

# Video Recording and Photography in the Gaming Machine Area (GMA) Policy

## Policy Statement

The Club is committed to maintaining compliance with all applicable gaming legislation, privacy requirements, and responsible gambling obligations. Video recording and photography within the Gaming Machine Area (GMA) may create privacy concerns for patrons and staff and may result in breaches of gaming advertising regulations.

Any person observed recording video, taking photographs, livestreaming, or otherwise capturing images within the Gaming Machine Area must be managed in accordance with this policy.

Failure to appropriately intervene and document incidents may expose the Club to regulatory action, penalties, and reputational risk.

## Purpose

This policy provides a clear process for staff to identify, manage, escalate, and document incidents involving video recording or photography within the Gaming Machine Area.

The objectives of this policy are to:

- Protect the privacy of patrons and staff.
- Ensure compliance with gaming legislation and regulatory requirements.
- Prevent the creation or dissemination of unauthorised gaming-related advertising or promotional material.
- Provide staff with a consistent approach to managing incidents.
- Maintain accurate records of all interventions.

## Scope

This policy applies to all employees, contractors, supervisors, managers, and Responsible Gambling Officers (RGOS) working within or overseeing the Gaming Machine Area.

## Definitions

- **Gaming Machine Area (GMA):** Any area of the venue containing electronic gaming machines and associated gaming facilities.

- **Recording Activity:** Any form of video recording, photography, livestreaming, screen capture, or image collection using a mobile phone, camera, tablet, wearable device, or other electronic equipment.
- **Responsible Gambling Officer (RGO):** A staff member appointed to fulfil responsible gambling duties in accordance with venue and legislative requirements.

## **Procedures**

### **Step 1 - Immediate Staff Intervention**

When a staff member observes a patron recording video or taking photographs within the Gaming Machine Area, they must immediately approach the patron in a professional and courteous manner.

The staff member must:

- Instruct the patron to cease recording or taking photographs immediately.
- Request that any footage or images already captured be deleted.
- Explain that recording and photography are not permitted within the Gaming Machine Area.
- Refer to venue signage and the privacy rights of other patrons and staff.

### **Step 2 - Escalation to Management**

If the patron refuses to comply with the initial direction, the staff member must immediately notify the Responsible Gambling Officer (RGO) or Duty Manager.

### **Step 3 - Final Direction and Removal**

The RGO or Duty Manager must provide the patron with a final direction to cease recording and comply with venue rules. Where the patron refuses to comply, they may be directed to leave the premises.

### **Step 4 - Incident Documentation and Surveillance**

- All incidents involving video recording or photography within the Gaming Machine Area must be documented, regardless of outcome, in the Responsible Gambling Incident Register.
- All recorded incidents must be cross referenced by management with CCTV footage to maintain a complete and accurate audit trail for regulatory review.

## **Responsibilities**

### **1. All Staff**

- Monitor the Gaming Machine Area for prohibited recording activity, including identifying potential influencers or social media content creators.
- Intervene immediately when recording or photography is observed.
- Escalate non-compliance to the RGO or Duty Manager.

### **2. Responsible Gambling Officers and Duty Managers**

- Manage escalated incidents.
- Provide final directions to patrons.
- Determine whether removal from the premises is required.
- Ensure all incidents are accurately documented and supported by relevant CCTV logs.

### **3. Venue Management**

- Ensure that the regulatory suggested "No Filming/No Photography" signage is displayed at all entry points to the Gaming Machine Area.
- Ensure staff are trained in this policy.
- Maintain incident records.
- Ensure CCTV systems are maintained in accordance with legislative standards (continuous 24/7 recording, minimum 28-day retention, and clear view of EGM screens) to support compliance monitoring.
- Review incidents to identify trends and opportunities for improvement.

## **Compliance**

Failure to comply with this policy may expose the Club to significant regulatory penalties and enforcement action.

## **Review**

This policy will be reviewed annually or sooner if legislative, regulatory, or operational requirements change.