

# Queensland responsible gambling Resource manual

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# Casinos

Developed by representatives from Queensland casinos and the Department of Justice and Attorney-General



# Contents

<b>Practice 1 Provision of information</b> .....	3	<b>Practice 4 Physical environment</b> .....	26
<b>1.1</b> Potential risks .....	3	<b>4.1</b> Minors prohibited and	
<b>1.2</b> Available on request .....	4	<b>4.2</b> Minors barred .....	26
Example <b>1.2A</b> Responsible gambling policy .....	4	<b>4.3</b> Hospitality services .....	26
<b>1.3</b> Odds of winning major prizes .....	7	<b>4.4</b> Intoxicated customers .....	27
<b>1.4</b> Predominant cultural groups .....	8	<b>4.5</b> Child care and play areas .....	27
Examples of acceptable/unacceptable actions .....	8	<b>4.6</b> Gratuities .....	27
<b>Practice 2 Interaction with customers and community</b> ..	9	<b>4.7</b> Passage of time .....	27
<b>2.1</b> Community liaison .....	9	<b>4.8</b> Breaks in play .....	28
<b>2.2</b> Customer liaison role .....	9	<b>4.9</b> New gambling products and services .....	28
Example <b>2.2A</b> Gambling-related incident report ..	11	Example <b>4.9A</b> New gambling service/product	
<b>2.3</b> Customer complaints .....	12	guideline—responsible gambling .....	28
Example <b>2.3A</b> Complaint handling procedures .....	12	Examples of acceptable/unacceptable actions .....	29
<b>2.4</b> Training and skills development .....	13	<b>Practice 5 Financial transactions</b> .....	30
Example <b>2.4A</b> Possible problem gambling risk		<b>5.1</b> ATM facilities .....	30
indicators .....	13	Example <b>5.1A</b> Financial transactions policy .....	30
Examples of acceptable/unacceptable actions .....	14	<b>5.2</b> Cashing of cheques and payment of winnings ..	31
<b>Practice 3 Exclusion provisions</b> .....	15	<b>5.3</b> Credit betting (lending of money) .....	31
<b>3.1</b> Exclusion procedures .....	15	Examples of acceptable/unacceptable actions .....	31
Example <b>3.1A</b> Conditions of re-entry		<b>Practice 6 Advertising and promotions</b> .....	32
(participation in gambling activities) .....	19	<b>6.1</b> Code of Ethics .....	32
Example <b>3.1B</b> Self-exclusion flowchart .....	20	<b>6.2</b> False, misleading or deceptive .....	33
Example <b>3.1C</b> Venue-initiated exclusion flowchart ..	21	<b>6.3</b> Misrepresentation of probabilities .....	33
Example <b>3.1D</b> Revocation process flowchart .....	22	<b>6.4</b> Reasonable strategy (financial betterment) .....	34
<b>3.2</b> Contact information for support services .....	23	<b>6.5</b> Misleading statements .....	34
<b>3.3</b> Exclusion from other gambling providers .....	23	<b>6.6</b> Community standards .....	35
<b>3.4</b> Correspondence to excluded customers .....	23	<b>6.7</b> Other activities to promote .....	36
Examples of acceptable/unacceptable actions .....	23	<b>6.8</b> Minors or vulnerable or disadvantaged groups ..	36
Glossary of terms .....	24	<b>6.9</b> External signs .....	38
Glossary of exclusion forms .....	25	<b>6.10</b> Irresponsible trading practices .....	39
		<b>6.11</b> Consumption of alcohol .....	40
		<b>6.12</b> Consent of the person .....	40
		<b>6.13</b> Responsible gambling messages .....	40
		<b>Gambling help information</b> .....	41

## Practice 1

# Provision of information

## Introduction

It is the aim of casinos to provide accurate, meaningful and readily accessible information to all customers, enabling them to make informed decisions when considering their choices in participating in the range of available gambling products.

To achieve this outcome, information will be provided to ensure maximum accessibility for all customers.

Suggested mediums include:

- educational brochures
- gaming guides
- posters
- signage
- player kiosks
- web pages.

Suggested placement of information:

- rest rooms
- cash out facilities
- cashier cages
- hotel rooms
- high traffic areas, e.g. near electronic gaming machines
- customer service desks
- orientation packages
- back of house areas
- training programs
- employee handbooks.

## 1.1 Potential risks

*Information about the potential risks associated with gambling and where to get help for problem gambling is prominently displayed in all gambling areas and near cash out facilities which service gambling areas.*

### Actions of the casino operator

The casino will:

- train staff to access information
- provide self and venue-initiated excluded customers with information on Gambling Help services
- provide information on where to seek assistance for problem gambling in brochures and other relevant information
- prominently display near cash out facilities the current responsible gambling signage and information on where to get help. Current in-venue signage includes:



For additional information about where the signage can be used, or to download copies please visit [www.business.qld.gov.au/liquor-gaming](http://www.business.qld.gov.au/liquor-gaming)

### Best practice

The casino may develop brochures which include:

- information on our responsible gambling commitment
- signs of problem gambling and where to seek help
- chances of winning
- financial transactions
- internal contact phone numbers

- information on the self-exclusion program
- information on unattended children.

In addition to existing signage, information may be provided via an electronic display or an emerging technological format.

**Note:** ‘excluded customers’—for the purposes of this document, include self-exclusions and venue-initiated exclusions for problem gambling.

## 1.2 Available on request

*Information is displayed in a prominent location to alert customers that the following information is available on request:*

- *the gambling provider’s Responsible gambling policy document including policies for addressing problem gambling issues relevant to the local community*
- *the nature of games, game rules, odds or returns to players*
- *exclusion provisions*
- *gambling-related complaint handling procedures*
- *key elements of the gambling provider’s financial transaction practices.*

### **Actions of the casino operator**

The casino will:

- ensure the casino’s *Responsible gambling policy (Example 1.2A)* document, including policies for addressing problem gambling issues relevant to the local community is available upon request
- inform customers of the availability of the gaming guides, which provide information on the nature of games, game rules and odds or returns to player
- inform customers of the availability of further information upon request, including:
  - exclusion provisions
  - gambling-related complaint handling procedures
  - key elements of the gambling provider’s financial transaction practices.

### **Best practice**

The casino may:

- incorporate relevant information into staff orientation, training programs, and information sessions
- insert links to relevant databases and websites such as Gambling Help Online ([www.gamblinghelponline.org.au](http://www.gamblinghelponline.org.au)) on our websites.

## Example 1.2A Responsible gambling policy

**Casino name** \_\_\_\_\_

### **Workplace goal**

Most customers enjoy gambling as a part of their leisure and entertainment experience. The implementation of the *Queensland responsible gambling Code of Practice* (Code of Practice) enables management and team members to meet the needs of all our customers with a particular focus on those customers who are adversely affected by either their own or a significant other’s gambling behaviour.

### **Achieving outcomes**

The Code of Practice is designed to achieve the following outcomes:

- individuals, communities, the gambling industry and the Government have a shared understanding of responsible gambling practices
- individuals, communities, the gambling industry and the Government have an understanding of their rights and responsibilities in relation to responsible gambling practices
- the gambling industry provides safe and supportive environments for the delivery of gambling products and services
- customers make informed decisions about their gambling practices
- harm from gambling to individuals and the broader community is minimised
- people adversely affected by gambling have access to timely and appropriate information and assistance
- the gambling industry considers, and applies, principles of responsible gambling to all new and emerging technologies.

### **Commitment**

This casino is committed to achieving the outcomes of the Code of Practice. In line with this commitment we endeavour to:

- provide accurate, meaningful and readily accessible information to enable customers to make informed decisions when considering their level of gambling activities
- work with external support agencies in providing assistance and information for customers adversely affected by gambling
- provide sensitive and confidential support to customers who wish to exclude themselves from our casino/s

- ensure self-excluded customers do not receive promotional material
- assist self-excluded customers to self-exclude from other gambling venues
- provide a pleasant, safe and comfortable gambling environment
- ensure children are not left unattended at any of our casinos
- encourage customers to be aware of the passing of time
- encourage customers to take breaks in play
- prevent unduly intoxicated customers from gambling
- accept cheques only after prior arrangements
- restrict the cashing of winnings cheques for 24 hours from time of issue
- prohibit credit betting
- confirm gambling advertising and promotions comply with the Code of Practice.

### **Initiatives**

The following initiatives are designed to assist in the implementation, maintenance and continuous improvement of responsible gambling practices:

- A person/s is nominated to perform the customer liaison role at each casino during approved opening gaming hours. The responsible gambling team is accountable for the maintenance and continuous improvement of responsible gambling practices.
- All new team members are introduced to responsible gambling practices in general orientation and are expected to understand their role and responsibilities.
- All team members are expected to complete an annual responsible gambling refresher training session.

### **General information**

#### **What is my role in demonstrating responsible gambling practices?**

It is the shared responsibility of all team members to demonstrate an awareness of responsible gambling practices and to know where to access further information. Your role is to:

- respond with respect and refer
- attend responsible gambling training
- be able to direct customers to relevant information and assistance
- respond immediately to customers requesting self-exclusion
- report any unduly intoxicated customers attempting to gamble

- recognise and report suspected extended and intensive play
- report any unattended children
- refuse to serve someone believed to be a minor
- understand the complaint handling procedures and know where to get further information.

#### **What is the responsibility of the responsible gambling team?**

The responsible gambling team assists in the implementation, maintenance and continual improvement of responsible gambling practices.

The role involves:

- providing responsible gambling education
- providing appropriate information to assist customers with gambling-related problems
- providing support to team members in assisting customers
- providing support to team members with gambling-related problems
- establishing effective links with local gambling-related support services
- taking appropriate action in response to reported incidents in the *Responsible gambling incident register*
- supporting management and internal committees as appropriate
- approving responsible gambling procedures
- influencing external responsible gambling strategies.

#### **What written information is available for customers and where is it located?**

Several brochures are available informing customers about the potential risks of gambling, the odds of winning major prizes, the responsible gambling commitment statement and where to get assistance for problem gambling. Brochures are located near the cash out facilities, in toilets (front and back of house), in hotel rooms and at customer services desks.

Further written information is available upon request and includes self-exclusion particulars, complaint handling details, key elements of financial transaction policies and the *Responsible gambling policy*. Customers can access this information by asking the responsible gambling team.

#### **What is problem gambling?**

Problem gambling is characterised by difficulties in limiting money and/or time spent on gambling which leads to adverse consequences for the gambler, others, or for the community.

### **Where can customers get assistance for problem gambling?**

This casino works with a number of external support services including organisations operated by professional counsellors who are trained to help those people adversely affected by gambling. The Gambling Helpline phone number (1800 858 858) can be found in the responsible gambling brochure and takeaway cards. Customers may also be referred to the responsible gambling team.

### **What should I do if I believe an unduly intoxicated customer is gambling?**

All our food and beverage and senior gaming team members are trained in responsible service of alcohol procedures which prevents the service of alcohol to unduly intoxicated customers. However, if this situation does occur you should report it to your supervisor or manager.

### **What should I do if I believe a minor (under 18 years) is on the gaming floor?**

Safety and security officers are responsible for checking the identification of any suspected underage person wishing to enter the gaming floor. If you believe a minor has entered the gaming floor, the matter should be reported to your supervisor or manager, or a safety and security officer immediately and the minor is to be asked to leave the gaming floor. It is everybody's responsibility to be on the lookout for minors on the gaming floor.

### **What should I do if a customer has a gambling-related complaint?**

If the complaint is minor you should handle it according to your departmental procedures. Pass any significant complaint onto your immediate supervisor or manager.

### **How can I recognise extended and intensive play? What should I do about it?**

Determining extended and intensive play is a very sensitive situation and cannot necessarily be judged by the customers' length of play. Refer to the *Possible problem gambling risk indicators* section of **Practice 2** in the *Queensland responsible gambling resource manual (Casinos)* for signs of what to look out for.

You are encouraged to be aware of anyone showing these signs and report it to your supervisor or manager. Customers are not to be approached except by those team members who have received specialised training in handling these situations. The responsible gambling team may also be available to offer assistance.

### **What should I do if I see a child left unattended in any area of the property?**

If you suspect a child has been left unattended, you must report it to a safety and security officer or your supervisor or manager immediately. Remain with the child until assistance arrives.

### **What should I do if a customer asks about being excluded?**

If a customer asks you about self-exclusion you should ask your supervisor or manager to immediately contact the gaming duty manager, safety and security or the responsible gambling team.

### **How do I enrol on a responsible gambling training course?**

Responsible gambling training is mandatory for all team members and your supervisor or manager is required to enrol you on a responsible gambling training program, usually pre-employment or during Orientation. To ensure your knowledge and skills remain current you will be enrolled into responsible gambling refresher training on a regular basis.

### **Further information**

For further information, contact the responsible gambling team, gaming duty manager and/or safety and security.

### **Key points**

Training is provided for all team members.

Brochures are available on responsible gambling practices and where to get help.

How to play gaming guides provide the odds of winning.

Minors and unduly intoxicated customers are prohibited from gambling.

The responsible gambling team may offer assistance to customers adversely affected by gambling.

Customers may self-exclude from the gaming floor.

### **Staff action and responsibilities**

Team members directly involved in providing service for gambling activities are to:

- attend responsible gambling training
- direct customers to relevant information and assistance
- understand the availability of self-exclusion
- report unduly intoxicated customers attempting to gamble
- recognise and report suspected extended and intensive play
- report any unattended children
- refuse to serve someone believed to be a minor

- understand the complaint handling procedures
- know where to get further information.

It is the responsibility of every team member to:

- demonstrate an awareness of responsible gambling practices (respond with respect and refer)
- know where to find responsible gambling information.

It is the responsibility of management to:

- enrol team members into training
- provide support and coaching
- refuse gambling services to unduly intoxicated customers
- ensure customers requesting self-exclusion are referred to the gaming duty manager or safety and security immediately.

## 1.3 Odds of winning major prizes

*Meaningful and accurate information on the odds of winning major prizes is prominently displayed in all gambling areas and in proximity to relevant games.*

### ***Actions of the casino operator***

The casino will:

- display information contained in gaming guides throughout the casino, in the form of *How to play the game* brochures (the material is to include information on the aim of the game, how to play, gaming terminology, the range of bets, and payout odds)
- maintain communication on the availability of player information to staff and customers
- provide links on their websites to how to play information using the following links:
  - [www.jupitersgoldcoast.com.au/casino/learn-to-play](http://www.jupitersgoldcoast.com.au/casino/learn-to-play)
  - [www.treasurybrisbane.com.au/casino/pages/how-to-play.aspx](http://www.treasurybrisbane.com.au/casino/pages/how-to-play.aspx)

### ***Best practice***

The casino may:

- update current brochures and information flyers to include links to gambling help service providers
- provide information in relevant languages suitable to customers.

## 1.4 Predominant cultural groups

*Gambling providers are to provide information and materials suitable for predominant cultural groups in their local community.*

### ***Actions of the casino operator***

The casino will provide upon request, information and/or materials that have been developed by government or gambling help service providers and are suitable for predominant cultural groups in each casino's local community.

Where suitable information and materials are not available, gambling providers should provide non-English speaking customers with the contact details for a translating service, e.g. Translating and Interpreting Service (TIS) National on **131 450** or [www.immi.gov.au](http://www.immi.gov.au)

### ***Best practice***

The casino may develop a range of responsible gambling materials in languages other than English, which are stored electronically and printed upon request. For example, responsible gambling brochures, self-exclusion forms and 'unattended children brochures' in languages suitable for each casino's local environments.

## Examples of acceptable/ unacceptable actions

### ***Acceptable***

Displaying responsible gambling signage and takeaway cards in a prominent location within the casino.

Where appropriate, informing customers that responsible gambling information and brochures are available.

### ***Unacceptable***

Placing responsible gambling information in hard to reach areas or covering responsible gambling signage with other notices.

Not displaying responsible gambling signage and takeaway cards.



# Interaction with customers and community

## Introduction

Casinos aim to ensure the highest level of customer satisfaction through developing and maintaining communication strategies that continue to build relationships which:

- establish links between casinos and local relevant community networks and support services
- train staff members for customer liaison roles
- establish a customer complaints handling mechanism
- provide ongoing training for staff in responsible gambling programs and initiatives.

## 2.1 Community liaison

*To support early intervention and prevention strategies where opportunities arise, gambling providers are to establish effective mechanisms to link with:*

- *local gambling-related support services*
- *community networks where responsible gambling-related issues could be raised.*

### ***Actions of the casino operator***

The casino will:

- ensure members of the senior management team represent the casino operator in the customer liaison role to continue open communication channels with local gambling-related support services and relevant local community networks
- have knowledge of local community support services, including counselling services, to assist customers.

### ***Best practice***

The casino may appoint a responsible gambling committee who is responsible for discussing responsible gambling issues, new initiatives and maintaining contact with community service providers.

## 2.2 Customer liaison role

*Gambling providers are to nominate a person/s to perform the customer liaison role and who is to:*

- *be available during approved opening gaming hours*
- *provide appropriate information to assist customers with gambling-related problems*
- *support staff in providing assistance to those customers*
- *provide assistance to staff with gambling-related problems*
- *develop linkages with local community groups where opportunities arise.*

### ***Actions of the casino operator***

The casino will nominate positions within the property to facilitate the role of responsible gambling liaison.

These positions will be responsible for:

- providing support and referral services for customers and/or their families who have self-identified as having a gambling-related problem
- providing support to staff in assisting customers with gambling-related problems
- providing assistance to staff who have self-identified as having gambling-related problems
- providing support to staff in the management of self-exclusions, exclusion directions for problem gambling, revocations and the handling of contraventions
- communicating to staff and customers any new responsible gambling policies and/or practices
- contributing to the maintenance and currency of responsible gambling training programs

- assisting with the ongoing maintenance of the *Queensland responsible gambling resource manual (Casinos)* (Resource manual)
- developing linkages with regulatory bodies, internal departments, community support services, community and industry groups and other associations who contribute to partnerships that are committed to responsible gambling initiatives and practices.

### **Best practice**

The casino may:

- investigate and follow up all responsible gambling incidents that are reported to the casino operator
- complete a *Gambling-related incident report* (Example 2.2A) for incidents that occur in the casino
- provide ongoing maintenance of a *Register of responsible gambling incidents*
- implement new initiatives and ideas as they evolve with the ongoing recommendations outlined in the *Queensland responsible gambling Code of Practice* (Code of Practice).

## Example 2.2A Gambling-related incident report

Site name \_\_\_\_\_

Incident date \_\_\_\_\_ Incident time \_\_\_\_\_

Staff member name \_\_\_\_\_

Staff member signature \_\_\_\_\_

Who reported the incident? (record as many details as possible)

Name \_\_\_\_\_ Phone \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State/Territory \_\_\_\_\_ Postcode \_\_\_\_\_

Email \_\_\_\_\_

Incident details (attach additional pages if required)

\_\_\_\_\_

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Immediate action taken (attach additional pages if required)

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\_\_\_\_\_

Follow-up action/other matters to note (attach additional pages if required)

\_\_\_\_\_

\_\_\_\_\_

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\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Signatory name \_\_\_\_\_

Signatory position (customer liaison officer/manager/other) \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_

## 2.3 Customer complaints

*Complaint handling procedures that can deal with gambling issues are established and promoted by gambling providers.*

### **Actions of the casino operator**

The casino will:

- address all customer complaints initiated through any source
- ensure all customer complaints are handled by the appropriate manager on duty
- implement *Complaint handling procedures (Example 2.3A)* in accordance with company and regulatory requirements
- maintain a register of incidents and complaints, that are forwarded to the Office of Liquor and Gaming Regulation (OLGR).

### **Best practice**

The casino may:

- incorporate the process for complaints in communications to staff and customers
- establish a minimum time in which to respond to a complaint.

## Example 2.3A Complaint handling procedures

The casino's procedure for handling customer complaints is as follows:

- Frontline staff member handles minor complaints.
- The matter is escalated to the next level as appropriate.
- Should complaint be of a particular matter or resolution is not satisfactory to all parties the manager on duty will escalate the matter to gaming operations management.
- The Office of Liquor and Gaming Regulation (OLGR) receives notification of decisions made at the gaming operations management level.
- Should complaint remain unresolved, the player is encouraged to report the situation to OLGR.
- Should a complaint be made against the casino, the player is encouraged to contact OLGR directly.
- Complaints are recorded in the duty manager's reports.

## 2.4 Training and skills development

*Mechanisms are established to ensure that appropriate and ongoing responsible gambling training is provided to staff who provide gambling products to customers.*

*In addition, the relevant owners, boards and managers receive appropriate information to guide decision making in relation to responsible gambling.*

### **Actions of the casino operator**

The casino will:

- develop and maintain a training program in line with national competencies
- train all gaming staff, security, managers and other relevant staff in responsible gambling training programs
- keep a register of training for responsible gambling training courses.

### **Best practice**

The casino may:

- evaluate short, medium and long term training results to assist in monitoring the effects or otherwise of training from a team member, customer and community perspective
- consider other methods of delivering relevant gambling information—for example, online learning and responsible gambling awareness programs
- include information in staff training programs on how to identify the signs of problem gambling and how to respond. Refer to *Possible problem gambling risk indicators (Example 2.4A)*.

## Example 2.4A Possible problem gambling risk indicators

You may encounter customers displaying one or several of these indicators. Displaying one risk indicator may not mean the customer is a problem gambler (unless they display that particular risk indicator to an unreasonable degree). Some of the indicators can be quite subtle whilst others may be more obvious. We are looking for clusters of three or more indicators. Remember, you are not a trained counsellor; our job is to respond with respect and refer.

### **Observed or reported signs**

#### **Emotional responses**

- Suffering from depression and/or have thoughts of suicide due to gambling behaviour.
- Displaying anger, kicking machines, looking sad and/or crying.

#### **Faulty cognition**

- Having an unrealistic perception about the chance/odds of winning.

#### **Frequency, duration and intensity**

- Gambling every day of the week.
- Gambling continuously without taking a break for extended periods of time.

#### **Impaired control/loss of control**

- Trying obsessively to win on a particular machine.

#### **Irrational attributions/behaviours**

- Blaming the venue, the staff or gaming machines because they lost.

#### **Raising funds/chasing behaviour**

- Getting cash out from an ATM at the venue on multiple occasions.
- Trying to borrow, 'scam' money or sell valuables to others for gambling.
- Putting large win amounts back into the machine and keep playing.

#### **Social behaviours**

- Friend or relatives call or arrive to ask if the person is still at the venue.
- Spending too much time and/or money gambling.

*Adapted from Delfabbro, P.H., Osborn, A., Nevile, M., Skelt, L. & McMillen, J. (2007). Identifying Problem Gamblers in Gaming Venues, Gambling Research Australia, Melbourne and Responsible Gambling Advisory Committee Exclusions Focus Group (2002) Pathways and Protocols for Exclusion—An Intervention/Rehabilitation Strategy.*

## Examples of acceptable/ unacceptable actions

### **Acceptable**

Promptly referring a customer who has a gambling-related complaint to the gaming duty manager.

The casino maintaining regular contact with community support services.

Staff demonstrating behaviours as highlighted in responsible gambling training program.

Upon request, providing information on *Complaint handling procedures* (Example 2.3A) to customers.

### **Unacceptable**

Discussing a customer's gambling habits in front of other customers.

Staff providing gambling services who are not trained in responsible gambling.

Customer incidents and complaints not being taken seriously.

## Practice 3

# Exclusion provisions

Self-exclusions and venue-initiated exclusions for problem gambling

## Introduction

Casinos will:

- provide the option for players to self-exclude by providing an environment that ensures the matter is dealt with sensitively, confidentially and in a timely manner
- self-exclude customers on request
- provide contact information on counselling services
- make self-exclusion material available to casino staff and customers
- make sure customers who self-exclude or receive a venue-initiated exclusion for problem gambling do not receive promotional correspondence and materials.

Legislative references:

- *Casino Control Act 1982*
- *Keno Act 1996*
- *Wagering Act 1998*.

## 3.1 Exclusion procedures

*Gambling providers to provide exclusion procedures and supporting documentation.*

Refer to Casino Control Act for exclusion procedures.

### ***Actions of the casino operator***

The casino will:

- provide sensitive and confidential support to customers that wish to exclude themselves from the casino licensed area in a timely manner and ensure the customers are assisted upon request
- ensure the customer is provided with correct and comprehensive information pertaining to the *Self-exclusion notice (Form 3A)*, *Self-exclusion order (Form 3B)*, the *Conditions of re-entry (participation in gambling activities) (Example 3.1A)* and *Revocation notice: self-exclusion order (Form 3C)*
- ensure that all relevant supportive evidence as outlined in the *Conditions of re-entry (participation in gambling activities)* is taken into consideration when revocation notices are received
- ensure that customers who are experiencing adverse consequences as a result of their gambling behaviour are assisted.

The following initiatives are designed to assist in the implementation and maintenance of the self-exclusion legislation:

- An exclusion review committee with representatives from gaming and non-gaming meet regularly to review revocation notices for self-exclusion orders.
- Training is conducted for all managers and staff involved in the self-exclusion process.
- The responsible gambling team is available to assist customers who wish to initiate a self-exclusion or are self-excluded (where practicable).
- A *Register of excluded persons* is maintained by the casino operator.
- Systems are in place to ensure that promotional or advertising material is not distributed to persons who are self-excluded, been issued with an *Exclusion direction (Form 3D)* for problem gambling or are known to have formally requested that this information not be sent.

## Self-exclusion—implementation procedures (s. 91O)

The procedure for a self-exclusion is:

- All s. 91O exclusions are handled by the designated manager/supervisor.
- The manager/supervisor will assist the customer immediately or as soon as possible. One of the responsible gambling team will attend and support the customer where practicable.
- Staff are trained on how to respond and to refer the customer to internal assistance.
- The customer is offered an interpreter if practicable.
- The manager/supervisor explains to the customer that the exclusion order covers entering or remaining in the casino licensed area. In addition, the exclusion also covers placing a bet on Keno and wagering at the TAB within the precinct.
- The manager/supervisor explains to the customer that the consequences of breaching a *Self-exclusion order* will generally incur:
  - for the first contravention: written warning
  - for the second contravention: infringement notice and fine
  - for the third contravention: notice to attend or complaint/summons. Max Penalty—40 penalty units.
- The manager/supervisor explains to the customer that the *Self-exclusion order* applies immediately and:
  - remains in force for five years from the date of issue, or
  - until a customer lodges a *Revocation notice: self-exclusion order* to the casino operator.
- The manager/supervisor explains to the customer that the *Revocation notice: self-exclusion order* may only be completed:
  - within 24 hours or
  - at least 12 months from the date of the *Self-exclusion order*.
- The manager/supervisor provides:
  - a *Self-exclusion notice* to the customer who is provided with a brief explanation and asked to read, complete and sign the *Self-exclusion notice*
  - a *Self-exclusion order* which the manager/supervisor completes and issues to the customer
  - a *Conditions of re-entry (participation in gambling activities)* form.
- A witness will be present during the completion of the documentation.
- A photograph is taken of the customer and inserted in a *Register of excluded persons*.

- The manager/supervisor must give the customer a list of counselling services and details of organisations that provide gambling-related support services for problem gamblers.
- The manager/supervisor informs the customer that the responsible gambling team may support them in seeking consensual exclusions from other venues where practicable.
- The customer is asked to read and sign the acknowledgement of service of the *Self-exclusion order*.
- A casino operator must keep a *Register of excluded persons*, and make it available for inspection by OLGR upon request (s. 100C of the Casino Control Act). Penalty—40 penalty units.

**Note:** *exclusion documentation translations may be available in other languages relevant to the casino's market.*

Severe penalties apply to the casino operator and the individual for breaches under s. 100B of the Casino Control Act if the casino operator fails to take reasonable steps to prevent the person from entering or remaining in the casino. The responsible gambling team may become involved (by phone or appointment) as necessary.

## Self-exclusion—revocation procedures (s. 91P)

To revoke a *Self-exclusion order* a person may submit a *Revocation notice: self-exclusion order* within 24 hours of the receipt of the Order. Otherwise a *Revocation notice: self-exclusion order* may only be given to the gambling provider to revoke the *Self-exclusion order* following a minimum exclusion period of one year.

### Within 24 hours

If a person wishes to revoke their *Self-exclusion order* within 24 hours of its receipt the person must complete a *Revocation notice: self-exclusion order* and have a meeting with the manager/supervisor who will supply a copy of the **Form 3C** for completion. The person who is excluded must not be taken into a casino licensed area to complete the forms.

Once complete the revocation is effective immediately unless a decision is made by the exclusions review committee (the Committee) to initiate an *Exclusion direction*.



### After 12 months

If a person wishes to revoke their *Self-exclusion order* after a minimum period of one year they must complete a *Revocation notice: self-exclusion order*. The responsible gambling team will send a copy of the **Form 3C** by post upon request together with an Information sheet outlining our *Conditions of re-entry (participation in gambling activities)* and a self addressed envelope for returning completed forms.

The *Revocation notice: self-exclusion order* will be date stamped/receipted upon receipt. The revocation notice takes effect 28 days after it is given to the casino operator. If the casino operator does nothing, then the person may assume their *Self-exclusion order* has expired.

The responsible gambling team will compile advice for the Committee on a case by case basis and/or convene a meeting with the Committee if required. The Committee will make the decision whether or not to initiate an *Exclusion direction (Form 3D)* under s. 93A.

The decision of the Committee will be communicated to the self-excluded person by the casino operator either by letter acknowledging receipt of the *Revocation notice: self-exclusion order* and advising the date upon which their exclusion expires and the person may re-enter the casino, or an *Exclusion direction* and an *Information notice—exclusion direction (Form 3I)* will be issued to the person if the Committee has decided to implement an *Exclusion direction* for problem gambling. This process will be completed within the 28 day period.

After 12 months, a person excluded under s. 910 has automatic right of re-entry 28 days after giving the casino operator a *Revocation notice: self-exclusion order* unless the casino operator issues an *Exclusion direction*.

### Exclusion direction for problem gambling—implementation (s. 93A)

Under s. 93A of the Casino Control Act the casino operator may issue an *Exclusion direction (Form 3D)* when they believe on reasonable grounds, that a person is a problem gambler.

Considerations for an *Exclusion direction* to be issued may include all or some of the following:

- reports from the *Responsible gambling incident register*
- information provided by a third party
- a person who initiated a *Self-exclusion order* and when revoking that Order has failed to provide the following information found in casino operator's *Conditions of re-entry (participation in gambling activities)*:
  - evidence from a counselling service to support their revocation notice
  - supporting evidence from person/s with a close personal interest in their welfare
  - information as requested by the casino operator.
- recommendation from the responsible gambling team.

Provided there are reasonable grounds to believe it is in the best interest of the person, an *Exclusion direction* could be initiated.

**Note:** an *Information notice—exclusion direction (Form 3I)* must be provided with an *Exclusion direction (Form 3D)*.

The procedure for issuing such a decision will be determined by the casino operator. A person who has been given an *Exclusion direction* may apply to the Queensland Civil and Administrative Tribunal (QCAT) under the *Queensland Civil and Administrative Tribunal Act 2009*, for a review of this decision.

Consequences of breaching an *Exclusion direction* for problem gambling will generally incur:

- for first contravention: written warning
- for second contravention: infringement notice and fine
- for third contravention: notice to attend or complaint/summons. Max Penalty—40 penalty units.

## **Exclusion direction—revocation procedures (s. 98–99)**

If a person wishes to revoke their *Exclusion direction*, excluded under s. 93A they must provide an *Application to revoke exclusion direction (Form 3E)* to the casino operator after a minimum of one year from the date the *Exclusion direction* was issued, to have their revocation considered. The casino operator will either revoke or refuse to revoke the *Exclusion direction* within 28 days. Should the casino operator fail to decide the application within 28 days, the failure is taken to be a decision not to revoke the *Exclusion direction*.

The following documentation in support of the *Application to revoke exclusion direction* must be provided:

- evidence from a counselling service provider in support of the application
- evidence provided by persons with a close personal interest in the applicant’s welfare
- a personal statement to the effect that the circumstances leading to their exclusion no longer apply.

The person must acknowledge the general conditions of re-entry of the casino operator as defined in the *Application to revoke exclusion direction*:

- their personal responsibility to gamble in a way that is unlikely to cause physical, emotional or financial distress to themselves or others
- their personal responsibility to access problem gambling information made available by the casino operator, should the need arise
- their personal responsibility to seek the assistance of the casino operator, should the need arise
- the role of the casino operator’s staff in this regard.

Persons excluded under s. 93A do not have automatic right of re-entry 28 days from the date of the receipt of the *Application to revoke exclusion direction*.

If the casino operator decides to revoke the Direction, the operator must as soon as practicable give the customer notice of the revocation in the approved form, *Revocation notice—exclusion direction (Form 3F)*. A *Revocation notice—exclusion direction* takes effect when it is given to the customer.

If the casino operator decides not to revoke the Direction, the operator must as soon as practicable give the customer an *Information notice—refusal to revoke an exclusion direction (Form 3J)* and keep a copy on file.

## **Appeal**

Where the casino operator issues an *Exclusion direction* or refuses an *Application to revoke an exclusion direction*, the customer may have the decision reviewed by QCAT. A review is started by filing an application to review with QCAT as per s. 33 of the Queensland Civil and Administrative Tribunal Act. Generally, review must be lodged within 28 days.

Details regarding rights of appeal must be provided to the customer with their *Information notice—exclusion direction* at the time of the issue of the *Exclusion direction*. A decision to refuse to revoke an existing *Exclusion direction* is to be relayed to the customer by completion of *Information notice—refusal to revoke an exclusion direction*.

The customer liaison officer (CLO) may familiarise themselves with the following:

- *Self-exclusion flowchart (Example 3.1B)*
- *Venue-initiated exclusion flowchart (Example 3.1C)*
- *Revocation process flowchart (Example 3.1D)*.

## Example 3.1A Conditions of re-entry (participation in gambling activities)

Casino name \_\_\_\_\_

Gambling is a popular recreational pastime. Gambling is also a risk-taking activity and this casino is committed to the implementation of risk-management processes aimed at minimising harm to the physical, emotional, social and financial welfare of their customers.

### General conditions of entry

Persons entering these premises, or participating in gambling activities offered by this casino thereby acknowledge:

- their personal responsibility to gamble in a way that is unlikely to cause physical, emotional or financial distress to themselves or others
- their personal responsibility to access problem gambling information made available by our staff, should the need arise
- their personal responsibility to seek the assistance our staff, should the need arise
- the role of our staff in this regard.

Customers are assured that their gambling-related information will be handled in accordance with this casino's privacy policy. A copy of our privacy policy is available upon request.

Customers are advised that, where our staff are reasonably adjudged to have discharged their player protection obligations in good faith and customers have falsified or withheld relevant information in relation to gambling-related problems or neglected to seek assistance in this regard—this is likely to limit this casino's liability for any negative consequences of the customer's gambling behaviours.

### Provision of additional information (revocation of an *Exclusion direction* only)

When lodging an application for the revocation of an *Exclusion direction* the applicant may choose to submit any or all of the following in support of their application:

- a statement to the effect that the circumstances leading to their exclusion no longer apply and recognising the responsible gambling steps taken by this casino's personnel
- a list of attendance from a recognised counselling service provider or qualified psychologist.

### Declaration

I hereby acknowledge that the above conditions of re-entry have been provided to me at the time of my exclusion:

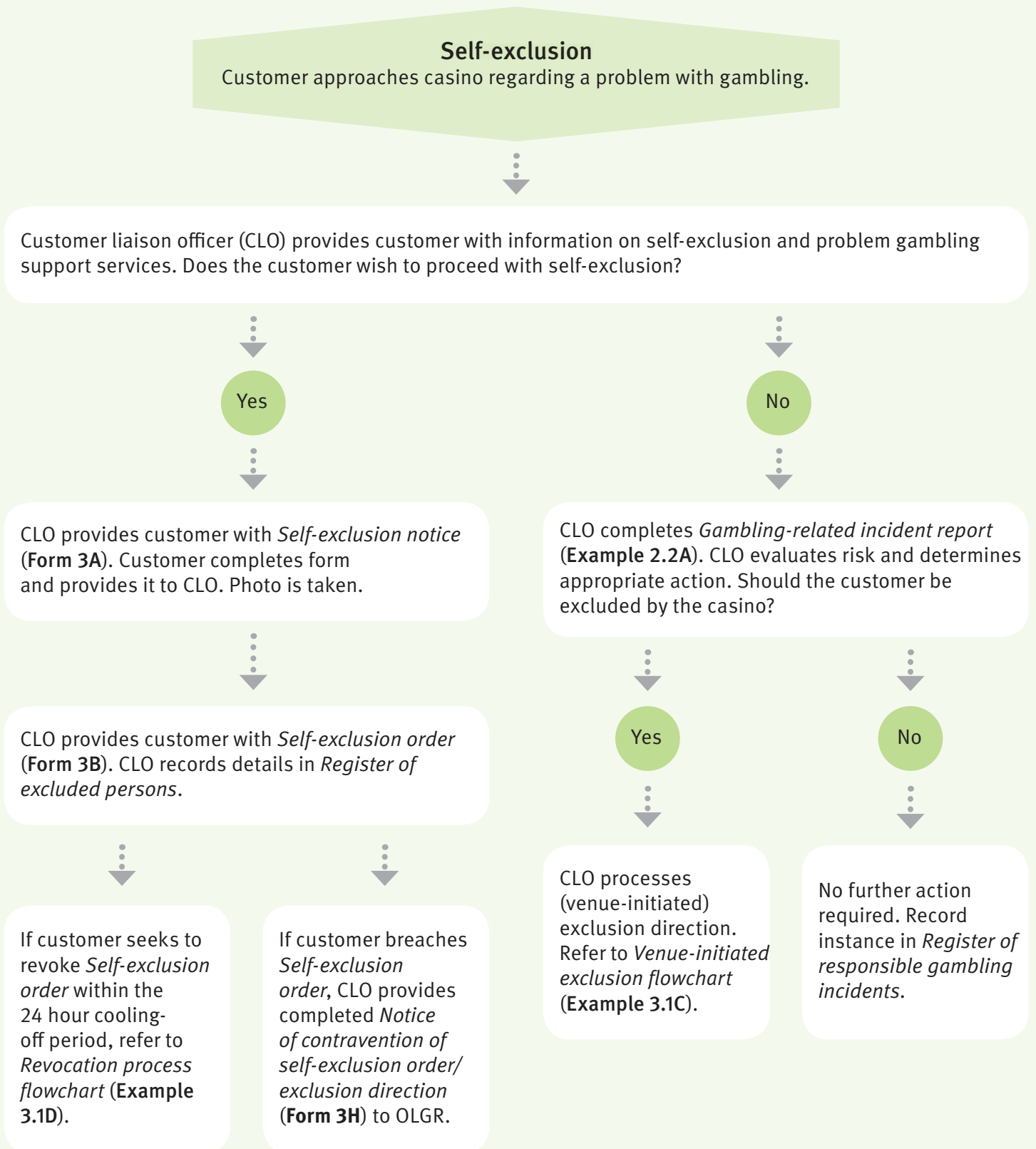
Name \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_

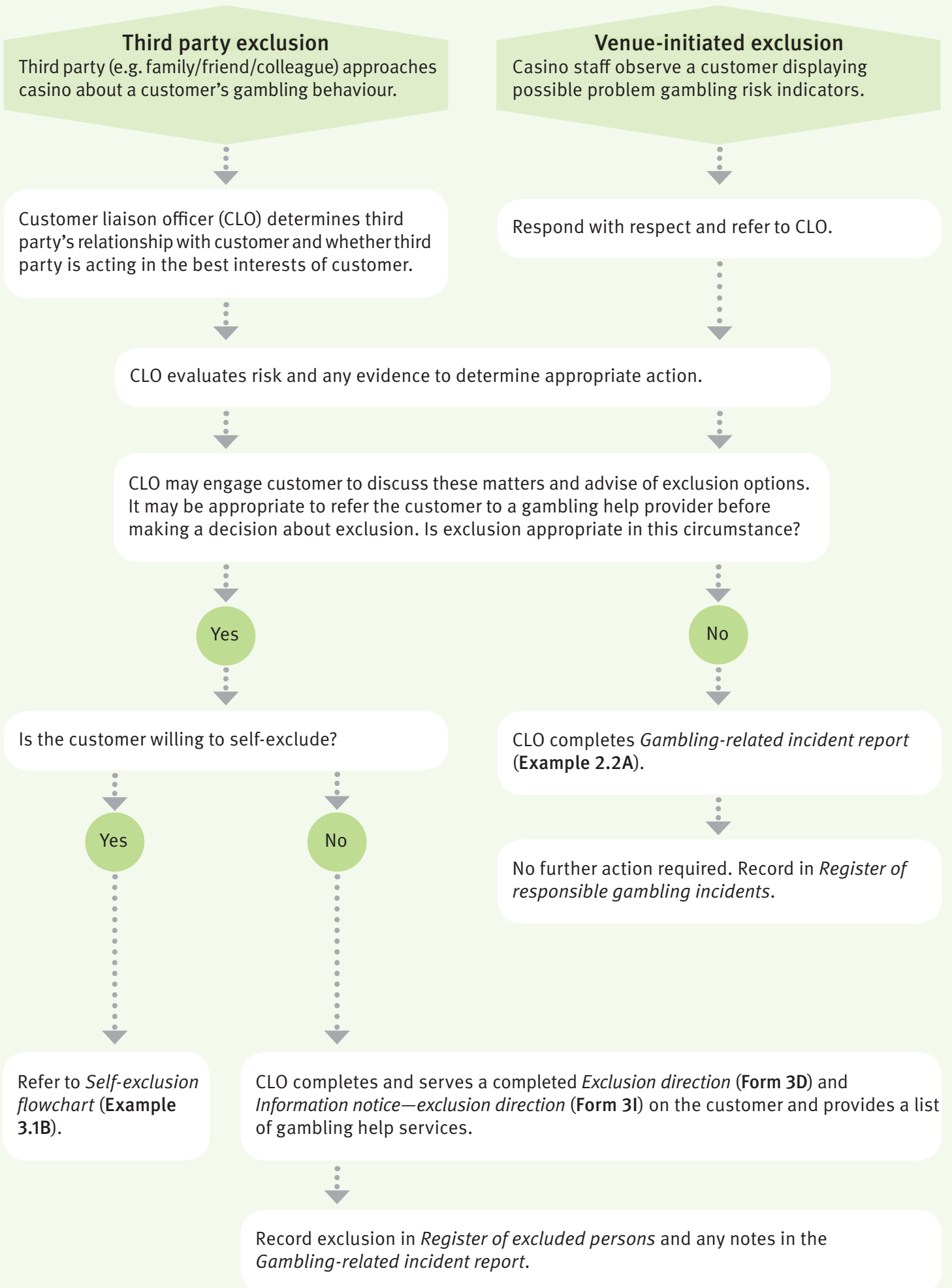
Witness name \_\_\_\_\_

Witness signature \_\_\_\_\_

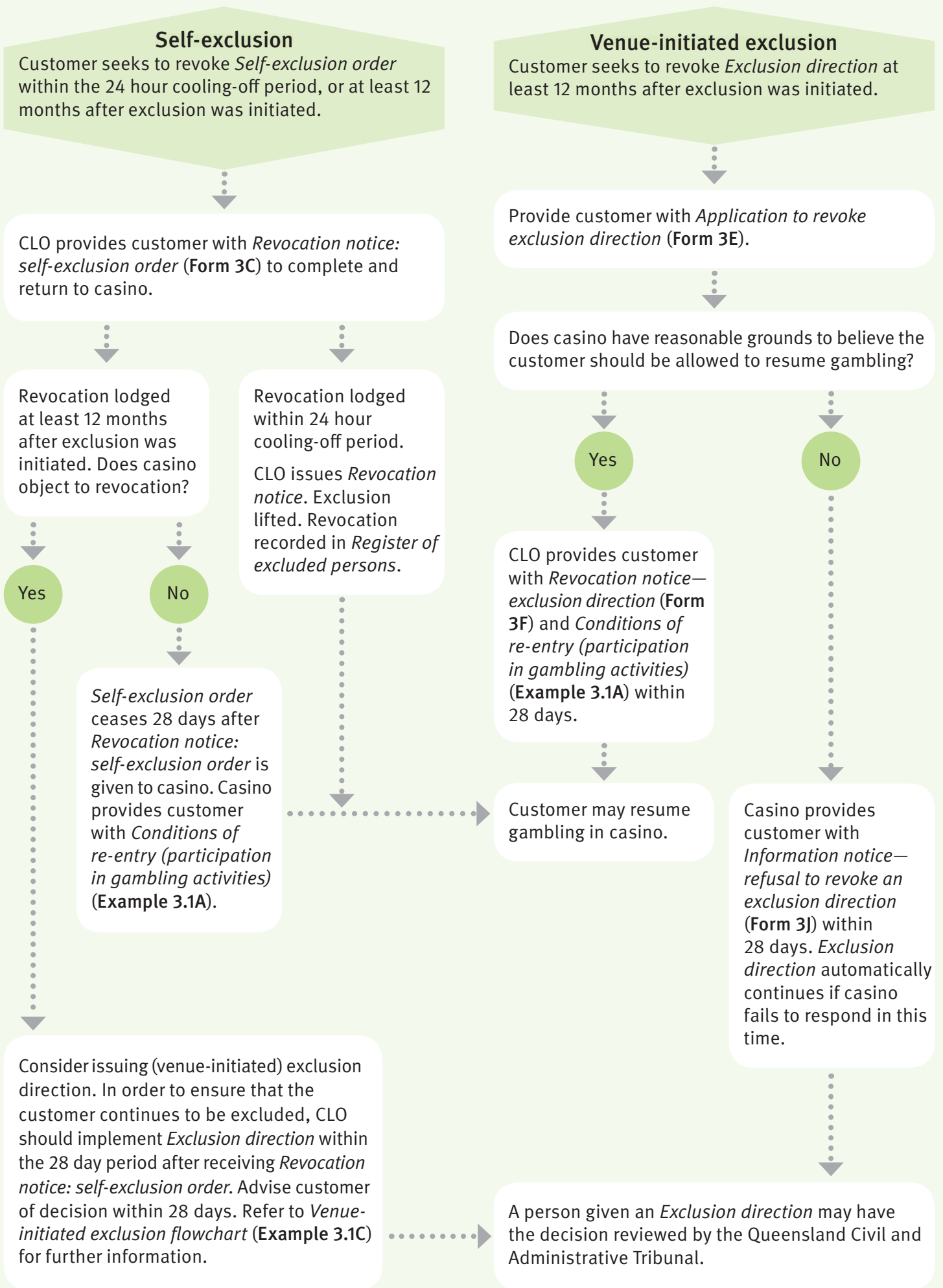
## Example 3.1B Self-exclusion flowchart



## Example 3.1C Venue-initiated exclusion flowchart



## Example 3.1D Revocation process flowchart



## 3.2 Contact information for support services

*Gambling providers offer customers who seek exclusion contact information for gambling-related support services.*

### **Actions of the casino operator**

The casino will:

- work with external support services in providing assistance and information to customers who wish to self-exclude
- list names and contact telephone numbers of relevant gambling-related support services on all copies of the *Self-exclusion order (Form 3B)*
- provide all self-excluding persons with a copy of relevant responsible gambling and where to get help information.

### **Best practice**

The casino may:

- place responsible gambling and where to get help information (including posters) near gaming machines
- choose to display Gambling Help services information in other areas at the discretion of the casino operator.

## 3.3 Exclusion from other gambling providers

*Excluded customers are to be given support in seeking consensual exclusions from other gambling providers, where practicable.*

### **Actions of the casino operator**

The casino will assist self-excluded customers to self-exclude from other gambling providers upon request, where practicable.

### **Best practice**

The casino may provide the customer with contact details of other gambling providers that may be appropriate for the customer to be self-excluded from.

## 3.4 Correspondence to excluded customers

*Gambling providers must not distribute promotional or advertising material to persons who are self-excluded, been issued with an exclusion direction for problem gambling or are known to have formally requested that this information not be sent.*

### **Actions of the casino operator**

The casino will:

- identify all customers who have been self-excluded, been issued with an *Exclusion direction* for problem gambling or are known to have formally requested that information not be sent in the loyalty program database and ensure such customers do not receive promotional material
- maintain a *Register of excluded persons*
- suspend customer loyalty program accounts (as applicable).

### **Best practice**

The casino may:

- conduct an internal audit on the *Register of excluded persons* from time to time
- develop interface technology between the *Register of excluded persons* and the loyalty program database.

## Examples of acceptable/unacceptable actions

### **Acceptable**

Explaining in detail the requirements and procedures of self-exclusion to customers who request self-exclusion.

Providing customers with contact information for gambling-related support services for problem gamblers and documenting the name/s provided on the self-exclusion/re-entry incident report.

Maintaining a *Register of excluded persons*.

Removing excluded customers' names from the customer mailing list.

### **Unacceptable**

Dismissing a customer's request for self-exclusion.

Providing counselling to customers who request self-exclusion, instead of referring them to appropriate local support agencies.

Knowingly allowing self-excluded customers to enter gambling areas and to partake in gambling activities.

Not removing excluded customer's names from the mailing list.

## Glossary of terms

Casino	The areas of a hotel-casino complex identified in the casino licence as the areas of the casino, and includes not only the areas for the conduct and playing of games but also areas for money counting, surveillance, accounting, storage and other activities related to the operation and functioning of the casino.
Exclusion	A prohibition against a customer from entering or remaining in the casino licensed area and participating in other gambling products at the venue.
Exclusion direction	A document initiated and issued by a licensee to a customer to exclude them from the venue or gambling products.
Executive Director	The Executive Director of the Office of Liquor and Gaming Regulation (OLGR), Locked Bag 180, City East, Queensland 4002. May be referred to as the Chief Executive in the legislation.
Information notice	A notice given to a customer when issued with an <i>Exclusion direction</i> or refusal of revocation, detailing reasons for exclusion or decision and further avenues for action.
Manager/supervisor	A person designated as a manager/supervisor for the casino by the casino operator or a more senior person who takes part in managing the operations of the casino.
Notice of contravention of self-exclusion order/exclusion direction	Where the casino operator prevents an excluded customer from entering or remaining in the casino licensed area, and the customer attempts to contravene their exclusion order or direction. A notice advising of the event is to be submitted to the Executive Director, OLGR.
Problem gambler	A person whose behaviour is characterised by difficulties in limiting money and/or time spent on gambling which leads to adverse consequences for the gambler, others or for the community.
Responsible gambling	Responsible gambling is the provision of safe, socially responsible and supportive gambling environments where the potential for harm associated with gambling is minimised and people can make informed decisions about their participation in gambling. It occurs as a result of the collective actions and shared ownership of individuals, communities, the gambling industry and government.
Revocation	<p>Cancelling the <i>Self-exclusion order</i> or <i>Exclusion direction</i> issued to a customer. Following revocation the customer is able to re-enter the casino licensed area without interference. A revocation is initiated by the customer.</p> <p><b>Note:</b> <i>in some circumstances a revocation notice may be refused by the casino operator.</i></p>
Self-exclusion order	A document issued by the casino upon receipt of a <i>Self-exclusion notice</i> from a person, to exclude that person from the casino and/or other gambling products offered at the casino.
Venue	A generic term to refer to the location of gaming activities, such as hotel, club or casino.



## Glossary of exclusion forms

<b>Form 3A</b> <i>Self-exclusion notice</i>	Completed by an individual wanting a self-exclusion from a venue or gambling activity and given to a gambling provider.
<b>Form 3B</b> <i>Self-exclusion order</i>	Completed by a gambling provider and presented to an individual following receipt of <i>Self-exclusion notice (Form 3A)</i> .
<b>Form 3C</b> <i>Revocation notice: self-exclusion order</i>	Completed by individuals requesting cancellation of <i>Self-exclusion order (Form 3B)</i> . May only be lodged within the 24 hour cooling-off period, or one year after receipt of <i>Self-exclusion order</i> . Only one application may be made in any 12 month period.
<b>Form 3D</b> <i>Exclusion direction</i>	Completed by a gambling provider to exclude an individual from a venue or gambling activity.
<b>Form 3E</b> <i>Application to revoke exclusion direction</i>	Completed by individuals requesting cancellation of venue-initiated <i>Exclusion direction (Form 3D)</i> . May only be first lodged one year after commencement of <i>Exclusion direction</i> . Only one application may be made in any 12 month period.
<b>Form 3F</b> <i>Revocation notice—exclusion direction</i>	Completed by a gambling provider following receipt of <i>Application to revoke exclusion direction (Form 3E)</i> and given to the individual, confirming cancellation of <i>Exclusion direction</i> .
<b>Form 3I</b> <i>Information notice—exclusion direction</i>	Completed by a gambling provider and given to the individual with <i>Exclusion direction (Form 3D)</i> to provide information about why the <i>Exclusion direction</i> has been issued.
<b>Form 3J</b> <i>Information notice—refusal to revoke an exclusion direction</i>	Completed by a gambling provider following receipt of <i>Application to revoke exclusion direction (Form 3E)</i> and given to the individual to provide information about why the gambling provider has refused to cancel the <i>Exclusion direction</i> .
<i>Register of excluded persons</i> (Casino operators use own form)	Completed by casino operator to record persons excluded from their venue or from gambling activities at the venue.
<i>Report on excluded persons</i> (Casino operators use own form)	Completed by casino operator and given to OLGR within 14 days after 30 June and 31 December every year.

# Physical environment

## Introduction

Casinos provide a physical environment that is pleasant, comfortable and safe for all customers where:

- casinos endeavour to offer a safe gambling environment to customers
- minors are prohibited from all forms of gambling
- minors are prohibited from entering gaming areas.

### 4.1 Minors prohibited and 4.2 Minors barred

*This section combines Practice 4.1—Minors are prohibited from gambling and Practice 4.2—Minors are prohibited from designated gambling areas.*

#### **Actions of the casino operator**

The casino will:

- ensure all staff are made aware of the rules and regulations regarding minors (under 18 years)
- ensure security officers and other relevant staff ask for ID if in doubt about underage customers
- ensure appropriate signage is placed in appropriate locations at the casino entrance to alert customers to the restriction of minors from gambling and being present in gambling areas.

#### **Best practice**

As with the service of alcohol, all venue staff will be required to ask customers for appropriate proof of age if they are in any doubt as to whether the customer is over 18 years of age.

The only acceptable forms of identification in Queensland are:

- a current driver licence or learner permit
- a current passport (from any country)
- an Adult Proof of Age card (18+ Card)
- a Keypass identity card
- Foreign driver licences with a photo and date of birth of the licence holder.

Where a foreign driver licence is not written in English, an international driver permit issued in the foreign country of origin (and including a photo of the licence holder and translation) must be presented with the foreign driver licence.

No other forms or means of ascertaining a customer's age will be accepted other than these five examples—for example, a parent's 'word' is unacceptable.

The casino may:

- implement a policy of regularly checking casino car parks during the day, particularly in summer months, for any minors left in cars unattended
- include the restriction of minors in responsible gambling brochures and gaming advertising and promotional material
- develop an 'unattended children's' brochure in multiple languages suitable for each casino's local environment.

### 4.3 Hospitality services

*Provision of hospitality services in areas where gambling is provided is managed in such a way as to encourage customers to take breaks in play.*

#### **Actions of the casino operator**

The casino will:

- not use alcohol to promote any gaming activities
- offer non-alcoholic beverages, tea and coffee facilities to encourage breaks in play.

#### **Best practice**

The casino may:

- refrain from offering the service of complimentary refreshments to customers (excluding premium gaming customers) while they are participating in gambling in the casino public gambling areas
- manage the service and sale of alcohol in the casino public gambling areas in such a way as to encourage breaks in play.

## 4.4 Intoxicated customers

*Customers who are unduly intoxicated are not permitted to continue gambling.*

### **Actions of the casino operator**

The casino will:

- provide responsible service of alcohol training to security officers, food and beverage staff, gaming staff and other relevant team members
- establish and implement policies and procedures on the action and reporting processes for staff to take when dealing with unduly intoxicated customers
- ask unduly intoxicated customers to leave the gaming area—customers who have been refused service of alcohol are not permitted to gamble in any form on the premises until the next trading period or after the expiry of 24 hours.

### **Best practice**

The casino may engage in practices and promotions that encourage the responsible consumption of alcohol, for example:

- having food available for purchase or on a complimentary basis
- promoting light and low alcoholic drinks
- having a range of non-alcoholic drinks available for purchase or on a complimentary basis.

## 4.5 Child care and play areas

*Where child play areas are provided, best efforts should be made to minimise exposure to areas where gambling activities are conducted.*

*Where gambling providers offer adjunct child care, these facilities must provide safe and suitable standards of care in accordance with relevant child care legislation.*

### **Actions of the casino operator**

The casino will:

- encourage customers to make adequate child minding arrangements away from the gambling premises
- provide information and training to all staff on being aware of unattended children and minors within the property
- include information about unattended children in relevant brochures and promotional material.

### **Best practice**

The casino may:

- bar customers who have left children unattended while gambling
- make sure that room compendiums contain information about unattended children in the property
- develop guidelines for the protection of minors visiting the property.

## 4.6 Gratuities

*Staff working in gambling areas are not to encourage gambling customers to give them gratuities.*

### **Actions of the casino operator**

The casino will:

- implement policies that do not permit licensed staff to accept gratuities
- provide training to licensed staff on how to refuse gratuities
- provide information to staff on other relevant internal company policies.

### **Best practice**

The casino may:

- require that any gifts received by staff from customers or left by customers be recorded in a gift register
- provide relevant information and/or training to staff on induction regarding internal company policies.

## 4.7 Passage of time

*Gambling providers implement practices to ensure that customers are made aware of the passage of time.*

### **Actions of the casino operator**

The casino will:

- install clocks in prominent positions throughout the gaming areas
- encourage use of natural light in the gaming areas within the restraints of the building.

### **Best practice**

The casino may:

- where practicable and reasonable, implement initiatives to make customers aware of the passage of time—for example, the availability of natural light through either skylights, windows or doors
- run promotions that include a time reference—for example, promotions where prizes are drawn at a specified time and announcements are made about the time of the draw.

## 4.8 Breaks in play

*Gambling providers implement practices to ensure that customers are discouraged from participating in extended, intensive and repetitive play.*

### **Actions of the casino operator**

The casino will discourage extended, intensive and repetitive play by providing and promoting a range of alternative leisure activities—for example, restaurant facilities and other entertainment experiences.

### **Best practice**

The casino may:

- train staff to notify a supervisor if they notice particular behaviours as per the *Possible problem gambling risk indicators* (Example 2.4A) document (p. 13) in this Resource manual
- include in brochures, information encouraging customers not to indulge in extended, intensive and repetitive play
- manage the service and sale of alcohol in the casino public gambling areas in such a way as to encourage breaks in play.

## 4.9 New gambling products and services

*Prior to the introduction of relevant new gambling products and services, including those which make use of emerging technology, consideration should be given as to the potential impact of the technology on responsible gambling behaviours.*

### **Actions of the casino operator**

The casino will develop a *New gambling service/product guideline (responsible gambling)* (Example 4.9A) for use when considering the potential impacts of new and emerging products, services and technology on responsible gambling behaviours.

### **Best practice**

The casino may develop and implement:

- a new gambling service/product responsible gambling checklist
- a new gambling products/services responsible gambling approval form.

Examples of product, service and technology include but are not limited to the following:

- product:
  - new or varied table game
  - new or varied bet type
  - new electronic gaming machine product that varies from Queensland standard
  - new or varied voucher.

- service:
  - new or varied way or method of servicing VIP customers.
- technology
  - new or varied IT system or program relating to the new or varied product or service.

## Example 4.9A New gambling service/product guideline—responsible gambling

### **Awareness, education and player information**

Does the new product or service require any amendment or addition to the appropriate information already made available so that customers are able to make informed decisions and choose whether to gamble or not, consistent with their personal preferences and individual circumstances?

### **Compliance with laws and other industry codes/regulations**

Does the new product or service comply with all relevant laws within the jurisdiction in which it is to be offered to customers including but not limited to:

- minors
- the provision of credit
- player information
- the responsible service of alcohol
- advertising and promotions
- privacy?

### **Training**

Does the introduction of this new product or service necessitate any changes to the responsible gambling training programs and refresher training that is in place? If yes, do such changes need to be made immediately or can they wait until the annual review process?

### **Irresponsible trading practices**

Does the new product or service encourage customers to do any of the following:

- chase their losses
- continue playing after they have indicated a desire to stop?

## Examples of acceptable/ unacceptable actions

### ***Acceptable***

Clearly displaying signage that minors are not permitted to gamble and are not permitted in the casino licensed area.

Inform parents/guardians that minors are not allowed in gambling areas or to take part in any form of gambling.

Offering customers a means of being aware of the passage of time.

Encouraging breaks in play by informing gambling persons about the availability of tea or coffee service in the food and beverage outlets.

Staff demonstrating appropriate procedures in dealing with unduly intoxicated customers.

Where appropriate, staff following procedures in reporting suspected excessive or intensive play.

### ***Unacceptable***

Offering free drinks to solely promote gambling.

Continuing to serve alcohol to gambling customers who show signs of undue intoxication.

Licensed staff being permitted to accept and retain gratuities.

Knowingly allowing minors to gamble.

Intentionally allowing minors in designated gambling area.

Engaging in practices and promotions that encourage the rapid and excessive consumption of alcohol by customers gambling.

# Financial transactions

## Introduction

The Financial transactions policy is a harm minimisation approach designed to provide excellent customer service for customers. Each player is treated with fairness and integrity in order to deliver a balanced solution that maintains the company reputation and supports player responsibility.

The *System of accounting and internal control manual* sets out more specifically the policies and procedures pertaining to financial transactions and are to be read in conjunction with this Resource manual.

## 5.1 ATM facilities

*ATMs are not to be located in close proximity to designated gambling areas, or in the entry to gambling areas, where safe and practicable.*

### **Actions of the casino operator**

The casino will:

- where safe and practicable, locate ATMs as far as practical, away from gaming areas and out of view from the casino licensed area
- provide on request the *Financial transactions policy* (Example 5.1A) to members and customers.

### **Best practice**

The casino may install pre-printed receipts on ATM's that advertise the Gambling Helpline phone number (1800 858 858).

## Example 5.1A Financial transactions policy

### **ATMs and EFTPOS**

The casino will locate ATMs, as far as practical, away from designated gambling areas.

### **Credit**

Credit betting is illegal and the casino will not extend credit under any circumstances.

For the purchase of non-gambling-related goods and services, the casino will allow credit transactions.

### **Cashing of cheques**

The limit for cashing a cheque in the casino is:  
\$ \_\_\_\_\_

Cheques can only be exchanged by prior arrangement.

The casino has the right to refuse cashing a cheque.

### **Payment of winnings**

The casino will not cash winnings cheques until the next trading day or within 24 hours of the win.

## 5.2 Cashing of cheques and payment of winnings

*Gambling providers are to establish a limit above which all winnings are paid by cheque or electronic transfer.*

*Gambling winnings above the set limit are paid by cheque and are not cashed on the gambling provider's premises until the next trading day or within 24 hours of the win.*

*The following cheques can be cashed only by prior arrangement:*

- cheques not made payable to the venue
- cheques not made payable to the person presenting the cheque
- multiple cheques.

### **Actions of the casino operator**

The casino will:

- set a limit for cashing a personal cheque (limits are set in accordance with the customer's request only after review by a senior executive in the organisation and in accordance with strict policy guidelines)
- not allow personal cheques to be exchanged without an approved cheque cashing facility
- not cash any cheques for winnings until the next trading day or within 24 hours of the win
- only exchange personal cheques made payable to the casino by the person presenting the cheque and multiple cheques by prior arrangement
- establish a limit for the payment of winnings that are to be paid in cash for Keno and electronic gaming machine jackpots; the balance of any amount over this limit will be paid by cheque
- negotiate international customers' payment for winnings accordingly
- accept gaming chips to be honoured as cash (exceptions to this policy will only be granted by authorisation of casino management and will be duly documented according to relevant policies and procedures).

### **Best practice**

The casino may:

- display financial transactions information in their responsible gambling brochure and display at ATM/s and near the cage/s
- offer customers requiring cheque payment for winnings above the set limit the option to receive the whole payment by cheque.

## 5.3 Credit betting (lending of money)

*Gambling providers are not to provide credit or lend money to anyone for the purpose of gambling.*

### **Actions of the casino operator**

The casino will:

- not lend money or extend credit for the purpose of gaming
- only offer credit transactions for non-gaming products and services.

### **Best practice**

The casino may:

- train all staff not to lend any customer or staff member money for the purpose of gambling
- reinforce to all levels of staff that they are not to partake in any gambling activity conducted on the premises where they work
- establish a policy regarding staff gambling at the casino where they work.

## Examples of acceptable/unacceptable actions

### **Acceptable**

Encouraging winning customers to accept the winnings by cheque or partly in cash to the maximum limit approved for the casino and the balance by cheque.

Accepting credit for the purchase of food, drinks and other non-gambling-related products and services at the casino.

### **Unacceptable**

Accepting credit betting.

Cashing winning cheques within 24 hours of the win or before next trading day.

Cashing cheques not made payable to the casino, to the party presenting the cheque or multiple cheques without prior arrangement.

## Practice 6

# Advertising and promotions

## Introduction

**Practice 6** applies to the advertising and promotion of all gambling activities (including player loyalty programs) in all Queensland gambling industry sectors. This Practice requires gambling providers to develop and implement strategies to ensure advertising and promotions are delivered in a responsible manner with consideration given to the potential impact on people adversely affected by gambling.

This Practice covers communication activities including (but not limited to):

- advertising in the media (including internet and all electronic and social media)
- sponsorship
- point of sale materials (e.g. leaflets)
- internal and external signage/displays
- subscriber products (e.g. Sky Channel, Pay TV, etc.)
- any other materials designed for public communication.

In determining whether an advertisement or promotion adheres to the Code of Practice, both the content (including tone) and the structure of the item must be consistent with the spirit of the Code of Practice. Consideration must be given to the potential impact that advertising and promotions may have on a person with a gambling problem, or a person at risk of developing a gambling problem. Furthermore, the following aspects need to be considered:

- target audience selection
- themes
- imagery
- the message and its placement, e.g. media type selected and time of airing.

This section provides examples of acceptable and unacceptable practices relating to the advertising and promotion of gambling products and services. These are provided as a guide only, and may not specifically relate to your individual gambling activities.

In addition to the voluntary practices, there are practices which have a legislative requirement. These practices must be complied with or action may be taken under the relevant gambling legislation.

**Practice 6** is to be used in conjunction with all other regulatory requirements for the conduct of gambling in Queensland.

This Practice does not extend to advertising and promotions for casino international business or premium international players.

**Note:** *'player loyalty programs' are systems or programs designed to build player loyalty, by suitably and responsibly recognising and rewarding its members for their loyalty to the organisation and/or its products.*

## 6.1 Code of Ethics

*Strategies will ensure that any advertising or promotion complies with the Code of Ethics as adopted by the Australian Association of National Advertisers.*

### **Actions of the casino operator**

Casino operators will ensure that advertising and promotions comply with the *Code of Ethics* as adopted by the Australian Association of National Advertisers (AANA) ([www.aana.com.au](http://www.aana.com.au)).

### **Acceptable practices**

All advertising and promotional activities, including advertising relating to a player loyalty program, are developed and delivered to comply with the *Code of Ethics* as adopted by the AANA.

### **Unacceptable practices**

Developing or delivering advertising that does not comply with the *Code of Ethics* as adopted by the AANA.

Developing advertising or promotional material that contradicts **Practice 6**. For example, when the player loyalty program is the dominant feature of the advertising and the program only allows loyalty point accrual from gambling activities.



## 6.2 False, misleading or deceptive

*Strategies will ensure that any advertising or promotion is not false, misleading or deceptive.*

### **Actions of the casino operator**

Casino operators will ensure that all advertising and promotional materials provide a balanced perspective and are not false, misleading or deceptive.

### **Acceptable practices**

Advertising of the actual jackpots that can be won at a particular moment in time, including the advertising of current jackpot prizes that are available on the casino's website.

Advertising the introduction of a new gambling product and providing information about product features that are not false or misleading, e.g. number of lines on a machine or special features of the game.

Having a balance of winning and non-winning play imagery in gambling advertisements and promotions. For example, advertisements which show people gambling and enjoying themselves but which do not actually depict anyone winning.

Having information about the player loyalty program available for consumers to make informed decisions regarding their participation in the player loyalty program and ensuring that:

- information about the player loyalty program is based on fact and is not likely to be misleading or deceptive
- registration materials include terms and conditions of participation
- the company's privacy policy is provided on request.

### **Unacceptable practices**

Advertising a maximum possible jackpot when the jackpot advertised has not yet reached that amount.

Using false or misleading language, in relation to jackpots that may encourage visitation, e.g. 'Get in now to win the current jackpot'.

Any advertising or promotion that encourages a false belief that the outcome of any game can be predicted or controlled. This includes the use of superstitious behaviour. For example, an image on a gambling advertisement which shows someone engaging in a superstitious behaviour such as rubbing a Buddha statue, blowing on some dice or rubbing a gaming machine for luck and suggesting that this resulted in their winning.

Any advertisement or promotion that suggests there is some relationship between past, present and future events, when there is not. For example, 'Jackpot has not gone off for the last 8 weeks, it must go off soon'.

Explicitly stating or implying through imagery or written/verbal information that numbers chosen in a certain manner (e.g. horoscopes, 'lucky' numbers, etc.) are luckier than any other numbers. For example, a gambling advertisement which depicts someone selecting their numbers on the basis of astrology or some lucky intuition and suggesting that this method of selection improved their chances of winning.

Gambling advertisements that imply that players can win after losing many times. For example, 'Your time to win is coming up', 'Hang in there and you'll win sooner or later', 'Chances are...you'll win sometime'.

Any player loyalty program information materials that are not based on fact. For example, 'The player loyalty programs with the greatest rewards in Queensland'.

Any player loyalty program information materials that mislead or deceive, or are likely to mislead or deceive.

**Note:** 'non-winning play imagery' are images of persons involved in gambling but not in the process of celebrating a win.

## 6.3 Misrepresentation of probabilities

*Strategies will ensure that any advertising or promotion does not implicitly or explicitly misrepresent the probability of winning a prize.*

### **Actions of the casino operator**

Advertising and promotions will emphasise the fun and entertainment aspect of gambling and not imply an individual promise/guarantee of winning.

Advertising and promotions will not encourage the public to gamble by directly or indirectly misrepresenting the probability of winning a prize. Winning will not be presented as the probable or likely outcome in each playing instance or session of play. Advertising and promotional campaigns which show winning should be shown with a balance of winning and non-winning play images.

### **Acceptable practices**

Having a balanced advertising campaign where the media spend is balanced between gaming and non-gaming departments.

Images of winning play are balanced with images of non-winning play.

The focus of advertisements relating to gambling is on the fun and entertainment value of visiting the venue rather than upon winning. For example, people depicted laughing and enjoying themselves without any indication that they are either winning or losing.

### **Unacceptable practices**

Suggesting that winning at the casino is easy. For example, 'Winning is easy', 'Have a bet and win'.

Depicting or implying the odds of winning prizes are greater than they actually are.

Depicting people winning in all or the majority of, images depicting actual gambling behaviour.

Using visuals/images of winning. For example:

- gambling advertisements which contain images of large wads of notes, piles of cash, buckets of money or people holding large amounts of cash while sitting at pokies or tables
- imagery such as large wads of cash/large golden dollar signs/large text of large dollar amounts (e.g. \$80,000) flashing up on television screens during gambling advertisements and promotions particularly when the imagery dominates the advertisement.

**Note:** 'dominates' is to have a commanding influence on, or be the most influential or conspicuous.

## **6.4 Reasonable strategy (financial betterment)**

*Strategies will ensure that any advertising or promotion does not give the impression that gambling is a reasonable strategy for financial betterment.*

### **Actions of the casino operator**

Casino operators will avoid any type of advertising or promotional activity which gives the customer the impression that gambling is a reasonable strategy for financial betterment.

Odds of winning will form an integral part of any advertising or promotional material.

Responsible advertising and promotions will not promote gambling as an easy and automatic:

- alternative to employment or earning an income
- financial investment
- way of solving financial problems
- way to achieve financial security.

### **Acceptable practices**

A marketing strategy focusing on fun, entertainment and/or product variety.

Making information available that enables customers to make a reasonable informed decision.

Enhancing the enjoyment of a specific event through the use of casino products offered on the event.

### **Unacceptable practices**

Using an advertisement which depicts a person or a family moving from a situation of relative poverty to relative affluence as a result of their attendance at the casino.

Encouraging customers to spend their last dollar with the expectation to win.

Linking prizes to education, for example payment of school fees.

Using language or imagery that would imply that winning at the casino is another way to earn an income or winning at the casino may alter your living standards. For example, an advertisement or promotion which depicts someone:

- giving up their job as a result of a big win at the casino
- as wealthy and successful and suggests that this wealth and success is linked to their attendance at the casino
- paying off bills or school fees or loans with their gambling winnings from the casino.

## **6.5 Misleading statements**

*Strategies will ensure that any advertising or promotion does not include misleading statements about odds, prizes or chances of winning.*

### **Actions of the casino operator**

Responsible advertising and promotions will not make false promises/statements about the odds, prizes or chances of winning. This includes not suggesting that skill can influence games that are really games of chance. Luck should not be used in advertising or promotions in a manner that implies winning is a probable or likely outcome. It is not appropriate to promote a venue or an individual as possessing intrinsic luck.

An essential element all gaming machines share is that the outcome of any particular game is determined by chance only. Because chance only determines the outcome of any game, the following statements are absolutely true and should be observed when advertising or promoting gaming machines:

- There is no method or play pattern that can have any effect on whether a game is a winning or losing one.
- Machines do not adjust to compensate for a string of losing games or for a string of winning games. In other words, machines do not become due to loosen up or dry up because of past events.

- It is not possible to predict the outcome of the next game.

### **Acceptable practices**

Printed gaming guides for all casino games include the odds of winning and are easily accessible on the casino floor.

Gaming guides are advertised on the casino's website.

Gaming guides are available in languages other than English upon request, where practicable.

Advertisements which use 'luck' in a humorous way whilst depicting people gambling and enjoying themselves. For example, there being no suggestion that the individual or the venue has 'intrinsic luck'.

Remove out-of-date advertising and promotional material on display as quickly as practicable.

### **Unacceptable practices**

Advertising in a way that misleads or misrepresents the actual chance or odds of winning. Examples of misleading statements include 'You can be lucky too', 'Our jackpot is due to go off'.

See also related examples in **Practices 6.2** and **6.3**.

Not removing out-of-date advertising and promotional material on display as quickly as practicable.

Using language that may imply customers could win the total jackpot possible.

Providing incorrect odds or refusing to supply odds of winning.

Using advertisements or promotions which suggest that a venue has intrinsic luck. For example:

- suggesting through graphics or imagery that the casino or gambling area is 'lucky' and wise punters would choose to gamble there rather than elsewhere
- having a venue 'mascot' who is claimed to be unnaturally 'lucky' and 'never loses at games of chance'
- statements, graphics or imagery which may imply that winning is more likely at the casino than at another venue.

Suggesting in gambling advertisements and promotions through imagery, written or verbal information, that 'feeling lucky' is some sort of intuition which skilled people can use to determine on what days, table, or gaming machines they will win and so improve their chances of winning. For example, an advertisement or promotion which:

- depicts a person selecting keno numbers on the basis of a 'lucky' hunch and winning as a result

- depicts a person selecting a gaming machine on the basis of a 'lucky hunch' and then depicts them winning a jackpot as a result
- depicts a person 'feeling lucky', deciding to go to the casino to 'test their luck' and then winning
- depicts a person utilising a 'lucky charm' when gambling and winning as a result
- suggests that 'luck' or 'feeling lucky' or having a 'hunch' is accurately indicative of an imminent future win.

Explicitly stating or implying through imagery in a gambling advertisement, that there are strategies that people can adopt or employ in order to modify their 'luck' so as to improve their chances of winning. For example:

- an image which shows someone engaging in a superstitious behaviour such as rubbing a Buddha statue, blowing on some dice or rubbing a gaming machine for luck and suggesting that this resulted in their winning
- stating or implying through imagery that numbers chosen for a game of chance using a certain method, e.g. horoscopes, 'lucky' numbers are any luckier than any other numbers. For example, depicting someone selecting their roulette numbers on the basis of astrology or some lucky intuition or similar means. Such suggests that this method of selection improved their chances of winning, e.g. depicting them winning as a result of this 'selection strategy'.

Any advertisement or promotion which suggests through imagery, visual or auditory information that 'luck' is a cause of someone's winning. For example, suggesting if you are on a winning streak or 'roll', the winning streak or roll will continue because of your present state of 'good luck'.

Any advertisement or promotion which encourages the false belief that certain people bring good and bad luck and that this luck then causes winning and losing game outcomes.

## **6.6 Community standards**

*Strategies will ensure that any advertising or promotion does not offend prevailing community standards.*

### **Actions of the casino operator**

Responsible advertising and promotions will reflect decency, dignity and good taste and adhere to prevailing community standards.

### **Acceptable practices**

Advertising and promotions do not include imagery and/or language that may offend prevailing community standards.

Advertising and promotions do not offend prevailing community standards.

Player loyalty program features and functions including direct mail or email campaigns that do not offend prevailing community standards.

### **Unacceptable practices**

Using images of minors gambling or picking numbers.

Exceeding the relevant regulatory and advertising codes/guidelines, e.g. placing adult theme advertisements in general exhibition time slots.

Suggesting that enhancement of one's social, financial or sexual success and general abilities can be attributable to gambling.

Player loyalty program features and functions which:

- involve minors or any person reasonably construed as being under 18 years of age, in any stage or aspect of gambling
- may offend people from different religious or ethnic backgrounds
- are sexually explicit/provocative. For example:
  - using images or people dressed inappropriately to the context of the direct mail and which do not conform to prevailing community standards
  - using imagery or text in direct mail or email campaigns which aims to encourage or incite violence
  - using racist or sexist language and imagery in direct mail and email campaigns.

**Note:** 'player loyalty program features and functions'—the elements of the player loyalty program itself can include the promotional and operational functionality, the side promotions undertaken at a venue and/or direct marketing materials.

## **6.7 Other activities to promote**

*Strategies will ensure that any advertising or promotion does not focus exclusively on gambling, where there are other activities to promote.*

### **Actions of the casino operator**

Responsible gambling advertising and promotions will ensure there is a balance between messages about gambling and other activities offered by the casino operator. If the advertisement is part of a series of advertisements that make up a campaign, this balance must be reflected across the campaign.

### **Acceptable practices**

Advertising gambling products within the context of an overall marketing strategy for their business.

Where there are other products to promote, gambling messages are not over-represented as defined by media spend.

Player loyalty program accrual or redemption mechanisms link with other non-gambling venue activities where available and practicable. For example, ensuring customers have multiple choices for redemption of points through hospitality services, food and beverage outlets or machine play.

### **Unacceptable practices**

Promoting gambling as the only entertainment activity available at a casino property.

Redemption mechanisms of the player loyalty program only made available for gambling activities.

## **6.8 Minors or vulnerable or disadvantaged groups**

*Strategies will ensure that any advertising or promotion is not implicitly or explicitly directed at minors or vulnerable or disadvantaged groups.*

### **Actions of the casino operator**

#### **Minors**

Advertising and promotions related to gambling will not appear in media directed primarily at minors. Media selection and placement of all advertising and promotions will be in accordance with the relevant legislative and code of practice/guideline requirements for all forms of advertising and promotions in Australia, e.g. television, radio, print, online (including social media, if applicable).

Persons depicted as gamblers in advertising and promotions should not be, or appear to be, minors. Advertising and promotions should not contain language or symbols that are primarily intended to appeal to minors. The use of animation should be monitored to ensure characters are not associated with animated characters on children's programs. Celebrities or other testimonials that would primarily appeal to minors, should not be used.

#### **Vulnerable or disadvantaged groups**

Advertising and promotions are not directed primarily at vulnerable or disadvantaged groups by linking social and financial betterment issues to gambling. Disadvantaged persons may include persons lacking social or economic access, due largely to inadequate income, an inadequate standard of living in terms of housing, food, clothing and health care and lacking opportunities to fully participate in society through education, employment and social pursuits.

Vulnerable persons may include persons at risk of harm or harmful patterns of behaviour due to external influences or internal susceptibilities.

## Acceptable practices

Ensuring media selection and placement of all advertising and promotions are in accordance with the relevant legislative and code of practice/guideline requirements for all forms of advertising and promotions in Australia, e.g. television, radio, print, online (including social media, if applicable).

Specifically marketing products to adult audiences via electronic and print media.

Not intentionally advertising or promoting services to minors or vulnerable or disadvantaged groups.

Providing entertainment opportunities for a particular group (e.g. seniors) that offer cheap entertainment that is not conditional upon gambling. For example, 'Treasure Day'.

A gambling advertisement or promotion which appears in media targeting specific culturally and linguistically diverse communities (e.g. a Chinese language newspaper) being in accordance with all the practices with particular reference to **Practices 6.2, 6.3, 6.4, 6.5**.

An advertisement for the casino which suggests that the rooms have been designed with a consideration of Feng Shui principles, without referring to luck or gambling.

Any player loyalty program material is aimed at adults aged 18 years and over.

Ensuring any player loyalty program material is not intentionally sent to an excluded customer or a person who has requested such material not be sent.

Conducting direct mail campaigns that responsibly communicate with members based on their purchase history.

Using graphics, photos and text that are generally associated with an adult market.

**Note:** 'excluded customers'—for the purposes of this document, include self-exclusions and venue-initiated exclusions for problem gambling.

## Unacceptable practices

### Minors

Intentionally placing media where it targets minors and disadvantaged groups. For example, gambling advertisements and promotions which:

- advertise and promote gambling in media directed primarily at minors, e.g. appears in close proximity to schools or events involving minors such as children's concerts, children's sporting events, billboards outside of venues or within 200 metres of a school.

- media selection and placement of all advertising and promotions that are not in accordance with the relevant legislative and code of practice/guideline requirements for all forms of advertising and promotions in Australia
- contain symbols or language that is primarily intended to appeal to minors, e.g. using the slang of an underage generation or using images of children picking numbers for games or imagery strongly associated with and appealing to children in direct mail campaigns
- use celebrities or other testimonials that would primarily appeal to minors, e.g. using a popular children's entertainment group or some other spokesperson(s) or representative(s) primarily popular with minors because of their fame
- utilise cartoon characters which are popular with minors or which resemble characters which are popular with minors, e.g. using Superman or a cartoon strongly resembling this figure in a gambling advertisement or promotion
- portray minors gambling or using advertising talent that projects the image of a minor.

### Disadvantaged groups—low socio-economic groups

Sending correspondence or promotional material to gambling customers who are excluded or known to have formally requested that this information not be sent.

Running promotions on specific days with the express purpose of attracting low income groups to come when they have money, e.g. cheap lunches served for students on the day they receive their Austudy payments.

Entertainment opportunities for a particular group (e.g. seniors) that offer cheap entertainment that is conditional upon gambling.

Gambling advertisements or promotions which appeal to the vulnerabilities of those from low socio-economic areas or those financially disadvantaged, by linking social and financial betterment to gambling.

Depicting someone on a pension (e.g. disability pension due to a mental illness or physical disability) or someone on social security payments experiencing a significant improvement in their wealth and way of life as a result of their winning a jackpot at the casino.

Targeting low socio-economic areas with advertising and promotional material which suggests that gambling is a reasonable strategy for financial betterment. For example:

- an advertisement or promotion which depicts someone giving up their job as a result of a big win at the casino

- an advertisement or promotion which depicts someone as wealthy and successful and suggests that this wealth and success is a result of their attendance at the casino.

See other relevant examples in **Practice 6.4**.

### **Vulnerable groups (e.g. culturally and linguistically diverse communities, mentally ill, etc.)**

Gambling advertisements or promotions which appeal primarily to culturally and linguistically diverse communities that do not comply with the requirements of **Practice 6**. For example:

- a gambling advertisement or promotion which contains implicitly misleading information (imagery, written or verbal) about the chances of winning major prizes which is published in magazines and newspapers primarily read by Vietnamese and Chinese speaking people
- a gambling advertisement or promotion which suggests that the casino gambling area has been designed according to Feng Shui principles, and so is 'luckier' or more likely to result in more wins for players than other gambling areas not so designed.

An image on a gambling advertisement which shows someone engaging in a culturally superstitious behaviour such as rubbing a Buddha statue for luck or using a 'lucky' colour and suggesting that this resulted in their winning (suggesting culturally specific superstitious practices are strategies that can be employed by people if they wish to improve their chances of winning at the casino).

Gambling advertisements or promotions which appeal primarily to culturally and linguistically diverse communities, which target the particular vulnerabilities of these communities. For example:

- a gambling advertisement or promotion which depicts a culturally and linguistically diverse communities person engaging in some cultural superstitious practice such as reading tea leaves, consulting an oracle or opening a fortune cookie and then depicting them winning at the casino as a result
- placing an advertisement or promotion in a Vietnamese language newspaper or magazine which says that if you are Vietnamese and bring the coupon to the venue, you can receive \$20 worth of free pokies credit.

Gambling promotional material sent to a person who has excluded from the venue.

Any player loyalty program material which contains graphics, imagery or text which is primarily directed at minors, disadvantaged or vulnerable groups.

Conducting a player loyalty program campaign that specifically targets extremely disadvantaged groups or areas, e.g. people who have a mental disability or illness or are unemployed.

## 6.9 External signs

*Strategies will ensure that any advertising or promotion does not involve any external signs advising of winnings paid.*

### **Actions of the casino operator**

External signs include signage able to be viewed from any external part of a gambling provider's premises advising of winnings paid. This also includes signage not on the premises, such as highway billboards, newspaper advertisements, television advertisements, radio advertisements, and any web-based information. Further, external signs can be taken to include signs displayed inside premises, allowing viewing from any external viewpoint, for example, through a window or glass wall.

Where web pages are passive, they should be considered as internal promotions and **Practice 6.9** does not apply.

### **Acceptable practices**

Not externally advertising 'coin out' or 'turnover' as winnings paid.

Internally advertising actual winnings paid. For example, a light box sign indicating a large jackpot has been won.

Internal signage about actual winnings paid not being visible from any external viewpoint through a door, window or glass wall.

### **Unacceptable practices**

Advertising externally 'coin out' or 'turnover' as winnings paid. For example, information on or in any media such as:

- 'Major jackpots so far this year: \$26,000, \$28,000, \$32,000, \$52,000, \$29,000...'
- 'Two huge jackpot winners at [casino name]'
- 'Payouts to our customers last week, over \$300,000'.

**Note:** 'passive web pages' are web pages that supply information which can only be viewed by choice and are non-interactive.

## 6.10 Irresponsible trading practices

*Strategies will ensure that any advertising or promotion does not involve any irresponsible trading practices by the gambling provider.*

### **Actions of the casino operator**

The Code of Practice defines irresponsible trading practices as ‘the offering of an inappropriate enticement or inducement to customers that is in conflict with the objective of maximising responsible gambling and minimising problem gambling’.

Irresponsible trading practices are actions designed to persuade an individual to gamble in an excessive and irresponsible manner by offering inappropriate inducements. Such inducements may involve individuals who are persuaded to gamble who, in the absence of an inappropriate inducement, would not have otherwise. This may result in individuals being persuaded to gamble for longer periods of time and in a more excessive and irresponsible manner than they otherwise would have done. Inappropriate inducements therefore have the potential to impact on people who are at risk of, or have, a gambling problem.

### **Acceptable practices**

Conducting responsible promotional activities for specific products within the business and not directing these promotions at disadvantaged groups or encouraging irresponsible gambling behaviour.

Being committed to best practice in the provision of responsible gambling, with the aim of minimising the potential harm to individuals in the community through responsible gambling practices.

Player loyalty program features or functions which encourage the use of a range of the venue’s facilities and services.

Rewarding customers for their loyalty or encouraging them to modify their buying behaviour in a reasonable manner.

Offering responsible rewards. For example:

- for every dollar spent across a range of the casino services/products customers receive an entry into a prize draw
- offering additional entries as rewards.

Advertising or promotions align with the Association for Data-driven Marketing and Advertising (ADMA) *Direct Marketing Code of Practice*.

Player loyalty programs have the ability to recognise which members would like to receive gambling promotional material.

Customers can opt out of the direct marketing program and are notified of their right to opt out of receiving direct marketing material.

### **Unacceptable practices**

Providing customers with credit or lending money to gamble (as specified in regulations and **Practice 5.3** of the Code of Practice.)

Offering customers inappropriate inducements to gamble. Examples of irresponsible trading practices include:

- offering free money, gaming machine credits or prizes conditional on increased or more intensive play
- encouraging players to spend money which would otherwise be used for purposes other than gambling, e.g. meals, taxi
- targeting promotions at disadvantaged groups or regions
- using known problem gambling trigger points to encourage irresponsible play
- inducements that would result in a substantial increase to the person’s normal betting stake or activity.

Implying the participation in a player loyalty program improves the chances of winning on a gambling product.

A rewards system that encourages irresponsible play to receive a reward or entry into an additional prize draw.

Implementing player loyalty program promotions or features that imply the use of the player loyalty program increases a customer’s luck or increases the likely winning outcome of the game.

Implementing a player loyalty program that encourages irresponsible play. For example:

- by implying the punter is due for a win or luck is about to change
- punter has a streak of losses so their luck must change.

Developing advertising or promotional material that contradicts the ADMA *Direct Marketing Code of Practice*.

Player loyalty programs that do not have the ability to recognise which members would like to receive promotional material.

Emailing or direct marketing gambling material or promotions to members who have not consented or expressly requested, to receive such material or to any excluded person.

**Note:** ‘*inducements*’ are incentives that induce, motivate or persuade a person to participate in the use or purchase of a particular product or service.

## 6.11 Consumption of alcohol

*Strategies will ensure that any advertising or promotion does not promote the consumption of alcohol while engaged in the activity of gambling.*

### **Actions of the casino operator**

Casino operators will not promote the consumption of alcohol while engaged in the activity of gambling.

### **Acceptable practices**

Not promoting the consumption of alcohol while engaged in the activity of gambling.

Using visuals of customers engaged in gambling where images of alcoholic beverages appear.

### **Unacceptable practices**

Promoting the consumption of alcohol whilst engaged in a gambling activity.

Running a joint promotion with an alcohol supplier to promote the consumption of alcohol in association with gambling activities.

## 6.12 Consent of the person

*Strategies will ensure that any advertising or promotion has the consent of the person prior to publishing or causing to be published anything which identifies a person who has won a prize.*

### **Actions of the casino operator**

A casino operator will not publish or cause to be published anything which identifies any person who has won a prize, unless that person has given prior consent.

### **Acceptable practices**

Having strict privacy guidelines in keeping with privacy laws.

Advising customers of the casino's intentions in relation to promotional activities through terms and conditions.

Advising winners that they have the right to anonymity if they wish.

Taking particular care to ensure that any winner, including elderly and persons with English as their second language, understands their rights to privacy when winning a prize.

### **Unacceptable practices**

Displaying a person's identity/image without their consent.

Taking footage of customers without their knowledge for advertising and promotional purposes.

Not ensuring that any winner, including persons who are elderly or whose first language is not English, understand their rights to privacy when winning a prize.

## 6.13 Responsible gambling messages

*Strategies will ensure that any advertising or promotion incorporates responsible gambling messages (where applicable).*

### **Actions of the casino operator**

Casino operators will include words and/or images that convey the message that gambling is fun when done so in a responsible manner.

### **Acceptable practices**

Developing responsible gambling messages/tag lines that are incorporated in gambling advertising and promotions (including player loyalty programs) where appropriate, e.g. 'Bet with your head, not over it'.

Responsible gambling messages are to be sized appropriately with respect to the ratio of advertising or promotional material.

Including responsible gambling messages on player loyalty program:

- membership cards where practicable
- application forms
- sections on a casino's website.

Player loyalty program correspondence and marketing material which carry responsible gambling messages.

### **Unacceptable practices**

Using an irresponsible message in a player loyalty program advertisement or promotion. For example 'Everyone is a winner', 'Queensland's luckiest rewards program'.



# Gambling help information

## Phone

Gambling Helpline (**1800 858 858**) is a free, confidential help service which operates 24 hours a day, seven days a week offering information and assistance over the phone, including crisis support and referral to the nearest Gambling Help service for face-to-face counselling.

## Face-to-face

Queensland Gambling Help services are staffed by qualified counsellors and community educators who provide assistance and support services to individuals concerned about their own gambling or those that are worried about friends, family members or workmates. The counsellors and educators are located within a network of regions across Queensland under the auspices of:

- Centacare
- Lives Lived Well
- UnitingCare Community
- Relationships Australia Queensland
- Lifeline Darling Downs and South West Qld
- Moonyah Rehabilitation Service (residential facility operated by Salvation Army).

The network is funded by the Queensland Government from gambling revenue and operates during business hours across Queensland. The Gambling Help services offer:

- professional, confidential and free face-to-face counselling for issues such as addictions and relationship and financial problems that can result from problem gambling
- individual, couple or family based sessions for both the person with the gambling problem or significant others
- phone counselling for clients in remote areas
- counselling for referral to other agencies, where appropriate
- individual support to venues and customers for venue-initiated exclusion and self-exclusions, where applicable
- training for gambling industry staff
- culturally appropriate assistance.

Phone the Gambling Helpline on **1800 858 858** for referral to the nearest local Gambling Help service or contact your local Gambling Help service directly.

## Online

Gambling Help Online is a national website that provides live online professional counselling and email support 24 hours a day, seven days a week. The website includes extensive information and self-help tools to assist in identifying, and dealing with, problem gambling. It is a free, anonymous and confidential service and is available at [www.gamblinghelponline.org.au](http://www.gamblinghelponline.org.au)

## Other services (available 24 hours)

Gamblers Anonymous **1800 002 210**

Lifeline **13 11 14**

## Frequently asked questions

### *What are the effects of problem gambling?*

Apart from the obvious financial harm, gambling can cause a variety of personal, social, vocational, financial and legal harm within the community. This harm may include:

- psychological problems, with 40–60 per cent of problem gamblers experiencing clinical depression, displaying suicidal behaviour and anxiety problems (*Battersby & Tolchard, 1996*)
- poor physical health (*Delfabbro & LeCouteur, 2008*)
- relationship issues and family difficulties, with problem gamblers reporting that they have lost (or jeopardised) relationships, neglected the needs of their families and lied to family/friends as a result of gambling
- vocational issues, including absenteeism, loss of employment, and/or committing crimes within the workplace to fund problem gambling
- financial difficulties, including debt, bankruptcy and homelessness.

The local community is also impacted by problem gambling, and services such as Centrelink, Legal Aid, emergency relief providers (e.g. the Salvation Army), Lifeline, mental health service providers and other social welfare agencies are all accessed by the gambler or their family. Insurance companies, landlords, utility service providers and local businesses are also affected by claims or bad debts.

### ***Why do some people develop problem gambling behaviours and others do not?***

There are a number of theories and approaches that account for why individuals develop problem gambling behaviours. Risk factors associated with problem gambling behaviour include age, gender, impulsivity, biological/genetic vulnerabilities, family history, peer group influence, and environmental variables.

Sometimes, individuals simply learn problem gambling behaviours as a conditioned response to the positive feelings associated with winning. Some find that they gain a sense of importance and enjoy the notice and approval shown by others towards them at the venue when they do win.

It has often been reported that they may use gambling as a means of overcoming a number of different negative emotions such as feeling lonely, boredom, dealing with grief, depression/anxiety or to satisfy a need for excitement/entertainment and/or compensate for poor coping skills. Some problem gamblers exhibit this behaviour as a result of pre-existing mental health problems such as post traumatic stress disorder or depression and bipolar disorders.

Children are often first exposed to gambling within the family unit. Where problem gambling is prevalent in the family unit, those children may be at a higher risk of starting to gamble or use alcohol and tobacco at an early age. It is critical to understand that problem gamblers don't overcome their problem by simply having more self control. Problem gambling is more complex than just a control problem.

### ***Why is it important to know your local Gambling Help service provider?***

The Code of Practice supports early intervention and prevention strategies, and where opportunities arise, gambling providers are to establish effective mechanisms to link with local gambling-related support services and community networks where responsible gambling-related issues could be raised.

Gambling Help counsellors and educators are also available for staff training and to provide information about problem gambling behaviours. It's often hard

to recognise who has a problem and who hasn't. Staff training sessions are also a good way to get to know your local Gambling Help counsellor. Occasionally venue staff also seek confidential free counselling as a result of work-related issues around problem gamblers. The Gambling Help service is available to help the venues and the staff with gambling-related issues.

It is a legislative requirement that gambling providers provide information on gambling-related support services for customers seeking assistance or who wish to self-exclude. Customers with problem gambling behaviours will often approach the venue to self-exclude from the venue, or it may become apparent to staff at a gaming venue that a customer or family member may be experiencing distress as a result of problem gambling.

### ***What are some signs which may indicate that someone is displaying 'problem gambling' behaviour?***

For a comprehensive list of indicators refer to the *Possible problem gambling risk indicators* in **Practice 2** of this Resource manual (p. 13).

### ***How successful is counselling in the treatment of 'problem gambling'?***

Studies suggest that problem gambling behaviours have a much higher rate of recovery once the gambler enters treatment, compared to problem drinking or other substance abuse behaviours.

- 'My counsellor and the group work that I did really helped me understand why I gambled and helped me to deal with my feelings better. It isn't easy, but things are so much better now...I have a life'  
—Joseph, 54 years.
- 'I finally have my jewellery out of hock and I can start saving for things I want. I still get strong urges but I know that I have to do this for my sake and my husband'—Jenny, 35 years.
- 'The financial counsellor had some really good cash safety strategies, I feel that there is some hope now. That I can stay safe from harming myself and my family'—Terry, 27 years.

In addition to providing counselling (including financial counselling), education and support for problem gamblers and their families, all the services above provide a wide range of other services. These services may include a combination of relationship counselling, mediation, employment assistance programs, support for young people and their families, support for victims of crime, education and support groups in many areas such as domestic violence. For information and assistance on possible services contact your local Gambling Help service directly.

***What should I do if I have a customer that:***

- ***spends an unusually long time gambling?***
  - ***appears distressed?***
  - ***tells you they feel their gambling is out of control?***
1. Demonstrate your concern and display respect for the customer.
  2. Refer the customer to the CLO/supervisor/manager.
  3. CLO/supervisor/manager approaches customer to discuss issue and asks if they would like to contact the Gambling Help service to make a free counselling appointment:
    - a. If the customer agrees, provide them with the contact details for the Gambling Help service and offer them the use of a phone and a quiet location within the venue. CLO advises the customer about their right to self-exclude from your venue.
    - b. If the customer does not agree, provide the customer with contact details for the Gambling Help service to take home with them. CLO advises the customer about their right to self-exclude from your venue.