, even when you can’t solve the problem immediately.

What is active listening?

Active listening means giving your full attention and showing the patron you are listening to their feelings and concerns. It’s more than hearing words. It’s about listening for meaning and responding respectfully.

How to practise active listening:

- **Be present:** Stop other tasks, maintain calm eye contact, and use open body language.
- **Listen for emotion:** Notice tone, pace, and body language as much as words.
- **Reflect back:** Use phrases like “It sounds like you’re frustrated” or “I can hear this has been a tough night for you.”
- **Clarify gently:** Ask short, neutral questions to confirm understanding, e.g., “Just so I understand, you’re saying you’ve had a rough run tonight?”

What is validation

Validation is the skill of acknowledging a patron’s feelings and concerns without judgment. It doesn’t mean agreeing with everything they say, it means showing that you are listening to them, and what they say matters. When patrons feel heard and respected, tension often decreases, making it easier to guide the conversation toward safety and support.

Why validation matters

Validation reassures patrons that their feelings are acknowledged, even if you can’t fix the issue right away.

- It reduces defensiveness and helps calm strong emotions.
- It builds trust and rapport, even in high-pressure situations.
- It shows duty of care, reinforcing your commitment to responsible gambling.

De-escalation strategies to calm aggression

De-escalation relies on how you speak and move, not just what you say.

Effective de-escalation verbal strategies include:

- acknowledge emotion before addressing logic. Example: “I can see this is really upsetting you. Let’s take a moment.”

- use low, even volume. Your calmness invites them to mirror calmness.
- give the patron space to vent safely. Interrupting or correcting too early often increases anger.
- offer choice and control. Phrases like “Let’s step over here to talk privately” maintain dignity and reduce the sense of threat.
- avoid arguments or ultimatums. Replace “You need to calm down” with “I want to make sure we can talk safely - let’s take a breath first.”

Effective de-escalation non-verbal strategies include:

- maintain open posture and avoid blocking exits or entering a patron’s personal space
- keep hands visible and movements slow
- stand at an angle, not face-to-face, to reduce the sense of confrontation
- use calm eye contact – consistent but not challenging or too intense.

These cues signal respect and control, helping to restore a calm balance even when the situation feels tense.

[Appendix 4: Responsible Gambling quick reference: Communication under pressure](#)

provides a one-page quick reference guide on communication under pressure. It includes conversational scaffolds, active listening cues, and de-escalation prompts to support gaming operations staff manage communication under pressure and help maintain confidence in high-intensity situations.

Maintaining staff and patron safety

During any escalation, safety is the priority. Gaming operations staff must coordinate subtly and efficiently to minimise risk:

- **Positioning:** ensure a clear line of retreat for staff and patrons. Avoid cornering the person.
- **Communication:** use discreet signals or agreed-upon phrases to alert colleagues or security (e.g. “Can you check something for me?”).
- **Patron protection:** calmly move bystanders away without creating alarm using phrases like “let’s just give them some space.”
- **Team roles:** one person leads communication while others monitor surroundings and prepare for backup or assistance.

Knowing when to step in, when to support from a distance, and how to maintain professional calm under pressure to always ensure staff and patron safety is critical.

When and how to disengage and escalate

Not every situation can be defused. Recognising when to disengage and call for emergency assistance is a mark of safe and sound judgment, not failure to de-escalate a situation.

Remember, under the NSW *Liquor Act 2007*, non-voluntary exclusion and banning orders are available to licensed premises for patrons who are intoxicated, violent, quarrelsome or disorderly, including on the gaming room floor.

Disengage if:

- the patron becomes physically threatening or refuses to calm down after multiple attempts
- weapons or property damage are present
- the patron’s distress is beyond verbal support and requires professional intervention.



When disengaging:

- keep your voice level and words short: "I'm going to get someone to help us."
- move toward safety in a calm manner
- signal for security, management, or emergency services (000) according to venue procedures
- once safe, record and debrief immediately.

Activity 8: De-escalation in action

Scenario

During a busy evening, a patron slams the machine and shouts, "This place is rigged!" He stands up, red-faced, and begins arguing with another player.

Task

1. Identify a common early warning sign that may have been present before the outburst.	
2. Write or discuss an immediate de-escalation action you would take to reduce risk. (verbal or non-verbal)	

2.3.4 REPORT: Accurate reporting and follow-up

Accurate and timely reporting is essential in responsible gambling practice. It ensures that observations, interventions, and escalations are recorded, acted upon, and followed to maintain patron safety, staff support, and venue accountability.

While identifying and assisting patrons is critical, it is only part of the gaming operations role. Without proper reporting and follow-up, interventions may lose effectiveness, risks may go unmonitored, and patterns of harm can continue unnoticed. Documentation and escalation are themselves harm minimisation tools.

You learned in the RCG course how to report gambling harm in your venue's gambling incident register. As a reminder, incidents that must be recorded in the register include:

- where a gaming patron displays or engages in behaviour that indicates they are at risk of or they are experiencing gambling harm
- any requests for self-exclusion, information about self-exclusion or requests for intervention by a patron
- any requests for information about exclusion or a request for the venue to intervene, made by a family member of a patron (however, no personal details of family members are allowed to be recorded)
- any breach or attempted breach of a self-exclusion arrangement
- any gaming offence, alleged offence or incident involving a minor.

You may choose to record other incidents in the register, such as machine faults or patron complaints as well. [Appendix 3](#) provides guidance on when to record warning signs of gambling harm.

After you have recorded the incident, you must include the action you have taken in response to the incident. Gambling incidents must be recorded as soon as practicable, but no later than 24 hours after they happen.

Principles of 'real-time' reporting

Real-time reporting is about creating a clear, actionable record that supports immediate and ongoing intervention.

Key principles include:

- **Accuracy:** record factual observations, not assumptions or judgments. Include behaviours, statements, times, and context.
- **Timeliness:** report incidents as soon as you can after they occur. Delays can reduce clarity.
- **Confidentiality:** share details only with those who need the information for follow-up or safety purposes.
- **Professional tone:** maintain a neutral, objective style to ensure clarity and credibility.

Escalation and accountability

Reporting is effective when it's followed up with action.

RGOs should:

- record information about reportable gambling incidents including details of the incident the employee observed, and details of any action taken
- notify senior operational management immediately for high-risk or escalating situations, such as self-harm disclosure, aggression, or serious financial harm
- provide appropriate support, whether through self-exclusion options, referrals to support services, or follow up checks where appropriate
- document steps taken, including who was notified, when, and what follow-up occurred.

Gaming operations supervisors and responsible gambling managers are responsible for monitoring these reports, verifying that:

- gaming floor staff and especially RGOs are recording gambling incidents and actions are completed promptly
- RGOs have the guidance and support needed to manage challenging situations.
- patterns of concern across multiple visits or patrons are identified and addressed.

Venue leadership are responsible for ensuring:

- a gambling incident register in an approved format is in the venue (maximum penalty - 50 penalty units)
- information about reportable gambling incidents is recorded correctly (maximum penalty - 50 penalty units)
- registers are made available for inspection by a police officer or inspector (maximum penalty - 50 penalty units)
- monthly reviews are conducted of entries in the register for the purposes of identifying trends in gambling incidents, and to consider what action, if any, should be taken to address, mitigate or minimise the number or kinds of gambling incidents.



Role Plays

Role plays in this workbook are designed to help you practise advanced responsible gambling skills. These activities focus on analysing behaviour, applying RAAR (Rapport, Approach and assess, Assist, Report), and making ethical decisions under pressure.

Role performance/acting is optional. The flexibility has been provided to either act out the role of patron and senior staff member, or participants can choose to perform the role play in a discussion-based format and talk through scenarios, explore options, and reflect on best practices.

How it works:

- You'll work in small groups of 3 using real-world scenarios from gaming environments.
- Discuss whether you will **perform/act in the roles** or **talk through your approach**.
- Select a scenario (A, B, or C) and assign roles. (Your group can select more than one scenario if you would like to swap roles and practice further).

Role Play Scenarios

Scenario A: Aggressive regular patron

Rebecca, a long-term regular patron, becomes verbally aggressive after a loss, blaming staff and demanding compensation.

Scenario B: Volatile Behaviour near ATM

Patron Jason is pacing near the ATM, visibly agitated, muttering about needing cash urgently. He appears distressed and yells loudly "this place is rigged!".

Scenario C: Patron in crisis

Patron Simon quietly says: "I'm in a lot of debt and I don't see how I'm going to get out of this mess." When you express concern, they add: "It'd be easier if I didn't wake up tomorrow." They look pale, tired, and withdrawn.



Role play style 1: Discussion-based

Roles (3 people)

Senior staff member Discuss answers to scenario step-through prompts

Questioner: Keep the scenario moving by reading the step-through prompts.

Observer: Note strengths, possible improvements, and read debrief questions.

Select scenario (A,B,C)

Step-through prompts

(Questioner to read, Senior staff member to answer)

- Risk checks: What immediate safety concerns exist?
- Language scripts: How would you start the conversation?
- RAAR actions: How do you apply RAAR framework?
- Escalation: When and how do you involve a supervisor or security?
- Reporting: What details must be documented in the gambling incident register?

(Observer to read, Senior staff member to answer, group to discuss)

Debrief questions

- What worked well in your approach?
- What could be improved?



Role play style 2: Acting/performing in roles

Roles (3 people)

Patron: Read the script prompts and act in character.

Senior staff member Utilise script prompts or create your own responses.

Observer: Note strengths, possible improvements, and read debrief questions.

Scenario A script: Aggressive regular patron

- **Patron (Rebecca):** (*angry tone, loud*) “This place is a scam! I’ve lost everything! You people don’t care!”
- **Staff member:** (*calm tone, open body language*) “I can see you’re upset, Rebecca. Let’s step away from the machines and talk somewhere quieter.”
- **Patron:** (*sarcastic*) “Why? So you can kick me out? I’m not leaving!”
- **Staff member:** “I’m not here to kick you out. I want to make sure you’re safe and comfortable. Can we move over to the lounge for a quick chat?”

Observer prompt: Did the staff validate feelings before offering a solution? Was the tone calm and non-confrontational?

Scenario B script: Volatile behaviour near ATM

- **Patron (Jason):** (*frustrated, muttering*) “I need more cash now! Don’t tell me what to do!”
- **Staff member:** (*steady voice*) “Jason, I can see this is stressful. Let’s step away from the ATM and talk where it’s quieter.”
- **Patron:** (*snaps*) “I just need money! Leave me alone!”
- **Staff member:** “I hear you. I’m not here to stop you — I just want to make sure you’re okay. Can we take a minute together?”

Observer prompt: Did the staff maintain safety positioning and calm tone? Did they offer choice and control?

Scenario C script: Patron in crisis

- **Patron (Simon):** (*soft voice, withdrawn*) “I’m in a lot of debt... I don’t see how I’m going to get out of this mess.”
- **Staff member:** (*gentle tone*) “That sounds really hard, Simon. I’m concerned about how you’re feeling.”
- **Patron:** (*emotionless*) “It’d be easier if I didn’t wake up tomorrow.”
- **Staff:** (*steady, practical*) “I’m worried about what you just said just now Simon, but you’re not alone in this. Let’s move somewhere private so we can talk and I can get some support for you.”
(Staff discreetly signals supervisor or uses agreed code phrase while staying with Simon.)
- **Supervisor (optional):** “Simon, we’re here to help. Let’s sit down somewhere safe while we call someone who can give you the right support.”

Observer prompt: Did the staff avoid minimising? Did they escalate immediately and maintain rapport?

2.4 Resilience and peer support

Gaming operations staff deal with strong emotions every day. They see patrons who are upset, in denial, or struggling because of gambling. While helping patrons is the main focus, it's just as important for staff to take care of themselves. If stress builds up over time, it can make it harder to think clearly, stay patient, and do your job well. That's why knowing how to stay resilient and support each other is a key part of being effective in your role.

Resilience doesn't mean just "pushing through". It means staying calm, clear-headed, and professional, even when things get stressful or emotional. In the ARCG context, it also means being equipped to perform these important operational harm minimisation roles for a sustained period of time

Recognising the emotional toll

Working in harm minimisation means being exposed to difficult situations and strong emotions. Over time, regularly supporting patrons who are in distress or struggling with gambling harm can take a personal toll. You might start to feel emotionally drained, less patient, or find it harder to stay positive and motivated at work. You might notice:

- feeling worn out after a tough shift
- becoming impatient or easily frustrated
- finding it harder to switch off after work
- taking patrons' problems home in your thoughts
- avoiding certain tasks or situations because they feel too much.

This is a normal response to ongoing sensitive work. Recognising this early helps prevent burnout and keeps you effective, balanced, and able to support patrons and colleagues with respect and professionalism.



“Effective gaming operations staff are not those who never feel stressed. They simply know when to pause, reflect, and recharge.”

Managing psychological hazards: A shared responsibility

Supporting your own wellbeing and that of your colleagues isn't just good practice, it's a legal responsibility under the *NSW Work Health and Safety Act 2011* (WHS Act).

Psychological hazards, such as stress from high-intensity situations or repeated exposure to patrons in distress, must be managed just like physical hazards. This means venues and staff share a duty of care to identify risks early and take steps to minimise them.

To help meet these obligations, SafeWork NSW has published an approved Code of Practice on *How to Manage Psychosocial Hazards at Work*. This code provides practical guidance on achieving compliance with the WHS Act and WHS Regulation, including effective ways to identify and manage psychosocial risks. You can read the [Code of Practice here](https://www.safework.nsw.gov.au/__data/assets/pdf_file/0004/983353/Code-of-Practice_Managing-psychosocial-hazards.pdf) (URL: https://www.safework.nsw.gov.au/__data/assets/pdf_file/0004/983353/Code-of-Practice_Managing-psychosocial-hazards.pdf).

Building personal coping strategies

Everyone has their own way of coping with ongoing challenging situations. Building resilience is about creating daily habits that take care of your emotional wellbeing and help you bounce back. Small, consistent actions can help you maintain focus and wellbeing over time.

Gaming operations supervisors and responsible gambling managers play an important role in reminding staff that self-care is a part of professional responsibility.

Some simple but effective strategies include:

- **Take time to debrief:** after a difficult conversation, talk it through with a colleague or supervisor. A short chat can make a big difference.
- **Set clear boundaries:** you can care without taking responsibility for fixing someone's problems. You are not a counsellor or therapist. Your role is to actively observe, listen, and refer to the appropriate professional service when appropriate.
- **Have short resets:** step outside, stretch, or take a quiet moment before returning to the floor.
- **Practise calm breathing:** sometimes you just need to take a breath, literally. Breathing helps your body relax after tension or adrenaline.
- **Reflect at the end of your shift:** ask yourself, "what went well today?" and "what can I learn from that situation?"

Supporting colleagues through peer reflection

One of the best ways to stay resilient is through peer support. Sometimes the most effective help comes from a quick conversation with someone who understands what the job is like.

Peer support can take resilience from an individual skill into a team strength. When gaming operations staff share experiences openly; they normalise the emotional reality of harm minimisation work and build a sense of team-based responsibility.

Practical ways to strengthen peer reflection:

- **Check in regularly:** "that was a tough one, do you want to talk about it?"
- **Reflect together:** share what worked well and what could be done differently.
- **Run short team debriefs:** focus on lessons learned and wellbeing.
- **Mentor each other:** pair newer RGOs with experienced ones to share skills.

When people feel supported and heard, they recover faster and handle future challenges more effectively. A supportive peer to peer culture helps prevent isolation and reinforces that no one manages gambling harm alone. It is always a shared duty.

Knowing when to seek professional support

Some experiences extend beyond what peer or personal coping strategies can manage. This is often referred to as operating 'outside of your window of tolerance'.

There are times when it's best to get extra help. If stress starts to affect your mood, sleep, or relationships, it may be time to talk to someone outside the workplace. Gaming operations staff must be confident in recognising when to step from informal to professional support.

Seek professional assistance if you experience:

- Persistent anxiety or sleep disturbance
- Feeling emotionally disconnected or 'numb' towards patrons
- Loss of motivation, concentration, or ability to perform at work.

Professional help might include:

- Employee Assistance Programs (EAP) for confidential counselling
- External mental health professionals (counsellor, psychologist, GP)
- Organisational wellbeing programs or mental health first aid training.

Operational leaders play a vital role by ensuring staff know where and how to access support without stigma. Seeking help doesn't mean you're not coping. It means you're taking steps to stay healthy and capable in a sometimes-demanding role.



Activity 9: Building a team safety net

1. Identify two strategies that help you personally manage stress or emotional load after a difficult shift.	
2. Think of one way your team currently supports one another and one new idea that could make this stronger.	

Module wrap-up

You've completed Module 2, which focused on practical, on-the-floor skills for managing complex and high-intensity situations. You learned about:

- Adapting RAAR for complex situations: Explored advanced RAAR application and strategies for engaging resistant patrons. De-escalation requires calm presence, clear communication, and knowing when to disengage or escalate.
- Applying de-escalation techniques: Learned verbal and non-verbal strategies to calm aggression and maintain safety.
- Accurate reporting and escalation: Covered principles of real-time reporting and how to document and follow up effectively.
- Resilience and peer support: Discussed coping strategies, team debriefs, and when to seek professional help.

Reflective questions

- What specific de-escalation techniques will you use during high-pressure situations?
- How will you adjust RAAR when dealing with resistant or distressed patrons?
- What steps will you take to protect your own wellbeing after challenging shifts?

Let's move on to Module 3: Venue Leadership in Responsible Gambling.

Module 3

Venue Leadership in Responsible Gambling



Module 3

Venue Leadership in Responsible Gambling

Venue leadership

Venue leaders carry the responsibility of shaping a venue's approach to responsible gambling. Unlike gaming operations staff who manage patron interactions directly, venue leaders must ensure that systems, policies, and leadership behaviours create a culture where harm minimisation is embedded at every level.

This module focuses on the strategic and organisational aspects of responsible and safe gambling. You will examine the ethical tensions that can arise at venue leadership level, particularly when balancing commercial responsibilities with the duty of care required for patrons and the community.

This module has also been designed for gaming operations staff to gain insight into what is expected at a venue leadership level to proactively minimise gambling harm. This includes gaining insight into venue leadership's responsibility to balance commercial and ethical obligations. If the strategies discussed are not currently implemented in your venue, you have a responsibility to promote harm minimisation not only to patrons, but to venue wide management and leadership. You may have the opportunity to suggest improvements to harm minimisation policy and strategies in team meetings to help strengthen your venue's proactive approach to gambling harm minimisation.

Why this matters

The strategic decisions and policies that leaders make affect the conditions and environment where gambling takes place. While gaming operations staff may directly interact with patrons, venue leadership roles determine whether those staff are empowered, supported, and guided by clear systems and processes. By embedding responsible gambling into policy, culture, and leadership practice, you not only meet compliance obligations but also protect your venue's reputation, staff wellbeing, and most importantly, the safety of patrons.

This module covers:

- From policy to culture
- Organisational risk and reputation
- Ethical leadership in commercial environments

By the end of this module, you will be able to:

- implement organisational policies that embed responsible gambling practices beyond minimum compliance requirements
- lead cultural change initiatives that empower and support staff to identify, escalate, and manage gambling harm
- apply principles of ethical leadership to reconcile financial obligations with the venue's duty of care obligations.

3.1 From policy to proactive culture

Policies set the rules. Culture determines how consistently people follow them. In responsible gambling, leadership means moving beyond compliance and creating a workplace where patron care, integrity, and accountability are part of everyday decision-making to proactively address harmful gambling behaviour.

A venue might have every policy in place, yet it may be ineffective if staff feel untrained, rushed, unsupported, or unsure when to act. Turning compliance into culture means making harm minimisation a shared value, not just a regulatory requirement.

Beyond tick-box compliance

Compliance answers the question: “Are we doing what the law requires?” Culture asks: “Are we doing what’s right, consistently, even when no one is watching?”

Tick-box compliance focuses on completing forms, recording incidents, and avoiding penalties. Proactive culture focuses on recognising risk early, taking initiative, and supporting both patrons and staff to act responsibly.

Let’s take a look at the compliance mindset vs the culture mindset.

Compliance mindset	Proactive culture mindset
Follows minimum legal standards	Follows legal standards, aims for best practice and ethical leadership
Waits for incidents to happen	Proactively prevents harm and promotes patron and staff wellbeing
Focuses on record keeping	Focuses on record keeping and real impact on patrons and staff with actionable follow up
Treats issues as ‘problems to fix’	Treats issues as ‘opportunities to improve’

3.1.1 Embedding responsible gambling

A responsible gambling culture doesn’t only live in the policy manual. It must appear in the systems, training, and daily routines, decisions, and actions that shape staff and patron behaviour.

Let’s take a look at venue leadership actions to embed gambling harm minimisation in your venue culture:

1. Gaming Plan of Management (GPOM)

The Gaming Plan of Management (GPOM) is not just a compliance document. It’s a strategic blueprint for ethical gambling operation. A strong gaming plan of management goes beyond describing what the law requires and instead shows how the venue leads in preventing and responding to gambling harm.

In RCG training, you learned that a GPOM is a framework for patrons and staff to understand a venue’s responsible conduct of gambling obligations and harm minimisation measures. It provides guidance to staff on how to meet these obligations and how to respond to particular gaming-related situations.

You also learned the minimum requirements for the GPOM as outlined in the Gaming Machines Regulation 2019 and what the GPOM must include.

Let's take a look at some advanced measures venue leaders can include in a GPOM:

- Include clear escalation pathways for staff outlining when to notify supervisors, when to report to management, and when to engage external support services.
- Detail staff support systems, such as debrief procedures or access to wellbeing resources after difficult patron interactions.
- Outline how responsible gambling messages are reinforced across signage, digital displays, loyalty communications, and venue promotions.
- Commit to annual review and improvement, ensuring the GPOM evolves with changes in risk, patron behaviour, or regulatory updates.
- Include structured systems for staff to perform welfare checks, encourage breaks in play, or suggest alternatives to gambling available in the venue or beyond.
- Increase welfare checks and patron interactions after midnight to encourage breaks in play.
- Recognise staff who demonstrate a commitment to harm minimisation.
- Appoint dedicated staff (e.g. a responsible gambling manager or gambling contact officer) to provide specialist support to staff and patrons.
- Reduce the amount of cash that can be withdrawn from the ATMs in your venue.
- Host on-site visits from gambling counsellors or organise periodic on-site information stalls staffed by gambling counsellors.
- Consider hosting local speakers with lived experience of gambling harm.

A regularly reviewed GPOM demonstrates accountability. When leaders consistently review and update it, staff see that responsible and safe gambling is part of the venue culture, not just placed in a rulebook on a shelf.

To support venues in developing and implementing a GPOM that aligns with regulatory requirements and promotes responsible gambling practices, L&GNSW provide [GPOM guidance, templates, fact sheets, and standards online](https://www.nsw.gov.au/business-and-economy/liquor-and-gaming/gaming/responsible-gaming/gpom) (URL: <https://www.nsw.gov.au/business-and-economy/liquor-and-gaming/gaming/responsible-gaming/gpom>).



Activity 10: Operational plans

Reflection question

What is one suggestion that could strengthen your venue's current Gaming Plan of Management to make harm minimisation more visible in everyday practice?

2. Staff induction and ongoing training

Training is one of the strongest culture shaping activities in any venue. Effective training programs teach staff not only what to do, but why it matters, linking harm minimisation to values like respect, empathy, and community responsibility.

Venue leaders can strengthen training culture in the following ways:

- Ensure all new employees have completed RCG, ARCG if relevant, and venue-specific responsible gambling training and orientation before starting in gaming operations.
- Ensure all new employees working in gaming operations have access to and are knowledgeable in the venue's Gaming Plan of Management.
- Include values-based discussions in training, for example: "What does patron care look like in our venue?" or "How would we define responsible conduct of gambling?" or "What does minimising gambling harm mean to you?"
- Schedule short, regular harm minimisation training refreshers rather than relying on annual sessions or 5-year regulatory training refreshers.
- Invite RGOs or gaming operations supervisors to share real experiences or challenges during training to reinforce real-world experiences.
- Recognise and reward staff who demonstrate responsible gambling leadership, not just those who identify harm, but those who handle it with empathy, effectiveness, and professionalism.

Training builds competence. Conversation builds culture. Encourage teams to talk about responsible gambling and harm minimisation as a part of everyday conversation and learning.



Activity 11: Induction and training

Reflection question

What are 2 areas of staff training or induction that could be strengthened at your venue?

3. Daily operations

The best way for venue leaders to embed responsible gambling practice into venue culture is by making harm minimisation visible in routine operations and communication.

Venue leaders can integrate responsible gambling practice into daily operations by:

Gambling practice	Description
Shift briefing or team meeting	Include a short responsible gambling reminder, highlight recent incidents or positive interventions, and invite quick reflections.
Debriefs	Encourage staff to discuss what went well or what could be improved after a challenging patron situation.
Check-ins	Regularly ask gaming operations staff if they've noticed any emerging patterns of concern.
Visible leadership	Venue leadership spend time on the gaming floor modelling calm, professional responses and supporting staff in real time.
Consistent messaging	Use internal communication boards, newsletters, or team meetings to reinforce harm minimisation wins and lessons learned.

The more responsible gambling is part of daily conversation, the less it feels like compliance, and the more it becomes “how we do things here.”



Activity 12: Daily operations

Reflection question

What is one new way for your venue to embed responsible gambling practice into daily operations?

Embedding responsible gambling into every layer of the business takes intention, consistency, and visible leadership. When operational plans, management documents, training, and daily routines all reinforce the same values, responsible gambling becomes part of the venue's DNA, not just a compliance task. Staff start to act from a shared understanding, patrons notice the difference in culture, and managers can demonstrate accountability with confidence.

This is a proactive approach to minimising gambling harm in your venue.

3.2 Organisational risk & reputation

Responsible gambling leadership is not only about supporting patrons. It's also about protecting the organisation. Every harm-related incident carries potential consequences beyond the gaming floor. The way a venue anticipates, responds to, and reports these incidents reflects directly on its integrity, compliance, and reputation.

A venue's reputation for patron care and safety is shaped by both **what it does** and **what it allows**. When gambling harm is ignored, or when responses appear inconsistent, it can create a perception that the venue prioritises profit over people. This perception can spread quickly through patrons, community networks, and at times media coverage, and may result in lasting effects on patron loyalty, licence renewals, and community goodwill.

Inadequate harm minimisation can also expose venues to regulatory penalties, licence reviews, or formal investigations. Legal liability can also extend beyond the business to managers, hoteliers and directors if they fail to ensure compliance.

Compliance gaps can include:

- failure to maintain, review, or keep all record entries for at least 3 years in the gambling incident register
- employing staff on the gaming room floor without the correct training endorsements or not engaging, training, or supporting an RGO if you have more than 20 gaming machines in operation
- not including clear steps and procedures for your staff to follow nor reviewing or updating in the venue's GPOM.

A proactive venue leadership culture treats these not as administrative issues but as core risk areas requiring regular review and management oversight.

Venue leaders should treat every gambling harm incident as both a human story and a reputational test. Transparent reporting, timely escalation, and actionable follow-up are not just best practice, but are risk control measures.

Using risk management frameworks

Organisational risk in responsible gambling can be broadly grouped into three categories:

1. **Operational risk:** failures in day-to-day responsible gambling practice
2. **Compliance risk:** breaches of the *Gaming Machines Act* or Regulation, or other regulatory guidelines
3. **Reputational risk:** public or media criticism, loss of community trust, or damaged relationships with regulators and key stakeholders.

Effective venue leadership understands how these risks are connected. A single unresolved incident or failure to act can quickly shift from a gaming operations issue to a boardroom concern.

Applying a structured risk management approach helps venue leaders move from reaction to prevention. Frameworks such as [ISO 31000 \(Risk Management – Guidelines\)](#) (ISO, 2023) are internationally-accepted principles and guidelines for risk management that include a structured framework for implementing risk processes, standard criteria for monitoring, reviewing and improving risk management, and tools for reporting and communicating risks organisation-wide.

This framework can be adapted to gambling operations by following four steps:

Step	Description
Identify risks	Map where harm minimisation failures could occur (e.g., staff shortages, inconsistent reporting, lack of tailored training).
Assess risks	Evaluate the likelihood and potential impact on patrons, staff, and the venue.
Control risks	Implement policies, training, and supervision to reduce or eliminate those risks.
Review and monitor	Audit incidents, GPOM, gambling incident registers, feedback, and outcomes to measure effectiveness and adjust as needed.

Using a formal risk management framework demonstrates accountability and gives regulators and management confidence that harm minimisation is managed systematically, not irregularly.

3.3 Ethical leadership in commercial environments

Every gaming venue operates within a commercial reality of budgets, targets, and financial obligations. Yet within this environment, leaders must also uphold the non-negotiable duty and legal requirement to protect patrons from gambling harm. Ethical leadership in responsible gambling is about managing that tension transparently. It means ensuring that decisions ranging from promotions to staffing and training never compromise patron safety and wellbeing.

Balancing commercial and ethical obligations

Ethical leadership requires acknowledging that commercial and ethical priorities can sometimes appear to conflict, but they are not in opposition with one another.

Commercial priorities might include:

- maintaining patron engagement and loyalty
- meeting operational costs and business targets
- ensuring competitive positioning in the local market.

Ethical responsibilities include:

- minimising gambling harm and supporting vulnerable patrons
- ensuring transparent and compliant promotional activity
- providing safe, supportive, responsible and accountable gaming environments.

Venue leaders who build ethical responsibilities into commercial decision-making may find that long-term profitability could be strengthened through reduced regulatory risk, improved staff morale, and increased community trust leading to regular patronage.



When harm minimisation is measured alongside revenue, customer service, and compliance, it signals that patron wellbeing is a business priority, not a background task.

Navigating stakeholder pressures

Venue leaders work within a mix of different stakeholder expectations and pressures. At times, these pressures can be conflicting:

- **Boards and owners** may focus on financial performance.
- **Regulators** require strict compliance and harm minimisation evidence.
- **Community groups** seek and lobby social responsibility.
- **Staff** rely on clear guidance, consistency, and support.

Strong venue leaders bridge these expectations by practising transparency and accountability. They communicate openly about how responsible gambling aligns with the venue's strategic and financial goals, and they ensure that staff feel empowered to raise concerns.

Building trust through ethical leadership

Trust is mostly earned through everyday behaviour and actions, not policies alone. Ways that venue leaders in gaming environments can build trust may include:

- **Modelling transparency** by sharing reasoning behind decisions.
- **Encouraging accountability** by creating space for staff to speak up.
- **Prioritising wellbeing** by recognising the human impact of gambling harm.
- **Demonstrating consistency** by acting the same way, regardless of who is watching.

When staff, patrons, and the community see integrity in action, they may be more likely to engage openly, report issues early, and view the venue as a responsible community partner.



Activity 13: The grey area

Scenario:

A marketing manager proposes a late-night gaming promotion to increase revenue on slower nights. The RGO raises concern that the timing could attract patrons already at risk of harm due to extended play.

Reflection questions

1. How should the venue balance commercial opportunity with ethical responsibility?

2. What information could help make an informed, transparent decision?

3.4 Connecting operations and oversight

Policies and procedures are only effective when turned into action.

Responsible gambling is put into practice not only through planning, but through everyday decisions, communication, and teamwork.

The effectiveness of a venue's harm minimisation strategy depends on how well gaming operations and venue leadership connect their responsibilities and share accountability.

Gaming operations and venue leaders all contribute to the same harm minimisation operational structure but at different levels of responsibility:

- Gaming operations staff handle real-time interactions with patrons, identifying early signs of harm, offering support, and referring concerns through escalation pathways.
- Venue leaders provide the oversight, resources and accountability structures that enable those interventions to happen effectively and consistently.

When these levels are connected through communication, reporting, and shared understanding, harm minimisation becomes part of how the venue operates every day, not just a set of isolated compliance tasks.

Practical alignment may look like:

- Gaming operations staff document incidents clearly and promptly, providing senior management with accurate insights to identify patterns, assess risk, and inform strategic decision-making.
- Venue leaders review these insights at a higher level, ensuring that harm minimisation actions are implemented, monitored, and transparently reported.
- Regular collaboration between gaming operations staff and venue leadership allows for discussion of emerging trends, shared learning, and continuous improvement in harm minimisation policies and culture.

This alignment ensures that harm minimisation becomes a lived practice.

Communication channels

Strong communication channels contribute to the effectiveness of harm minimisation. They allow information to move efficiently between the staff members who see harm first-hand and the leadership who make operational or strategic decisions.

Key communication practices for your venue might include:

What	How
Structured debriefs and team briefings	Short, scheduled check-ins where RGOs and gaming operations supervisors share updates or concerns.
Incident register reviews	Turning data into discussion, what do the incidents mean for training, staffing, or patron care?
Direct lines to decision-makers	Clear processes for RGOs to escalate urgent issues to without delay.
Two-way communication	What will you keep doing, change, or maybe try next time?

When communication flows both ways, leadership becomes shared. Staff feel trusted to act, and leaders stay connected to the real experiences of patrons and employees.

Collaboration: shared responsibility, shared success

Responsible gambling is a team effort. No single person can uphold harm minimisation alone. Collaboration recognises that different people contribute to different parts of the solution.

- RGOs lead through presence, empathy, and action.
- Gaming operations supervisors and responsible gambling managers lead through coordination, support, and follow-up.
- Venue leaders lead through policy, systems, culture, and accountability.

When these roles support one another, they form a network of patron care that's stronger than any individual effort.

Examples of collaboration in practice:

Who	What
RGO	An RGO briefing management after a difficult incident so policy updates can be considered.
Gaming operations supervisors and responsible gambling managers	A supervisor backing up an RGO's gambling harm intervention decision, even when a patron complains.
Direct lines to decision-makers	Clear processes for RGOs to escalate urgent issues without delay.
Venue leader	A venue leader acknowledging and celebrating staff who perform effective harm minimisation actions.

This shared model reduces pressure on individuals and strengthens trust across the organisation.



Activity 14: Collaboration in action

Scenario:

An RGO notices and reports that several staff are hesitant to record minor gambling harm-related incidents because they feel management “only want to know about serious cases.” What actions could an RGO, gaming operations supervisor, responsible gambling manager, or venue leader, take to:

Encourage transparent reporting?	
Show that all levels of harm matter to the venue's culture?	

Module wrap-up

You've completed Module 3, which focused on how leadership shapes venue culture, governance, and reputation. You learned about:

- Moving from Policy to Culture: Explored how to move beyond tick-box compliance and embed harm minimisation into everyday operations
- Organisational Risk & Reputation: Learned how proactive leadership and collaboration reduces risk
- Ethical Leadership: Examined how to balance commercial priorities with duty of care.

Reflective questions

- How will you turn compliance into culture in your venue? What will staff see, hear, and feel that shows harm minimisation is a priority?
- When commercial and ethical priorities conflict, how will you lead with transparency and integrity.

Leading the future of safe and responsible gambling

Congratulations on completing the Advanced Responsible Conduct of Gambling (ARCG) training. You've built on your existing Responsible Conduct of Gambling (RCG) foundation to develop advanced, harm minimisation knowledge and skills.

This course has prepared you to lead harm minimisation practice across both gaming operations and at a venue leadership level, creating venues where patron care, compliance, and culture work together to protect patrons and support staff.

Throughout the 3 modules of ARCG training, you've developed the mindset and skills of a leader in harm minimisation. You've learned that responsible gambling is not a task on paper. It's a commitment to people, principles, and continuous improvement.

ARCG leaders:

- **move beyond compliance** to create a culture of genuine patron care.
- **model ethical and confident decision-making** in complex situations.
- **build partnerships** within their teams and across the industry.
- **lead by example**, ensuring that every action upholds the values of integrity, transparency, safety, and respect.

Your leadership makes a difference, not just to patrons, but to your colleagues, your venue, and the wider community.

Let's finish off with some short reflections to take back into your workplace.



Activity 15: Final ARCG reflections

Write short reflections identifying:

The most valuable learning you have gained in the ARCG course.	
What specific actions you will take to continue growth in your responsible gambling duties.	



Write short reflections identifying:

One area for improvement in harm minimisation practice.	
A concrete step you will take within the next month on an area for improvement.	

Appendices



Appendix 1: Gaming Machines Regulation 2019

Part 3 Responsible gambling practices and other harm minimisation measures

Division	Section
<u>Division 1 Provisions relating to player information</u> (URL: https://legislation.nsw.gov.au/view/html/inforce/current/s1-2019-0428#pt.3-div.1)	• 18 Display of information concerning chances of winning prizes on gaming machines • 19 Approval of player information brochures in English and other languages • 20 Provision of player information brochures in English • 21 Provision of player information brochures in other languages • 22 Dangers of gambling — notices to be displayed on gaming machines • 23 Gambling counselling services — notice to be displayed • 24 Signage to be displayed on ATMs and cash-back terminals
<u>Division 2 Cheques and cash dispensing facilities</u> (URL: https://legislation.nsw.gov.au/view/html/inforce/current/s1-2019-0428#pt.3-div.2)	• 25 Prohibitions on dealings with cheques • 26 Payment of prize money by cheque or electronic funds transfer • 27 Requirements relating to prize winning cheques • 28 Location and line of sight of cash dispensing facilities — the Act, s 47 • 28A Location of signage for cash dispensing facilities away from gaming machines • 28B Advertising of gaming machines not permitted on or near cash dispensing
<u>Division 3 Gaming machine threshold scheme</u> (URL: https://legislation.nsw.gov.au/view/html/inforce/current/s1-2019-0428#pt.3-div.3)	• 30 Threshold increase ranges • 31 Threshold increase applications — general requirements • 32 Threshold increase applications — consultation requirements • 33 Class 1 LIA — information to be provided • 34 Class 2 LIA — information to be provided • 35 Provision of class 1 LIA in relation to amalgamated club premises • 36 Special provision for clubs establishing adjacent to new development areas • 37 Consultation and notice requirements • 38 Restriction on approving threshold increase applications for small venues • 39 Exemption from operation of section 37B(4) of Act for club premises in retail • 40 Time within which threshold increase applications to be dealt with
<u>Division 4 Miscellaneous harm minimisation measures</u> (URL: https://legislation.nsw.gov.au/view/html/inforce/current/s1-2019-0428#pt.3-div.4)	• 41 Gaming machine advertising and signs — exclusions • 42 Provision of player activity statements under player reward schemes • 43 Requirement to keep record or copy of player activity statement • 44 Provision of problem gambling counselling services • 45 Self-exclusion schemes • 46 Provision of gambling contact cards • 47 Offering of inducements to gamble • 48 Notices relating to gaming machine areas in clubs • 49 Location of jackpot prize monitors for linked gaming systems • 50 Publicity for prizewinners
<u>Division 4A Responsible gambling officers — the Act, s 47</u> (URL: https://legislation.nsw.gov.au/view/html/inforce/current/s1-2019-0428#pt.3-div.4A)	• 50B Appointment of responsible gambling officers for hotels and registered clubs • 50C Number of responsible gambling officers required to be on duty at all times • 50D Midnight to 8am requirement for on-duty responsible gambling officers • 50E Secretary's approval for number of responsible gambling officers • 50F Duties of responsible gambling officers • 50G Duties of hotelier or registered club • 50I Hotelier or registered club directing or encouraging contraventions • 50J Responsible gambling officers — making complaints or inquiries

<u>Division 4B Gambling incident registers and gaming plans of management – the Act, s 47</u> (URL: https://legislation.nsw.gov.au/view/html/inforce/current/sl-2019-0428#pt.3-div.4B)	Subdivision 1 Gambling incident registers • 50K Gambling incident registers • 50L Gambling incident registers – duty of employees to record • 50M Gambling incident registers – inspection • 50N Gambling incident registers – review Subdivision 2 Gaming plans of management • 50P Gaming plans of management • 50Q Gaming plans of management – access and training for employees • 50R Gaming plans of management – inspections • 50S Gaming plans of management – review
<u>Division 5 Responsible conduct of gambling (RCG) training</u> (URL: https://legislation.nsw.gov.au/view/html/inforce/current/sl-2019-0428#pt.3-div.5)	• 52 Interim RCG certificates • 53 Issue and replacement of recognised competency card • 54 Expiry of RCG endorsement • 55 Renewal of RCG endorsement • 56 Inspection of recognised competency card • 57 Training of hoteliers, club secretaries and employees • 58 Approval of training providers

Appendix 2: Gambling support services

Support Type	DESCRIPTION
Patron self-help	<u>“I want to help myself”</u> (URL: https://www.gambleaware.nsw.gov.au/i-need-support/i-want-to-help-myself) • Get a grip on your finances • Take a break and ban yourself • Be gamble aware and gamble more safely • Use apps to manage your gambling
Talk to someone	<u>“I need to talk to someone”</u> (URL: https://www.gambleaware.nsw.gov.au/i-need-support/i-need-to-talk-to-someone) • Face to face counselling services • Online and email counselling • Culturally safe services for Aboriginal people • Support in over 40 languages for culturally and linguistically diverse communities • Financial counsellors • Psychological support • Gambling related videos and social media support
Connecting with people	<u>“How do other people cope?”</u> (URL: https://www.gambleaware.nsw.gov.au/i-need-support/how-do-other-people-cope) • Peer to peer support • Hear real people sharing real stories
People affected by someone else’s gambling	<u>“I’m affected by someone else’s gambling”</u> (URL: https://www.gambleaware.nsw.gov.au/i-need-support/i-am-affected-by-someone-elses-gambling) • GambleAware counsellors • Keeping finances and family safe
Supporting family and friends	<u>“What strategies can you use?”</u> (URL: https://www.gambleaware.nsw.gov.au/supporting-someone/supporting-family-and-friends) • Signs of gambling harm • Prepare yourself • Start the conversation • Supporting someone with legal issues • Supporting yourself • Supporting a young person
Support in the workplace	<u>“Support in the workplace”</u> (URL: https://www.gambleaware.nsw.gov.au/supporting-someone/support-in-the-workplace) • Supporting your employees • Supporting a workmate • Signs gambling may be a problem

Appendix 3: How to act on warning signs of gambling harm

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 - Uses coin machine at least four times	On their own, these may be early warning signs. A patron showing several of these signs could be experiencing 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 in your venue's gambling incident register 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 experiencing gambling harm. - Monitor the patron's behaviour. - Record what you have noticed in your venue's gambling incident register 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 problems - 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 experiencing gambling harm. - Monitor the patron's behaviour - Record what you have noticed in your venue's gambling incident register, 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

Appendix 4: Responsible Gambling quick reference: Communication under pressure

Conversational scaffolds	Examples
Opening check-in	"Hi, just checking in - how's your night going?" "We like to make sure everyone's comfortable - how are things for you?" "I've noticed you've been here for a while; thought I'd see if you need anything."
Normalising concern	"We check in with everyone from time to time - it's part of keeping things safe." "It's something we do regularly to make sure patrons feel supported." "We want everyone to enjoy their time here in a safe way."
Offering options without pressure	"If you'd like, I can share some info about taking a break or support services." "There are some helpful resources if you ever want them - no pressure." "Would you like to know about self-exclusion or other ways to manage play?"
Redirecting Resistance	Patron: "I'm fine, don't worry about me." Response: "I hear you - just checking in, we care about everyone's experience." Patron: "Why are you asking me this?" Response: "We ask everyone from time to time - it's about keeping things safe and comfortable for all patrons." Patron: "Everyone plays this much." Response: "Lots of people enjoy playing - sometimes it helps to take a short break though."
Encouraging Reflection	"Sometimes a short break can make a big difference - what do you think?" "Have you had a chance to grab some water or stretch your legs?" "Would you like me to point you to some options that others have found helpful?"
Closing the conversation	"Thanks for chatting - I'm here if you need anything." "If you change your mind about getting some info, just let me know." "We're always here to help - don't hesitate to ask."
Active listening clues	Examples
Reflect feelings	"It sounds like you're feeling frustrated right now." "I can hear this has been a tough night for you." "You seem a bit stressed - thanks for sharing that with me." "I get that this is important to you."
Clarify gently	"Just so I understand, you're saying you've had a rough run tonight?" "Can I check I've got that right - you're worried about how much you've spent?" "You mentioned things have been hard in here - what do you mean by that?"
Affirm autonomy	"It's completely your choice - I'm here if you want support." "You're in control - I can share options if that helps." "Whatever you decide, I'm here to make sure you feel supported."
Closing the conversation	"Thanks for chatting - I'm here if you need anything." "If you change your mind about getting some info, just let me know." "We're always here to help - don't hesitate to ask."
De-escalation prompts	Examples
Acknowledge emotion first Offer space and choice Avoid ultimatums	"I can see this is upsetting - let's take a moment." "Would you like to step over here where it's quieter?" Replace "You need to calm down" with "I want to make sure we can talk safely - let's take a breath first."

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