

ATTACHMENT 2

Burswood Entertainment Complex provides an example of a venue specific code. The Crown Responsible Gambling Code of Conduct is also attached. It is an example of a venue specific code that is approved by the Victorian Commission for Liquor, Gaming and Racing. The Queensland, Tasmanian and South Australian Codes provide examples of government mandated codes. These are implemented after a consultation process that includes feedback from industry and community stakeholders.

VENUE SPECIFIC CODE:

- i. Burswood Responsible Gambling Code of Practice
- ii. Crown Responsible Gambling Code of Conduct

GOVERNMENT CODES:

- i. Queensland,
- ii. South Australia,
- iii. Northern Territory
- iv. Tasmania

Burswood Entertainment Complex Responsible Gambling Code of Practice



Foreword

Burswood Entertainment Complex ('Burswood') is renowned for excellence in all aspects of its services and operations. As a leading provider of entertainment facilities in Western Australia, Burswood is committed to providing gaming services for patrons in a responsible manner. This Responsible Gambling Code of Practice is an important reflection of that commitment.

The vast majority of Burswood Casino patrons enjoy their gaming experience. However, a small minority have difficulty in controlling their gambling behaviour and may encounter serious personal and financial difficulties.

Whilst it is acknowledged that problem gambling may never be completely avoidable, Burswood is committed to providing programmes and initiatives to minimise problem gambling behaviours and the provision of timely and effective assistance for customers who seek help.

This Code of Practice represents an approach considered appropriate for the unique Western Australian environment. The input and support of the Gaming and Wagering Commission of Western Australia and Department of Racing, Gaming and Liquor is acknowledged.

As the industry's and community's understanding of the causes of problem gambling and appropriate responses further develop, the Code of Practice will require updating over time. It is envisaged that all interested sections of the community, including government, counsellors and gaming customers themselves, will have input into such development.



Barry Felsted
Chief Executive Officer

Table of Contents

1.	Mission Statement.....	2
2.	Responsible Gambling.....	2
3.	Problem Gambling.....	3
4.	Provision of Information.....	4
	4.1 Burswood's Mission Statement	4
	4.2 Customer Information	4
	4.3 Gaming Information.....	4
	4.4 Problem Gambling Counselling Services	4
	4.5 Responsible Gambling Information	4
5.	Interaction with Customers and Community.....	5
	5.1 Customer Service Staff	5
	5.2 Customer Complaints.....	5
	5.3 Problem Gambling Support Counselling	5
	5.4 Persons Under 18 Years	6
	5.5 Staff Training and Skills Development.....	6
	5.6 Staff Gambling Prohibition	6
	5.7 Privacy	6
6.	Exclusion.....	7
	6.1 Self-Exclusion	7
	6.2 Involuntary Exclusion.....	7
	6.3 Counselling for Excluded Customers	7
	6.4 Removal from Mailing Lists.....	7
	6.5 Re-entry following Self-Exclusion or Involuntary Exclusion.....	7
7.	Physical Environment	8
	7.1 Breaks in Play.....	8
	7.2 Responsible Service of Alcohol	8
	7.3 Clocks	8
	7.4 Lighting.....	8
8.	Financial Transactions	9
	8.1 ATMs.....	9
	8.2 EFTPOS.....	9

Table of Contents Continued

8.3	Credit	9
8.4	Cheque Cashing Restrictions.	9
8.5	Cooling-Off	9
8.6	Staff Interaction with Customers.....	9
8.7	TAB Agency	9
9.	Advertising and Promotions	10
9.1	Advertising and Promotions Code of Practice	10
9.2	Promotion of Responsible Gambling.....	11
9.3	Complimentaries Policy.....	12
10.	Cultural and Geographic Diversity.....	13
10.1	Sensitivity.....	13
10.2	Information in Community Languages	13
10.3	Other Community Groups.....	13
11.	Accountability and Review	14
11.1	Responsible Gambling Management Committee	14
11.2	Internal Compliance Audits.....	14
12.	Research	14
13.	Terms Used in the Code of Practice.....	15

1. Mission Statement

Burswood Entertainment Complex is committed to providing Responsible Gambling services through the provision of effective and responsible gambling programmes, information, assistance and services.

2. Responsible Gambling

Responsible Gambling is a term used to cover all aspects of the Casino's gaming operations which enables informed choice and encourages responsible behaviour by Casino customers.

Burswood has adopted the following definition:

"Responsible gambling occurs in a regulated environment where the potential for harm associated with gambling is minimised and people make informed decisions about their participation in gambling."

"Responsible gambling occurs as a result of the collective actions and shared ownership by individuals, communities, the gambling industry and the Government to achieve outcomes that are socially responsible and responsive to community concerns."¹

Burswood's responsible gambling initiatives are aimed at minimising the potential risk for the small number of customers who may develop difficulties associated with their gambling behaviours.

¹ Queensland Responsible Gambling Code of Practice

3. Problem Gambling

Burswood recognises that some people may develop problems associated with their gambling behaviours. This occurs when people gamble more than they can afford which may result in harm to themselves and/or others.

Burswood is committed to having programmes in place to minimise the incidence of problem gambling by providing appropriate and timely assistance and referrals for customers who may be experiencing difficulties associated with their gambling behaviours.

Two recognised definitions of problem gambling are:

“Problem gambling exists when gambling activity results in a range of adverse consequences where:

- the safety and wellbeing of gambling customers and/or their families and friends are placed at risk; and/or*
- negative impacts extend to the broader community.”²*

“Problem gambling refers to the situation when a person’s gambling activity gives rise to harm to the individual player, and/or to his or her family, and may extend into the community.”³

² Queensland Responsible Gambling Code of Practice

³ Victorian Commission of Gambling Regulation. Definition and Incidence of Problem Gambling, including the Socio-Economic Distribution of Gamblers.

4. Provision of Information

4.1 Burswood's Mission Statement

Burswood's responsible gambling mission statement will be clearly displayed for both staff and customers.

4.2 Customer Information

Consumer information will be made freely available to assist customers to make informed choices. Information about the potential risks associated with gambling and where to get assistance will be prominently displayed.

4.3 Gaming Information

Information about the odds of the games and probability of winning will be made available to customers, in the Casino.

4.4 Problem Gambling Counselling Services

Contact information including the telephone number of problem gambling counselling services will be prominently displayed.

4.5 Responsible Gambling Information

The following information will be made available on request:

- The Burswood Responsible Gambling Code of Practice;
- Information about the table games and electronic gaming machines;
- Information about the Burswood Self-Exclusion Programme;
- Availability of problem gambling counselling and other assistance;
- Gambling-related complaints procedures;
- Privacy complaints procedures;
- Information in key community languages.

5. Interaction With Customers and Community

5.1 Customer Service Staff

Customer Service Staff will be trained and available to provide information about assistance available to customers who may be experiencing difficulties with their gambling behaviours, and to receive and investigate complaints and queries.

Burswood will nominate staff members who will be available to speak with customers about any responsible gambling issues, complaints or queries.

5.2 Customer Complaints

Burswood will implement and publicise an effective complaints resolution mechanism.

5.3 Problem Gambling Support Counselling

Burswood will strive to develop and maintain effective links with gambling counselling providers and other services available to assist those who may be experiencing difficulties associated with their gambling behaviours.

Burswood will provide financial support for gambling counselling through the Problem Gambling Support Services Advisory Committee.

5.4 Persons Under 18 Years

Staff will be vigilant to ensure that children are not left unattended while parents are in the Casino. Systems will be implemented for the purpose of preventing persons under 18 years from gambling or entering the Casino except as provided by law.

5.5 Staff Training and Skills Development

Nominated Burswood staff will receive training in responding to the needs of customers who may be experiencing difficulties associated with their gambling behaviours. Higher levels of training will be provided on an ongoing basis for staff directly involved in the self-exclusion process.

5.6 Staff Gambling Prohibition

Burswood employees are not permitted to gamble at the Burswood Entertainment Complex at any time.

5.7 Privacy

Privacy of customers will be observed in accordance with the law and Burswood's Privacy Policy. Any written request by a prize-winner that he or she not be identified will be honoured.

Customers have the right to ask to be removed from marketing mailing lists and membership based programmes.

6. Exclusion

6.1 Self-Exclusion

A Self-Exclusion programme will be maintained, promoted and enforced.

6.2 Involuntary Exclusion

An involuntary exclusion process will be implemented for persons believed by Burswood to be putting themselves at potential risk of serious harm as a result of their gambling behaviours. Persons who are subject to involuntary exclusion have the right of appeal to the Gaming and Wagering Commission of Western Australia.

6.3 Counselling for Excluded Customers

Self-excluded and involuntary excluded customers will be encouraged to seek counselling and/or other assistance.

6.4 Removal from Mailing Lists

Procedures will be implemented for the removal of the details of self-excluded and excluded customers from mailing lists and membership based programmes.

6.5 Re-entry Following Self-Exclusion or Involuntary Exclusion

Customers who wish to re-enter the Casino following expiry of their period of exclusion will be interviewed and may be required to provide evidence that they have taken steps to manage their gambling behaviours.

7. Physical Environment

7.1 Breaks in Play

Procedures will be implemented to offer those customers who win large prizes the opportunity to take breaks in play.

7.2 Responsible Service of Alcohol.

Burswood is committed to the responsible service of alcohol. All reasonable efforts will be made to prevent intoxicated persons from gambling.

7.3 Clocks

Clocks will be displayed in gaming areas to assist customers to be aware of the passage of time.

7.4 Lighting

Adequate lighting will be provided in gaming areas.

8. Financial Transactions

8.1 ATMs

ATMs are to be located outside gaming areas.

8.2 EFTPOS

In the gaming areas and except for International Gaming purposes, EFTPOS is only to be used to access cash from savings or cheque (not credit) accounts.

8.3 Credit

Burswood will not provide credit or lend money to customers for the purpose of gambling other than as approved by the Gaming and Wagering Commission of Western Australia.

8.4 Cheque Cashing Restrictions

Customers are required to complete an Application for Cheque Cashing Facility form before a cheque cashing limit is set. Payroll cheques and third party cheques will not be cashed (other than as approved by the Gaming and Wagering Commission of Western Australia). Casino prize/payout cheques will not be cashed at the time.

8.5 Cooling-Off

Relevant staff will be instructed to offer customers, who have received large payouts, the opportunity to 'cool-off' by taking payment in part or full by cheque.

8.6 Staff Interaction with Customers

Staff will receive specific instruction regarding the limits on their interaction with customers in financial matters.

8.7 TAB Agency

Burswood has a TAB agency and as an agent will comply with and adhere to the TAB's Code of Practice. A copy of the TAB's Code of Practice is available upon request.

9. Advertising and Promotions

9.1 Advertising and Promotions Code of Practice

Burswood is committed to the following Advertising and Promotions Code of Practice:

- Gambling advertisements and promotions will comply with the Advertising Code of Ethics as adopted by the Australian Association of National Advertisers;
- Gambling advertising will not give an unrealistic expectation of the prospects of winning or encourage irresponsible gambling behaviour;
- Gambling advertising will not give the impression that gambling is a reasonable strategy for financial betterment;
- Burswood's annual advertising program will not focus solely on gambling activities, but rather include gambling as one of a range of entertainment and leisure choices;
- Advertisements and promotions will not be false, misleading or deceptive;
- Gambling advertisements and promotions will inform consumers, in a clearly discernible way of applicable terms, conditions and limitations, or where information about applicable terms, conditions and limitations may be found;
- Gambling advertisements and promotions will not offer a false understanding of how gambling technologies work or include misleading statements about odds, prizes or the chances of winning;
- Gambling advertising will not depict persons under 18 years of age and will not be broadcast other than in accordance with approved advertising standards for television;
- Gambling advertising will not promote the irresponsible consumption of alcohol;
- Gambling promotional material will not be sent to excluded customers;

- Gambling advertisements and promotions will not be targeted at vulnerable or disadvantaged groups or portray people in a way that discriminates against a person or section of the community on the basis of their race, ethnicity, nationality, sex, age, sexual preference, religion, disability or political belief;
- Gambling advertisements and promotions will be in good taste and not offend prevailing community standards.

9.2 Promotion of Responsible Gambling

Burswood will produce and display a range of materials promoting responsible gambling including:

- Stand-alone responsible gambling information brochures and advertisements;
- Responsible gambling messages to accompany external gambling advertising and promotional material;
- Responsible gambling notices for display inside the Casino;
- Counselling service promotional materials such as signs, brochures and machine stickers that provide contact details for problem gambling counselling and assistance services.

9.3 Complimentaries Policy

Complimentary items:

- must be provided on a basis that is fair and transparent;
- must focus on enhancing the customer's experience;
- must not be provided in a way that is calculated to result in an excessive level of gambling;
- may be used as a form of compensation for a reduced level of service;
- may be provided to celebrate a special occasion;
- may be used to celebrate a big win, particularly where they may assist in providing a break from gambling;
- may be used to settle a dispute;
- may be provided for other appropriate reasons.

10. Cultural and Geographic Diversity

10.1 Sensitivity

Burswood will be sensitive to the needs of local communities and cultural groups that participate in gambling activities.

10.2 Information in Community Languages

Written information about self-exclusion and counselling services will be available in languages appropriate to significant customer groups.

10.3 Other Community Groups

Burswood will promote staff sensitivity to the special needs of other community groups that may experience difficulties with their gambling behaviours.

11. Accountability and Review

11.1 Responsible Gambling Management Committee

The Responsible Gambling Management Committee will be established to monitor and review all gaming and associated activities to ensure that Burswood provides a safe and responsible gaming environment.

11.2 Internal Compliance Audits

Compliance with this Code of Practice will be monitored and regularly reviewed by the Responsible Gambling Management Committee.

12. Research

Burswood is committed to supporting appropriate research into responsible gambling practices and problem gambling prevention and treatment.

13. Terms Used in the Code of Practice

Gaming

All legal forms of gambling other than wagering. In this Code, gaming includes gaming machines, casino table games, lotteries and keno.

Gaming areas

Those parts of Burswood Casino where gambling products or services are provided.

Involuntary Exclusion

A direction given by Burswood requiring an individual to keep out of the Casino based on information demonstrating that the individual has a serious problem associated with his or her gambling behaviour, or has otherwise demonstrated inappropriate behaviour.

Problem gambling

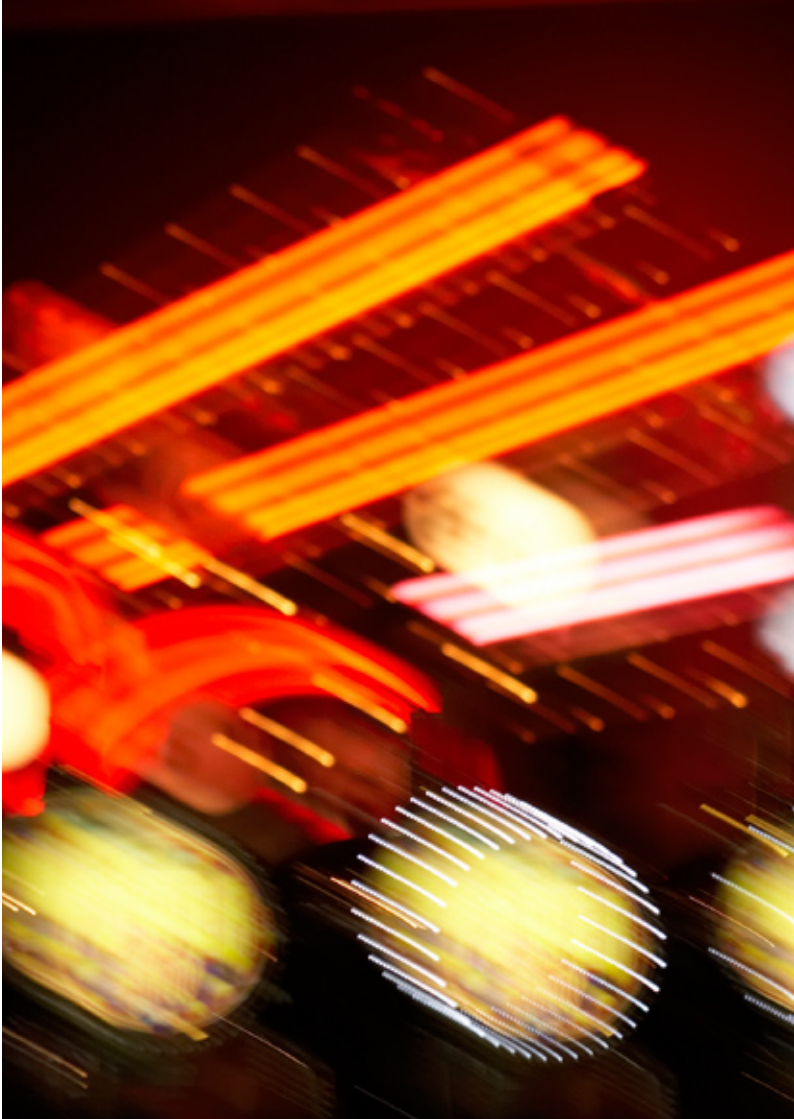
Problem gambling exists when gambling activity results in significant adverse consequences to gambling customers or others affected by their behaviour.

Responsible gambling

The provision of gambling activities in a manner that minimises the potential for harm to gambling customers or others affected by their behaviour.

Self-Exclusion Agreement

A written document signed by an individual by which that individual agrees to not enter the Casino and Burswood agrees to take reasonable steps to help the person not enter the Casino.



Burswood Nominees Limited ABN 24 078 250 307
a.t.f. The Burswood Property Trust ABN 35 491 489 282
trading as Burswood Entertainment Complex
Managed by Burswood Resort (Management) Limited ABN 68 009 396 945
Great Eastern Highway, Burswood, Western Australia
PO Box 500 Victoria Park, Western Australia 6979
Tel: 61 8 9362 7777 Fax: 61 8 9470 1789
burswood@burswood.com.au www.burswood.com.au



BURSWOOD
ENTERTAINMENT COMPLEX



RESPONSIBLE GAMBLING

Code of Conduct

VERSION 2
SEPTEMBER 2010

RESPONSIBLE GAMBLING CODE OF CONDUCT – OVERVIEW

This section is intended to provide an overview of the Crown Melbourne Limited (**‘Crown’**) Responsible Gambling Code of Conduct (**‘Code’**).

The full version of the Code follows and is available at various locations throughout the Casino as well as on the Crown Melbourne website www.crownmelbourne.com.au

Chinese (Simplified and Traditional), Vietnamese, Arabic, Greek, Italian, Cambodian and Hindi versions are also available online or on request at any Crown Signature Club information desk.

For further information, please contact any member of staff or phone the Responsible Gaming Support Centre on 1800 801 098.



RESPONSIBLE GAMING
STAY IN CONTROL

Crown Responsible Gaming Support Centre: 1800 801 098

Gambler's Help: 1800 858 858

Crown's Commitment to Responsible Gambling

Crown is committed to providing responsible gambling services by making available education, information, assistance and resources concerning responsible gambling matters.

Crown's responsible gambling message is 'STAY IN CONTROL'.

Gambling Product Information

The rules of all Table Games and Electronic Gaming Machines (**‘EGMs’**) offered at Crown are available upon request or by visiting the Crown website. Player Information Displays on all EGMs and Fully Automated Table Games can provide further information including your odds of winning.

RESPONSIBLE GAMBLING

Crown Signature Club (Customer Loyalty Program) Information

The Crown Signature Club terms and conditions (including how to join, account balances and the accrual and redemption of benefits) are provided to all new members.

Further information is available at any loyalty program information desk or by calling the Crown Signature Club Information Hotline on (03) 9292 7222.

Crown's Play Safe Limits (Pre-Commitment Strategy)

Crown's Play Safe Limits allow Crown Signature Club members to set limits on the time and money spent playing EGMs and Fully Automated Table Games. Brochures are available throughout the casino and on request.

Interaction with Customers

All relevant Crown staff complete approved Responsible Service of Gambling training. Training is regularly reviewed to ensure that customers can be provided with the most appropriate service(s) for their individual circumstances.

Responsible Gambling services available to customers include (but are not limited to):

- Responsible Gaming Support Centre
- Self Exclusion
- Information and advice
- Referral to other support providers
- Responsible Gaming Psychologists
- Chaplaincy Support Service
- Brochures (including languages other than English)

All services are provided confidentially and free of charge.

Interaction with Staff

Crown employees are not permitted to gamble at the Casino at any time. A free, confidential Employee Assistance Program is available to any staff member requiring assistance.

Problem Gambling Support Services

Crown maintains regular contact with a number of problem gambling support services. This is achieved via email, attendance at meetings, seminars and/or conferences.

Customer Complaints

Crown has a comprehensive complaint handling process.

Complaints may be made in person, via telephone, fax, email, or by letter. All complaints will be acknowledged and responded to promptly.

Complaints about the Code can be raised with a Responsible Gaming Liaison Officer on tel: 1800 801 098.

Prohibition on Gambling by Minors/Persons under 18 Years

Crown Casino is an adult environment and as such, no person under the age of 18 will be permitted entry to any gambling area. If any doubt exists, appropriate identification will be requested. If appropriate identification cannot be provided, entry will be refused.

Any parent or guardian bringing a child to any part of the complex must ensure that the child is not left unattended. If a child is unattended, the parent or guardian may be banned from entering the complex and the matter may be referred to the police.

RESPONSIBLE GAMBLING

The Gambling Environment

A number of features exist within the Gaming areas of Crown which are aimed to encourage responsible gambling. These include (but are not limited to):

- Responsible gambling information (brochures, posters etc)
- Clocks
- Adequate lighting
- Responsible Service of Alcohol
- Restricted ATMs

Financial Transactions

A number of restrictions apply to financial transactions within Crown. These restrictions include things such as cheque cashing, payment of winnings and identification requirements.

Full details are available by contacting staff at any cashier station.

Responsible Advertising and Promotions

Advertising and/or promotions will comply with the Australian Association of National Advertisers Code of Ethics and applicable laws.

Implementation and Review of the Code

The Code is reviewed regularly. All customers and staff are welcome to provide feedback at any time by writing to:

General Manager
Responsible Gaming
Crown Melbourne Limited
8 Whiteman Street
SOUTHBANK, VIC 3006



CONTENTS

Foreword 2

Crown’s Commitment to Responsible Gambling 4

Availability of the Code 6

Responsible Gambling Information 8

Gambling Product Information 12

Customer Loyalty Program Information 13

Crown’s Play Safe Limits (Pre-Commitment Strategy) 14

Interaction with Customers 16

Interaction with Staff 19

Problem Gambling Support Services 19

Customer Complaints 21

Compliance with the Prohibition on Gambling
by Minors/Persons Under 18 Years 23

The Gambling Environment 25

Financial Transactions 27

Responsible Advertising and Promotions 29

Implementation and Review of the Code 30

Glossary 32

FOREWORD

Crown Melbourne Ltd (**“Crown”**) is the operator of the Crown Entertainment Complex and the appointed Victorian Casino Licence holder. The Crown Entertainment Complex is one of the world's largest and most diverse entertainment destinations. Crown is renowned for excellence in all aspects of its services and facilities, and our commitment to providing gaming services for our customers in a responsible manner, is no exception. This Responsible Gambling Code of Conduct is an important reflection of that commitment.

Our entertainment and gaming experiences are enjoyed by the vast majority of our customers. However, we recognise that some of our customers have difficulties with gambling responsibly and this may cause them personal and financial difficulties, and potentially their family, friends and the wider community may also be impacted.

While the decision to gamble lies with the individual and represents a choice based on an individual's circumstances, we recognise that to make that choice responsibly, our customers need to be informed about our gaming products and information regarding the services and support available to them should they need or seek help with their gambling.

As the industry's and community's understanding of the causes of problem gambling and the appropriate responses further develop, our Code will be reviewed

RESPONSIBLE GAMBLING

and updated over time. It is our goal to work with all interested sections of the community including Government, counsellors and gaming customers themselves to ensure that there is appropriate input into such developments.

This Code represents our commitment to our customers and employees concerning responsible gambling. We want you to enjoy your experiences with us.

As always, we welcome your feedback on any issue at any time and particularly with respect to our continued efforts to ensure that our gaming services are enjoyed by all who choose to participate.

Rowen Craigie
Chief Executive Officer

CROWN'S COMMITMENT TO RESPONSIBLE GAMBLING

Responsible Gambling

Responsible gambling occurs in a regulated environment where the potential for harm associated with gambling is minimised, as customers are informed and can therefore make sensible and rational choices when they participate in gambling, based on their individual circumstances.

Responsible gambling is the shared responsibility and actions of individuals, communities, the gaming industry and the Government, working in partnership to achieve socially responsible outcomes which are responsive to community concerns.

Crown's responsible gambling initiatives are focused on minimising the potential for risks for those small number of customers who may develop difficulties associated with their gambling behaviours.

Crown's Responsible Gambling Commitment

Crown is committed to providing responsible gambling services by making available education, information, assistance and resources concerning responsible gambling matters.

Crown's Responsible Gambling Code of Conduct ("**Code**") describes and demonstrates how we execute this commitment. It is our objective to ensure that Crown remains a world leader in responsible gambling practices and, at a minimum, that we comply with the legal requirements regarding responsible gambling as contained in the *Casino Control Act 1991* (Vic) and the *Gambling Regulation Act 2003* (Vic).

RESPONSIBLE GAMBLING

Crown's commitment to the responsible service of gambling extends to include a Responsible Gaming Support Centre ("**RGSC**"), a facility which includes a dedicated team of staff, managers and professionals who are tasked with implementing Crown's responsible service of gambling initiatives and for providing a focal point for interacting with customers who may need support.

Crown's Responsible Gambling Message

Crown's responsible gambling message is simple yet meaningful – "STAY IN CONTROL". The accompanying "traffic lights" logo reinforces this message. Our message is found clearly visible throughout the Casino, including being placed on electronic gaming machines ("**EGMs**"), Fully Automated Table Games ("**FATGs**"), table games and near Automatic Teller Machines ("**ATMs**") throughout the Complex.

Crown's responsible gambling message is printed on all gaming related advertising.



RESPONSIBLE GAMING
STAY IN CONTROL

Crown Responsible Gaming Support Centre: 1800 801 098
Gambler's Help: 1800 858 858

AVAILABILITY OF THE CODE

The Code will be made available to customers, in written form, on request and copies will be available at brochure stands near Cashier locations and at the RGSC or by contacting a Responsible Gaming Liaison Officer (**“RGLO”**) on 1800 801 098. The Code will also be available on Crown’s website at www.crownmelbourne.com.au

Customers will be notified about the Code and how to access it, via signage placed at the RGSC and Crown Signature Club information desks. An example of that signage follows:

The Crown Responsible Gambling Code of Conduct is available at the Crown Responsible Gaming Support Centre, at Crown Signature Club information desks, upon request and via the Crown Melbourne website at www.crownmelbourne.com.au



RESPONSIBLE GAMING
STAY IN CONTROL

Crown Responsible Gaming Support Centre: 1800 801 098
Gambler’s Help: 1800 858 858

RESPONSIBLE GAMBLING

Our Code will also be made available on our website (and in written form on request) in the following community languages:

- Chinese (*Traditional and Simplified*)
- Vietnamese
- Arabic
- Greek
- Italian
- Cambodian
- Hindi

Crown employs staff from linguistically diverse backgrounds capable of interpreting this Code to assist customers. We encourage our customers to ask for this assistance if they need it.

RESPONSIBLE GAMBLING INFORMATION

In addition to our own responsible gambling message, Crown displays responsible gambling information throughout the Casino in a variety of forms including brochures, posters, in-house TV and on screen Player Information Displays (“**PIDs**”) on EGMs and FATGs. We also include responsible gambling messages in our Crown Signature Club newsletter that is sent to member customers. For further information or assistance, customers are encouraged to contact the RGSC or a RGLO on 1800 801 098.

Information and some examples of key Crown and Government responsible gambling messages found at the Casino follow.

(a) How to gamble responsibly



PLAYING THE POKIES

KNOW THE FACTS

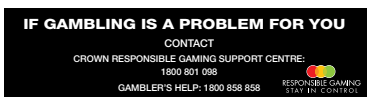
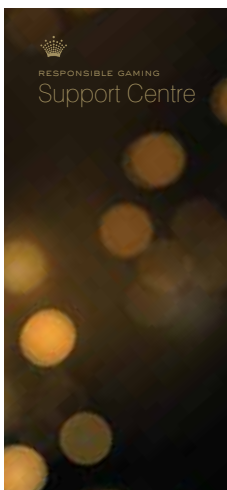
- WHO REALLY WINS ON THE POKIES?
- HOW DO THE POKIES WORK?
- WHAT ARE MY CHANCES OF WINNING?

Level 5, 32 Spring Street Melbourne, 3000
Monday to Friday during Day to Day
Phone 03 9603 2222 Fax 03 9603 2222
Email rgp.responsiblegambling@vic.gov.au
www.rog.vic.gov.au

Victoria

RESPONSIBLE GAMBLING

(b) Availability of gambling support services and Crown's RGSC



(c) Payment of winnings, credit and lending

Except for lawful exceptions, EGM winnings or accumulated credits above \$2,000 must be paid by cheque and not made out to cash. Crown will not provide credit or lend money to Australian customers for the purpose of gambling.

Crown may provide chips on credit to non-Australian residents in circumstances prescribed by legislation and in accordance with controls and procedures approved by the Victorian Commission for Gambling Regulation (“**VCGR**”).

Customers who have received large payments have the opportunity to take payment in part or full by cheque.

More detailed information is available on request.

(d) Crown's Self-Exclusion Program

In addition to observing its existing legislative requirements regarding Exclusion orders, Crown has a Self-Exclusion Program. Self-Exclusion is a process available to customers to ban themselves from the Casino. This may be an option useful to those customers who may be experiencing difficulties as a result of their gambling behaviours.

Self-Exclusions are:

- facilitated by trained staff in the RGSC;
- available 24 hours a day, 7 days per week; and
- provided free of charge.

Crown will not disclose information gathered during the facilitation of a Self-Exclusion to any third party unless legally obliged to do so or with the customer's consent.

Crown will not knowingly send any advertising or other promotional material relating to gaming to Self-Excluded or excluded customers.

Brochures containing information about Self-Exclusion will be provided to customers on request, and made available at various locations throughout the Complex and at the RGSC.

Additional Information

Crown's responsible gambling programs include:

- The establishment of the Crown RGSC as a world first responsible gambling initiative, which operates 24 hours a day, 7 days a week.
- A Self-Exclusion Program for customers that encourages applicants to seek counselling and assistance.
- The operation of Play Safe Limits (a pre-commitment strategy) for EGMs and FATGs, and the provision of

RESPONSIBLE GAMBLING

Player Activity Statements (see “Customer Loyalty Program” information in this Code).

- The availability of Psychologists experienced in the field of problem gambling to assist customers and family members.
- A robust process that applies to the application by a customer for the revocation of their Self-Exclusion. This process includes satisfying criteria whereby the applicant demonstrates the ways in which they have addressed their gambling behaviours, such that they are back “in control”.
- A Gambling Resumption Information Program (“**GRIP**”), designed for customers who are successful in satisfying the criteria for revoking their Self-Exclusion, to assist them in developing strategies when resuming gaming at Crown.
- A Chaplaincy Support Service.

Additionally, customers may attend the RGSC in person or ring on free-call 1800 801 098 to speak to our experienced staff or obtain more information about any of the services or information contained in this Code.

Crown complies with all relevant government legislation pertaining to the Responsible Service of Gambling.

Crown wants its customers to enjoy their gaming in a responsible manner and encourages customers to gamble within their means and budget.

Customers can obtain free information on household budgeting from websites such as the Commonwealth Government’s website ‘Understanding Money’ www.understandingmoney.gov.au

In addition, the State Government’s problem gambling support website can be found at www.problemgambling.vic.gov.au

GAMBLING PRODUCT INFORMATION

Signs are displayed in the Casino at Crown Signature Club information desks advising customers that, upon request, Crown will provide information on:

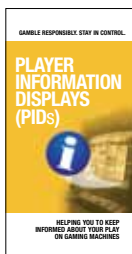
The Rules of all Table Games and EGMs offered for play at the Casino.

Those Rules are also available on Crown's website at www.crownmelbourne.com.au

The following Brochure explains the chances of winning on EGMs and is available at the Casino upon request.



EGM and FATG game information, including the chances of winning, accessible via PID screens on each EGM and FATG, which allows players to keep informed about their gaming machine and FATG play. Information on how to access and view the PID screens is available from a member of staff or PID brochures (for gaming machines), are available on request at Crown Signature Club information desks and the RGSC. Below is an example of the kind of brochure that will be available.



CUSTOMER LOYALTY PROGRAM INFORMATION

Crown operates a Loyalty Program called Crown Signature Club which entitles its members to certain benefits and privileges. The EGM Loyalty Scheme that forms part of the Crown Signature Club is provided to customers in accordance with relevant legislation.

Customers can obtain information on how to join the Crown Signature Club, benefits they may accrue, account balances and the manner in which points may be redeemed for rewards:

- at any Crown Signature Club information desk;
- by contacting the Crown Signature Club Information Hotline on 03 9292 7222; and
- in the terms and conditions available on application for membership (or on request).

When joining the Crown Signature Club, EGM customers will be supplied with the required information, and be given the opportunity to set Play Safe Limits, relevant to EGMs.

Further information regarding Play Safe Limits is provided in this Code under “Pre-Commitment Strategy”.

Crown will not knowingly send or direct any advertising or other promotional material relating to gaming to any person who is excluded or Self-Excluded from the Casino.

At least once a year, Player Activity Statements are made available to EGM Crown Signature Club members.

Members who play FATGs are able to collect a Player Activity Statement on request, at any Crown Signature Club desk. Player Activity Statements provide information on each member's EGM or FATG play, including all wins and losses for the period of the statement. Crown's responsible gambling message 'Stay in Control', as well as information regarding the availability of the Code, is incorporated in and forms part of Player Activity Statements.

CROWN'S PLAY SAFE LIMITS (PRE-COMMITMENT STRATEGY)

A pre-commitment decision is a choice a person makes, before commencing a session of gaming, to set themselves a limit on their expenditure and/or time spent gaming. Crown encourages and supports customers who play EGMs and FATGs to set individual time and spend limits by providing the Play Safe Limits brochure to all customers joining the Crown Signature Club. Staff are also available to provide information regarding Play Safe Limits at locations throughout the Casino, including at the Crown Signature Club information desks and the RGSC.

Crown's Play Safe Limits allow our Crown Signature Club members to set a time and money limit according to their individual circumstances. Play Safe Limits brochures are available throughout the Casino and on request.



RESPONSIBLE GAMBLING

RGLOs will be available on request to assist and support a customer on strategies for keeping within their Play Safe Limits or any other pre-commitment strategy.

In addition, all EGMs and FATGs enable a player to use the PID to track the time and the net loss or win during a session of play. Information on how to activate session tracking is available from staff and the PID brochure (for EGMs) is available on request.

Example PID screen information follows:



INTERACTION WITH CUSTOMERS

Crown is committed to providing a world-class entertainment experience for our customers and exceptional levels of customer service in all areas. This includes being aware of our customers and our responsibility to foster responsible gambling. All relevant staff, including Crown management, are trained in the responsible service of gambling both when they are inducted into the business and on an ongoing basis. Crown's staff training meets national competency standards and is approved by the VCGR. Training is subject to ongoing review so that any proven initiatives or programs in responsible service of gambling are included, ensuring relevant staff, are at the forefront of responsible gambling.

Crown employees are instructed that, when approached by customers who have requested information or assistance with a gambling problem; requested information on Self-Exclusion; or display observable signs of distress that may be related to their gambling behaviours, to refer them, as soon as practicable, to Crown specialist assistance via their supervisor/manager to the RGSC.

Crown's RGSC, located within the Complex but away from the Casino, provides a range of services to customers and others.

The RGSC is staffed by RGLOs who are specially trained in all aspects of Crown's responsible gambling programs, including recognising the observable signs of distress, which may be related to problems associated with a customer's gambling. The RGLOs are supported by Psychologist(s) and a Chaplain to assist those customers who may be distressed and/or experiencing difficulties with their gambling behaviours.

RESPONSIBLE GAMBLING

The RGSC also:

- provides strategies to assist customers in managing their gambling behaviours, to foster responsible gambling and prevent difficulties from arising;
- offers professional support, assistance and referral, which is available 24 hours a day, 7 days a week;
- facilitates referrals to problem gambling and financial counselling support services and welfare organisations and provides contact with, and information about, these bodies;
- ensures its assistance and referral service are conducted on a strictly confidential basis;
- has available Psychologists experienced in the field of problem gambling to assist customers and family members;
- provides information regarding Self-Exclusion for customers who wish to exclude themselves from the Casino and manages Crown's Self-Exclusion Program;
- is able to access and provide information in selected community languages;
- provides a Chaplaincy Support Service for customers and staff; and
- all RGSC services are provided free of charge.

As part of delivering exceptional customer service, our staff are encouraged to engage with our customers. A customer displaying signs of distress or unacceptable behaviour will be approached by a staff member who will offer assistance and referrals to specialist support as required. These signs are known by our staff and may include, but are not limited to, a person:

- either gambling every day or finding it difficult to stop gambling;
- gambling for extended periods without a break;

- avoiding contact while gambling;
- communicating very little with anyone else;
- barely reacting to events going on around them;
- displaying aggressive, antisocial or emotional behaviour while gambling; and
- making requests to borrow money from staff or other customers or continuing to gamble with the proceeds of large wins.

The assistance offered by staff may take the form of:

- interaction with the customer and encouraging them to take a break from gambling;
- offering the customer non-alcoholic refreshments such as a cup of tea or coffee in a quieter and more private area such as our break-out lounge areas or the RGSC.

Our RGLOs or senior management, who have undergone advanced responsible gambling training, will be referred to for persons displaying these types of behaviours.

All contact with customers by the RGLOs and senior management are recorded in an incident register which includes any action taken. This register and all personal information recorded by Crown is held in accordance with Australian privacy laws.

INTERACTION WITH STAFF

Crown employees are not permitted to gamble at the Casino *at any time*. Crown also has policies in place which restrict certain staff from gambling at affiliated properties.

Crown recognises that some employees (like other members of the community) may develop difficulties associated with their gambling behaviours, outside of their employment at Crown. Crown employees so affected are encouraged to seek professional assistance through Crown's Employee Assistance Program. This is a free service for all employees and their immediate family, which is run by non-Crown employed professional counsellors and details of all discussions are treated confidentially.

Where appropriate, employees are also encouraged to seek professional assistance from external support services and RGSC staff can provide relevant information.

PROBLEM GAMBLING SUPPORT SERVICES

As a major stakeholder in the gaming industry, Crown is a member of and participates in, a number of industry peak bodies and consultative groups to enable it to remain alert to relevant responsible gambling issues, practices and procedures.

Crown maintains regular contact with problem gambling support services. This is achieved through emails, face-to-face meetings, in addition to attending seminars and/or conferences with support service staff.

Examples of these may include:

- participation in working group meetings with Gambler's Help Centres occurring when Gambler's Help agree (Crown will request such meetings at least annually);
- various Gambler's Help Centre meetings arranged and held as required;
- National Association for Gambling Studies - occurring at an annual conference;
- Problem Gambling Research and Treatment Centre – information sessions as requested or provided by Monash and Melbourne Universities; and
- Ad hoc telephone contact with Gambler's Help and other support agencies as required.

Details of all meetings with problem gambling support services are retained in a Responsible Gambling Register located in the RGSC and attendance details include:

- time and date of the meeting;
- attendees at the meeting;
- topics discussed;
- outcomes/action items for the meeting (where applicable); and
- next meeting/attendance date (where applicable).

CUSTOMER COMPLAINTS

Crown has comprehensive processes in place for managing and resolving issues relating to customer complaints received at Crown, including complaints related to the provision of gaming and this Code.

All relevant staff are trained to manage and resolve customer complaints.

Complaints from customers may be received by Crown's Customer Relations Department, other Crown Departments directly, or frontline staff.


To register a complaint, customers may:

- complete a comment card/feedback form, located in brochure stands throughout the Casino;
- contact Crown by telephone;
- send a fax, letter or email; or
- do so in person.

Any complaints received will be:

- managed and responded to in a timely and appropriate manner;
- investigated sensitively;
- recorded in the Crown Customer Relations system; and
- managed and resolved in accordance with Australian Standards.

All customer complaints will be acknowledged, where possible, within 48 hours of receipt of the complaint and resolution will be attempted at first point of contact or within 7 working days.



During the investigation of a complaint, a Crown manager may seek information from the staff member concerned on the subject matter of the complaint.

The appointed Crown manager will seek to establish whether the customer has been treated reasonably.

Where contact details have been provided to Crown, the customer will be informed of the outcome of their complaint.

In the management and resolution of customer complaints, Crown will comply with relevant legal obligations, including our obligations to protect the customer's privacy.

Information about complaints will be provided to the VCGR if requested. Customer complaints will also be received and investigated by the VCGR as an independent body for investigations and resolution.

Complainants in all unresolved gaming disputes will be advised of the presence of, and their right to consult, a VCGR Inspector.

COMPLIANCE WITH THE PROHIBITION ON GAMBLING BY MINORS/PERSONS UNDER 18 YEARS


Gambling by persons under 18 years is prohibited. Signs are located at every entry point to the Casino banning minors from entering. Casino entry point staff are located at all entrances 24 hours a day, 7 days a week and are vigilant and responsible for monitoring customers and will request appropriate proof of age documentation if they are uncertain whether a customer is at least 18 years. Entry will be refused if appropriate identification is not produced upon request.

In addition, all staff share the responsibility for asking for proof of age when they are uncertain whether a customer is a minor and all staff members are trained to alert a Crown Security Services Representative in these circumstances. If the relevant identification cannot be produced, the customer will be asked to leave the Casino, or will be removed as the situation requires.

Unattended Children

A parent or guardian who brings a child or young person to the Complex must not leave the child or young person unattended in or around the Complex.

Crown's staff and tenants are instructed to monitor and report the presence of any unaccompanied child or young person in or around the Complex to a Security Services Representative.



Where a parent or guardian leaves a child or young person unattended (particularly in order to participate in gambling activities) Crown may ban the customer from the Complex.

A Security Services Representative, and where appropriate, the on-duty RGLO, will attempt to:

- ascertain the identity of the child or young person;
- establish the whereabouts of the parent or guardian in order to reunite them; and
- require proof that the located adult is the parent/guardian of the child.

The RGLO may also refer the matter to the police.

THE GAMBLING ENVIRONMENT

Breaks in Play

Customers will be encouraged to take regular breaks from gambling. This encouragement may take various forms including:

- announcing a draw, including those relating to a trade promotion;
- the announcement of any entertainment occurring;
- verbal encouragement by staff for customers to take refreshment breaks;
- the opportunity for customers who have received winnings/large payments to take payment in part or full by cheque;
- lounge and break-out facilities, available throughout the Casino; and
- the availability of our RGSC located away from the Casino.

Clocks

Clocks are displayed in the Casino and on individual EGMs so that customers can be aware of the passage of time. Staff will mention the time when making announcements about entertainment activities occurring in the Casino.

Lighting

Adequate lighting is provided in the Casino and complies with relevant gambling legislation.

Responsible Service of Alcohol

Crown is committed to the responsible service of alcohol and will not knowingly allow a person who is in a state of intoxication to gamble or bet in the Casino. Under relevant legislation, a person is intoxicated if his or her speech, balance, co-ordination or behaviour is noticeably affected and there are reasonable grounds for believing that this is the result of the consumption of alcohol.

ATMs

ATMs are located away from the Casino and are positioned and/or restricted in accordance with relevant legislation.

Credit

Crown will not provide credit or lend money to Australian resident customers for the purpose of gambling. Non Australian resident customers may be approved to operate a credit facility after the completion of an Application for Credit Facility form and subsequent approval of that facility in accordance with procedures approved by the VCGR.

No outdoor EGMs

No EGM is, or will be, situated outdoors.

Agencies

Crown has a TAB agency in the Casino which is required to adhere to its own Tabcorp Wagering Responsible Gambling Code of Conduct. Customers can ask the TAB agency about accessing Tabcorp Wagering's Responsible Gambling Code of Conduct.

Crown operates an Intralot Agency within the Complex, which is required to adhere to its own Intralot Responsible Gambling Code of Conduct. Customers can ask the Intralot outlet about accessing Intralot's Responsible Gambling Code of Conduct.

FINANCIAL TRANSACTIONS

Cheque Cashing Facilities

A Cheque Cashing Facility may be made available to customers who have completed an Application for Cheque Cashing Facility form and are approved to operate such a facility in accordance with Crown's internal processes and the relevant Regulatory Rules.

A summary of the rules that apply to Cheque Cashing Facilities can be found on the relevant Application Form. Customers can enquire about applying for a Cheque Cashing Facility with Crown Staff at any Cashier's location.

Accepting Cheques other than through a Cheque Cashing Facility

Customers of Crown may cash items including, but not limited to, Bank Cheques, Bank Drafts and personal cheques (collectively referred to as cheques) under certain circumstances. Customers who wish to cash cheques at Crown may open a Casino deposit account. The following (for example) can be credited as a deposit to that account:

- money;
- a cheque payable to Crown; or
- traveller's cheques.

Customers may withdraw from the deposit account by way of Crown issued chip purchase vouchers or withdrawals of money up to the value of the amount in the customer's deposit account.

Customers can enquire about cashing cheques with Crown staff, at the Cashier's location.

Customer cheques will be cashed in accordance with Casino legislative requirements. Customers attempting to cash such cheques will be advised of Crown's policy by staff at the Cashier's location, at the time they attempt to present the relevant cheque.

Any cheques issued by Crown for a payout won from EGM play will not be cashed by Crown. Any customer attempting to cash EGM payout cheques will be advised of Crown's policy by staff at the Cashier's location at the time they attempt to present that cheque.

All cheques cashed by Crown are recorded against the customer's name in Crown's confidential and secure customer database and/or a copy of the cheque will be retained by Crown.

Payment of Winnings

Customers who are the recipient of wins may take payment in part or full by:

- cash (or cash equivalent);
- cheque;
- chips; or
- credits.

By law, all winnings or accumulated credits exceeding \$2,000 from EGMs at Crown must be paid by cheque (unless the relevant EGM is legally operated in an area specified with the consent of the VCGR).

A customer can play an EGM in the specified area, when that customer is a member of and holds a valid Crown Signature Club card and has made a pre-commitment decision pursuant to Crown's Play Safe Limits Program.

RESPONSIBLE ADVERTISING AND PROMOTIONS

The advertising or promotion of EGMs to the general public outside the Casino is prohibited by law in Victoria.

All permitted advertising and promotions will:

- Comply with the Advertising Code of Ethics, (as adopted by the Australian Association of National Advertisers (**"AANA"**)) and all applicable laws.
- Not give unrealistic expectations of the prospects of winning or encourage irresponsible gambling behaviour.
- Not give the impression that gambling is a reasonable strategy for financial betterment.
- Not be false, misleading or deceptive about odds, prizes or the chances of winning.
- Have the consent of any person identified as winning a prize, prior to the publication.
- Not be offensive or indecent in nature.
- Not promote the consumption of alcohol while gambling.
- Be in good taste and not offend prevailing community standards.
- Not intentionally be directed at or expressed indirectly at minors or vulnerable or disadvantaged groups and advertising or other promotional material relating to gaming will not knowingly be sent to excluded customers or customers suspended or removed from the Crown Signature Club.

Each prospective advertisement and promotion will be checked by relevant marketing staff against a checklist developed from the AANA Advertising Code of Ethics and also checked against relevant legal requirements by Crown's Legal department.

IMPLEMENTATION AND REVIEW OF THE CODE

The Code will be provided to all new gaming staff when they commence employment at Crown.

Staff members who effectively implement and adopt the practices in the Code will be recognised by Crown management as part of our ongoing assessment of our staff in providing excellent customer service in all areas.

The Code will be internally reviewed, at least annually, to ensure that it complies with relevant legislation and any other relevant Ministerial Directions and Guidelines as they exist from time to time.

The content and operation and effectiveness of the Code for the preceding 12 months will also be reviewed at this time.

This review will involve seeking feedback from all relevant stakeholders, including Crown staff, customers and problem gambling support services.

In particular, each year, feedback will be sought and collated from a sample of stakeholders. The Crown Responsible Gaming Department will obtain that feedback and collate and report on the data collected and where relevant, that report will include recommendations for improvement of the Code and/or its operation.

Within three months of the commencement of the relevant review, a meeting of the Crown Responsible Gambling Management Committee (**“RGMC”**) will be held to consider and review the report, and where relevant, agree to recommendations for change and/or improvement. The RGMC will also make a plan for actioning accepted recommendations. If the Code is updated it will be provided to the VCGR.

RESPONSIBLE GAMBLING

The report and recommendations and all actions will be recorded by the Chair of the RGMC.

Customers and staff are encouraged to provide feedback at any time and for inclusion into this annual review by writing to:

General Manager
Responsible Gaming
Level 6
8 Whiteman Street
Southbank Vic 3006

GLOSSARY

Complex	means the Crown Entertainment Complex and all parts of it including gaming and non gaming areas, hotels and retail tenancies, all located at the site known as 8 Whiteman Street, Southbank
Casino	means the area in the Complex licensed by the VCGR to conduct gaming, known as the casino gaming floor
Gaming	means all legal forms of gaming permitted at the Casino and operated by Crown and gambling has the same meaning
Loyalty Program	means the Crown Signature Club, which is a membership program that entitles members to certain benefits and privileges
Loyalty Scheme	means the Crown operated EGM component of the Crown Signature Club, operated in accordance with relevant legislation
Problem gambling	exists when a gambling activity results in a range of adverse consequences including, where the safety and well being of gambling customers, or their friends and families, is placed at risk and/or negative impacts extend to the broader community
Regulatory Rules	means those rules agreed to or imposed by the VCGR with respect to casino operations and processes

RESPONSIBLE GAMBLING

Responsible Gambling Management Committee	is an internal committee comprising Crown senior management, including Chief Operating Officer Gaming; Executive General Manager Legal and Regulatory Affairs; Executive General Manager Gaming Machines, Executive General Manager Table Games and General Manager Responsible Gaming
RGLOs	(Responsible Gaming Liaison Officers) are Crown staff members who have undergone specific and advanced responsible gambling training and are experienced in the provision of responsible gambling services and identifying and dealing with signs of distress. RGLOs are directly involved and trained in Crown's Self-Exclusion process
Unacceptable Behaviour	means any customer behaviour that endangers the safety of any customer, themselves or others, or affects the enjoyment of others at Crown

Crown Responsible Gaming Support Centre

The Responsible Gaming Support Centre is a world first facility located within the Crown Entertainment Complex.

The Centre is open 24 hours, 7 days a week and provides a range of services including:

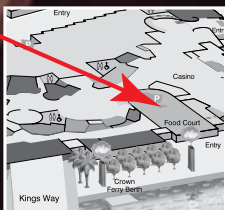
- Responsible Gaming Information
- Counselling
- Chaplaincy Support
- Facilitation of Self Exclusions
- Referral to Government funded support services
- General information

All services are confidential and provided free of charge.

Interpreters can be arranged if required.

LOCATION

Escalators leading down to the Responsible Gaming Support Centre



Responsible Gaming Support Centre
1800 801 098

Chaplaincy Support Service
1800 456 228



RESPONSIBLE GAMING
STAY IN CONTROL

Crown Responsible Gaming Support Centre: 1800 801 098
Gambler's Help: 1800 858 858



A WORLD OF ENTERTAINMENT.™

Crown Melbourne Limited ABN 46 006 973 262
8 Whiteman Street Southbank Victoria 3006 Australia
Telephone +61 3 9292 8888 Facsimile +61 3 9292 6600
www.crownmelbourne.com.au
www.crownmelbourne.com.au/responsible-gaming
Email: RGSC@crownmelbourne.com.au

Queensland
RESPONSIBLE GAMBLING

**Advertising
and
Promotions
Guideline**

to support the implementation of the

*Queensland Responsible Gambling
Code of Practice*

March 2005

For further information on the *Queensland Responsible Gambling Code of Practice*, contact:

Queensland Office of Gaming Regulation

Level 4 33 Charlotte Street Brisbane Qld

Locked Bag 180 CITY EAST QLD 4002

Tel: (07) 3224 4561 **Freecall: 1800 064 848**

Fax: (07) 3237 1656

Email: codeofpractice@treasury.qld.gov.au

Fax: (07) 3237 1656

www.responsiblegambling.qld.gov.au

Contents

Rationale 2

Scope 2

Accountability and Review 2-3

Practices 3

Implementing the Guideline 4-5

Advertising and Promotions Practices Explained 6-10

Glossary of Terms 10

Appendix 1

 Advertiser Code of Ethics 11-12

Appendix 2 Industry Examples

 Hotels 14-17

 Clubs..... 18-22

 Casinos 24-33

 UNiTAB..... 34-37

 Keno 38-47

 Lotteries 48-54

Appendix 3

 Correlates for Problem Gambling 56-57

Rationale

The *Responsible Gambling Advertising and Promotions Guideline* (Guideline) was developed to support the gambling industry to implement Section 6 - Advertising and Promotions - of the *Queensland Responsible Gambling Code of Practice* (Code of Practice). Section 6 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.

Scope

The Guideline applies to advertising and promotions in all sectors of gambling in Queensland. In recognition of the diversity within the gambling industry, the Guideline reflects the Code of Practice in recognising that some practices apply to all sectors of the industry while others apply only to particular sectors. Details of how these practices apply to each industry sector can be found in the appendix in the Code of Practice.

The Guideline covers communication activities including (but not limited to) advertising in the media (including all electronic media), sponsorship, point of sale material, leaflets, displays, internal and external signage, the internet, subscriber products (such as Sky Channel and pay TV) and other materials designed for public communication.

The Guideline is to be used in conjunction with all regulatory requirements for the conduct of gambling in Queensland.

The Guideline does not extend to casino international business or premium international players.

Accountability and Review

All gambling providers, advertising bodies, media and gambling promotional organisations are responsible for the application of the Guideline.

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

The Code of Practice, including the Guideline, will be independently monitored and evaluated regularly for its effectiveness. Following a review of voluntary commitment with the Code of Practice, minimum standards may be recommended and, where appropriate, codified into legislation.

Practices

The Guideline provides further details to assist gambling providers to implement the Advertising and Promotions section (Section 6) of the Code of Practice.

The practices in the Advertising and Promotions section are aimed at ensuring advertising and promotion are delivered in a responsible manner with consideration given to the potential impact on people adversely affected by gambling. Specifically, the practices commit the gambling industry to ensure that any advertising or promotion:

- 6.1 complies with the *Advertiser Code of Ethics* as adopted by the Australian Association of National Advertisers
- 6.2 is not false, misleading or deceptive
- 6.3 does not implicitly or explicitly misrepresent the probability of winning a prize
- 6.4 does not give the impression that gambling is a reasonable strategy for financial betterment
- 6.5 does not include misleading statements about odds, prizes or chances of winning
- 6.6 does not offend prevailing community standards
- 6.7 does not focus exclusively on gambling where there are other activities to promote
- 6.8 is not implicitly or explicitly directed at minors or vulnerable or disadvantaged groups
- 6.9 does not involve any external signs advising of winnings paid
- 6.10 does not involve any irresponsible trading practices by the gambling provider
- 6.11 does not depict or promote the consumption of alcohol while engaged in the activity of gambling
- 6.12 has the consent of the person prior to publishing or causing to be published anything which identifies a person who has won a prize
- 6.13 incorporates, where appropriate, positive responsible gambling messages.

Implementing the Guideline

The *Queensland Responsible Gambling Code of Practice* (Code of Practice) defines responsible gambling as:

Responsible gambling occurs in a regulated environment where the potential for harm associated with gambling is minimised and people make informed decisions about their participation in gambling. Responsible gambling occurs as a result of the collective actions and shared ownership by individuals, communities, the gambling industry and the Government to achieve outcomes that are socially responsible and responsive to community concerns.

Gambling can be advertised and promoted as a form of leisure and entertainment which a person must be prepared to pay for, with money spent on gambling being an ‘entertainment cost’. Gambling can be advertised and promoted as fun and enjoyable if engaged in responsibly. This Guideline also recognises that some people’s lives can be adversely affected by problem gambling.

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 of implicit messages in advertising and promotion. Furthermore, the following aspects (themes) need to be considered:

- target audience selection
- message placement (including media type selected and time of airing).

Consideration must be given to the potential impact of advertising and promotion on a person with a problem with gambling, or at risk of developing a gambling problem. The *Queensland Gambling Household Survey 2001* and other research identify a number of correlates for problem gambling that can be used to build a profile that may assist in identifying those at risk of developing gambling problems. These correlates alone may not identify problem gamblers and should only be used as indicators assisting in identifying people at risk of developing a problem with gambling. These identifiers are explained in Appendix 3.

According to the Productivity Commission, people who have problems with gambling spend a greater proportion of income on gambling than recreational gamblers. In addition, the Household Gambling Survey indicates that their level of involvement in gambling activities is also a risk factor, in that:

- the problem gambling group participates in more gambling activities than other groups of gamblers
- they gamble more frequently in each gambling activity
- they gamble for greater amounts of time in each activity.

Responsible advertising and promotions would avoid images or messages that promote any of the identified risk factors for problem gambling. Some of these are further explored in the following practices.

Advertising and Promotions Practices Explained

Each practice in the Advertising and promotions section of the Code of Practice is further explained in this section. The appendices provide further information including examples of advertising and promotion that support the spirit of the Code of Practice and examples of advertisements and promotions that do not support the Code of Practice.

In developing marketing material, consideration must be given to ensure it supports all practices in the Code of Practice.

Practice 6.1

Advertising or promotion complies with the Advertiser Code of Ethics as adopted by the Australian Association of National Advertisers

The *Advertiser Code of Ethics* is provided in Appendix 1.

Practice 6.2

Advertising or promotion is not false, misleading or deceptive

Responsible gambling advertising and promotion will not be false, misleading or deceptive.

Practice 6.3

Advertising or promotion does not implicitly or explicitly misrepresent the probability of winning a prize

Responsible advertising and promotion 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.

Practice 6.4

Advertising or promotion does not give the impression that gambling is a reasonable strategy for financial betterment

Responsible advertising and promotion 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.

Practice 6.5

Advertising or promotion does not include misleading statements about odds, prizes or chances of winning

Responsible advertising and promotion 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 promotion 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 (other than skill-based games) 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.

Practice 6.6

Advertising or promotion does not offend prevailing community standards

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

Practice 6.7

Advertising or promotion does not focus exclusively on gambling where there are other activities to promote

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

Practice 6.8

Advertising or promotion is not implicitly or explicitly directed at minors or vulnerable or disadvantaged groups

Minors

Advertising and promotion related to gambling will not appear in media directed primarily at minors. Media selection and placement of television advertising will be in accordance with the Commercial Television Industry Code of Practice adopted by the Federation of Commercial Television Australia (CTVA).

Persons depicted as gamblers in advertising and promotion should not be, or appear to be, minors. Advertising and promotion should not contain symbols or language that is 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 promotion is 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.

Practice 6.9

Advertising or promotion does not involve any external signs advising of winnings paid

External signs include signage able to be viewed from any external part of a gambling provider's premises. This also includes signage not on the premises, irrespective of where the sign is placed in relation to the premises, such as highway billboards. 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 promotion and Practice 6.9 does not apply.

Practice 6.10

Advertising or promotion does not involve any irresponsible trading practices by the gambling provider

The Code of Practice defines irresponsible trading practices as:

The offering of an inappropriate enticement 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.

Practice 6.11

Advertising or promotion does not depict or promote the consumption of alcohol while engaged in the activity of gambling

Practice 6.12

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

A gambling provider 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.

Practice 6.13

Advertising or promotion incorporates, where appropriate, positive responsible gambling messages

An example of a positive message:

- “Keep gambling enjoyable, gamble responsibly.”

Glossary of Terms

“**Actively promote**” means the promotion is available to be viewed by any person.

“**Dominate**” means to have a commanding influence on, or be the most influential or conspicuous.

“**Inducements**” means things that are offered to persuade a person to gamble. For example:

- Prizes or gifts directly linked to winning a particular game
- Promotions conditional to a person gambling
- Offer of free credit to customers or potential customers.

“**Non-winning play images**” means images of persons involved in gambling but not in the process of celebrating a win.

“**Passive web pages**” means web pages that supply information which can only be viewed by choice and are non-interactive.

“**Virtual space**” means artificial space created by interactive computer technology.

APPENDIX 1

Advertiser Code of Ethics

as adopted by the Australian Association of National Advertisers (AANA)

Advertiser Code of Ethics

This Code has been adopted by AANA to be applied as a means of advertising self-regulation in Australia and is intended to be applied to all forms of advertising.

The object of this Code is to ensure that advertisements are legal, decent, honest and truthful and that they have been prepared with a sense of obligation to the consumer and society and fair sense of responsibility to competitors.

In this Code, the term “advertisement” shall mean matter which is published or broadcast, other than via internet, direct mail, point of sale or direct distribution to individuals, in all of Australia or in a substantial section of Australia for payment or other valuable consideration and which draws the attention of the public, or a segment of it, to a product, service, person, organisation or line of conduct in a manner calculated to promote or oppose directly or indirectly that product, service, person, organisation or line of conduct.

Section 1

- 1.1 Advertisements shall comply with Commonwealth law and the law of the relevant State or Territory.
- 1.2 Advertisements shall not be misleading or deceptive or be likely to mislead or deceive.
- 1.3 Advertisements shall not contain a misrepresentation which is likely to cause damage to the business or goodwill of a competitor.
- 1.4 Advertisements shall not exploit community concerns in relation to protecting the environment by presenting or portraying distinctions in products or services advertised in a misleading way or in a way which implies a benefit to the environment which the product or services do not have.
- 1.5 Advertisements shall not make claims about the Australian origin or content of products advertised in a manner which is misleading.

Section 2

- 2.1 Advertisements shall not portray people or depict material in a way which discriminates against or vilifies a person or section of the community on account of race, ethnicity, nationality, sex, age, sexual preference, religion, disability or political belief.
- 2.2 Advertisements shall not present or portray violence unless it is justifiable in the context of the product or service advertised.
- 2.3 Advertisements shall treat sex, sexuality and nudity with sensitivity to the relevant audience and, where appropriate, the relevant programme time zone.
- 2.4 Advertisements for any product which is meant to be used by or purchased by children shall not contain anything which is likely to cause alarm or distress to those children.
- 2.5 Advertisements shall only use language which is appropriate in the circumstances and strong or obscene language shall be avoided.
- 2.6 Advertisements shall not depict material contrary to prevailing community standards on health and safety.
- 2.7 Advertisements for motor vehicles shall comply with the Federal Chamber of Automotive Industries Code of Practice relating to Advertising for Motor Vehicles and section 2.6 of this Code shall not apply to advertisements to which the Federal Chamber of Automotive Industries Code of Practice applies.

APPENDIX 2

Industry Examples—Hotels

PRACTICE

ACCEPTABLE PRACTICES—HOTELS

UNACCEPTABLE PRACTICES—HOTELS



Queensland Responsible Gambling Code of Practice Advertising and Promotions Guideline—Hotels

PRACTICE

ACCEPTABLE PRACTICES—HOTELS

UNACCEPTABLE PRACTICES—HOTELS

6.1 Complies with the *Advertiser Code of Ethics* as adopted by the Australian Association of National Advertisers

a) Any advertising or promotion aligns with the *Advertiser Code of Ethics*.

a) Developing advertising or promotional material which contradicts the *Advertiser Code of Ethics*.

6.2 Is not false, misleading or deceptive

a) Any advertisement or promotion, and any statement, phrase or inclusion for any advertisement or promotion, is based on fact and will not mislead or deceive, or is not likely to be misleading or deceptive.

a) Any advertisement or promotion that encourages the false belief, either explicitly or implicitly, that the outcome of certain games can be predicted or controlled e.g. “Plan your play, the jackpot is due to go off soon.”

b) Ensuring any jackpot amount or prize being promoted or advertised is available to be won at the time of the advertisement or promotion.

b) Advertisements or promotions that imply that people can exercise skill and control over the outcome of a certain game, where they can not e.g. “Match your wits against...”

c) Having available any terms and conditions to any promotion or condition of winning e.g. “Must be present to claim the prize.”

c) Any advertisement or promotion that is not based on fact e.g. “The hotel with the best odds.”

d) Where appropriate and practical, any advertisement or promotion states the random nature of games and that the outcomes are based purely on chance.

d) Any advertisement or promotion that misleads or deceives, or is likely to mislead or deceive.

Industry Examples—Hotels

PRACTICE	ACCEPTABLE PRACTICES—HOTELS	UNACCEPTABLE PRACTICES—HOTELS
6.3 Does not implicitly or explicitly misrepresent the probability of winning a prize	<p>a) Where appropriate and practical, any advertisement or promotion states the random nature of games and that the outcomes are based purely on chance.</p> <p>b) Where appropriate and practical, operators give consideration to any implied message in the naming of promotional activities, gaming rooms or promotional groups, in addition to key words and/or phrases in advertisements.</p>	<p>a) Statements, graphics or images which may imply that winning is more likely at one venue over another, e.g.</p> <ul style="list-style-type: none"> • “Winning is easy at the...” • “Winning is easier at the...” • “More chances of winning...” • “WIN \$\$\$ WIN \$\$\$ WIN \$\$\$...” • “The venue which gives you more chances of winning the jackpot...” • “Everyone is a winner...” • “The jackpot will be won by a lucky...” <p>b) Any advertisement or promotion that suggests there is some relationship between past, present and future events, when there is not e.g. “No jackpot for the last 8 weeks, it must go off soon...”</p> <p>c) Not adequately alerting patrons to the existence of additional terms and conditions to promotions.</p> <p>d) Statements, graphics or images which may imply there is some skill involved in winning on games based on complete randomness and chance.</p>
6.4 Does not give the impression that gambling is a reasonable strategy for financial betterment	<p>a) Advertising and promotions which emphasise gambling as an ancillary form of entertainment.</p> <p>b) Advertising and promotions depicting gambling as fun and enjoyable.</p>	<p>a) Statements, graphics or other content which may imply that gambling can be an alternative means of income e.g. “Buy that new boat with a flutter...”</p> <p>b) Statements, graphics or other content which may imply that gambling can improve a person’s social status or standard of living e.g. “Be the envy of all your friends.”</p> <p>c) Statements, graphics or other content which may suggest that gambling can be a means of paying for household essentials e.g. education, groceries, utilities, rent or mortgage payments.</p> <p>d) Any promotional activity or advertisement with an undue focus on winning e.g. “WIN WIN WIN Club”.</p>
6.5 Does not include misleading statements about odds, prizes or chances of winning	<p>a) Prize amounts on offer and availability are factual.</p> <p>b) Odds should be readily accessible by patrons at the venue e.g. displaying the ‘Chances of Winning’ sign, available from staff. (cont. over)</p>	<p>a) Any advertisement or promotion that is confusing or ambiguous to a regular patron.</p> <p>b) Any advertising or promotion which may misrepresent the chances of winning a prize e.g. Everyone will win.</p> <p>c) Omitting terms and conditions or expiry dates from advertisements or promotional information.</p> <p>d) Related section 6.3.</p>

Industry Examples—Hotels

PRACTICE	ACCEPTABLE PRACTICES—HOTELS	UNACCEPTABLE PRACTICES—HOTELS
6.5 <i>cont</i>	<ul style="list-style-type: none"> c) Any terms or conditions for the promotion are readily accessible by the patron e.g. terms and conditions available from cashier's booth. d) The possibility of winning a prize or jackpot is clearly stated e.g. "Jackpot could go off". 	
6.6	<p>Does not offend prevailing community standards</p> <ul style="list-style-type: none"> a) Advertising or promotions which support prevailing community standards. 	<ul style="list-style-type: none"> a) Advertisements or promotions which are sexually explicit or provocative in nature. b) Advertisements or promotions which may offend people from different religious or ethnic backgrounds. c) Advertisements or promotions which are linked to alcohol or drugs. d) Advertisements or promotions which may offend minority groups. e) Advertisements or promotions which involve minors, or any person reasonably construed as being under 18 years, in any stage or aspect of gambling. f) Related sections 6.4 and 6.6.
6.7	<p>Does not focus exclusively on gambling where there are other activities to promote</p> <ul style="list-style-type: none"> a) External advertisements promoting a range of venue facilities and services. 	<ul style="list-style-type: none"> a) External advertisements which focus exclusively on gambling. b) External advertisements which are dominated by gambling.
6.8	<ul style="list-style-type: none"> a) Any advertisement or promotion is aimed at adults over 18 years of age. b) Ensuring any advertisement or promotional material is not directly sent to an excluded patron or a person who has requested such material not be sent. c) Related section 6.1. 	<ul style="list-style-type: none"> a) Any advertisement or promotion which contains graphics, imagery or text which would ordinarily attract minors or disadvantaged groups e.g. cartoon-related theme for gambling advertisement or 'Down & Out Winners Club'. b) Prizes which may attract minors (e.g. children's video games) or disadvantaged groups (e.g. blankets).
6.9	<p>Does not involve any external signs advising of winnings paid</p> <ul style="list-style-type: none"> a) No external messages advising of winnings paid. 	<ul style="list-style-type: none"> a) External signs that advise of winnings paid e.g. A-frame sign on footpath, banner on roof or advertisement stating "payouts so far this month = \$XXX,XXX".

Industry Examples—Hotels

PRACTICE	ACCEPTABLE PRACTICES—HOTELS		UNACCEPTABLE PRACTICES—HOTELS	
6.10	Does not involve any irresponsible trading practices by the gambling provider	<ul style="list-style-type: none"> a) Promotions which encourage the use of all the venue's facilities and services. b) Advertisements which promote a range of venue facilities and services. 	<ul style="list-style-type: none"> a) Irresponsible inducement linked to an advertisement e.g. \$5 free coins redeemable only in the gaming room. b) The offer of free or discounted alcohol for gambling patrons only e.g. gaming room happy hour. c) The offer of a free meal only for gaming patrons e.g. free breakfast for gaming patrons before 10am. 	
6.11	Does not depict or promote the consumption of alcohol while engaged in the activity of gambling	<ul style="list-style-type: none"> a) Alcohol-free advertisements and promotions. 	<ul style="list-style-type: none"> a) Advertisements or promotions which depict the consumption of alcohol whilst engaged in a gambling activity e.g. patron drinking at a gaming machine. b) Advertisements or promotions which suggest consumption of alcohol whilst engaged in a gambling activity. 	
6.12	Has the consent of the person prior to publishing or causing to be published anything which identifies a person who has won a prize	<ul style="list-style-type: none"> a) The express consent of the person is obtained prior to publishing or causing to be published anything which identifies the person as having won a prize. 	<ul style="list-style-type: none"> a) Publishing—(e.g. by displaying a promotional cheque) or causing to be published or advertised—the details of a person who has won a prize without their express consent. 	
6.13	Incorporates, where appropriate, positive responsible gambling messages	<ul style="list-style-type: none"> a) Using a responsible gambling message in advertisements and promotions e.g. The <i>responsible entertainment</i> venue. 	<ul style="list-style-type: none"> a) Using an irresponsible message in an advertisement or promotion e.g. <ul style="list-style-type: none"> •“Everyone is a winner” •“You will win” •“Guaranteed jackpot winners” •“Brisbane's most winning venue” •“More chances to win”. 	



Queensland Responsible Gambling Code of Practice
Advertising and Promotions Guideline—Clubs

PRACTICE	ACCEPTABLE PRACTICES—CLUBS	UNACCEPTABLE PRACTICES—CLUBS
6.1 Complies with the <i>Advertiser Code of Ethics</i> as adopted by the Australian Association of National Advertisers	<p>a) Demonstrating compliance with the AANA Code of Ethics by incorporating various elements of the Code of Ethics in gambling advertising and promotions, such as:</p> <ul style="list-style-type: none">• Advertisements not containing a misrepresentation that is likely to cause damage to the business or goodwill of a competitor.• Advertisements not portraying people or depicting material in a way which discriminates against or vilifies a person or section of the community on account of race, ethnicity, nationality, sex, age, sexual preference, religion, disability or political belief.• Advertisements only using language which is appropriate in the circumstances and strong or obscene language being avoided.• Advertisements not depicting material contrary to prevailing community standards on health and safety. <p>Please refer to the full AANA Code.</p>	<p>a) Advertising or promoting gambling products and services in a way that constitutes a breach of the AANA Code of Ethics, such as:</p> <ul style="list-style-type: none">• Promoting the misconception that there is a greater chance of winning at your club than at any other gambling venue in the local area.• Making a claim that women or teenagers have a higher chance of winning at the club.• Portraying erroneous beliefs, through words and images and either explicitly or implicitly that gambling is 'sexy' or 'macho'.

Industry Examples—Clubs

PRACTICE	ACCEPTABLE PRACTICES—CLUBS		UNACCEPTABLE PRACTICES—CLUBS	
6.2	Is not false, misleading or deceptive		a)	Advertising or promoting gambling products and services using flawed catch phrases, such as: <ul style="list-style-type: none"> • “always win with us” • “this is a winning club”.
			b)	Including information in gambling advertisements or promotions that create a false or unrealistic sense of hope or winning.
			c)	Creating an impression, either implicitly or explicitly, that you can predict the outcome of certain games or you may use certain skills, such as: <ul style="list-style-type: none"> • “Use a strategy”.
6.3	Does not implicitly or explicitly misrepresent the probability of winning a prize	a)	As far as practicable, stating in gambling advertising and promotions that winning is a matter of chance and randomness that is determined independently of how machines are played.	Using statements, graphics or images that could be interpreted either explicitly or implicitly as influencing the probability of winning a prize, such as: <ul style="list-style-type: none"> • “the club has made winning easier” • “our club gives you more chances to win” • “everyone is a winner at our club” • “you always win at our club” • “WIN \$\$\$ WIN \$\$\$ WIN \$\$\$”.
		b)	As far as practicable, making a reference to the Player Information Guide, which sets out the odds of winning a major prize, in gambling advertising and promotions.	Making a false connection between the gambling environment and the probability of winning a prize, such as: <ul style="list-style-type: none"> • naming the gambling room ‘winners den’.
6.4	Does not give the impression that gambling is a reasonable strategy for financial betterment	a)	Avoiding any reference in gambling advertising and promotions to words such as: <ul style="list-style-type: none"> • ‘investment’ • ‘income’ • ‘profit’ • ‘your personal bank’. 	Implying in gambling advertising and promotions that winners can use the money to pay bills or cover domestic expenditure or other expenses (e.g. school fees) on a regular basis.
				Encouraging customers to spend their last dollar with an expectation to win.
				Promoting gambling as a guaranteed and quick way to get rich or as a useful strategy for retirement savings.

Industry Examples—Clubs

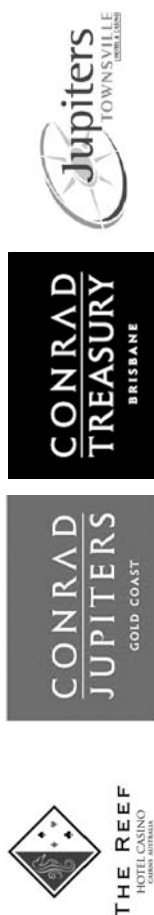
PRACTICE		ACCEPTABLE PRACTICES—CLUBS	UNACCEPTABLE PRACTICES—CLUBS
6.5	Does not include misleading statements about odds, prizes or chances of winning	<p>a) Where possible, informing in gambling advertising and promotions that a Player Information Guide is available, upon request.</p>	<p>a) Using statements, graphics or images that could be interpreted either explicitly or implicitly as influencing the odds, prizes or chances of winning, such as:</p> <ul style="list-style-type: none"> • “winning is easy at the club” • “you can be lucky too” • “our machines offer you a better chance of winning” • “our jackpot is due to go off”. <p>b) Implying that the venue or a person is ‘lucky’ or has the necessary physical or mental attributes that could increase their chances of winning through the use of common fallacies/superstitious beliefs such as:</p> <ul style="list-style-type: none"> • “this is a lucky venue” • “Friday is your lucky day” • “young, beautiful and a winner too” • “win if you press the buttons in a certain way” • “too many losses lead to a big win” • “play at a certain time to increase your chances of winning”.
6.6.	Does not offend prevailing community standards	<p>a) Using language and images in advertising and promotions that reflect decency, dignity and good taste such as:</p> <ul style="list-style-type: none"> • language that is not discriminatory or offensive • images that do not show nudity. 	<p>a) Communicating in words and images, either explicitly or implicitly, messages such as:</p> <ul style="list-style-type: none"> • One’s social, financial or sexual success and general abilities can be attributed to gambling. • It is okay for children to participate in picking numbers for races or other number type games. • Gambling is more challenging or enjoyable if it is pursued with alcohol. • Only certain people (e.g. minority groups) have a problem with gambling.
6.7	Does not focus exclusively on gambling where there are other activities to promote	<p>a) Advertising and promoting gambling as one of a range of venue facilities and services offered by the club.</p>	<p>a) Making gambling products and services the dominant part of any advertising or promotional campaign.</p> <p>b) External advertisements which focus exclusively on gambling.</p>
6.8	Is not implicitly or explicitly directed at minors or vulnerable or disadvantaged groups	<p>a) Ensuring that gambling advertising or promotions such as using media, time slots, merchandise, celebrities and symbols are not directed primarily at children, in accordance with the Commercial Television Industry Code of Practice.</p>	<p>a) Suggesting in words and images and either explicitly or implicitly that the following people are especially welcome to gamble at the club:</p> <ul style="list-style-type: none"> • minors • people who need cash or have difficulties paying bills • unemployed

Industry Examples—Clubs

PRACTICE	ACCEPTABLE PRACTICES—CLUBS	UNACCEPTABLE PRACTICES—CLUBS
6.8 <i>cont</i>	<p>b) Advertising and promoting gambling in a way that it does not appeal to the vulnerable or disadvantaged groups, such as not sending correspondence or promotional materials to gambling customers who are excluded or known to have formally requested that this information not be sent to them.</p>	<ul style="list-style-type: none"> • people who are culturally or linguistically disadvantaged (e.g. new migrants) • people from low socio-economic areas • people at risk (e.g. homeless). <p>b) Conveying the impression that a person's social or financial betterment is due to gambling and anyone can achieve a high level of social and financial success through gambling.</p> <p>c) Equating gambling with freedom or glamour or independence.</p>
6.9	<p>a) Advertising or promoting jackpots within designated gambling areas.</p> <p>b) Ensuring any external advertising and promotions focus on a range of venue facilities and services and not just gambling.</p>	<p>a) Put signage outside the club or in an area that is visible from outside to show the major amounts won in a previous period, such as:</p> <ul style="list-style-type: none"> • A-frame sign on footpath • banner on roof • advertisement stating payouts so far this month = \$XXX,XXX.
6.10	<p>a) Ensuring that gambling advertising or promotions complies with relevant legislation and the <i>Queensland Responsible Gambling Code of Practice</i>.</p>	<p>a) Suggesting in words and images, either explicitly or implicitly, that certain legislative requirements, such as the ban on credit betting, does not apply to the club.</p> <p>b) Using other irresponsible trading practices, such as:</p> <ul style="list-style-type: none"> • offering free money or credit for the purposes of gambling • encouraging players to spend their last dollar • targeting promotions at disadvantaged groups or regions • offering inducements that would result in a substantial alteration to the person's normal betting stake or activity • offering free or discounted alcohol for gambling patrons only e.g. gaming room happy hour • offering free meals only for gaming patrons e.g. free breakfast for gaming patrons before 10am.
6.11	<p>a) Avoiding reference to or offer of free alcohol as a reward for gambling at the club.</p>	<p>a) Showing images such as the following:</p> <ul style="list-style-type: none"> • alcohol being served at gaming machines • players holding a glass containing alcohol • people playing gaming machines in an intoxicated state.

Industry Examples—Clubs

PRACTICE	ACCEPTABLE PRACTICES—CLUBS		UNACCEPTABLE PRACTICES—CLUBS	
6.12	Has the consent of the person prior to publishing or causing to be published anything which identifies a person who has won a prize	<p>a) Complying with the privacy legislation and the <i>Queensland Responsible Gambling Code of Practice</i>, such as seeking permission from people before using their personal information (e.g. name, photograph) in gambling advertising.</p> <p>b) Ensuring that the club safeguards privacy (e.g. only allows authorised persons to access the personal records of players and keeps this information in a secure location at the club.)</p>	<p>a) Publishing photos of jackpot winners in the club newsletter without obtaining their consent.</p> <p>b) Ignoring requests by players to safeguard their privacy when they win a major prize.</p>	
6.13	Incorporates, where appropriate, positive responsible gambling messages	<p>a) Including words and images that convey the message that gambling is fun only when people play responsibly, such as the following:</p> <ul style="list-style-type: none"> • “keep gambling enjoyable, gamble responsibly” • “bet with your head, not over it”. 	<p>a) Using responsible gambling messages in gambling advertising promotions in an ambiguous or misleading way, such as:</p> <ul style="list-style-type: none"> • “play responsibly to win big” • “take a break and prepare for the next round of play”. 	



Queensland Responsible Gambling Code of Practice Advertising and Promotions Guideline—Casinos

UNACCEPTABLE PRACTICES—CASINOS

ACCEPTABLE PRACTICES—CASINOS

PRACTICE

<p>6.1 Complies with the <i>Advertiser Code of Ethics</i> as adopted by the Australian Association of National Advertisers</p>	<p>a) All advertising and promotional activities are developed and delivered to comply with the <i>Advertiser Code of Ethics</i> as adopted by the Australian Association of National Advertisers.</p>	<p>a) Developing or delivering advertising that does not comply with the <i>Advertiser Code of Ethics</i> as adopted by the Australian Association of National Advertisers.</p>
<p>6.2 Is not false, misleading or deceptive</p>	<p>a) Advertising jackpots and providing information about the actual dollar prize that can be won. Current jackpot prizes that are available also being advertised on the internet.</p> <p>b) Advertising the introduction of a new gaming product (electronic gaming machine or table games) 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).</p> <p>c) Having a balance of winning and non-winning play imagery in gambling advertisements and promotions. For example:</p>	<p>a) Advertising a maximum jackpot possibility when the amount advertised is not a true projection of the expected jackpot amount.</p> <p>b) Using false or misleading language, in relation to jackpots and new product, that may encourage visitation e.g. “get in now to win the current jackpot” or for new product, advertising potential “maximum possible jackpots” when the jackpot has not actually reached that amount.</p> <p>c) Any advertising or promotion that encourages the false belief, either explicitly or implicitly, that the outcome of certain games can be predicted or controlled using written or visual images such as: plan your play, beat the odds, work your system, 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.</p> <p>d) Any advertisement or promotion that suggests there is some relationship between past, present and future events, when there is not. For example:</p> <ul style="list-style-type: none"> • “Jackpot has not gone off for the last 8 weeks, it must go off soon...”

Industry Examples—Casinos

PRACTICE	ACCEPTABLE PRACTICES—CASINOS	UNACCEPTABLE PRACTICES—CASINOS
<p>6.2 <i>cont</i></p>	<ul style="list-style-type: none"> • Advertisements which show people gambling and enjoying themselves but which do not actually depict anyone winning and/or advertisements which show people gambling but focus on humour. 	<p>e) Explicitly stating or implying through imagery or written/verbal information that numbers chosen—for example, in roulette and keno—in a certain manner (e.g. horoscopes, “lucky” numbers, etc.) are luckier than any other numbers. For example:</p> <ul style="list-style-type: none"> • A gambling advertisement which depicts someone selecting their keno or roulette numbers (or even a specific gaming machine) on the basis of astrology or some lucky intuition or similar means, and suggesting that this method of selection improved their chances of winning (depicting them winning as a result of this ‘selection strategy’). <p>f) Gambling advertisements that imply that players can win after losing many times. For example:</p> <ul style="list-style-type: none"> • “Your time to win is coming up” • “Hang in there and you’ll win sooner or later” • “Chances are ... you’ll win sometime”.
<p>6.3</p>	<p>Does not implicitly or explicitly misrepresent the probability of winning a prize</p> <p>a) Having a balanced advertising campaign where the media spend is balanced between gaming and non-gaming departments.</p> <p>b) Images of winning play are balanced with images of non-winning play.</p> <p>c) 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.</p>	<p>Using language or imagery that:</p> <p>a) Suggests that winning at the casino is easy. For example:</p> <ul style="list-style-type: none"> • “Winning is easy” • “Have a bet and win” • “Today is your lucky day” • “WIN \$\$\$ WIN \$\$\$ WIN \$\$\$” • “The venue which gives you more chances of winning the jackpot...” <p>Whilst some of these statements might be true, they could implicitly misrepresent the probability of winning a prize.</p> <p>b) Depicts:</p> <ul style="list-style-type: none"> • Large wads of \$100 notes in gambling advertisements and promotions. • People winning in all, or the majority of, images depicting actual gambling behaviour. • Large amounts of money which can be won, especially when this dominates advertisements. For example, television advertisements, with figures like \$60,000 and \$100,000 flashing up on the screen in large gold lettering. • Lady jumping out of a gaming machine with a fist full of cash.

Industry Examples—Casinos

PRACTICE	ACCEPTABLE PRACTICES—CASINOS	UNACCEPTABLE PRACTICES—CASINOS
<p>6.3 <i>cont</i></p>		<p>c) Implies the odds of winning prizes are greater than they actually are. For example:</p> <ul style="list-style-type: none"> • Gambling advertisements which contain images of large piles of cash, buckets of money or people holding large amounts of cash while sitting at pokies or tables and looking rather pleased. • 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. • People winning in all, or the majority of, images depicting actual gambling behaviour (on or in advertisements and promotions).
<p>6.4</p> <p>Does not give the impression that gambling is a reasonable strategy for financial betterment</p>	<p>a) A marketing strategy focusing on fun and entertainment and what differentiates its products from random outcome-based gambling products. Advertising addressing issues such as:</p> <ul style="list-style-type: none"> • 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. <p>b) Not implying that using their services is a life-changing event or winning will improve standard of living.</p>	<p>a) 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:</p> <ul style="list-style-type: none"> • 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 – or is linked to – their attendance at the casino. • An advertisement or promotion which depicts someone paying off bills or school fees or loans with their gambling winnings from the casino. • The inclusion of text or verbal information in gambling advertisements and promotions like: <ul style="list-style-type: none"> - “Who needs to work?” - “Why would anybody work?” - “You’d be crazy to work” - “Working is for mugs” - “Who wants (needs) a day job?” <p>b) An advertisement which depicts a person or a family moving from a situation of relative poverty (e.g. old car, run down house and worrying over bills) to relative affluence (e.g. new luxury car, large new house and so forth) as a result of their attendance at the casino.</p> <p>c) An advertisement which suggests that gambling at the casino is a reliable or viable strategy a reasonable person would adopt if they needed money to pay bills.</p> <p>d) Encouraging customers to spend their last dollar with the expectation to win.</p> <p>e) Linking prizes to education, for example payment of school fees.</p>

Industry Examples—Casinos

PRACTICE	ACCEPTABLE PRACTICES—CASINOS	UNACCEPTABLE PRACTICES—CASINOS
<p>6.5 Does not include misleading statements about odds, prizes or chances of winning</p>	<p>a) Printed gaming guides are easily accessible to customers on the casino floor advising them of the odds of winning for every game in the casino.</p> <p>b) Player information guide detailing the odds of winning every game in the casino is advertised on the casino's website.</p> <p>c) When advertising jackpots, the casino advises customers of the "estimated" jackpot amount.</p> <p>d) Offering information on the odds in languages other than English.</p> <p>e) Not including predictions of outcomes of games on gaming machines. (For guidance in relation to the working of gaming machines, consult AGMMMA's website <www.agmma.com.au/pdf/playerinfo.pdf>.)</p> <p>f) Advertisements which use 'luck' in a humorous way whilst depicting people gambling and enjoying themselves—there being no suggestion that the individual or the venue has 'intrinsic luck'.</p>	<p>a) Advertising in a way that misleads or misrepresents the actual chance or odds of winning. Examples of misleading statements include:</p> <ul style="list-style-type: none"> • "You can be lucky too." • "Our jackpot is due to go off." • See also related examples in 6.2 and 6.3. <p>b) Leaving out-of-date advertising material (Point of Sale) displayed that shows prize amounts that are no longer available.</p> <p>c) Using language that may imply that customers could win the total jackpot possible.</p> <p>d) Supplying incorrect odds or supplying information in difficult to understand language.</p> <p>e) Refusing to supply odds of games to customers or making them difficult to access.</p> <p>f) Advertisements or promotions which suggest that a venue has intrinsic luck. For example:</p> <ul style="list-style-type: none"> • Suggesting in a gambling advertisement through graphics or imagery that a particular venue or gaming area is "lucky" – or predisposed towards paying out lots of jackpots—and that as a result, wise punters would choose to gamble there rather than elsewhere. • Having—and including in gambling advertisements or promotional material—a venue "mascot" who is claimed to be unnaturally "lucky", who "never loses at games of chance", who "always gambles at the venue in question" and so forth. • Statements, graphics or images which may imply that winning is more likely at the casino than at another venue (which may suggest or imply that the casino is especially "lucky".) <p>g) 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:</p> <ul style="list-style-type: none"> • Depicts a person selecting keno numbers on the basis of a "lucky" hunch and winning as a result.

Industry Examples—Casinos

PRACTICE

6.5
cont

ACCEPTABLE PRACTICES—CASINOS

UNACCEPTABLE PRACTICES—CASINOS

- 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.
- h) Explicitly stating or implying through imagery or written/verbal information 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 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. (Suggesting superstitious practices are effective strategies that can be employed by people if they wish to improve their chances of winning at the casino.)
 - Explicitly stating or implying (suggesting) through imagery or written or verbal information that numbers chosen—for example, in roulette—in a certain manner (e.g. horoscopes, “lucky” numbers) are any luckier than any other numbers. For example, a gambling advertisement which depicts someone selecting their roulette numbers (or a specific gaming machine) 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’.)
- i) Any advertisement or promotion which suggests—through imagery, visual or auditory information—that “luck” is a cause of someone’s winning. For example, suggesting in a gambling advertisement or promotion that if you are on a winning streak or “roll”, the winning streak or roll will continue because of your present state of “good luck”. For example:
- Depicting someone on a winning streak with another patron saying “He can’t stop (or leave) now, he’s on a roll.”
 - Depicting someone on a winning streak with the question “Would You Leave Now?”

Industry Examples—Casinos

PRACTICE	ACCEPTABLE PRACTICES—CASINOS	UNACCEPTABLE PRACTICES—CASINOS
6.5 <i>cont</i>		j) 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. For example, depicting in an advertisement someone—perhaps winning—who brings other players luck, in that it is suggested that others are more likely to win due to this person's presence or proximity.
6.6	<p>Does not offend prevailing community standards</p> <ul style="list-style-type: none"> a) Undertaking not to use images that may offend prevailing community standards. b) Advertising is compliant with prevailing community standards. 	<ul style="list-style-type: none"> a) Using images of minors gambling or picking numbers. b) Exceeding the relevant regulatory and advertising codes/guidelines e.g. placing adult theme advertisements in general exhibition time slots. c) Suggesting that enhancement of one's social, financial or sexual success and general abilities can be attributable to gambling.
6.7	<p>Does not focus exclusively on gambling where there are other activities to promote</p> <ul style="list-style-type: none"> a) Advertising gambling products within the context of an overall marketing strategy for their business. b) Where there are other products to promote, gaming messages are not over represented as defined by media spend. 	<ul style="list-style-type: none"> a) Promoting gaming as the only entertainment activity available at a casino property.
6.8	<p>Is not implicitly or explicitly directed at minors or vulnerable or disadvantaged groups</p> <p><i>(Disadvantaged persons may include persons lacking 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.)</i></p> <ul style="list-style-type: none"> a) Marketing products to adult audiences via electronic and print media. b) Not intentionally advertising or promoting services to minors or vulnerable or disadvantaged groups. c) Not using images of minors gambling. d) Providing entertainment opportunities for a particular group (e.g. seniors) that offer cheap entertainment that is not conditional upon gambling. For example "Treasure Day". <p>(cont. over)</p>	<p>1. Minors</p> <p>Intentionally placing media where it targets minors and disadvantaged groups. For example, gambling advertisements and promotions which:</p> <ul style="list-style-type: none"> a) Advertise and promote gambling in media directed primarily at minors. (Media selection and placement of advertising not in accordance with the Commercial Television Industry Code of Practice adopted by the Federation of Commercial Television Australia (CTVA).) b) Appear in close proximity to schools (for example, billboards outside or within 200 meters of a school.) c) Appear at events primarily of appeal to minors e.g. a children's concert or a children's sporting event. <p>Gambling advertisements and promotions which:</p> <ul style="list-style-type: none"> a) Contain symbols or language that is primarily intended to appeal to minors e.g. using the slang of an underage generation.

Industry Examples—Casinos

PRACTICE	ACCEPTABLE PRACTICES—CASINOS	UNACCEPTABLE PRACTICES—CASINOS
<p>6.8 <i>(Vulnerable persons may include persons at risk of harm or harmful patterns of behaviour due to external influences or internal susceptibilities.)</i></p>	<p>e) A gambling advertisement or promotion which appears in media targeting specific culturally and linguistically diverse (CALD) communities (e.g. a Chinese language newspaper) being in accordance with this Guideline and all the practices with particular reference to 6.2, 6.3, 6.4, 6.5.</p> <p>f) An advertisement for the hotel which suggests that the hotel rooms have been designed with a consideration of Feng Shui principles, without referring to luck or gambling.</p>	<p>b) 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.</p> <p>c) 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.</p> <p>d) Portray minors gambling.</p>
	<p>2. Disadvantaged Groups—Low Socio-Economic Groups</p>	<p>a) Sending correspondence or promotional material to gambling customers who are excluded or known to have formally requested that this information not be sent.</p> <p>b) 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.</p> <p>c) Entertainment opportunities for a particular group (e.g. seniors) that offer cheap entertainment that is conditional upon gambling.</p> <p>d) 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.</p> <p>e) Depicting someone on a pension (e.g. disability pension due to a mental illness of 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.</p> <p>f) Targeting low socio-economic areas with advertising and promotional material which suggests that gambling is a reasonable strategy for financial betterment. For example:</p> <ul style="list-style-type: none"> • 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—or is linked to—their attendance at the casino. <p>g) See other relevant examples in section 6.4.</p>

Industry Examples—Casinos

PRACTICE	ACCEPTABLE PRACTICES—CASINOS	UNACCEPTABLE PRACTICES—CASINOS
6.8 cont		<p>3. Vulnerable Groups—e.g. CALD Communities, Mentally Ill</p> <p>a) Gambling advertisements or promotions which appeal primarily to culturally and linguistically diverse (CALD) communities, which do not comply with the requirements of this Guideline. For example:</p> <ul style="list-style-type: none">• 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 gaming 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 gaming areas not so designed. <p>b) 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.)</p> <p>c) Gambling advertisements or promotions which appeal primarily to CALD communities, which target the particular vulnerabilities of these communities. For example:</p> <ul style="list-style-type: none">• A gambling advertisement or promotion which depicts a CALD person engaging in some cultural superstitious practice like reading tea leaves, consulting an oracle or opening a fortune cookie and then depicting them winning at the casino as a result.• Placing a 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 pokie credit. <p>d) Gambling promotional material sent to a person who has self-excluded from the venue.</p>
6.9	<p>a) Does not involve any external signs advising of winnings paid</p>	<p>a) Advertising externally ‘coin out’ or ‘turnover’ as winnings paid. For example, information on or in any media like:</p> <ul style="list-style-type: none">• “Major jackpots so far this year: \$26,000; \$28,000; \$32,000; \$52,000; \$29,000.....”• “TWO HUGE JACKPOT WINNERS AT XXXX”• Payouts to our customers last week, over \$300,000”.

Industry Examples—Casinos

PRACTICE	ACCEPTABLE PRACTICES—CASINOS	UNACCEPTABLE PRACTICES—CASINOS
<p>6.9 (Advertising or promotion which involves any external signs advising of winnings paid. This may include, for example, external signs at the venue, newspaper advertisements, television advertisements, radio advertisements, mail-out material, brochures, and any web-based information that is considered external by this Guideline.)</p>	<p>b) Internally advertising actual winnings paid. For example, a light box sign indicating a large jackpot has been won.</p> <p>c) Internal signage about actual winnings paid not being visible from any external viewpoint through a door, window or glass wall.</p>	
<p>6.10 Does not involve any irresponsible trading practices by the gambling provider</p>	<p>a) Conducting responsible promotional activities for specific products within the business and not directing these promotions at disadvantaged groups or encouraging irresponsible gambling behaviour.</p> <p>b) 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.</p>	<p>a) Providing customers with credit or lending money to gamble (as specified in regulations and Practice 5.3 of the Code.)</p> <p>b) Offering customers improper inducements to gamble. Examples of irresponsible trading practices include:</p> <ul style="list-style-type: none"> • 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.
<p>6.11 Does not depict or promote the consumption of alcohol while engaged in the activity of gambling</p>	<p>a) Not undertaking this form of advertising or promotion.</p>	<p>a) Using images of individuals drinking and gambling.</p> <p>b) Running a joint promotion with an alcohol supplier to promote the consumption of alcohol in association with gaming activities.</p>
<p>6.12 Has the consent of the person prior to publishing or causing to be published anything which identifies a person who has won a prize</p>	<p>a) Having strict privacy guidelines in keeping with Privacy Laws - these guidelines being implemented across all advertising and promotional activity.</p>	<p>a) Displaying a person's identity/image without their consent and without their knowledge.</p> <p>b) Taking footage of customers without their knowledge for advertising and promotional purposes.</p> <p>c) 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 major prize.</p>

Industry Examples—Casinos

PRACTICE	ACCEPTABLE PRACTICES—CASINOS	UNACCEPTABLE PRACTICES—CASINOS
6.12 cont	<p>b) Customers are always advised of a casino's intentions in relation to promotional activities through Terms and Conditions and posters.</p> <p>c) Advising winners that they have the right to anonymity if they wish.</p> <p>d) 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 major prize.</p>	
6.13	<p>Incorporates, where appropriate, positive responsible gambling messages</p> <p>a) Developing responsible gambling messages/tag lines that are incorporated in gaming advertising and promotions where appropriate e.g. "Bet with your head, not over it."</p>	



Queensland Responsible Gambling Code of Practice Advertising and Promotions Guideline—UNiTAB

PRACTICE	ACCEPTABLE PRACTICES—UNiTAB	UNACCEPTABLE PRACTICES—UNiTAB
6.1	Complies with the <i>Advertiser Code of Ethics</i> as adopted by the Australian Association of National Advertisers	UNiTAB Ltd and its advertising agency subscribing to the <i>Advertiser Code of Ethics</i> as adopted by the Australian Association of National Advertisers. All advertising developed and delivered complying with that Code.
6.2	Is not false, misleading or deceptive	<ul style="list-style-type: none"> a) When advertising jackpots (First 4 and FootyBet), UNiTAB advising customers of the “estimated” jackpot amount. b) When advertising upcoming Telebet Express Payday payouts, UNiTAB advising all Telebet Express Customers of “estimated” payout figure. c) When advertising Fixed Odds prices for TAB Sportsbet in print or electronic mediums, UNiTAB advising audience of the time at which the odds were current and where to access the current odds.
6.3	Advertising or promotion does not implicitly or explicitly misrepresent the probability of winning a prize	<ul style="list-style-type: none"> a) UNiTAB not using language that suggests that winning with the TAB is easy. b) UNiTAB providing customers with several different forms of racing information to assist customers to make their own selections and deductions. c) Describing how exotic bet types work and the combinations covered by a particular exotic bet.
		<ul style="list-style-type: none"> a) Advertising a jackpot (First 4 and FootyBet) where the amount advertised is not a true projection of the expected jackpot amount. b) Using language that may imply that customers may win the total jackpot amount if they select the correct outcome. (First 4 or Footybet). c) Inferring Fixed Odds prices are not subject to change.
		<ul style="list-style-type: none"> a) Suggesting that a venue, product or distribution channel is “lucky”. b) Using language that “winning is easy”, “have a bet and win” or “today is your lucky day”. c) When advertising an exotic bet type, implying the odds of winning are greater than they actually are.

Industry Examples—UNiTAB

PRACTICE	ACCEPTABLE PRACTICES—UNiTAB	UNACCEPTABLE PRACTICES—UNiTAB
6.4	<p>Does not give the impression that gambling is a reasonable strategy for financial betterment</p> <p>a) UNiTAB's marketing strategy focusing on fun and entertainment and what differentiates UNiTAB's products from random outcome-based gambling products. Advertising addressing issues such as:</p> <ul style="list-style-type: none"> • Having a bet on a live and unfolding event (in Sport and Racing). • Customers can use a degree of knowledge and skill to influence the chance of winning. • Making information available that enables customers to make a reasonable informed decision. • Enhancing the enjoyment of a specific event through the use of UNiTAB products offered on the event. <p>b) UNiTAB not implying that using its services is a life-changing event or winning will improve standard of living.</p>	<p>a) Using language that would imply that winning at the TAB is another way to earn an income or winning at TAB may alter your living standards.</p>
6.5	<p>Does not include misleading statements about odds, prizes or chances of winning</p> <p>a) When advertising Fixed Odds prices for TAB Sportsbet in print or electronic mediums, UNiTAB advising audience of the time at which the odds were current and where to access the current odds.</p> <p>b) Printed material in-store advising customers that the prices for Fixed Odds (TAB Sportsbet) are not set until the bet is sold.</p> <p>c) On the back of all wagering tickets and on the website, UNiTAB advising customers of all deductions.</p> <p>d) When advertising jackpots (First 4 and FootyBet), UNiTAB advising customers of the "estimated" jackpot amount.</p> <p>(cont. over)</p>	<p>a) Advertising in a way that misleads or misrepresents the actual chance or odds or winning.</p> <p>b) Leaving out-of-date advertising material (Point of Sale) displayed that shows prize amounts that are no longer available.</p> <p>c) Using language that may imply that customers may win the total jackpot amount if they select the correct outcome. (First 4 or Footybet).</p>

Industry Examples—UNiTAB

PRACTICE	ACCEPTABLE PRACTICES—UNiTAB	UNACCEPTABLE PRACTICES—UNiTAB
6.5 <i>cont</i>	e) When advertising upcoming Teletbet Express Payday payouts, UNiTAB advises Teletbet Express Customers of “estimated” payout figure.	
6.6	Does not offend prevailing community standards	a) UNiTAB not using images that may offend prevailing community standards. a) Use of images and words that are overtly sexual in nature. b) Use of images of minors betting.
6.7	Does not focus exclusively on gambling where there are other activities to promote	
6.8	Is not implicitly or explicitly directed at minors or vulnerable or disadvantaged groups	a) UNiTAB specifically targeting 18+ audiences via electronic and print media. b) UNiTAB not intentionally advertising or promoting services to minors or vulnerable or disadvantaged groups. c) UNiTAB not using images of minors betting. d) UNiTAB not providing sponsorship to, or supporting organisations, clubs or schools that are made up of minors. (UNiTAB's encumbered advertising agencies, KWP Advertising and The Partners, operate under the <i>Advertiser Code of Practice</i> and conduct all media buying.)
6.9	Does not involve any external signs advising of winnings paid	a) Intentionally placing media where it targets minors and disadvantaged groups. b) Sponsor/support clubs, organisations or schools that are made up of minors.

Industry Examples—UNiTAB

PRACTICE	ACCEPTABLE PRACTICES—UNiTAB		UNACCEPTABLE PRACTICES—UNiTAB	
6.10	Does not involve any irresponsible trading practices by the gambling provider	<ul style="list-style-type: none"> a) UNiTAB and its agents conducting responsible promotional activities for specific products within the business and not directing these promotions at disadvantaged groups or encouraging irresponsible gambling behaviour. b) UNiTAB having agents' agreements in place which provide for termination of the operator if it is found that credit betting has taken place. 	<ul style="list-style-type: none"> a) Providing customers credit for the purpose of betting. b) Offering customers improper inducements to bet. c) Running promotions on specific days (pension days) to encourage people to come when they have money. 	
6.11	Does not depict or promote the consumption of alcohol while engaged in the activity of gambling	<ul style="list-style-type: none"> a) Undertaking advertising or promotion that does not use images of individuals drinking while gambling. 	<ul style="list-style-type: none"> a) Using images of individuals drinking and gambling. b) Running a joint promotion with an alcohol supplier to mutually promote goods and services. 	
6.12	Has the consent of the person prior to publishing or causing to be published anything which identifies a person who has won a prize	<ul style="list-style-type: none"> a) UNiTAB's privacy guidelines in keeping with Privacy Laws and implemented across all advertising and promotional activity. b) Customers being advised of UNiTAB's intentions in relation to promotional activities through Terms and Conditions and posters. c) UNiTAB Agents running in-store promotions displaying Terms and Conditions posters to advise customers of their intentions. d) UNiTAB advising winners that they have the right to anonymity if they wish. 	<ul style="list-style-type: none"> a) Displaying a person's identity/image without their consent and without their knowledge. b) Taking footage of customers without their knowledge for advertising and promotional purposes. 	
6.13	Incorporates, where appropriate, positive responsible gambling messages	<p>Including words or images that convey the message that gambling is fun only when people play responsibly such as:</p> <ul style="list-style-type: none"> • “gamble responsibly”. 		

APPENDIX 2

Industry Examples—Keno



Queensland Responsible Gambling Code of Practice Advertising and Promotions Guideline—Keno

PRACTICE		ACCEPTABLE PRACTICES—KENO	UNACCEPTABLE PRACTICES—KENO
6.1	Complies with the <i>Advertiser Code of Ethics</i> as adopted by the Australian Association of National Advertisers	a) All advertising and promotional activities developed and delivered to comply with the <i>Advertiser Code of Ethics</i> as adopted by the Australian Association of National Advertisers.	a) Developing or delivering advertising that does not comply with the <i>Advertiser Code of Ethics</i> as adopted by the Australian Association of National Advertisers.
	Is not false, misleading or deceptive	a) Advertising jackpots and providing information about the actual dollar prize that can be won in the venue. Current jackpot prizes that are available also being advertised on the internet. b) 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 in licensed premises but which show a balance of gambling and non-gambling activities.	a) Advertising a maximum jackpot possibility when the amount advertised is not a true projection of the expected jackpot amount. b) Using false or misleading language in relation to jackpots or a new product that may encourage visitation e.g. “get in now to win the current jackpot” or for new product, advertising potential “maximum possible jackpots” when the jackpot has not actually reached that amount. c) Any advertising or promotion that encourages the false belief, either explicitly or implicitly, that the outcome of certain games can be predicted or controlled using written or visual images such as: plan your play, beat the odds, work your system, 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. d) 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...” e) Explicitly stating or implying through imagery or written/verbal information that numbers chosen—for example in Keno—in a certain manner (e.g. horoscopes, “lucky” numbers) are any luckier than any other numbers. For example:

Industry Examples—Keno

PRACTICE	ACCEPTABLE PRACTICES—KENO	UNACCEPTABLE PRACTICES—KENO
6.2 <i>cont</i>		<ul style="list-style-type: none">• A gambling advertisement which depicts someone selecting their Keno numbers (or even a specific gaming machine) on the basis of astrology or some lucky intuition or similar means, and suggesting that this method of selection improved their chances of winning (depicting them winning as a result of this 'selection strategy'). <p>f) Gambling advertisements that imply that players can win after losing many times. For Example:</p> <ul style="list-style-type: none">• "Your time to win is coming up"• "Hang in there and you'll win sooner or later"• "Chances are ... you'll win sometime".
6.3	<p>Does not implicitly or explicitly misrepresent the probability of winning a prize</p> <p>a) The focus of advertisements relating to gambling is on the 'fun' and 'entertainment' value of visiting the venue rather than upon winning (For example, depicting people laughing and enjoying themselves while playing Keno.)</p>	<p>Keno using language or imagery that:</p> <p>a) Suggests that winning Keno is easy. For example:</p> <ul style="list-style-type: none">• "Winning is easy"• "Have a bet and win"• "Today is your lucky day"• "WIN \$\$\$ WIN \$\$\$ WIN \$\$\$". <p>Whilst some of these statements might be true, they could implicitly misrepresent the probability of winning a prize.</p> <p>b) Depicts:</p> <ul style="list-style-type: none">• Large wads of \$100 notes in gambling advertisements and promotions.• People winning in all, or the majority of, images depicting actual gambling behaviour.• Large amounts of money which can be won, especially when this dominates advertisements. For example, television advertisements with figures like \$60,000 and \$100,000 flashing up on the screen in large gold lettering.• Lady jumping out of a gaming machine with a fist full of cash. <p>c) Implies the odds of winning a prize are greater than they actually are. For example:</p> <ul style="list-style-type: none">• More jackpots, more often—whilst this might be true it could imply the chances of winning a prize are greater than they actually are.• Gambling advertisements which contain images of large piles of cash, buckets of money or people holding large amounts of cash while sitting at pokies or tables and looking rather pleased.

Industry Examples—Keno

PRACTICE	ACCEPTABLE PRACTICES—KENO	UNACCEPTABLE PRACTICES—KENO
6.3 <i>cont</i>		<ul style="list-style-type: none"> • 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. • People winning in all, or the majority of, images depicting actual gambling behaviour in advertisements and promotions. • Imagery depicting flowing rivers of gold coins spewing forth from poker machines, or people swimming in oceans of money.
6.4	<p>Does not give the impression that gambling is a reasonable strategy for financial betterment</p> <ol style="list-style-type: none"> Keno marketing strategy focusing on the fun and entertainment aspects of playing. Making information available that enables customers to make a reasonable informed decision. 	<ol style="list-style-type: none"> Using language or imagery that would imply that winning on Keno is another way to earn an income or winning on Keno may alter your living standards. For example: <ul style="list-style-type: none"> • An advertisement or promotion which depicts someone giving up their job as a result of a big win on Keno. • An advertisement or promotion which depicts someone as wealthy and successful and suggests that this wealth and success is a result of—or is linked to—winning on Keno. • An advertisement or promotion which depicts someone paying off bills or school fees or loans with their gambling winnings from Keno. The inclusion of text or verbal information in gambling advertisements and promotions like: <ul style="list-style-type: none"> - “Who needs to work?” - “Why would anybody work?” - “You’d be crazy to work” - “Working is for mugs” - “Who wants (needs) a day job?” An advertisement which depicts a person or a family moving from a situation of relative poverty (e.g. old car, run down house and worrying over bills) to relative affluence (new luxury car, large new house and so forth) as a result of their winning Keno. An advertisement which suggests that gambling on Keno is a reliable or viable strategy a reasonable person would adopt if they needed money to pay bills. Encouraging customers to spend their last dollar with the expectation to win. Linking prizes to education, for example payment of school fees.

Industry Examples—Keno

PRACTICE		ACCEPTABLE PRACTICES—KENO	UNACCEPTABLE PRACTICES—KENO
6.5	Does not include misleading statements about odds, prizes or chances of winning	a) The Keno licensee has a player information guide, detailing the odds of winning Keno, on their website. b) Advertisements which use 'luck' in a humorous way whilst depicting people gambling and enjoying themselves. There is no suggestion that the individual or the venue has 'intrinsic luck'.	a) Advertising in a way that misleads or misrepresents the actual chance or odds of winning. Examples of misleading statements include: <ul style="list-style-type: none">• "You can be lucky too."• "Our jackpot is due to go off."• See also related examples in 6.2 and 6.3. b) Leaving out-of-date advertising material (Point of Sale) displayed that shows prize amounts that are no longer available. c) Using language that may imply that customers could win the total jackpot possible. d) Supplying incorrect odds or supplying information in difficult to understand language. e) Advertisements or promotions which suggest that a venue has intrinsic luck. For example: <ul style="list-style-type: none">• Suggesting in a gambling advertisement through graphics or imagery that a particular venue or gaming area is "lucky"—or predisposed towards paying out lots of jackpots—and that as a result, wise punters would choose to gamble there rather than elsewhere.• Having—and including in gambling advertisements or promotional material—a venue "mascot" who is claimed to be unnaturally "lucky", who "never loses at games of chance", who "always gambles at the venue in question" and so forth.• Calling a gaming area some name that suggests the area is "lucky" or inherently predisposed to result in more wins for players than other gaming areas (The name of the area itself as well as the promotion of it in the media would be inappropriate.)• Statements, graphics or images which may imply that winning is more likely on Keno than on another game or form of gambling. f) 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 they will win and so improve their chances of winning. For example: <ul style="list-style-type: none">• An advertisement which depicts a person selecting Keno numbers on the basis of a "lucky" hunch and winning as a result.

Industry Examples—Keno

PRACTICE

6.5
cont

ACCEPTABLE PRACTICES—KENO

UNACCEPTABLE PRACTICES—KENO

- An advertisement which depicts a person utilising a “lucky charm” when gambling and winning as a result.
 - Any advertisement or promotion that suggests that “luck” or “feeling lucky” or having a “hunch” is accurately indicative of an imminent future win.
- g) Explicitly stating or implying through imagery or written/verbal information 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 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 (Suggesting superstitious practices are reliable strategies that can be employed by people if they wish to improve their chances of winning on Keno.)
 - Explicitly stating or implying (suggesting) through imagery or written /verbal information that numbers chosen—for example on Keno—in a certain manner (e.g. horoscopes, “lucky” numbers) are any luckier than any other numbers. For example:
 - A gambling advertisement which depicts someone selecting their Keno numbers on the basis of astrology or some lucky intuition or similar means, and suggesting that this method of selection improved their chances of winning (depicting them winning as a result of this ‘selection strategy’.)
- h) Any advertisement or promotion which suggests—through imagery, visual or auditory information—that “luck” is a cause of someone’s winning. For example:
- Suggesting in a gambling advertisement or promotion that if you are on a winning streak or “roll”, the winning streak or roll will continue because of your present state of “good luck”. For example:
 - Depicting someone on a winning streak with another patron saying “He can’t stop (or leave) now, he’s on a roll.”
 - Depicting someone on a winning streak with the question “Would You Leave Now?”
- i) 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. For example:
- Depicting in an advertisement someone—perhaps winning—who brings other players luck, such that it is suggested that others are more likely to win due to this person’s presence or proximity.

Industry Examples—Keno

PRACTICE	ACCEPTABLE PRACTICES—KENO		UNACCEPTABLE PRACTICES—KENO	
6.6	Does not offend prevailing community standards	a) Undertaking not to use images that may offend prevailing community standards. b) Advertising complying with prevailing community standards.	a) Using images of minors gambling or picking numbers. b) Exceeding the relevant regulatory and advertising codes/guidelines e.g. placing adult theme advertisements in general exhibition time slots. c) Suggesting that enhancement of one's social, financial or sexual success and general abilities can be attributable to gambling.	
6.7	Does not focus exclusively on gambling where there are other activities to promote			
6.8	Is not implicitly or explicitly directed at minors or vulnerable or disadvantaged groups <i>(Disadvantaged persons may include persons lacking 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.)</i> <i>(Vulnerable persons may include persons at risk of harm or harmful patterns of behaviour due to external influences or internal susceptibilities.)</i>	a) Marketing products to adult audiences via electronic and print media. b) Not intentionally advertising or promoting services to minors or vulnerable or disadvantaged groups. c) Not using images of minors gambling. d) Being part of entertainment opportunities or promotions for a particular group (e.g. seniors) that offer cheap entertainment that is not conditional upon gambling, e.g. "Treasure Day". e) A gambling advertisement or promotion which appears in media targeting specific culturally and linguistically diverse (CALD) communities (e.g. a Chinese language newspaper) being in accordance with this Guideline and all the practices with particular reference to 6.2, 6.3, 6.4, 6.5.	1. Minors Intentionally placing media where it targets minors, vulnerable or disadvantaged groups. For example, gambling advertisements and promotions which: a) Advertise and promote gambling in media directed primarily at minors. (Media selection and placement of advertising not in accordance with the Commercial Television Industry Code of Practice adopted by the Federation of Commercial Television Australia (CTVA).) b) Appear in close proximity to schools (for example, billboards outside or within 200 meters of a school.) c) Appear at events primarily of appeal to minors e.g. a children's concert or a children's sporting event. Gambling advertisements and promotions which: a) Contain symbols or language that is primarily intended to appeal to minors e.g. using the slang of an underage generation. b) 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. c) 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. d) Portray minors gambling.	

Industry Examples—Keno

PRACTICE

6.8
cont

ACCEPTABLE PRACTICES—KENO

UNACCEPTABLE PRACTICES—KENO

2. Disadvantaged Groups—Low Socio-Economic Groups

- a) Sending correspondence or promotional material to gambling customers who are excluded or known to have formally requested that this information not be sent.
- b) 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.
- c) Entertainment opportunities for a particular group (e.g. seniors) that offer cheap entertainment that is conditional upon gambling.
- d) 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.
- e) 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 on Keno.
- f) 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 on Keno.
 - An advertisement or promotion which depicts someone as wealthy and successful and suggests that this wealth and success is a result of—or is linked to—their winning on Keno.
- g) See other relevant examples in section 6.4.

3. Vulnerable Groups, e.g. CALD Communities, Mentally Ill

- a) Gambling advertisements or promotions, which appeal primarily to culturally and linguistically diverse (CALD) communities, which do not comply with the requirements of this Guideline. 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.

Industry Examples—Keno

PRACTICE

ACCEPTABLE PRACTICES—KENO

UNACCEPTABLE PRACTICES—KENO

6.8
cont

- A gambling advertisement or promotion which suggests that the Keno 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 gaming areas not so designed.
- b) 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 on Keno.)
- c) Gambling advertisements or promotions which appeal primarily to CALD communities, which target the particular vulnerabilities of these communities. For example:
 - A gambling advertisement or promotion which depicts a CALD person engaging in some cultural superstitious practice like reading tea leaves, consulting an oracle or opening a fortune cookie and then depicting them winning on Keno as a result.
 - Placing a 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 Keno play.
- d) Gambling promotional material sent to a person who has self-excluded from the venue.

6.9

- Does not involve any external signs advising of winnings paid
(Advertising or promotion which involves any external signs advising of winnings paid. This may include, for example, external signs at the venue, newspaper advertisements, television advertisements, radio advertisements, mail-out material, brochures, and any web-based information that is considered external by this Guideline.)
- a) Not externally advertising ‘turnover’ as winnings paid.
 - b) Advertising actual winnings paid in the venue. For example:
 - Light box sign indicating a large jackpot has been won
 - A plaque indicating this venue has paid out a major jackpot
 - Posters inside the venue promoting a recent jackpot win on Keno.

- a) Advertising externally ‘coin out’ or ‘turnover’ as winnings paid. For example, information on or in any media like:
 - “Major jackpots so far this year: \$26,000; \$28,000; \$32,000; \$52,000; \$29,000...”
 - “TWO HUGE JACKPOT WINNERS AT XXXX”.

Industry Examples—Keno

PRACTICE		ACCEPTABLE PRACTICES—KENO	UNACCEPTABLE PRACTICES—KENO
6.10	Does not involve any irresponsible trading practices by the gambling provider	<p>a) Conducting responsible promotional activities for specific products and not directing these promotions at disadvantaged groups or encouraging irresponsible gambling behaviour.</p> <p>b) 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.</p>	<p>a) Providing customers with credit or lending money to gamble (as specified in regulations and Practice 5.3 of the Code.)</p> <p>b) Offering customers improper inducements to gamble. Examples of irresponsible trading practices include:</p> <ul style="list-style-type: none"> • 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.
6.11	Does not depict or promote the consumption of alcohol while engaged in the activity of gambling	<p>a) Keno not undertaking advertising or promotions showing players consuming alcohol while playing Keno.</p>	<p>a) Using images of individuals drinking and gambling.</p> <p>b) Running a joint promotion with an alcohol supplier to promote gaming activities.</p>
6.12	Has the consent of the person prior to publishing or causing to be published anything which identifies a person who has won a prize	<p>a) Having strict privacy guidelines in keeping with Privacy Laws—these guidelines being implemented across all advertising and promotional activity.</p> <p>b) Customers are always advised of Keno's intentions in relation to promotional activities through Terms and Conditions and posters.</p> <p>c) Always advising winners that they have the right to anonymity if they wish.</p> <p>d) Taking particular care to ensure that any winner, including elderly and persons with English as their second language, understand their rights to privacy when winning a major prize.</p> <p>e) Always ensuring that any winner agreeing to publicity signs a Release Form agreeing to have their details and/or photo released.</p>	<p>a) Displaying a person's identity/image without their consent and without their knowledge.</p> <p>b) Taking footage of customers without their knowledge for advertising and promotional purposes.</p> <p>c) 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 major prize.</p>

Industry Examples—Keno

PRACTICE		ACCEPTABLE PRACTICES—KENO	UNACCEPTABLE PRACTICES—KENO
6.13	Incorporate, where appropriate, positive responsible gambling messages.	a) Deploying responsible gambling messages/tag lines that are incorporated in gaming advertising and promotions e.g. “Bet with your head, not over it”.	

APPENDIX 2

Industry Examples—Lotteries



Queensland Responsible Gambling Code of Practice
Advertising and Promotions Guideline—Lotteries

PRACTICE

ACCEPTABLE PRACTICES—LOTTERIES UNACCEPTABLE PRACTICES—LOTTERIES

6.1 Complies with the *Advertiser Code of Ethics* as adopted by the Australian Association of National Advertisers

6.2 Is not false, misleading or deceptive

- a) For games such as Saturday Gold Lotto, where the first division prize pool is likely to be shared by a large number of winners, using words which indicate that people will win a share in \$22 million rather than win the entire \$22 million first division prize pool.
- b) Where information about frequently drawn numbers is issued by Golden Casket, providing a plain English clause which explains the randomness and unpredictability of a gaming event.
- c) When a major prize is won at a Golden Casket shop, the venue displaying promotional material that promotes this win, in relevant areas of the venue, for a limited period only (e.g. up to two weeks).
- d) Displaying a permanent plaque in an agency that indicates that a first division prize was sold by the agency.

- a) Advertising that implies that one person will win the entire Saturday Gold Lotto first division prize pool (e.g. Play Gold Lotto and win \$22 million, as it is unlikely that one person will win the entire amount.) (NB—This does not apply to other lotto games which have a different prize structure.)
- b) Golden Casket issuing information about frequently drawn numbers without a plain English explanation as to the randomness of a gaming event.
- c) Golden Casket using phrases such as “these numbers have come up before so play them to win again” or “these numbers have never come up so play them to win” as this may imply these numbers are an automatic chance to win.
- d) Implying that an agency has a major prize on sale (e.g. a lottery agency stating “Top Instant Scratch-Its prize not sold, last of tickets on sale here.”)
- e) An agency intentionally leaving out-of-date promotional material displayed that shows prize amounts or offers that are no longer available (e.g. posters, flyers and pre-marked coupons).
- f) Agency posters that promote a major win for an excessive period of time following the win (e.g. longer than two weeks).

Industry Examples—Lotteries

PRACTICE

6.3 Does not implicitly or explicitly misrepresent the probability of winning a prize

ACCEPTABLE PRACTICES—LOTTERIES

- a) Using words that communicate the randomness or “chance element” of a lottery activity rather than words that imply an easy and automatic win, e.g. “Play this game for your chance to win” or “Play this game for your chance to win \$1 million”.
- b) Golden Casket including a section within its website which explains the randomness and independence of gaming activities.
- c) Featuring superstitious themes (such as “Luck of the Irish” or “Black Friday”) or the word “lucky” on Instant Scratch-Its tickets and in advertising and promotions in a responsible manner.
- d) A promotion on unusual ways that people pick their lotto numbers or scratch their Instant Scratch-Its run in a light-hearted manner, without implying that one method of picking numbers is “luckier” than another.
- e) Using the word “lucky” to describe a winner who has won a Golden Casket prize (given it is factually true that they have been fortunate to win.)
- f) Golden Casket issuing an explanation regarding the randomness of winning when providing information about frequently drawn lotto numbers.
- g) Changing the “Lucky numbers” generator on the Golden Casket website to read “Favourite numbers”.

UNACCEPTABLE PRACTICES—LOTTERIES

- a) Luck used in advertising and promotions in a manner that implies that winning is a probable or likely outcome.
- b) Using words that imply that it is automatic to win such as “Play this game and win” or “Winning is easy” and “You will win”. Using luck to imply that some entries or games are luckier than others e.g. “Quickpicks are luckier than recorded numbers” or “This is your lucky entry”.
- c) Using superstitious themes (such as “Luck of the Irish” or “Black Friday”) or the word “lucky” on Instant Scratch-Its tickets and in advertising and promotions in a manner that implies that winning is a probable or likely outcome.
- d) Using the words “as a result” to describe a direct link between the intrinsic luck of a person or Golden Casket agency and “the result” of winning. For example, a winner rubbed a Buddha statue and “as a result”, won on an Instant Scratch-Its ticket.
- e) Stating as a fact or implying that certain lotto numbers are “luckier” than other lotto numbers.
- f) Using superstition or the element of “luck” to scare or coerce people into buying a product. For example, “If you don’t buy a ticket on Black Friday, you may never have the chance to be lucky again.”
- g) Producing advertisements that imply that players can win after losing many times such as “Your time to win is coming up” or “Hang in there and you’ll win sooner or later” or “Chances are ... you’ll win sometime”.
- h) Stating as a fact or implying that people have a better chance of winning by buying entries at one agency rather than another.
- i) Stating as a fact or implying that certain entry types have a greater chance of winning compared to other entry types (unless the odds for the entry types in question are actually more favourable.)
- j) Golden Casket advertising and promotional campaigns showing only winning images. For example, all Instant Scratch-Its campaign advertisements only featuring winning images and no advertisements focusing on the dreaming or enjoyment of play aspects.

Industry Examples—Lotteries

PRACTICE	ACCEPTABLE PRACTICES—LOTTERIES	UNACCEPTABLE PRACTICES—LOTTERIES
6.4	<p>Does not give the impression that gambling is a reasonable strategy for financial betterment</p> <p>a) Depicting a lottery win being used in various ways including mortgage payments and paying other bills in a manner that depicts an everyday acceptable situation rather than in a desperate and rescue-like manner.</p>	<p>a) Suggesting that lottery entries are an alternative to investment, e.g. “Would you like to <i>invest</i> your money in buying a lottery entry” or suggesting that someone should channel their money into lottery entries instead of investing in superannuation or the like.</p> <p>b) Promoting gambling as an easy and automatic way to pay off bills. Using imagery and words such as “Play this lottery game as another way to pay off bills”. For example, “Play today and chase those bills away”.</p> <p>c) Using imagery and text in advertisements which imply that customers can relieve their personal, physical and financial pain and anguish by buying lotto entries. For example, “Buy a lotto entry and chase all your pains away” or “Relieve all your personal problems by buying a lotto entry”.</p> <p>d) Advertising and promotions of lottery entries are portrayed in a desperate and rescue-type manner. For example, “Buy a lotto entry and save your life”.</p> <p>e) Using images and words such as “Play the lottery game and you can give up your job”.</p> <p>f) Saying to a customer who is collecting a substantial prize, “Imagine what you would win if you invested all your winnings in more entries.”</p> <p>g) Advertisements and promotions which encourage customers to spend their last dollar.</p> <p>h) Presenting gambling as a guaranteed way to get rich. For example, “Put a lottery entry in and you’ll get rich” or “Play the lottery and you’ll never have to worry at all”.</p>
6.5	<p>Does not include misleading statements about odds, prizes or chances of winning</p> <p>a) Having the odds of winning a lottery game easily accessible to customers (for example, making the odds of winning on any lottery game accessible from the home page of Golden Casket’s website or having information about the odds of winning available at the place of purchase.)</p> <p>b) Offering information on the odds in languages other than English.</p>	<p>a) Supplying incorrect odds or supplying information in difficult to understand language.</p> <p>b) Refusing to supply odds of games to customers or making them unreasonably inaccessible.</p> <p>c) Using images or text in advertisements such as “Remember the first time you had a big win, why not make it happen again and buy a lottery entry.”</p>

Industry Examples—Lotteries

PRACTICE	ACCEPTABLE PRACTICES—LOTTERIES	UNACCEPTABLE PRACTICES—LOTTERIES
6.6	Does not offend prevailing community standards	<ul style="list-style-type: none"> a) Using images or people who are dressed in a manner that is inappropriate to the context of the advertisement and does not conform to prevailing community standards. For example, an advertisement that features a lottery winner hiring a stripper as a result of winning Lotto. b) Suggesting that enhancement of one's social, financial or sexual success and general abilities can be attributable to gambling. c) Using imagery or text in advertisements which aims to encourage or incite violence. d) Using racist language and imagery in advertisements.
6.7	Does not focus exclusively on gambling where there are other activities to promote	
6.8	Is not implicitly or explicitly directed at minors or vulnerable or disadvantaged groups	<ul style="list-style-type: none"> a) Focusing solely on children and people that are clearly underage in a lottery advertisement. b) Featuring children and people who are clearly under-age participating in lottery activities. c) Using images of children picking numbers for games. d) Advertising and promotion relating to gambling appearing in media directed primarily at minors. (Media selection and placement of television advertising will be in accordance with the Commercial Television Industry Code of Practice adopted by the Federation of Commercial Television Australia (CTVA).) e) Knowingly sending correspondence or promotional material to gambling customers who are excluded or known to have formally requested that this information not be sent. f) Advertising of gaming at child-focused venues e.g. putting a poster up at a school or school sporting event. g) Advertising directly to unemployed people e.g. advertising at a Centrelink office. h) Conducting a direct mail campaign that specifically targets extremely disadvantaged areas e.g. those areas that are known to exhibit unusually high levels of people who: <ul style="list-style-type: none"> • have a mental disability or illness • are unemployed

Industry Examples—Lotteries

PRACTICE	ACCEPTABLE PRACTICES—LOTTERIES	UNACCEPTABLE PRACTICES—LOTTERIES
6.8 <i>cont</i>		<ul style="list-style-type: none"> • are known to be having high levels of financial difficulties e.g. bankrupt people. <ol style="list-style-type: none"> Placing advertising in “c” (children) or “p” (preschool) rated TV programming or children’s pages of a newspaper and child-skewed shows if they appear in “G” classification programs e.g. Willy Wonka’s Chocolate Factory movie. Using child-related celebrities to promote lottery products e.g. “a popular children’s entertainment group to promote a new game”. Showing lottery play as a way of dealing with grief or depression.
6.9	Does not involve any external signs advising of winnings paid	
6.10	Does not involve any irresponsible trading practices by the gambling provider	<ol style="list-style-type: none"> Aiming promotions specifically at disadvantaged groups or minors. Encouraging people to purchase unreasonably high levels of lottery products in order to win a promotion. An agency staff member aggressively pushing a customer to participate in gaming activity. Using offers of free alcohol to promote lottery play. Running a promotion which encourages people to spend their last dollar on lottery entries. Advertising an offer of free money or a loan for the purposes of gambling. Trade practices or inducements which intentionally aim to encourage people to gamble in an excessive or irresponsible manner.
6.11	Does not depict or promote the consumption of alcohol while engaged in the activity of gambling	<ol style="list-style-type: none"> Showing people drinking alcohol or consuming drugs while participating in lottery activities e.g. drinking a beer while playing a lottery game. Featuring images of people who are showing signs of being unduly intoxicated e.g. staggering, slurring of words. Sponsorships or partnering of brands to specific alcohol related products such as Joint Instant Scratch-Its and beer promotions in an irresponsible manner.

Industry Examples—Lotteries

PRACTICE		ACCEPTABLE PRACTICES—LOTTERIES	UNACCEPTABLE PRACTICES—LOTTERIES
6.12	Has the consent of the person prior to publishing or causing anything which identifies a person who has won a prize	<ul style="list-style-type: none">a) Having written guidelines in place to protect the privacy of major lottery winners.b) All staff who have contact with major winners are trained on privacy requirements for major winners.c) Obtaining express permission from a winner regarding releasing details about their story.d) Advising the winner that they have the right to full anonymity if they wish.e) Taking particular care to ensure that elderly winners and those with English as their second language understand their rights to privacy when winning a major prize.f) Taking special care about publishing details of a win where the winner lives in a small country town, to help ensure a winner is not identified, without their express permission.	<ul style="list-style-type: none">a) Releasing information about a winner's story without express permission of the winner.b) Aggressively persuading a winner to agree to participate in publicity activities.c) Not explaining to the winner that they have the right to full anonymity.d) Not ensuring that a winner who is elderly or whose first language is not English understands their rights to privacy when winning a major prize.
6.13	Incorporates, where appropriate, positive responsible gambling messages	<ul style="list-style-type: none">a) As part of every advertising campaign, placing of the message: "Have fun and play responsibly" on a prominent in-store point of sale advertising piece, which would usually comprise an A2 poster (if produced).b) Prominently displaying "Have fun and play responsibly" as a scrolling message on the LCD board in Golden Casket shops.c) Displaying the "Have fun and play responsibly" messages in digipos, Golden Casket's dynamic and prominent electronic point of sale system. <p>(cont. over)</p>	

Industry Examples—Lotteries

PRACTICE	6.13 cont	ACCEPTABLE PRACTICES—LOTTERIES	UNACCEPTABLE PRACTICES—LOTTERIES
		<div><div>d) Placement of the “Have fun and play responsibly” message on all Golden Casket promotional flyers.</div><div>e) Preparing a style guide to ensure that responsible play messages are consistent and at an appropriate scale, to ensure readability.</div><div>f) Having dedicated responsible play brochures, which feature the responsible play message in a prominent location in each Golden Casket agency.</div><div>g) Prominently displaying a responsible play sign featuring “Have fun and play responsibly” in each agency.</div><div>h) The responsible play message and dedicated responsible play information communicated via the “How to Play” brochure for all Golden Casket products with the brochure being located in each of Golden Casket’s 1,000 agencies - crucial “entry point” piece of communication which is the primary gateway for information on all Golden Casket products.</div><div>i) Responsible play message appearing on the home page of goldencasket.com at an appropriate size.</div></div>	
General		<div><div>a) Ensure that all relevant parties, e.g. agency managers and owners, receive training on responsible advertising practices.</div><div>b) Ensure that all lottery advertising contractors, e.g. advertising and promotions agencies, are fully briefed on responsible advertising practices.</div></div>	

APPENDIX 3

Correlates for Problem Gambling

Consideration must be given to the potential impact of advertising and promotion on a person with a problem with gambling or at risk of developing a gambling problem. The *Queensland Gambling Household Survey 2001* and other research identifies a number of correlates for problem gambling that can be used to build a profile that may assist in identifying those at risk of developing gambling problems.

Possible Problem Gambling Risk Indicators for use by Gambling Staff

RISK FACTORS	EXAMPLES OF RISK INDICATORS
Faulty cognition	Player reports: <ul style="list-style-type: none"> having a perception of chances of winning which is apparently unrealistic.
Loss of control	Player reports: <ul style="list-style-type: none"> having a problem with gambling having tried unsuccessfully to stop gambling spending too much time gambling. Player is observed: <ul style="list-style-type: none"> threatening or causing physical harm to others or self selling valuables to gamble behaving in an aggressive manner towards property.
Negative impacts of gambling	Player reports: <ul style="list-style-type: none"> having lost an important relationship due to gambling having lied to others to hide their gambling having lost a job due to gambling. Third party reports player: <ul style="list-style-type: none"> gambling instead of performing family responsibilities, e.g. picking children up after school trying to borrow or “scam” money for gambling from others, e.g. customers.
Use of alcohol or drugs while gambling	Player is observed as being unduly intoxicated.
Depression or thoughts about suicide	Player reports he/she is suffering from depression and/or has thoughts of suicide due to gambling.

RISK FACTORS

Involvement in multiple simultaneous gambling activities

EXAMPLES OF RISK INDICATORS

Player is observed to be participating in three or more gambling activities simultaneously (playing more than one gaming machine at a time is multiple gambling activities).

Personal remorse

Player reports:

- losing household money on gambling (e.g. money that was supposed to buy groceries or pay the rates or electricity bill)
- selling valuables to gamble
- borrowing money to live due to gambling
- being unable to meet loan repayments due to gambling
- depending on others to repay their gambling debts
- having committed illegal acts due to gambling (e.g. stealing, fraud or domestic violence).

Notes

Notes

Notes

Queensland Office of Gaming Regulation

Level 4 33 Charlotte Street Brisbane Qld
Locked Bag 180 CITY EAST QLD 4002

Tel: (07) 3224 4561 Freecall: 1800 064 848

Fax: (07) 3237 1656

Email: codeofpractice@treasury.qld.gov.au

Website: www.responsiblegambling.qld.gov.au

RESPONSIBLE Queensland GAMBLING

Code of Practice

May 2005

For further information on the *Queensland Responsible Gambling Code of Practice*

Queensland Office of Gaming Regulation

Level 6

33 Charlotte Street Brisbane Qld

Locked Bag 180 CITY EAST QLD 4002

Freecall: 1800 064 848

Telephone: (07) 3224 4561

Fax: (07) 3237 1656

Email: codeofpractice@treasury.qld.gov.au

www.responsiblegambling.qld.gov.au

© The State of Queensland (Queensland Treasury) MAY 2004.

Copyright protects this publication. Except for purposes permitted under the Copyright Act, reproduction by whatever means is prohibited without the prior written permission of the Under Treasurer.

Foreword

For many people, gambling is an enjoyable leisure and entertainment activity. For some, however, gambling can have negative impacts. In the long term, benefits to the gambling industry can be enhanced and safeguarded only by minimising harm to consumers and the broader community.

The *Queensland Responsible Gambling Code of Practice* (Code of Practice) has been developed by the Responsible Gambling Advisory Committee (RGAC). The RGAC is made up of community, industry and Queensland Government representatives and provides advice to the Queensland Treasurer. In developing the Code of Practice, the RGAC has consulted extensively with key stakeholders within and outside the gambling industry.

The Code of Practice represents a voluntary, whole-of-industry commitment to best practice in the provision of responsible gambling. It is the first whole-of-industry responsible gambling code of practice in Australia. In recognition of the diversity within the gambling industry, the Code of Practice gives consideration to how the practices apply to each sector of the industry.

The Code of Practice is supported by the *Queensland Responsible Gambling Resource Manual*, which will be maintained by the Research and Community Engagement Division of the Queensland Office of Gaming Regulation, Queensland Treasury with advice from the RGAC. It provides a platform to share best practice across the gambling industry sectors, as well as support for the effective implementation of the Code of Practice.

All gambling providers in Queensland are responsible for implementing the Code of Practice through the development and implementation of a Responsible Gambling Policy document specific to their operations. In preparing this document, gambling providers will consider the needs of their local communities, with a particular focus on any regional and cultural issues.

The Code of Practice is a living document and will be periodically reviewed to evaluate outcomes and the effectiveness of the practices.

The RGAC with the support of the Queensland Office of Gaming Regulation is pleased to provide this Code of Practice for the gambling industry to proactively promote responsible gambling in Queensland.

This Code of Practice is an integral component of the *Queensland Responsible Gambling Strategy* developed by the Queensland Government. This Strategy aims to balance the social and economic benefits and costs of gambling.



Howard Dreitzer
Chair, Responsible Gambling
Advisory Committee



Barry Sheehan
Deputy Chair, Responsible Gambling
Advisory Committee



David Ford
Queensland Office of
Gaming Regulation

Table of contents

Rationale	4
What is responsible gambling?	4
What is problem gambling?	4
Guiding principle	4
Outcomes	5
Accountability and review	5
Cultural and geographic diversity	6
Practices	6
1. Provision of information	7
2. Interaction with customers and community	8
3. Exclusion provisions	9
4. Physical environment	10
5. Financial transactions	11
6. Advertising and promotions	12
Supporting documents	13
• <i>Queensland Responsible Gambling Resource Manual</i>	13
• <i>Queensland Responsible Gambling Training Framework for Industry</i>	13
• Responsible Gambling Policy	14
Contributors to the <i>Queensland Responsible Gambling Code of Practice</i>	15
Glossary of Terms	16
Appendix	
How each practice applies to different types of gambling	19

“a proactive whole-of-industry approach to the promotion of responsible gambling practices”

“socially responsible and responsive to community concerns”

“ethical and responsible behaviour”

Rationale

The Code of Practice provides a proactive whole-of-industry approach to the promotion of responsible gambling practices. It also encourages the creation of gambling environments that minimise harm to individuals and to the broader community.

The Code of Practice supports and progresses the Government’s *Queensland Responsible Gambling Strategy*, which aims to balance the social and economic benefits and costs of gambling. The Code of Practice is based on industry commitment to best practice in the provision of responsible gambling.

What is responsible gambling?

Responsible gambling occurs in a regulated environment where the potential for harm associated with gambling is minimised and people make informed decisions about their participation in gambling.

Responsible gambling occurs as a result of the collective actions and shared ownership by individuals, communities, the gambling industry and the Government to achieve outcomes that are socially responsible and responsive to community concerns.

What is problem gambling?

Problem gambling exists when gambling activity results in a range of adverse consequences where:

- the safety and wellbeing of gambling customers and/or their families and friends are placed at risk; and/or
- negative impacts extend to the broader community.

Guiding principle

The Code of Practice is based on shared commitment by gambling industry providers to the guiding principle of ethical and responsible behaviour. This principle recognises the importance of customers’ wellbeing with a focus on minimising the potential harm of gambling. In addition, customers’ rights to privacy are respected.

Outcomes

*“customers
make informed
decisions”*

The *Queensland Responsible Gambling Code of Practice* aims 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 assistance and information.

Accountability and review

*“independently
monitored
and evaluated”*

All gambling providers within Queensland will be responsible for ensuring their commitment with the relevant practices contained in this Code of Practice. Each gambling provider will maintain appropriate records relating to the practices in the Code of Practice.

While commitment to the Code of Practice is voluntary, there are practices that are also a legislative requirement. These practices must be complied with or action may be taken under the relevant Acts.

The Code of Practice will be independently monitored and evaluated regularly for its effectiveness. Following a review of voluntary commitment to the Code of Practice, minimum standards may be recommended and, where appropriate, codified into legislation. The Government will also retain the right to legislate in any area of gambling at any time.

“recognition of the diversity in Queensland”

Cultural and geographic diversity

In recognition of the diversity in Queensland, gambling providers have a responsibility to respond to the needs of their local communities. Where appropriate, consideration needs to be given to ensuring people from culturally and linguistically diverse backgrounds have access to relevant protection measures contained in this Code of Practice. In addition, it is recognised that people living in different geographic areas may have particular needs that gambling providers will take into account in implementing the Code of Practice, where appropriate.

“focus on customer protection measures”

Practices

This Code of Practice commits the gambling industry to implement and adhere to responsible gambling practices, with a particular focus on customer protection measures. These practices are organised into the following broad categories:

1. Provision of information;
2. Interaction with customers and community;
3. Exclusion provisions;
4. Physical environment;
5. Financial transactions; and
6. Advertising and promotions.

In recognition of the diversity within the gambling industry, the Code of Practice acknowledges that some practices apply to all sectors of the industry while others apply only to particular sectors. The Appendix contains details of how these practices apply to industry sectors.

The Code of Practice is a dynamic document. It is anticipated that new practices will be developed in response to innovative best practice within the industry. Research into issues related to problem gambling and responsible gambling will also inform further development.

1. Provision of information

Each gambling provider is to provide information to ensure that customers can make informed decisions about their gambling.

- 1.1 A responsible gambling mission statement is clearly displayed.
- 1.2 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 ATM and EFTPOS facilities servicing gambling areas.
- 1.3 Information is displayed 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 complaints resolution mechanisms; and
 - key elements of the gambling provider's financial transaction practices.
- 1.4 Meaningful and accurate information on the odds of winning major prizes is prominently displayed in all gambling areas and in proximity to relevant games.

2. Interaction with customers and community

2.1 *Community liaison*

To support early intervention and prevention strategies, 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.

2.2 *Customer liaison role*

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

- provide appropriate information to assist customers with gambling-related problems;
- support staff in providing assistance to those customers; and
- provide assistance to staff with gambling-related problems.

2.3 *Customer complaints*

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

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.

3. Exclusion provisions

- 3.1 Gambling providers to provide exclusion procedures and supporting documentation.
- 3.2 Gambling providers offer customers who seek exclusion contact information for gambling-related support services.
- 3.3 Excluded gambling customers are to be given support in seeking exclusions from other gambling providers, where practicable.
- 3.4 Gambling providers are not to send correspondence or promotional material to gambling customers who are excluded or known to have formally requested that this information not be sent.

4. Physical environment

- 4.1 Minors are prohibited from gambling.
- 4.2 Minors are prohibited from designated gambling areas.
- 4.3 Service of alcohol on gambling provider's premises is managed in such a way as to encourage customers to take breaks in play.
- 4.4 Customers who are unduly intoxicated are not permitted to continue gambling.
- 4.5 Where gambling providers offer adjunct child care, the facilities must provide safe and suitable standards of care in accordance with relevant child care legislation.
- 4.6 Staff working in gambling areas are not to encourage gambling customers to give them gratuities.
- 4.7 Gambling providers implement practices to ensure that customers are made aware of the passage of time.
- 4.8 Gambling providers implement practices to ensure that customers are discouraged from participating in extended, intensive and repetitive play.

5. Financial transactions

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.

5.2 *Cashing of cheques and payment of winnings*

- Gambling providers or sectors of the industry 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 gambling provider;
 - cheques not made payable to the person presenting the cheque;
 - multiple cheques.

5.3 *Credit betting (lending of money)*

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

6. Advertising and promotions

Gambling providers are 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. Specifically, these strategies will ensure that any advertising or promotion:

- 6.1 complies with the Advertising Code of Ethics as adopted by the Australian Association of National Advertisers;
- 6.2 is not false, misleading or deceptive;
- 6.3 does not implicitly or explicitly misrepresent the probability of winning a prize;
- 6.4 does not give the impression that gambling is a reasonable strategy for financial betterment;
- 6.5 does not include misleading statements about odds, prizes or chances of winning;
- 6.6 does not offend prevailing community standards;
- 6.7 does not allow gambling to dominate, where there are other activities to promote;
- 6.8 is not implicitly or explicitly directed at minors or vulnerable or disadvantaged groups;
- 6.9 does not involve any external signs advising of winnings paid;
- 6.10 does not involve any irresponsible trading practices by the gambling provider;
- 6.11 does not depict or promote the consumption of alcohol while engaged in the activity of gambling; and
- 6.12 has the consent of the person prior to publishing or causing to be published anything which identifies a person who has won a prize;
- 6.13 where appropriate, positive responsible gambling messages are incorporated in advertising and promotion.

Supporting documents

The Queensland Responsible Gambling Code of Practice is supported by:

- the *Queensland Responsible Gambling Resource Manual* (Resource Manual);
- the *Queensland Responsible Gambling Training Framework for Industry*; and
- the provider's Responsible Gambling Policy document.

Queensland Responsible Gambling Resource Manual

The Resource Manual was developed in collaboration with gambling industry sectors. The Resource Manual is maintained by the Research and Community Engagement Division of the Queensland Office of Gaming Regulation, Queensland Treasury with advice from the Responsible Gambling Advisory Committee. The Resource Manual assists gambling providers to implement the Code of Practice.

It includes:

- guidance for gambling providers to develop and implement their Responsible Gambling Policy;
- examples of practices that conform to industry best practice; and
- an outline of responsible gambling strategies specific to each sector of the industry, based upon the practices of the Code of Practice.

Queensland Responsible Gambling Training Framework for Industry

The training framework outlines criteria for the development and implementation of responsible gambling training programs, the specific learning outcomes to be demonstrated by gambling provider employees, as well as benchmarks to indicate industry best practice. The overall purpose of the training framework is to enhance the knowledge and skill base of gambling employees and managers or other responsible officers in their work to promote other responsible approaches to gambling. It is envisaged such enhancement of knowledge and skills among gambling industry personnel will lead to safer and more supportive environments for the consumers of gambling services and products.

Responsible Gambling Policy

Each gambling provider will develop a Responsible Gambling Policy document.

This document will be specific to their operations to:

- assist in creating a responsible gambling environment that meets the needs of customers, with a particular focus on the customers and their families who are adversely affected by gambling;
- provide a clear statement of responsibilities for providers and their staff; and
- give consideration to the needs of their local communities with a particular focus on any geographic and cultural issues.

The Responsible Gambling Policy document will:

- take due regard to customers' rights to privacy; and
- support the implementation of the Code of Practice .

Contributors to the *Queensland Responsible Gambling Code of Practice*

The Code of Practice has been developed by the Responsible Gambling Advisory Committee (RGAC) in consultation with the gambling industry.

The RGAC comprises representation from:

Community

- Gambling Help Network, Queensland (one south-east Queensland and one regional representative)
- Queensland Council of Social Services
- Ethnic Communities Council of Queensland
- Heads of Churches

Industry

- Conrad Jupiters
- UNiTAB Limited
- Clubs Queensland
- Golden Casket Lottery Corporation Limited
- Queensland Hotels Association

Government

- Department of Communities
- Queensland Office of Gaming Regulation
- Queensland Health

An Industry Reference Group has provided advice in the development of this Code of Practice. Membership included the industry members of the RGAC listed above and representation from:

- charitable and non-profit gambling organisations;
- gaming machine manufacturers;
- licensed monitoring operators;
- keno providers;
- racing industry organisations; and
- Golden Casket Agents Association.

9. Glossary of terms

Application for Self-exclusion

A document executed by an individual by which the person agrees to being prohibited from specific gambling products, services or gambling areas of particular providers.

Charitable and non-profit activities

Include bingo, calcutta sweeps, lucky envelopes, promotional games and art unions (such as silver circles, football doubles, sweeps, cent auctions and lucky door prizes).

Credit betting

The provision of credit or the lending of monies by a gambling provider for the purpose of gambling.

Exclusion

A prohibition against a person from specific gambling products, services or gambling areas of particular gambling providers.

Gambling

Gambling involves staking money on uncertain events driven by chance or a combination of chance and skill. The major forms of gambling are wagering and gaming.

Gambling areas

Areas in which authorised gambling products or services are provided.

Gambling product or service

Any gambling activity or scheme authorised under a gaming or wagering act.

Gambling providers

Gambling providers that conduct legal forms of gambling, including gaming machines, casino, wagering, interactive gambling, lotteries, keno and minor gaming.

Gaming

All legal forms of gambling other than wagering. Gaming includes gaming machines, casino table games, interactive gambling, lotteries, keno and minor gaming.

Unduly Intoxicated

Means a state of being in which a person's mental and physical faculties are impaired because of consumption of liquor so as to diminish the person's ability to think and act in a way in which an ordinary prudent person in full possession of his or her faculties, and using reasonable care, would act under like circumstances.

(Source: Section 4, Liquor Act 1992)

Irresponsible trading practice

The offering of an inappropriate enticement to patrons that is in conflict with the objective of maximising responsible gambling and minimising problem gambling.

Minor gaming

Encompasses charitable and non-profit gaming including art unions, bingo, lucky envelopes, raffles and the like.

Odds

The likelihood of a particular outcome or event occurring.

Problem gambling

Problem gambling exists when gambling activity results in a range of adverse consequences where:

- the safety and wellbeing of gambling customers and/or their families and friends are placed at risk; and/or
- negative impacts extend to the broader community.

Responsible gambling

Responsible gambling occurs in a regulated environment where the potential for harm associated with gambling is minimised and people make informed decisions about their participation in gambling. Responsible gambling occurs as a result of the collective actions and shared ownership of individuals, communities, the gambling industry and the Government to achieve outcomes that are socially responsible and responsive to the concerns of the broader community.

Return to player

The theoretical percentage obtained by dividing the sum of prizes from all possible game outcomes by the sum of all bets.

Safe and supportive gambling environment

An environment where the benefits to all participants are maximised and the potential harm of gambling is minimised.

Self-exclusion

A prohibition from specific gambling products, services or gambling areas of particular gambling providers sought by an individual against themselves.

Wagering

Placing a bet on the outcome of racing, sport or other events covered by totalisators or licensed bookmakers.

Winnings

The amount of money won on a gambling product or service.

Appendix

How each practice applies to different types of gambling

Responsible Gambling Practices	* Sectors of the Industry							
	Casino	Charitable and Non-Profit (excluding Bingo)	Bingo	Gaming machine areas in clubs and hotels	Interactive	Keno	Lotteries	Wagering
1. Provision of Information								
1.1 A responsible gambling mission statement is clearly displayed	✓	✗	✗	✓	✓	✓	✓	✓
1.2 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 ATM and EFTPOS facilities servicing gambling areas	✓	Category 3 only	✓	✓	✓	✓	✓	✓
1.3 Information is displayed 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	✓	Category 3 only	Category 2 only	✓	✓	✓	✓	✓
• the nature of games, game rules, odds or returns to players	✓	Category 3 only	Category 2 only	✓	✓	✓	✓	✓
• exclusion provisions	✓	✗	✗	✓	✓	✓	✓	✓
• gambling-related complaints resolution mechanisms	✓	✓	✓	✓	✓	✓	✓	✓
• key elements of the gambling provider's financial transaction practices	✓	Category 3 only	Category 2 only	✓	✓	✓	✓	✓
1.4 Meaningful and accurate information on the odds of winning major prizes is displayed in all gambling areas and in proximity to relevant games	✓	Category 3 only	Category 2 only	✓	✓	✓	✓	✓

✓ = required

✗ = not required and/or not applicable

CNP: Category 3 = category 3 licensed charitable and non-profit organisations (over \$20,000+ gross proceeds)

Bingo: Category 2 = gross proceeds between \$2,000 and \$20,000

Appendix

How each practice applies to different types of gambling

Responsible Gambling Practices					* Sectors of the Industry			
	Casino	Charitable and Non-Profit (excluding Bingo)	Bingo	Gaming machine areas in clubs and hotels	Interactive	Keno	Lotteries	Wagering
2. Interaction with customers and community								
2.1 <u>Community Liaison</u> To support early intervention and prevention strategies, gambling providers are to establish effective mechanisms to link with: <ul style="list-style-type: none"> • local gambling-related support services • community networks where responsible gambling related issues could be raised 	✓	✓ Category 3 only	✓ Category 2 only	✓	✗	✓	✓	✓
2.2 <u>Customer Liaison Role</u> Gambling providers are to nominate a person to perform the customer liaison role and who is trained to: <ul style="list-style-type: none"> • 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 	✓	✓ Category 3 only	✓ Category 2 only	✓	✓	✓	✓	✓
2.3 <u>Customer Complaints</u> Complaint handling procedures that can deal with gambling issues are established and promoted by gambling providers.	✓	✓ Category 3 only	✓ Category 2 only	✓	✓	✓	✓	✓
2.4 <u>Training and skills development</u> 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.	✓	✓ Category 3 only	✓ Category 2 only	✓	✓	✓	✓	✓
3. Exclusion provisions								
3.1 Gambling providers to provide exclusion procedures and supporting documentation	✓	✗	✓ Category 2 only	✓	✓	✓	✗	✓
3.2 Gambling providers offer customers who seek exclusion contact information for gambling-related support services.	✓	✗	✓ Category 2 only	✓	✓	✓	✓	✓
3.3 Excluded gambling customers are to be given support in seeking self-exclusion from other gambling providers, where practicable	✓	✗	✗	✓	✓	✓	✗	✓
3.4 Gambling providers are not to send correspondence or promotional material to gambling customers who are excluded or known to have formally requested that this information not be sent	✓	✓	✓	✓	✓	✓	✓	✓

✓ = required

✗ = not required and/or not applicable

CNP: Category 3 = category 3 licensed charitable and non-profit organisations (over \$20,000+ gross proceeds)

Bingo: Category 2 = gross proceeds between \$2,000 and \$20,000

Appendix

How each practice applies to different types of gambling

Responsible Gambling Practices		* Sectors of the Industry						
	Casino	Charitable and Non-Profit (excluding Bingo)	Bingo	Gaming machine areas in clubs and hotels	Interactive	Keno	Lotteries	Wagering
4. Physical environment								
4.1 Minors are prohibited from gambling	✓	✓ Category 3 only	✱ Category 2 only	✓	✓	✓	✓	✓
4.2 Minors are prohibited from designated gambling areas	✓	✗	✗	✓	✗	✗	✗	✗
4.3 Service of alcohol on gambling provider's premises is managed in such a way as to encourage customers to take breaks in play	✓	✗	✗	✓	✗	✓	✗	✓
4.4 Customers who are unduly intoxicated are not permitted to continue gambling	✓	✓	✓	✓	✗	✓	✓	✓
4.5 Where gambling providers offer adjunct child care, the facilities must provide safe and suitable standards of care in accordance with relevant child care legislation	✓	✗	✗	✓	✗	✓	✗	✓
4.6 Staff working in gambling areas are not to encourage gambling customers to give them gratuities	✓	✓	✓	✓	✓	✓	✓	✓
4.7 Gambling providers implement practices to ensure that customers are made aware of the passage of time	✓	✗	✗	✓	✓	✓	✗	✓
4.8 Gambling providers implement practices to ensure that customers are discouraged from participating in extended, intensive and repetitive play	✓	✗	✗	✓	✓	✓	✗	✓
5. Financial Transactions								
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	✓	✗	✗	✓	✗	✓	✗	✓
5.2 Cashing of cheques and payment of winnings Gambling providers or sectors of the industry are to establish a limit above which all winnings are paid by cheque or electronic transfer	✓	✓	✓	✓	✓	✓	✓	✓ (Except Book-makers)
<ul style="list-style-type: none"> 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 	✓	✓	✓	✓	✓	✓	✓	✓ (Except Book-makers)
<ul style="list-style-type: none"> The following cheques can be cashed only by prior arrangement: <ul style="list-style-type: none"> cheques not made payable to the gambling provider cheques not made payable to the person presenting the cheque multiple cheques 	✓	✓	✓	✓	✗	✓	✓	✓
5.3 Credit betting (lending of money) Gambling providers are not to provide credit or lend money to anyone for the purpose of gambling	✓	✓	✓	✓	✓	✓	✓	✓ (Except Book-makers)

✓ = required

✗ = not required and/or not applicable

CNP: Category 3 = category 3 licensed charitable and non-profit organisations (over \$20,000+ gross proceeds)

Bingo: Category 2 = gross proceeds between \$2,000 and \$20,000

Appendix

How each practice applies to different types of gambling

Responsible Gambling Practices	* Sectors of the Industry							
	Casino	Charitable and Non-Profit (excluding Bingo)	Bingo	Gaming machine areas in clubs and hotels	Interactive	Keno	Lotteries	Wagering
6. Advertising and promotions								
6.1 Complies with the Advertising Code of Ethics as adopted by the Australian Association of National Advertisers	✓	✓	✓	✓	✓	✓	✓	✓
6.2 Is not false, misleading or deceptive	✓	✓	✓	✓	✓	✓	✓	✓
6.3 Does not implicitly or explicitly misrepresent the probability of winning a prize	✓	✓	✓	✓	✓	✓	✓	✓
6.4 Does not give the impression that gambling is a responsible strategy for financial betterment	✓	✓	✓	✓	✓	✓	✓	✓
6.5 Does not include misleading statements about odds, prizes or chances of winning	✓	✓	✓	✓	✓	✓	✓	✓
6.6 Does not offend prevailing community standards	✓	✓	✓	✓	✓	✓	✓	✓
6.7 Does not allow gambling to dominate, where there are other activities to promote	✓	✗	✗	✓	✓	✓	✗	✓
6.8 Is not implicitly or explicitly directed at minors or vulnerable or disadvantaged groups	✓	✓	✓	✓	✓	✓	✓	✓
6.9 Does not involve any external signs advising of winnings paid	✓	✗	✗	✓	✓	✓	✗	✓
6.10 Does not involve any irresponsible trading practices by the gambling provider	✓	✓	✓	✓	✓	✓	✓	✓
6.11 Does not depict or promote the consumption of alcohol while engaged in the activity of gambling	✓	✓	✓	✓	✓	✓	✓	✓
6.12 Has the consent of the person prior to publishing or causing to be published anything which identifies a person who has won a prize.	✓	✓	✓	✓	✓	✓	✓	✓
6.13 Where appropriate, positive responsible gambling messages are incorporated in advertising and promotion	✓	✓	✓	✓	✓	✓	✓	✓

✓ = required

✗ = not required and/or not applicable

CNP: Category 3 = category 3 licensed charitable and non-profit organisations (over \$20,000+ gross proceeds)

Bingo: Category 2 = gross proceeds between \$2,000 and \$20,000

* Principal Regulatory Framework

Each sector of the gambling industry and the relevant gambling legislation pertaining to that sector is detailed below.

Sector	Act
Casino	Casino Control Act, 1982
Charitable and Non-Profit	Charitable and Non-Profit Gaming Act, 1999
Clubs and Hotels with gaming machines	Gaming Machine Act, 1991
Interactive	Interactive Gambling (Player Protection) Act, 1998
Keno	Keno Act, 1996
Lotteries	Lotteries Act, 1997
Wagering	Wagering Act, 1998

Queensland Office of Gaming Regulation

Level 6

33 Charlotte Street Brisbane Qld

Locked Bag 180 CITY EAST QLD 4002

Freecall: 1800 064 848

Telephone: (07) 3224 4561

Fax: (07) 3237 1656

Email: codeofpractice@treasury.qld.gov.au

www.responsiblegambling.qld.gov.au

Adelaide Casino Responsible Gambling Code of Practice

As in force on 1 December 2008

TABLE OF CONTENTS

1. Purpose	1	8. Cheques.....	4
2. Venue responsible gambling documents	1	8A. Internal reporting of problem gamblers	5
3. Legislation and regulation.....	1	9. Self-exclusion facility	5
4. Gambling areas	2	10. Staff and training	6
5. Customer information and signage	2	11. Definitions and interpretation.....	7
5A. Coin availability.....	4	12. Operative dates and transitional	8
6. Alcohol and gambling.....	4		
7. Children	4		

SOUTH AUSTRALIA

CASINO ACT 1997

Adelaide Casino Responsible Gambling Code of Practice

[As in force on 1 December 2008]

This is the responsible gambling code of practice for the purposes of section 41B of the *Casino Act 1997*:

1. Purpose

This code provides a framework through which Skycity Adelaide Pty Ltd, the holder of the casino licence (“**gambling provider**”), can ensure that its general gambling practices are consistent with the community’s expectations that the licensed business will be conducted in a responsible manner so as to minimise the harm caused by gambling.

2. Venue responsible gambling documents

The gambling provider will—

- (a) in each gambling area—
 - (i) display prominently a sign indicating that gambling operations are governed by a code of practice; and
 - (ii) ensure that a copy of this code is made available to people in the gambling area, on request; and
- (b) for each gambling area, prepare and keep current a document detailing—
 - (i) the manner in which staff training and measures for intervention with problem gamblers are implemented; and
 - (ii) the roles of staff (described by name or by job title) in the implementation of this code.

3. Legislation and regulation

The gambling provider will—

- (a) conduct its business in accordance with all applicable laws and legal requirements; and
- (b) co-operate with regulatory bodies and government agencies in all matters, including their investigations of compliance with legal obligations.

4. Gambling areas

- (1) The gambling provider will ensure the prominent display of a warning message—
 - (a) on each gaming machine—
 - (i) on the cabinet of the gaming machine—in the form of the condensed warning message and (or within) a helpline sticker;
 - (ii) if the gaming machine is capable of displaying a message on a second game screen in a manner approved by the Authority—in the form of an expanded warning message on that second screen;
 - (b) in the form of the condensed warning message and (or within) a helpline sticker on or near each gaming table.
- (2) The gambling provider will ensure that the time of day is prominently displayed throughout gambling areas.
- (3) The gambling provider will take all reasonable and practicable steps to ensure that a person plays no more than one gaming machine at a time, including—
 - (a) the gambling provider displaying a warning sign that it does not permit any person to play more than one gaming machine at a time; and
 - (b) the gambling provider giving a warning to a patron offending for the first time and, should such a warning not be heeded, asking the patron to leave the gaming room for 24 hours.
- (4) The gambling provider will ensure that a copy of the gambling rules is available to customers in each gambling area.

5. Customer information and signage

- (1) The gambling provider will—
 - (a) prominently display responsible gambling materials (including a poster and a pamphlet) in gambling areas in a form which includes—
 - (i) if it is not reasonable or practicable to include an expanded warning message, the condensed warning message; or
 - (ii) an expanded warning message, rotated according to the protocol set out in clause 11(2); and

Casino Act 1997
Adelaide Casino Responsible Gambling Code of Practice

Clause 5

As in force on 1 December 2008

(b) make available its responsible gambling poster and pamphlet in the following 5 languages other than english—

- (i) arabic;
- (ii) chinese;
- (iii) greek;
- (iv) italian;
- (v) vietnamese—

together with any other language which the gambling provider considers appropriate.

(2) The gambling provider will—

- (a) ensure the prominent display of the condensed warning message and (or within) a helpline sticker on or near each ATM;
- (b) ensure that a quantity of helpline cards is available at or near each gaming machine and gaming table, on or near each ATM and at other places throughout gambling areas.

(3) The gambling provider will take all reasonable steps to ensure that a patron who demonstrates difficulty in controlling his or her personal expenditure on gambling products has his or her attention drawn to the name and telephone number of a widely available gambling referral service.

(3A) The gambling provider will—

- (a) identify a gambling rehabilitation agency that patrons can readily access (including the name of the manager of that agency and its address);
- (b) ensure that staff are sufficiently informed about the identity of the gambling rehabilitation agency so as to be able to direct patrons to the agency;
- (c) ensure that management level contact is established and maintained with the gambling rehabilitation agency about problem gambling matters.

(4) The gambling provider will—

- (a) from time to time file with the Authority; and
- (b) to the greatest extent practicable, publish on its website (if it has one) a representation of—

the responsible gambling materials referred to in sub-clause (1).

- (5) The gambling provider will reinforce its responsible gambling policy in appropriate customer newsletters and other communications.

5A. Coin availability

- (1) The gambling provider will ensure that coin can only be obtained from—
- (a) a cashier; or
 - (b) an automated coin dispensing machine which is located so as to enable patron activity to be monitored.
- (2) The gambling provider will ensure that patron activity on automated coin dispensing machines is routinely and regularly monitored.

6. Alcohol and gambling

- (1) The gambling provider will take all practicable steps—
- (a) to prevent a person who appears to be intoxicated from being allowed to gamble; and
 - (b) to prevent the entry of intoxicated people into gambling areas, or them remaining there; and
 - (c) to ensure that alcohol is not supplied to reward, promote or encourage continued gambling; and
 - (d) to provide education to staff about the effect of alcohol on patrons; and
 - (e) to include guidelines to recognise excessive alcohol consumption in staff training programs.
- (2) The gambling provider will ensure that a person is not served alcohol while seated or standing at a gaming machine.

7. Children

It is recommended that the gambling provider develop a protocol addressing the issue of young children (being children aged 10 years or less) who may otherwise be left unattended on the gambling provider's premises or in a motor vehicle parked in a car park over which the gambling provider has direct power and control.

8. Cheques

- (1) The gambling provider will not cash cheques in a gambling area, unless the Authority has given an exemption from this prohibition to the gambling provider in respect of the gambling area, by notice in writing

stating the reason for the exemption (such as the location of the premises containing the gambling area).

- (2) The gambling provider will, if requested to provide a cheque in respect of an undisputed prize, winnings or redemption of credits in aggregate of \$1 000 or more, provide the cheque as soon as practicable and, in any event, within 30 minutes after the patron makes the request and completes any formalities required by law.

8A. Internal reporting of problem gamblers

- (1) The gambling provider will establish a reporting process in respect of the identification of suspected problem gamblers by gaming staff and the recording of those gamblers' details.
- (2) The gambling provider will ensure that a gaming manager—
 - (a) reviews the record of suspected problem gamblers on a regular (at least fortnightly) basis; and
 - (b) documents, as part of the record, any steps taken to intervene in suspected problem gamblers' gambling behaviour.

9. Self-exclusion facility

- (1) The gambling provider will facilitate the indefinite voluntary exclusion of customers from one or more identified gambling areas.
- (2) The gambling provider will ensure that every approach by a customer about self-exclusion is responded to while the customer is on premises or on the telephone.
- (3) Self-exclusion will include—
 - (a) provision of a translation service (which may be a telephone interpreter service) during the application process, if requested;
 - (b) provision for immediate referral to, or liaison with, a counselling agency;
 - (c) provision for the review of self-exclusion notices with customers before notices are rescinded;
 - (d) removal of self excluded people from loyalty mailing databases.

- (4) The gambling provider will ensure, to the extent reasonably possible, that self excluded customers are not allowed to enter, or remain in, gambling areas from which they have been excluded.

10. Staff and training

- (1) The gambling provider will—
- (a) ensure that all staff receive problem gambling training, provided at four distinct levels—
 - (i) for all staff at induction—training which identifies problem gambling (1 hour); and
 - (ii) for staff employed in positions associated with Gaming, Food and Beverage, Security, Surveillance, and Action Hosts—further training which identifies problem gambling (2 hours); and
 - (iii) for all supervisors within the Gaming, Food and Beverage, Security, Surveillance, and Action Scheme departments—training identifying initial procedures for first level identification, and referral, of customers and supervised staff requiring assistance (4 hours); and
 - (iv) for appropriate senior employees—advanced training on the identification of, and intervention techniques for, problem gambling, including administration of the self-bar process (8 hours);
 - (b) provide refresher courses for all staff at least each two years;
 - (c) include responsible gambling information in employee newsletters and magazines; and
 - (d) display responsible gambling material in back of house areas to remind staff of policies and their responsibilities.
- (2) If the gambling provider is to use an external provider for training, that training provider must be appropriately accredited in a manner acceptable to the Authority.
- (3) Problem gambling training programs will be designed to—
- (a) provide information about the potential effect of gambling on customers; and
 - (b) include information on the recognition and identification of problem gambling traits; and
 - (c) ensure that the processes for approach, intervention, referral and follow-up are clear and well understood.
-

Clause 11

As in force on 1 December 2008

-
- (4) The gambling provider will ensure that problem gambling training programs are regularly reviewed and revised.
 - (5) The gambling provider will—
 - (a) make arrangements to ensure that training programs provided to its staff are the subject of an annual audit of their compliance with the requirements of this code; and
 - (b) provide a report of the outcome of each audit to the Authority within 28 days after completion.
 - (6) The gambling provider will take reasonable steps to ensure that staff with a potential or actual gambling problem are identified and referred for treatment.
 - (7) If the gambling provider provides training through an appropriately accredited external provider, the gambling provider may comply with sub-clauses (3), (4) and (5) through the activities of that external provider.

11. Definitions and interpretation

- (1) In this code—
 - “**ATM**” includes—
 - (a) an automatic teller machine in or near premises containing a gambling area;
 - (b) an electronic funds transfer device in or near premises containing a gambling area—over which the gambling provider could reasonably be expected to exercise control;
 - “**condensed warning message**” means the following message—
 - “Gamble Responsibly.”;
 - “**expanded warning message**” means one of the following messages—
 - (a) “Don’t chase your losses. Walk away. Gamble responsibly.”;
 - (b) “Don’t let the game play you. Stay in control. Gamble responsibly.”;
 - (c) “Stay in control. Leave before you lose it. Gamble responsibly.”;
 - (d) “You know the score. Stay in control. Gamble responsibly.”;

(e) “Know when to stop. Don’t go over the top. Gamble responsibly.”;

(f) “Think of the people who need your support. Gamble responsibly.”;

“gambling area” means a public area of the Casino;

“gambling rules” means the rules of games from time to time approved by the Liquor and Gambling Commissioner;

“helpline card” means a card of approximately 9 cm by 5 cm giving the name and telephone number of a widely available gambling referral service, identified by its usual name;

“helpline sticker” means a sticker giving the name and telephone number of a widely available gambling referral service, identified by its usual name.

- (2) For the purposes of rotating the six expanded warning messages over 3 years, the gambling provider will—
- (a) to the greatest extent practicable, always use the same expanded warning message at the same time;
 - (b) to the greatest extent practicable, use an expanded warning message for six months at a time;
 - (c) take reasonable steps to consult with other gambling providers required to use expanded warning message with a view to ensuring, to the greatest extent practicable, that all gambling providers are using the same expanded warning message at the same time.

12. Operative dates and transitional

- (1) The provisions of clauses 1–12 of this code as substituted by the Code Alteration (Adelaide Casino) (Responsible Gambling) (No. 1) 2004 apply from 30 April 2004.
- (2) The provisions of—
 - (a) clauses 2A, 4(4), 4A, 5(3A), 6A, 8A and 11(2)—as inserted by Code Alteration (Adelaide Casino) (Responsible Gambling) (No. 1) 2008; and
 - (b) clauses 4(1)(b), 5(1), 5(2), 8(2), 10(5)(a), 10(7) and 11(1)—as amended by Code Alteration (Adelaide Casino) (Responsible Gambling) (No. 1) 2008—

Casino Act 1997
Adelaide Casino Responsible Gambling Code of Practice

Clause 12

apply generally from 1 December 2008, subject to the following exception—

- (c) in respect of the obligation set out in clause 5(3A) [relationship with gambling help agency]—the gambling provider will not be required to comply with the obligation until 1 May 2010.

Queensland Responsible Gambling

Guidelines for Player Loyalty Programs



Addendum to
the Queensland
Responsible Gambling
Advertising and
Promotions Guideline
(March 2005)

Guidelines to support the implementation of the
*Queensland Responsible Gambling
Code of Practice*

August 2007

For further information on the *Queensland Responsible Gambling Code of Practice*, contact:

Queensland Office of Gaming Regulation

Level 4 33 Charlotte Street Brisbane Qld
Locked Bag 180 CITY EAST QLD 4002

Tel: (07) 3224 4564 **Freecall: 1800 064 848**

Fax: (07) 3237 1656

www.responsiblegambling.qld.gov.au

Contents

Preamble	2
Scope	2
Accountability and Review.....	2
Practices	2
Implementing the <i>Guidelines for Player Loyalty Programs</i>	3
Player Loyalty Program practices	3
Glossary of terms.....	4

Industry Examples: Acceptable and Unacceptable Practices

• Appendix One – Hotels and Clubs	5-6
• Appendix Two – Casino	7-9
• Appendix Three – Lotteries	10-11
• Appendix Four – UNiTAB.....	12-13

Preamble

The *Queensland Responsible Gambling Advertising and Promotions Guideline*, March 2005 (the Advertising Guideline) was developed by a sub-committee of the Responsible Gambling Advisory Committee (RGAC) known as the Advertising and Promotions Working Party (the Advertising Working Party). The Advertising Guideline, released in March 2005, was developed to support the gambling industry in implementing Section 6 of the *Queensland Responsible Gambling Code of Practice* – ‘Advertising and Promotions’.

At that time, the various functions and features of Player Loyalty Programs (PLPs) were excluded from the Advertising Guideline. In March 2005, the RGAC agreed that specific guidelines should be developed by the Advertising Working Party relating to the functions and features of PLPs. It is likely that these PLP guidelines will be incorporated within the broader Advertising Guideline at some future point in time. The Guidelines for PLPs are intended to support the *Queensland Responsible Gambling Code of Practice* (Code of Practice) where the functions and features of PLPs are concerned.

Scope

The *Guidelines for Player Loyalty Programs* (the PLP Guidelines) are intended to apply to Player Loyalty Programs in all sectors of gambling in Queensland.

The *Guidelines for Player Loyalty Programs* are to be used in conjunction with all other regulatory requirements for the conduct of gambling in Queensland.

Accountability and Review

All gambling providers and Player Loyalty Program system providers (including, where applicable, Licensed Monitoring Operators or LMOs) are responsible for the application of the *Guidelines for Player Loyalty Programs*.

The Code of Practice (including the Advertising Guideline and the *Guidelines for Player Loyalty Programs*) will be independently monitored and evaluated regularly for its effectiveness. Following a review of voluntary commitment with the Code of Practice, minimum standards may be recommended and, where appropriate, codified into legislation.

Adherence to the specific guidelines for PLPs does not absolve a gambling provider from observing the broader Advertising Guideline. In other words, the Advertising Guideline document applies where a venue is advertising or promoting their venue’s PLP.

Practices

The practices in the Code of Practice’s ‘Advertising and promotions’ section are aimed at ensuring advertising and promotions are delivered in a responsible manner with consideration given to the potential impact on people adversely affected by gambling. The practices in the Advertising Guideline commit the gambling industry to ensure that any advertising or promotion:

- 6.1 complies with the Advertising Code of Ethics as adopted by the Australian Association of National Advertisers
- 6.2 is not false, misleading or deceptive
- 6.3 does not implicitly or explicitly misrepresent the probability of winning a prize
- 6.4 does not give the impression that gambling is a reasonable strategy for financial betterment
- 6.5 does not include misleading statements about odds, prizes or chances of winning
- 6.6 does not offend prevailing community standards
- 6.7 does not focus exclusively on gambling where there are other activities to promote
- 6.8 is not implicitly or explicitly directed at minors or vulnerable or disadvantaged groups
- 6.9 does not involve any external signs advising of winnings paid
- 6.10 does not involve any irresponsible trading practices by the gambling provider
- 6.11 does not depict or promote the consumption of alcohol while engaged in the activity of gambling
- 6.12 has the consent of the person prior to publishing or causing to be published anything which identifies a person who has won a prize
- 6.13 where appropriate, positive responsible gambling messages are incorporated in advertising and promotion.

The actual advertising and promotion of a PLP should comply with the broader Advertising Guideline.

The actual components or functions of a PLP, itself, should comply with these PLP Guidelines.

Implementing the Guidelines for Player Loyalty Programs

The *Queensland Responsible Gambling Code of Practice* defines responsible gambling as follows:

Responsible gambling occurs in a regulated environment where the potential for harm associated with gambling is minimised and people make informed decisions about their participation in gambling. Responsible gambling occurs as a result of the collective actions and shared ownership by individuals, communities, the gambling industry and the Government to achieve outcomes that are socially responsible and responsive to community concerns.

PLPs should be advertised and promoted (like any other gambling product or service) in such a way as to encourage gambling as a form of leisure and entertainment which a person must be prepared to pay for, with money spent on gambling being an ‘entertainment cost’ – ie. as fun and enjoyable, if engaged in responsibly.

The following PLP Guidelines outline “acceptable” and “unacceptable” practices where the specific aspects and functions of the PLP itself are concerned.

At all times, consideration should be given to the potential impact of particular aspects of a PLP on a person with a problem with gambling, or at risk of developing a gambling problem¹. If future research is able to identify correlates for problem gambling (that can be used to build a profile that may assist in identifying those at risk of developing gambling problems) then these research findings may lead to discussions around the possible modification or updating of these PLP Guidelines.

Player Loyalty Program practices

Some of the following practices relating to the functionality of a PLP resemble some of the practices in the broader Advertising Guideline (ie. where these practices are judged applicable or relevant to specific aspects of PLPs). Other (new) practices may have been included to directly address PLP features or functions.

¹ Correlates for problem gambling may be identified by research such as the Queensland Gambling Household Survey. Some possible correlates are outlined in Appendix 3 of the Advertising and Promotion Guidelines.

The appendices provide further information including industry examples of Player Loyalty Program practices that support the spirit of the Code of Practice and examples of Player Loyalty Program practices that do not support the Code of Practice. Although the appendices have provided examples for specific industry groups, industry groups are not limited by these examples as some examples may be a useful guide across different industry groups and will assist in gaining a wider perspective on the practices.

Practice 1

Advertising or promotion of a PLP within the wider community complies with the Queensland Responsible Gambling Advertising and Promotions Guideline (March 2005).

Practice 2

Direct marketing practices comply with the Australian Direct Marketing Association (ADMA) Direct Marketing Code of Practice.

Practice 3

Registration process provides relevant information for the consumer to make informed decisions regarding their participation in the PLP.

Practice 4

PLP features and functions do not offend prevailing community standards.

Practice 5

PLP reward point accrual and redemption mechanisms do not focus exclusively on gambling activities where other venue activities are available, where practicable.

Practice 6

PLP features and functions are not implicitly or explicitly directed at minors or vulnerable or disadvantaged groups.

Practice 7

PLP features and functions do not involve any irresponsible trading practices by the gambling provider.

The Code of Practice defines irresponsible trading practices as:

The offering of an inappropriate enticement 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 gambled. 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.

Practice 8

Where appropriate and possible, positive responsible gambling messages are to be incorporated in PLP features and functions.

Practice 9

PLPs must comply with the Exclusions Framework.

Industry Examples: Acceptable and Unacceptable Practices

The following Appendices outline Industry Examples of Acceptable and Unacceptable Practices:

- Appendix One – Hotels and Clubs
- Appendix Two – Casino
- Appendix Three – Lotteries
- Appendix Four – UNiTAB.

Glossary of terms

“Player Loyalty Program (PLP)” means a system or program designed to build player loyalty, by suitably and responsibly recognising and rewarding its members for their loyalty to the organisation and / or its products.

“Inducements” means things that are offered to persuade a person to gamble. For example:

- prizes or gifts directly linked to winning a particular game
- promotions conditional to a person gambling
- offer of free credit to customers or potential customers.

“PLP features and functions” means the elements of the PLP itself – these can include:

- the promotional and operational functionality of a PLP system (eg. ability to scroll electronic messages across a sandwich card reader screen)
- the side promotions undertaken at a venue associated with PLP membership
- the direct marketing materials associated with a PLP.

Queensland Responsible Gambling Guidelines for Player Loyalty Programs

Appendum to the Queensland Responsible Gambling Advertising & Promotions Guideline (March 2005)

Appendix one – hotels and clubs

As with the Advertising and Promotions Guideline, consideration should be given to the potential impact of the Player Loyalty Program on a person with a gambling problem.

Practice	Acceptable practices	Unacceptable practices
1. Advertising/promotion of PLP complies with Queensland Responsible Gambling Advertising and Promotions Guideline (March 2005).	Any advertising or promotion aligns with the <i>Queensland Responsible Gambling Advertising and Promotions Guideline (March 2005)</i> . Advertising of PLPs that accrues points across multiple of venue activities. <i>For example- "Earn Bonus Points when you spend at our bars, bistro, gaming room, and bottle shop".</i>	Developing advertising or promotional material that contradicts the <i>Queensland Responsible Gambling Advertising and Promotions Guideline (March 2005)</i> . <i>For example- The PLP is the dominant feature of advertising where the PLP does not accrue points across multiple venue activities but only gambling.</i>
2. PLP direct marketing practices comply with ADMA Direct Marketing Code of Practice.	Any advertising or promotion aligns with the ADMA Direct Marketing Code of Practice. PLP has the ability to recognise which patrons would like to receive gaming promotional material. <i>For example- "You may choose to opt-in or opt-out of receiving our newsletter or other promotional material at any time. You will never receive information if you don't want to".</i>	Developing advertising or promotional material that contradicts the ADMA Direct Marketing Code of Practice. <i>For example- The PLP does not have the ability to recognise which patrons would like to receive gaming promotional material.</i>
3. PLP registration process provides relevant information for consumer to make informed decisions regarding their participation in the PLP.	a) Any registration materials, and any statement, phrase or inclusion in any registration materials, is based on fact and will not mislead or deceive, or is not likely to be misleading or deceptive. b) Any registration materials to include terms and conditions of participation in the PLP. c) Provide company's privacy information policy on request. <i>For example – "Our loyalty club's Terms & Conditions can be found on the back of our application form, and a copy of our Privacy Policy is available at any time- Just ask us".</i>	a) Any registration materials that are not based on fact. b) Any registration materials that mislead or deceive, or are likely to mislead or deceive. <i>For example – "The loyalty club with the greatest rewards in the world".</i> <i>For example – Not supplying Terms & Conditions of membership upon joining.</i>
4. PLP features and functions do not offend prevailing community standards.	PLP features and functions which support prevailing community standards in providing a responsible gambling culture and environment. <i>For example- "We take great pride in providing you with gambling entertainment and continually seek to raise our own standards and maintain those of our industry".</i> <i>For example- "We support the responsible service of alcohol and all prizes of liquor will be issued from our bottle shop for off-premise (takeaway) consumption only".</i>	a) PLP features and functions which involve minors or any person reasonably construed as being under 18 years, in any stage or aspect of gambling. <i>For example – Using images of children in or near gambling areas, or imagery associated with and appealing to children in PLP campaigns.</i> b) PLP features and functions which may offend people from different religious or ethnic backgrounds. c) PLP features and functions which are linked to irresponsible service of alcohol. <i>For example – "Win six Tequila Slammers- valid for day of issue only".</i> d) PLP features and functions which are sexually explicit or provocative in nature. e) PLP features and functions which may offend minority groups. <i>For example – Using racist or sexist language and imagery.</i>

Queensland Responsible Gambling Guidelines for Player Loyalty Programs

Appendum to the Queensland Responsible Gambling Advertising & Promotions Guideline (March 2005)

Appendix one – hotels and clubs - continued

Practice	Acceptable practices	Unacceptable practices
5. PLP reward point accrual or redemption mechanisms do not focus exclusively on gambling activities where other venue activities are available, where practicable.	<p>a) PLP reward point accrual or redemption mechanisms link with other venue activities where available and practicable. <i>For example</i> – “Redeem your Reward Points in our bistro, bars, and bottle shop. Gift certificates also available”.</p> <p>b) Ensure cash vouchers have no reference to gambling. <i>For example</i> – “Redeem your rewards points for club/hotel/venue dollars”.</p> <p>c) Members redeem their loyalty points away from a gaming machine.</p>	<p>a) Redemption of points for gaming credits only. <i>For example</i> – “Rewards Points can only be redeemed for \$10 Pokie Cash Vouchers”.</p> <p>b) Using gambling references with cash vouchers. <i>For example</i> – “Redeem your rewards points for Pokie Cash”.</p> <p>c) Members can redeem their loyalty points without leaving a gaming machine.</p>
6. PLP features or functions are not implicitly or explicitly directed at minors or vulnerable or disadvantaged groups.	<p>a) Any PLP material is aimed at adults over 18 years of age.</p> <p>b) Ensuring any PLP material is not directly sent to an excluded patron or a person who has requested such material not be sent. <i>For example</i> – “We understand if you do not wish to receive our promotional material. Our staff recognise the importance of making sure this will never happen”.</p>	<p>a) Any PLP material which contains graphics, imagery or text which would ordinarily attract minors or disadvantaged groups. <i>For example</i> – Prizes that may attract minors (e.g. video games aimed specifically at attracting children). <i>For example</i> – Cartoon-related theme for rewards advertisement or ‘Down & Out Winners Club’.</p>
7. PLP features or functions do not involve any irresponsible trading practices by the gambling provider.	<p>a) PLP features or functions which encourage the use of all the venue’s facilities and services.</p> <p>b) PLP features or functions which promote a range of venue facilities and services. <i>For example</i> – “Earn Bonus Points when you spend at our bars, bistro, gaming room, and bottle shop”.</p> <p>c) PLP redemption list prioritises non cash vouchers. <i>For example</i> – “Redeem your loyalty points for:</p> <ul style="list-style-type: none"> • Meals • Bar Service • Bottle Shop • Gift Certificates • Club Dollars”. 	<p>a) Implying the participation in a loyalty scheme improves the chances of winning on a gambling product.</p> <p>b) A rewards system that encourages irresponsible play to receive a reward or entry into an additional prize draw. <i>For example</i> – “The privileges of membership-Join today and win more often”. <i>For example</i> – “The more you bet the more you win”.</p> <p>c) A PLP redemption list prioritises cash vouchers. <i>For example</i> – “Redeem your loyalty points for:</p> <ul style="list-style-type: none"> • Club Dollars • Gift Certificates • Bottle Shop • Bar Service • Meals”.
8. Where appropriate and possible, positive responsible gambling messages are to be incorporated in PLP features and functions.	<p>Using a responsible message in PLP advertisements and promotions. <i>For example</i> – “This venue is committed to your responsible enjoyment for gambling”.</p>	<p>Using an irresponsible message in a PLP advertisement or promotion. <i>For example</i> – “Everyone is a winner” or “Brisbane’s most rewarding venue”.</p>
9. PLPs must comply with Exclusions Framework.	<p>a) Any advertising, promotion, features and functions comply with the Exclusions Framework.</p> <p>b) Ensuring any PLP material is not directly sent to an excluded patron or a person who has requested such material not be sent. <i>For example</i> – “We understand that if you have excluded yourself from our venue that you will not wish to receive our promotional material. Our staff recognise the importance of making sure this will never happen”.</p>	<p>Developing advertising or promotional material, features or functions that contradict the Exclusions Framework. <i>For example</i> – NOT immediately removing excluded persons from mailing lists.</p>

Queensland Responsible Gambling Guidelines for Player Loyalty Programs

Appendum to the Queensland Responsible Gambling Advertising & Promotions Guideline (March 2005)

Appendix two – casinos

As with the advertising and promotions guideline, consideration should be given to the potential impact of the player loyalty program on a person with a gambling problem.

Practice	Acceptable practices	Unacceptable practices
1. Advertising/promotion of PLP complies with Queensland Responsible Gambling Advertising and Promotions Guideline (March 2005).	Any advertising or promotion aligns with the <i>Queensland Responsible Gambling Advertising and Promotions Guideline (March 2005)</i> . <u>For example – Advertising of PLPs that accrue points across a range of venue activities.</u>	Developing advertising or promotional material that contradicts the <i>Queensland Responsible Gambling Advertising and Promotions Guideline (March 2005)</i> . <u>For example – When the PLP is the dominant feature of advertising where the PLP only accrues loyalty points from gambling activities.</u>
2. PLP direct marketing practices comply with ADMA Direct Marketing Code of Practice.	Any advertising or promotion aligns with the ADMA Direct Marketing Code of Practice. a) PLP has the ability to recognise which members would like to receive gaming promotional material. b) PLP direct marketing component provides patrons with the ability to opt out of any part of the direct marketing program be it gambling related or not. c) Patrons are notified of their right to opt out of receiving direct marketing material.	Developing advertising or promotional material that contradicts the ADMA Direct Marketing Code of Practice. a) PLP does not have the ability to recognise which members would like to receive gaming promotional material. b) To email or direct market gambling material or promotions to members who have not consented to receive such material. c) To email or direct market gambling material or promotions to members who have expressed a wish in writing not to receive such information. d) To email or direct market gambling material or promotions to any excluded person.
3. PLP registration process provides relevant information for consumers to make informed decisions regarding their participation in the PLP.	a) Any registration materials, and any statement, phrase or inclusion in any registration materials, is based on fact and will not mislead or deceive, or is not likely to be misleading or deceptive. b) Any registration materials are to include terms and conditions of participation in the PLP. c) Provide company's privacy information policy on request. d) Provide a copy of the company's Responsible Gambling Code of Practice on request.	a) Any registration materials that are not based on fact. <u>For example – "The PLP with the greatest rewards in Queensland."</u> b) Any registration materials that mislead or deceive, or are likely to mislead or deceive. c) Not to include a copy of the full terms and conditions of the PLP with information provided to new members who join the program.
4. PLP features and functions do not offend prevailing community standards.	a) PLP features and functions which support prevailing community standards. b) Using imagery and / or language in all advertising and promotions, direct mail or email campaigns that is in step with prevailing community standards.	a) PLP 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. b) PLP features and functions which are linked to irresponsible service of alcohol. c) PLP features and functions which may offend people from different religious or ethnic backgrounds. d) PLP features and functions which may offend minority groups. e) PLP features and functions which are sexually explicit or provocative in nature. <u>For example – Using images or people dressed inappropriately to the context of the direct mail and which do not conform to prevailing community standards.</u> <u>For example – Using imagery or text in direct mail or email campaigns which aims to encourage or incite violence.</u> <u>For example – Using racist or sexist language and imagery in direct mail and email campaigns.</u>

Queensland Responsible Gambling Guidelines for Player Loyalty Programs

Appendum to the Queensland Responsible Gambling Advertising & Promotions Guideline (March 2005)

Appendix two – casinos - continued

Practice	Acceptable practices	Unacceptable practices
5. PLP reward point accrual or redemption mechanisms do not focus exclusively on gambling activities where other venue activities are available, where practicable.	<p>a) PLP reward point accrual or redemption mechanisms link with other venue activities where available and practicable.</p> <p>b) Ensure cash vouchers have no reference to gambling. <u>For example</u> – “Redeem your rewards points for Casino dollars”.</p> <p>c) Members redeem their loyalty points away from a gaming machine.</p>	<p>a) Redemption of points for gaming credits only. <u>For example</u> – <i>Casino cash is only redeemable in an EGM.</i></p> <p>b) Using gambling references with cash vouchers. <u>For example</u> – “Redeem your rewards points for Pokie Cash”.</p> <p>c) Members can redeem their loyalty points without leaving a gaming machine.</p>
6. PLP features or functions are not implicitly or explicitly directed at minors or vulnerable or disadvantaged groups.	<p>a) Any PLP material is aimed at adults aged over 18 years of age and over.</p> <p>b) Ensuring any PLP material is not intentionally sent to an excluded patron or a person who has requested such material not be sent.</p> <p>c) Conducting direct mail campaigns that responsibly communicate with members based on their purchase history.</p> <p>d) Use graphics, photos and text that are generally associated with an adult market.</p>	<p>a) Any PLP material which contains graphics, imagery or text which would ordinarily attract minors or disadvantaged groups.</p> <p>b) Conducting a campaign that specifically targets extremely disadvantaged groups or areas. <u>For example</u> – <i>those known to exhibit unusually high levels of people who have a mental disability or illness or are unemployed.</i></p> <p>c) Focusing solely on children. <u>For example</u> – <i>Using images of children picking numbers for games or imagery strongly associated with and appealing to children in direct mail campaigns.</i> <u>For example</u> – <i>Using graphics or photos of recognised children’s cartoon characters or children’s entertainers.</i> <u>For example</u> – <i>Using advertising talent that projects the image of a minor.</i></p>
7. PLP features or functions do not involve any irresponsible trading practices by the gambling provider.	<p>a) PLP features or functions which encourage the use of a range of the venue’s facilities and services.</p> <p>b) PLP features or functions which promote a range of venue facilities and services.</p> <p>c) Rewarding patrons for their loyalty or encouraging them to modify their buying behaviour in a responsible manner.</p> <p>d) Offering responsible rewards. <u>For example</u> – <i>for every dollar spent across a range of the casino services/ products patrons receive an entry into a prize draw.</i> <u>For example</u> – <i>offering additional entries as rewards.</i></p> <p>e) PLP redemption list prioritises non cash vouchers. <u>For example</u> – “Redeem your loyalty points for:</p> <ul style="list-style-type: none"> • Accommodation • Meals • Bottle Shop • Bar Service • Gift Certificates • Casino Dollars”. 	<p>a) Implying the participation in a loyalty scheme improves the chances of winning on a gambling product.</p> <p>b) A rewards system that encourages irresponsible play to receive a reward or entry into an additional prize draw.</p> <p>c) To implement PLP promotions or features that imply the use of the PLP increases a patron’s luck or increases the likely winning outcome of the game.</p> <p>d) Implement a PLP that encourages irresponsible play. <u>For example</u> – <i>by implying the punter is due for a win or luck is about to change.</i> <u>For example</u> – <i>punter has a streak of losses so their luck must change.</i></p> <p>e) A PLP redemption list prioritises cash vouchers. <u>For example</u> – “Redeem your loyalty points for:</p> <ul style="list-style-type: none"> • Casino Dollars • Gift Certificates • Bottle Shop • Bar Service • Meals • Accommodation”.

Queensland Responsible Gambling Guidelines for Player Loyalty Programs

Appendum to the Queensland Responsible Gambling Advertising & Promotions Guideline (March 2005)

Appendix two – casinos - continued

Practice	Acceptable practices	Unacceptable practices
8. Where appropriate and possible, positive responsible gambling messages are to be incorporated in PLP features and functions.	<p>a) Using a responsible gambling message in PLP advertisements and promotions. <u>For example</u> – <i>Bet with your head, not over it.</i></p> <p>b) Including the messages on:</p> <ul style="list-style-type: none"> the PLP Membership cards where practicable the PLP application form the PLP information on a casino's Website <p>c) PLP correspondence & marketing material carries responsible gambling messages.</p>	<p>a) Using an irresponsible message in a PLP advertisement or promotion. <u>For example</u> – <i>“Everyone is a winner”.</i> <u>For example</u> – <i>“Queensland’s luckiest rewards program”.</i></p>
9. PLPs must comply with Exclusions Framework.	<p>a) Any advertising, promotion, features and functions comply with the Exclusions Framework.</p> <p>b) Ensuring any PLP material is not intentionally sent to an excluded patron or a person who has requested such material not be sent.</p> <p>c) Patrons can opt out of receiving PLP direct mail by contacting the casino.</p> <p>d) An automatic general opt out option is included on PLP email campaigns.</p> <p>e) Patrons can also request:</p> <ul style="list-style-type: none"> deactivation of their loyalty card for responsible gambling reasons by contacting the casino and/or promotional letters or offers to cease from being personally mailed or emailed to them for responsible gambling reasons by contacting the casino. <p>f) PLP terms provide for excluded patrons to be excluded from participating in any gambling related component of a PLP.</p>	<p>a) Developing advertising or promotional material, features or functions that contradict the Exclusions Framework.</p> <p>b) Knowingly sending direct mail or emails to patrons who are known to have formally opted out of receiving such materials or who have been excluded from the casino.</p> <p>c) Reactivating a patron PLP membership whilst they are still excluded from any gambling activities within the casino.</p>

Queensland Responsible Gambling Guidelines for Player Loyalty Programs

Appendum to the Queensland Responsible Gambling Advertising & Promotions Guideline (March 2005)

Appendix three – lotteries

As with the Advertising and Promotions Guideline, consideration should be given to the potential impact of the Player Loyalty Program on a person with a gambling problem.

Practice	Acceptable practices	Unacceptable practices
1. Advertising/ promotion of PLP complies with Queensland Responsible Gambling and Promotions Guideline (March 2005).	Any advertising or promotion aligns with the Queensland Responsible Gambling Advertising and Promotions Guideline (March 2005).	Advertising or promotions that contradict the Guideline. <u>For example</u> – <i>Implying to customers a big win is coming like “hang in there and you’ll win soon or later”.</i> <u>For example</u> – <i>Stating as a fact or implying that certain lotto numbers are “luckier” than others.</i> <u>For example</u> – <i>Encouraging people to buy a lottery entry to save their life or to relieve all their personal problems.</i>
2. PLP direct marketing practices comply with ADMA Direct Marketing Code of Practice.	Any advertising or promotions align with the ADMA Direct Marketing Code of Practice. <u>For example</u> – <i>Using a clearly visible opt-out option for the PLP.</i>	Advertising or promotions that contradict the ADMA Direct Marketing Code of Practice. <u>For example</u> – <i>Not offering, or making it difficult to, opt out of the PLP.</i>
3. PLP registration process provides relevant information for consumer to make informed decisions regarding their participation in the PLP.	Information on Golden Casket’s PLP, its benefits, associated prizes and fees are included on the application form and on www.goldencasket.com <u>For example</u> – <i>Using a clearly visible opt-out option for the PLP.</i>	Omitting major details about the mechanics etc of Golden Casket’s PLP, so customers are unable to determine how the program works prior to joining. <u>For example</u> – <i>Not offering, or making it difficult to, opt out of the PLP.</i>
4. PLP features and functions do not offend prevailing community standards.	Using imagery and / or language that is in step with prevailing community standards and that maintains a high industry standard.	a) Using images or people dressed inappropriately to the context and which do not conform to prevailing community standards. b) Using imagery or text which aims to encourage or incite violence. c) Using racist or sexist language and imagery.
5. PLP reward point accrual or redemption mechanisms do not focus exclusively on gambling activities where other venue activities are available, where practicable.	Not applicable to lotteries since Golden Casket’s PLP (Winners Circle) is a player registration and reward program designed solely for Golden Casket games (there are no other activities to promote).	Not applicable to lotteries since there are no other activities to promote.

Queensland Responsible Gambling Guidelines for Player Loyalty Programs

Appendum to the Queensland Responsible Gambling Advertising & Promotions Guideline (March 2005)

Appendix three – lotteries - continued

Practice	Acceptable practices	Unacceptable practices
6. PLP features or functions are not implicitly or explicitly directed at minors or vulnerable or disadvantaged groups.	<p>a) Conducting PLP campaigns that target customers based on their purchase history in a responsible manner.</p> <p>b) Focusing on a family as a whole and the parent figures in particular in PLP campaigns.</p>	<p>a) Conducting a campaign that specifically targets extremely disadvantaged groups or areas (i.e. those known to exhibit unusually high levels of people who for example have a mental disability or illness or are unemployed).</p> <p>b) Using images of children picking numbers for games, or watching televised lottery draws or imagery strongly associated with and appealing to children in PLP campaigns. <i>For example – Showing lottery play as a way of dealing with grief or depression.</i></p>
7. PLP features or functions do not involve any irresponsible trading practices by the gambling provider.	<p>a) Rewarding customers for their loyalty or encouraging them to modify their play in a responsible manner . <i>For example – upon customer's requests notifying them upcoming events / jackpots.</i></p> <p>b) Offering responsible rewards. <i>For example – randomly drawn surprise entries.</i></p>	<p>A rewards system that encourages irresponsible play in order to receive a reward or entry into an additional prize draw. <i>For example – spend \$300 to receive one entry into a promotional draw.</i> <i>For example – Encouraging people to spend their last dollar on lottery entries.</i></p>
8. Where appropriate and possible, positive responsible gambling messages are to be incorporated in PLP features and functions.	<p>Including the “Have Fun & Play Responsibly” message on:</p> <ul style="list-style-type: none"> the PLP application form; and Winners Circle and Lotto Direct pages of www.goldencasket.com 	
9. PLPs must comply with Exclusions Framework.	<p>Not strictly applicable, since the Exclusions Framework does not apply to lotteries. However, Golden Casket advocates the following for its PLP.</p> <p>a) Customers can opt out of receiving PLP direct mail by calling or emailing Golden Casket.</p> <p>b) An automatic general opt out option is clearly visible on PLP email campaigns.</p> <p>c) In addition to the standard opt out options, customers can also:</p> <ul style="list-style-type: none"> deactivate their Winners Circle card for responsible play reasons by calling Golden Casket; and/or stop promotional letters or offers from being personally mailed or emailed to them for responsible play reasons by calling Golden Casket. <p>d) Customers can self exclude from Lotto Direct for responsible play reasons for a minimum of 30 days by calling Golden Casket.</p>	<p>a) Knowingly sending direct mail or emails to customers who are known to have formally opted out or who have excluded from Lotto Direct for responsible play reasons.</p> <p>b) Lifting a customer's responsible play-instigated self exclusion from Lotto Direct before the 30 day minimum period has been reached.</p>

Queensland Responsible Gambling Guidelines for Player Loyalty Programs

Appendum to the Queensland Responsible Gambling Advertising & Promotions Guideline (March 2005)

Appendix four – UNiTAB

As with the Advertising and Promotions Guideline, consideration should be given to the potential impact of the Player Loyalty Program on a person with a gambling problem.

Practice	Acceptable practices	Unacceptable practices
1. Advertising/ promotion of PLP complies with Queensland Responsible Gambling and Promotions Guideline (March 2005).	Any advertising or promotion aligns with the Queensland Responsible Gambling Advertising and Promotions Guideline (March 2005). To advertise or promote a PLP that rewards customers for using a particular distribution channel in preference to another type of distribution channel or one betting product over alternate betting products.	To implement a PLP that provides rewards for expenditure above the customer's normal spend or encourages customers to bet for longer periods than they would normally.
2. PLP direct marketing practices comply with ADMA Direct Marketing Code of Practice.	Any advertising or promotion aligns with the ADMA Direct Marketing Code of Practice. a) To implement a PLP direct marketing component that provides customers with the ability to opt out of any part of the direct marketing program be it gambling related or not. b) Notify customers of their right to opt out of receiving direct marketing material.	To email or direct market in any way gambling material to customers who have not consented to receive such material or who have expressed a wish in writing not to receive such information or to any excluded person.
3. PLP registration process provides relevant information for consumer to make informed decisions regarding their participation in the PLP.	a) Provide PLP customer with UNiTAB's privacy statement and to obtain from the customer agreement to receive direct mail promotional material. b) Provide customer with the conditions for participation in the PLP and all benefits and obligations for the customer.	a) Not to provide customers with the full terms and conditions of the PLP when they join the program. b) Not to provide customers with the option to opt out of any player loyalty rewards programme. c) To explicitly state or infer a benefit not actually available to the customer participating in PLP or to imply inflated or exaggerated benefits or changes of winning through participation.
4. PLP features and functions do not offend prevailing community standards.	To use text and images that are in step with prevailing community standards and that maintain a high industry standard.	To use text or images that are sexually explicit, profane, mocking or degrading of a person's physical appearance, gender, racial or religious beliefs.
5. PLP reward point accrual or redemption mechanisms do not focus exclusively on gambling activities where other venue activities are available, where practicable.	Not applicable to UNiTAB as no other activities to promote.	Not applicable to UNiTAB as no other activities to promote.
6. PLP features or functions are not implicitly or explicitly directed at minors or vulnerable or disadvantaged groups.	To use graphics, photos and text that is specifically directed at an adult market.	a) To use graphics or photos of recognised children's cartoon characters or children's entertainers. b) To use advertising talent that projects the image of a minor.

Queensland Responsible Gambling Guidelines for Player Loyalty Programs

Appendum to the Queensland Responsible Gambling Advertising & Promotions Guideline (March 2005)

Appendix four – UNiTAB - continued

Practice	Acceptable practices	Unacceptable practices
7. PLP features or functions do not involve any irresponsible trading practices by the gambling provider.	Implementing PLP promotions and features that provide customers with the actual benefits and the actual cost of participating in the PLP.	<p>a) To implement PLP promotions of features that implies the use of the PLP increases a customer's luck or increases the likely winning outcome of the game or wager for the punter.</p> <p>b) Implement a PLP that encourages irresponsible play by implying the punter is due for a win, luck is about to change or has a streak of losses so your luck must change.</p>
8. Where appropriate and possible, positive responsible gambling messages are to be incorporated in PLP features and functions.	<p>Using a responsible message in PLP advertisements and promotions.</p> <p>PLP correspondence and marketing material carries responsible gambling messages and where to get help information and supports responsible gambling.</p>	To use terms that imply everyone is a winner or implies that participation in the PLP increases the chance of winning.
9. PLPs must comply with Exclusions Framework.	Excluded customers are removed by UNiTAB from participating in any gambling related component of a PLP.	Not to remove excluded persons from the PLP.

Queensland Office of Gaming Regulation

Level 4 33 Charlotte Street Brisbane Qld
Locked Bag 180 CITY EAST QLD 4002

Tel: (07) 3224 4564 Freecall: 1800 064 848

Fax: (07) 3237 1656

Email: codeofpractice@treasury.qld.gov.au

Website: www.responsiblegambling.qld.gov.au

SOUTH AUSTRALIA

**Adelaide Casino Advertising Code of
Practice**

As in force on 1 December 2008

TABLE OF CONTENTS

1. Purpose	1	6. Definitions and	
2. General principle.....	1	interpretation.....	3
3. Specific provisions.....	1	7. Operative dates and	
4. Electronic media—time		transitional	5
periods.....	2		
5. Prize advertising—			
specific obligations	2		

SOUTH AUSTRALIA

CASINO ACT 1997

Adelaide Casino Advertising Code of Practice *[As in force on 1 December 2008]*

This is the advertising code of practice for the purposes of section 41A of the *Casino Act 1997*:

1. Purpose

This code provides a framework through which Skycity Adelaide Pty Ltd, the holder of the casino licence (“**gambling provider**”), can ensure that its advertising activities are consistent with the community’s expectations that the licensed business will be conducted in a responsible manner so as to minimise the harm caused by gambling.

2. General principle

The gambling provider will ensure that all gambling related advertising is undertaken in a manner that—

- (a) is socially responsible; and
- (b) does not mislead or deceive the customer.

3. Specific provisions

- (1) The gambling provider will ensure that, when it advertises its gambling products, the advertising complies with—

- (a) applicable Commonwealth and State laws; and
- (b) relevant advertising industry codes of practice—

as in force from time to time.

- (1A) The gambling provider will ensure that, when it advertises its gambling products, the advertising includes either—

- (a) if it is not reasonable or practicable to include an expanded warning message, the condensed warning message; or
- (b) an expanded warning message, rotated according to the protocol set out in clause 6(4A).

- (2) The gambling provider will ensure that, when it advertises its gambling products, the advertising—

- (a) is not directed at minors;
- (b) does not portray minors participating in gambling activities;

Casino Act 1997
Adelaide Casino Advertising Code of Practice

Clause 4

As in force on 1 December 2008

-
- (c) is not explicitly or exclusively directed at vulnerable or disadvantaged groups (including recovering problem gamblers);
 - (d) does not promote gambling as a means of funding routine household purchases or costs of living (including mortgage repayments and rent or education and clothing costs) or for relieving financial or personal difficulties;
 - (e) does not promote gambling as a means of enhancing social standing or employment, social or sexual prospects;
* * * * *
 - (g) does not make claims related to winning or the prizes that can be won—
 - (i) that are not based on fact; or
 - (ii) that are unable to be proven; or
 - (iii) that are exaggerated;
 - (h) does not state or imply that a player's skill can influence the outcome of a gambling activity;
 - (i) does not associate gambling with excessive alcohol consumption;
 - (j) does not exaggerate the connection between the gambling activity and the use to which the gambling provider's profits may be put.
- (3) The gambling provider will, when it advertises on radio or television, ensure that the advertising does not include sounds normally associated with the playing of gaming machines, including but not limited to—
- (a) the sound of coins landing in a coin tray;
 - (b) any sound made by a gaming machine when a prize is won.

4. Electronic media—time periods

The gambling provider will, in relation to advertising on radio or television, refrain from advertising its gambling products during the following periods:

- (a) for radio advertising, between 6.00am and 8.30am, Monday to Friday (both days inclusive);
- (b) for television advertising, between 4.00pm and 7.30pm, Monday to Friday (both days inclusive).

5. Prize advertising—specific obligations

- (1) If, when it advertises a gambling product, the gambling provider refers to, or relies on, the value or nature of one of the prizes which are available to be won (whether or not the prize is a prize of money) or the

frequency with which the prize might be won, the advertising—

- (a) will include sufficient information to allow a reasonably informed person to understand the overall return to player or, if the product does not have an overall return to player, the odds of winning; and
- (b) in addition, if the advertising is intended to encourage a person to gamble during a particular period, will include sufficient information to allow a reasonably informed person to appreciate how likely it is that the prize will be won by someone during that period.

(2) If, in seeking to comply with this clause, the gambling provider—

- (a) calculates the theoretical number, value and frequency of prizes to be won;
- (b) in the advertising or promotion, suggests an outcome no less favourable to the gambling provider than that theoretical outcome; and
- (c) obtains an actual outcome more favourable than that which was advertised—

the gambling provider will still be regarded as complying with this clause.

(3) Sub-clause (1)(a) does not apply to advertising of a trade promotion lottery offered in conjunction with the purchase of a gambling product if the odds or chance of winning the trade promotion lottery are dependent on factors beyond the control of the gambling provider.

6. Definitions and interpretation

(1) In this code—

“condensed warning message” means the following message—

“Gamble Responsibly.”;

“expanded warning message” means one of the following messages—

- (a) “Don’t chase your losses. Walk away. Gamble responsibly.”;
- (b) “Don’t let the game play you. Stay in control. Gamble responsibly.”;
- (c) “Stay in control. Leave before you lose it. Gamble responsibly.”;
- (d) “You know the score. Stay in control. Gamble responsibly.”;

Casino Act 1997
Adelaide Casino Advertising Code of Practice

Clause 6

As in force on 1 December 2008

(e) “Know when to stop. Don’t go over the top. Gamble responsibly.”;

(f) “Think of the people who need your support. Gamble responsibly.”;

“plug” means an announcement on radio or television which includes information about the gambling provider’s gambling products or which associates one of the gambling provider’s gambling products with a particular program or period of programming;

“radio or television”—

(a) means any kind of radio or television broadcasting service within the meaning given by the *Broadcasting Services Act 1992* (Commonwealth); but

(b) does not include a radio or television broadcasting service principally operated for the purpose of promoting gambling products of the nature of those provided by the gambling provider, or related events—

and **“radio”** and **“television”** have corresponding meanings.

(2) For the purposes of this code, the gambling provider will be regarded as advertising—

(a) if a provider of radio or television runs a plug in exchange for a payment or for some other form of valuable consideration (including an agreement to purchase advertising);

(b) if a provider of radio or television or a publisher includes content in exchange for a payment or for some other form of valuable consideration (including an agreement to purchase advertising).

(3) Advertising will be regarded as offending against clause 3(2)(g) if it contains material which includes one or more of the following expressions (or anything analogous to them)—

(a) “Win”; and

(b) “\$”—

and that expression is not used in relation to—

(c) a particular prize which has been determined or is payable; or

(d) a reasonable approximation or estimate of a prize which can be won.

* * * * *

Clause 7

- (4A) For the purposes of rotating the six expanded warning messages over 3 years, the gambling provider will—
- (a) to the greatest extent practicable, always use the same expanded warning message at the same time;
 - (b) to the greatest extent practicable, use an expanded warning message for six months at a time;
 - (c) take reasonable steps to consult with other gambling providers required to use expanded warning message with a view to ensuring, to the greatest extent practicable, that all gambling providers are using the same expanded warning message at the same time.

7. Operative dates and transitional

- (1) The provisions of clauses 1–7 of this code as substituted by the Code Alteration (Adelaide Casino) (Advertising) (No. 1) 2004 apply from 30 April 2004.
- (2) The provisions of—
 - (a) clauses 3(1A) and 6(4A)—as inserted by Code Alteration (Adelaide Casino) (Advertising) (No. 1) 2008; and
 - (b) clauses 3(2)(d), 3(2)(f), 6(1), 6(3) and 6(4)—as amended by Code Alteration (Adelaide Casino) (Advertising) (No. 1) 2008—

apply generally from 1 December 2008.

Northern Territory

**Code of Practice
For
Responsible Gambling**

Statement

This Code of Practice reflects a partnership between Northern Territory gambling providers, Government, regulators and counseling services and forms an essential part of managing gambling services provided by Northern Territory gambling licensees. It represents a whole-of-industry commitment to best practice in the provision of responsible gambling.

Objective

For the majority of people, gambling is an enjoyable leisure and entertainment activity. However, for some, gambling can have negative impacts.

The Northern Territory community expects gambling services to be provided in a responsible manner and in harmony with community expectations. This Code sets out certain practices to be adopted by Northern Territory gambling providers in the provision of their services, so as to minimise the harm to consumers that may be adversely affected by gambling.

What is Responsible Gambling?

“Responsible gambling” is a broad concept and involves the conduct of gambling in a manner whereby the potential for harm associated with gambling is minimised.

It respects the responsibility of individuals for their own actions, but also acknowledges a responsibility on the part of the service providers.

Responsible gambling has regard to the context in which gambling occurs, the inducements made to gamble, the way the gambling service operates and the integrity of the gambling operator.

The aim is to enable persons to make informed decisions about their participation in gambling and, if harm has occurred, to provide access to gambling help services.

What is Problem Gambling?

Problem gambling exists when there is a lack of control over gambling, particularly the scope and frequency of gambling, the level of betting and the amount of leisure time devoted to gambling. The negative consequences of problem gambling may include:

Problem Gambling ...

- The gambler suffering excessive financial losses relative to the gambler's means;
- Adverse personal affects on the gambler, his or her family and friends;
- Adverse affects on employers and work performance; and
- Other costs which are borne by the community.

Expected Outcomes

This Code of Practice aims to achieve the following outcomes:

- Minimising the extent of gambling-related harm to individuals and the broader community;
- Enabling customers to make informed decisions about their gambling practices;
- Enabling people adversely affected by gambling to have access to timely and appropriate assistance and information;
- Promoting a shared understating between individuals, communities, the gambling industry and Government of responsible gambling practices and an understanding of their rights and responsibilities in relation to these practices;
- Ensuring the gambling industry provides safe and supportive environments for the delivery of gambling products and services

The Responsible Gambling Manual

This Code contains the practices to be applied to achieve industry "best-practice" in the delivery of gambling services.

Though the principles are intended to apply to all gambling providers and all forms of gambling, the method of implementing the Code will vary according to the form of gambling, and will change over time as new operating practices emerge.

Accordingly, while this Code contains specific clauses and describes the expected outcomes, the way these outcomes are to be achieved plus detailed descriptions of responsible gambling practices relevant to each sector of the gambling industry, are contained in the associated Responsible Gambling Manual. The Appendix attached to both Code and Manual indicates how the practices apply to each sector of the industry.

Continual review of the Code and Manual

Both the Code of Practice and the Manual are “living documents” in the sense that they will be amended to take account of new operating practices, effectiveness of current measures, research in problem gambling, and changing circumstances.

As “best-practice” is constantly evolving and changing in the light of new research, new technology and new business practices, the Code and the Manual will be subject to regular review and evaluation.

Responsible Gambling Advisory Committee

The Northern Territory Responsible Gambling Code of Practice has been developed by the Responsible Gambling Advisory Committee in consultation with the gambling industry. The Committee comprises representation from the following organisations:

- Amity Community Services
- Anglicare Top End
- Australian Hotels Association NT Branch
- CentreRacing
- Clubs NT
- Darwin Turf Club Incorporated
- IASbet Limited
- Jupiters Limited
- Lasseters Hotel Casino
- MGM Grand Darwin
- MultiBet.com Pty Ltd
- Northern Territory Licensing Commission
- Northern Territory TAB
- Northern Territory Treasury – Racing, Gaming and Licensing
- Relationships Australia NT Inc
- Salvation Army
- Tattersalls Sweeps Pty Ltd

The Responsible Gambling Practices

1. **Provision of Information**

A gambling provider is to adopt strategies for the provision of information to ensure that customers can make informed decisions about their gambling.

- 1.1 **Information about the Potential Risks** associated with gambling and where to get help for problem gambling is to be prominently displayed in all gambling areas and near ATM and EFTPOS facilities servicing gambling areas where these are provided.

For Internet/Telephone Sports Bookmakers and Online Gaming Licensees: Information about the potential risks associated with gambling and, as appropriate, where to get help for problem gambling is to be provided from the site.

- 1.2 **A Responsible Gambling Mission Statement** is to be clearly displayed.

For Internet/Telephone Sports Bookmakers and Online Gaming Licensees: The Responsible Gambling Mission Statement may be displayed and additional initiatives adopted as outlined above that are applicable to and varied to meet internet gambling.

- 1.3 **Information on the Odds or Win Rates of Major Prizes.** Easily understood and accurate information on the odds or win rates of major prizes is to be accessible in gambling area, in proximity to relevant games and on web sites.

For Internet/Telephone Sports Bookmakers and Online Gaming Licensees: Easily understood and accurate information on the odds or win rates of major prizes is to be accessible from the web site and in proximity to relevant bet type or games.

- 1.4 **Information is Available on Request:** Customers are to be advised that the following information is available on request:

- a) The gambling provider's Responsible Gambling Practices documentation including, where appropriate, policies for addressing problem gambling issues relevant to the local community;
- b) The nature of games, game rules, odds or returns to player;
- c) Self-Exclusion provisions;
- d) Gambling-related complaint resolution mechanisms.

For Internet/Telephone Sports Bookmakers and Online Gaming Licensees:

- a) A copy of the gambling provider's Responsible Gambling Practices document;
- b) The nature of games, game rules, odds or returns to player;
- c) Self-Exclusion provisions;

d) Gambling-related complaint resolution mechanisms.

2. Interaction with Customers and Community

2.1 **Community Liaison.** To support early intervention and prevention strategies, gambling providers are to:

- Establish appropriate links with gambling-related support services.
- Consult with local communities where relevant.

For Internet/Telephone Sports Bookmakers and Online Gaming Licensees: The internet gambling provider is expected, as far as is reasonable and practicable, to establish links with gambling-related support services and provide a contact point for Responsible Gambling issues.

2.2 **Customer Complaints.** Resolution mechanisms for recognising and addressing complaints are to be established and promoted by gambling providers. Any complaints concerning breaches of the Code will be directed to the individual provider. It is then the responsibility of that particular gambling provider to ensure that mechanisms are in place to address complaints in a manner that enables any legitimate issue to be dealt with effectively in order to ensure that this Code is upheld and that any breach is rectified as soon as possible.

For Internet/Telephone Sports Bookmakers and Online Gaming Licensees: Mechanisms for addressing and resolving complaints are to be established and promoted by gambling providers. Any complaints concerning breaches of the Responsible Gambling Code are to be dealt with by the operator, in the first instance, and any breach of the Code rectified as quickly as possible.

2.3 **Responsible Gambling Records.** Gambling providers will maintain a Responsible Gambling Incident Register and ensure recording of action taken by staff to assist people in accordance with the Code. The register will include the following particulars:

- a) Date, time, location and nature of any event where a patron reports a gambling-related problem.
- b) Name and address (if known) or description of the person in relation to whom action was taken.
- c) Action taken and by whom.
- d) Details of Self-Excluded persons under Section 4 of the Code.

In the case of casinos, the Log filed monthly with the Director replaces the Register.

For Internet/Telephone Sports Bookmakers and Online Gaming Licensees: gambling providers are to maintain full records of incidents, complaints and action taken by staff to assist people in accordance with the Code.

3. Training & Skills Development

- 3.1 **On-going Training.** Mechanisms are to be established to ensure gambling-relevant customer service staff receive appropriate information and on-going training in the provision of responsible gambling services and products.

For Internet/Telephone Sports Bookmakers and Online Gaming Licensees: Mechanisms are established to ensure all key personnel including gambling-related customer service staff and managers receive appropriate information and training on an on-going basis in the provision of responsible gambling services.

- 3.2 **Training Time Frame.** **All** relevant staff engaged in gambling services must complete appropriate gambling training within three months of the commencement of their employment.

- 3.3 **Product Comprehension.** **All** gambling providers will ensure staff engaged in gambling services have undertaken training and are able to provide a full explanation of the type of product offered, its Rules and How to Play, and, as applicable, the chances of winning.

- 3.4 **Responsible Gambling Contact Points.** Gambling providers will nominate one or more staff members for each of their operations, venues, sites or outlets as Responsible Gambling Liaison Officers to act as contact points when approached for problem gambling support services.

For Internet/Telephone Sports Bookmakers and Online Gaming Licensees: The gambling provider will ensure the due allocation between staff of duties for responsible gambling-related issues.

4. Exclusion of Problem Gamblers.

Gambling providers are to provide patrons who feel they are developing a problem with gambling, with the option of excluding themselves from the gambling venue or site.

- 4.1 **Patron Responsibility.** Gambling patrons will be encouraged to take responsibility for their gambling activity. Gambling providers are to provide patrons who feel they are developing a problem with gambling with the option of excluding themselves from the gambling venue or site.

- 4.2 **Self-Exclusion Procedures.** A generic form of self-exclusion has been developed for use by Northern Territory gambling providers, (Note: casinos have specific provisions in place). Procedures with clear, supporting documentation are to be implemented and application forms for self-exclusion must be available at Reception, within the gambling area, adjacent to the gambling products or/and on the website.

For Internet/Telephone Sports Bookmakers and Online Gaming Licensees: Appropriate self-exclusion facilities and procedures are to be developed and implemented.

- 4.3 **Completed Self-Exclusion Forms.** Management and/or security staff of the gambling provider to be supplied with the completed self-exclusion forms together with, where appropriate, a photo of the relevant person. These forms will include the stated wish of the patron to be reminded of their desire to be excluded from the specified gambling provider. Details will also be entered in the Responsible Gambling Incident Register.

For Internet/Telephone Sports Bookmakers and Online Gaming Licensees: The website is to operate such that the submission of a completed self-exclusion triggers technical responses that block access by the player to the site, and this action is written to the audit log for the system.

- 4.4 **Counselling Contact Information.** Gambling providers are to offer customers who seek self-exclusion and/or express a concern that they have a gambling problem, contact information for appropriate counselling agencies.

For Internet/Telephone Sports Bookmakers and Online Gaming Licensees: As appropriate, gambling providers are to offer customers who seek self-exclusion contact information for appropriate counselling agencies.

- 4.5 **Self-Exclusion from Other Gambling Providers.** Self-exclusion gambling customers are to be given support and encouragement in seeking self-exclusions from other gambling providers.

For Internet/Telephone Sports Bookmakers and Online Gaming Licensees: Self-exclusion gambling customers are to be given support and encouragement in seeking self-exclusions from other Australian gambling providers.

- 4.6 **Correspondence or Promotional Material.** All gambling providers are not to send correspondence or promotional material to gambling customers who are

excluded from their services or who request that this information not be sent to them.

5. Physical Environment

A gambling provider is to provide a safe environment to protect the interests of gamblers themselves, their friends and family, and a physical environment that is consistent with responsible gambling.

- 5.1 **Passage of Time.** Gambling providers will implement practices to ensure that customers are made aware of the passage of time. e.g. clearly visible clocks in the vicinity of cash cages and cash dispensers, together with natural lighting where possible.

For Internet/Telephone Sports Bookmakers and Online Gaming Licensees: Gambling providers will implement practices to ensure that customers are made aware of the passage of time.

- 5.2 **Intoxicated Customers.** Customers who are intoxicated are to be removed from the premises licensed under the Liquor Act, under the strict requirements of the law.

- 5.3 **Child Care Facilities.** Where gambling providers offer child care facilities, these facilities must recognise all child care regulations and patrons must be encouraged to check their child a minimum of once an hour and adhere to a maximum of a 3 hour stay permitted at the child care facility within any 24 hour period.

- 5.4 **Procedures to Check Venues and Car Parks.** Gambling providers, where practical, will adopt procedures to check venues and venue car parks under their control with the aim of reducing the risk of children being left unattended.

6. Minors

All gambling providers are to adopt appropriate strategies to ensure minors are prohibited from gambling and not induced to gamble.

- 6.1 **Prohibition of Minors.** Minors are prohibited from gambling and gambling providers will check the identification of any person whom they have reason to believe might be less than 18 years of age.

For Internet/Telephone Sports Bookmakers and Online Gaming Licensees: Minors are prohibited from gambling and gambling providers are to obtain adequate evidence of identity and age of any player who they have reason to believe might be under 18.

- 6.2 **Activities for Minors** run by gambling providers must not promote any aspect of gambling and should not be conducted in close proximity to gambling activities.

- 6.3 **Minors as Staff Members.** Minors are discouraged from selling NT Keno and lottery products.

7. Financial Transactions

Financial transactions associated with gambling are to be undertaken in a responsible manner, which includes such factors as the location and operation of Automatic Teller Machines ("ATMs"), the provision of credit or granting loans for the purpose of gambling, and the cashing of cheques.

- 7.1 **Signage.** ATMs situated within premises which provide licensed gambling services will have on or within close sight of them problem gambling warning signage and appropriate support service contact details in a manner clearly visible to customers.
- 7.2 **ATM and EFTPOS Facilities** will have access only to debit accounts; access to credit accounts will not be permitted.
- 7.3 **Credit and Money Lending.** **All** gambling providers, with the exception of bookmakers, are not to provide credit or lend money to anyone for the purpose of gambling.
- 7.4 **Cashing of Cheques**, whether personal or third party, on the gambling provider's licensed premises for the sole purpose of gambling is forbidden.

In the case of the Northern Territory casino licensees, cashing of personal or third party cheques on the gambling provider's licensed premises for the purpose of gambling is only permitted for customers who have opened an account for such purpose with the gambling provider; and have provided the gambling provider with account information and signatory information as defined in the Financial Transactions Reports Act 1988 (Cth).

8. **Advertising and Promotions**

Advertising and promotions are to be delivered in an honest and responsible manner with consideration given to the potential impact on people adversely affected by gambling.

- 8.1 **Compliance with the Advertising Code of Ethics.** Advertisements must comply with the Advertising Code of Ethics as adopted by the Australian Association of National Advertisers or the Advertising Federation of Australia. Any television advertising and promotion must also comply with the Federation of Commercial Television Stations (FACTS) Code of Practice.
- 8.2 **Return to Player.** Advertising and promotions shall not be false or deceptive, particularly with respect to the chances of winning a prize, "the return to player".
- 8.3 **Accurate Details.** Advertising, marketing and promotions must accurately detail prizes on offer and the game results available.
- 8.4 **False Impressions.** **No** advertising produced by any gambling provider is to give the impression that gambling is a reasonable strategy for financial betterment.
- 8.5 **Minors.** Advertising displays and point of sale material for gambling products must not be directed at minors, portray minors participating in gambling, or be set up in an area specifically to target minors.
- 8.6 **Problem Gambling Signage.** Advertising displays at the point of sale are to have on or within sight of them appropriate problem gambling warning signage in a clearly visible manner.
For Internet/Telephone Sports Bookmakers and Online Gaming Licensees:
Advertising and promotions directed at Northern Territory residents are to contain appropriate problem gambling warning signage in a clearly visible manner.
- 8.7 **Notices of Winnings Paid.** Advertising of individuals' winnings paid should only be displayed within the gambling provider's premises.
For Internet/Telephone Sports Bookmakers and Online Gaming Licensees:
Advertising of winnings paid should only be displayed on the provider's internet site.
- 8.8 **Urging to Buy.** Gambling providers are not to verbally urge non-gambling customers to buy gambling products.
For Internet/Telephone Sports Bookmakers and Online Gaming Licensees: Gambling providers are not to verbally urge non-gambling Northern Territory residents to buy gambling products.

9. Privacy Policy

The gambling provider must maintain the privacy of player information and must ensure, as far as possible, that there is no unauthorised or inappropriate disclosure of personal information obtained or kept under this Code of Practice.

Signatories

All parties to this Code agree to be bound by its terms, conditions and obligations:

Glossary of Terms

“gambling”	includes gaming, wagering or betting under a gambling law of the Northern Territory.
“gambling area”	means an area approved under a gambling law for the conduct of gambling, or otherwise, where gambling takes place.
“gambling provider”	means the holder of a licence under a gambling law of the Northern Territory.
“problem gambler”	means an individual affected by gambling to the point of no longer having normal control or rational judgment, leading to problems in other areas of the gambler’s life.
“wagering”	means placing a bet on the outcome of racing, sport or other events covered by totalisators or licensed bookmakers either on-course, off-course or on-line.

Acknowledgements

This Code is modeled on the Queensland Responsible Gambling Code of Practice as well as the ACT Gambling and Racing Control (Code of Practice).

Appendix Summary - The application of each practice of the Code to the different types of gambling

Responsible Gambling Practices		Sectors of the Industry							
		Casino	Charity & Non-profit	Clubs & Hotels	Internet/Tel. Sports Bookmakers	Lotteries	NT Keno	Online Gaming	Wagering TAB and oncourse
1. Provision of Information									
1.1 Information About The Potential Risks		✓	X	✓	As appropriate	✓	✓	As appropriate	✓
1.2 A Responsible Gambling Mission Statement		✓	X	✓	As appropriate	✓	✓	As appropriate	✓
1.3 Information on Odds or Win Rates of Major Prizes		✓	✓	✓	✓	✓	✓	✓	✓
1.4 Information is Available on Request:		✓	X	✓	As appropriate	✓	✓	As appropriate	✓
2. Interaction with Customers and Community									
2.1 Community Liaison		✓	X	✓	X	✓	✓	X	✓
2.2 Customer Complaints		✓	✓	✓	✓	✓	✓	✓	✓
2.3 Responsible Gambling Records		✓	X	✓	As appropriate	✓	✓	As appropriate	✓
3. Training & Skills development									
3.1 On-going Training		✓	X	✓	As appropriate	✓	✓	As appropriate	✓
3.2 Training Time Frame		✓	X	✓	✓	✓	✓	✓	✓
3.3 Product Comprehension		✓	✓	✓	✓	✓	✓	✓	✓
3.4 Responsible Gambling Contact Points		✓	X	✓	As appropriate	✓	✓	As appropriate	✓
4. Self-Exclusion Provisions									
4.1 Patron Responsibility		✓	✓	✓	✓	X	✓	✓	✓
4.2 Self-Exclusion Procedures		✓	X	✓	As appropriate	X	✓	As appropriate	✓
4.3 Completed Self-Exclusion Forms		✓	X	✓	✓	X	✓	✓	✓
4.4 Counselling Contact Information		✓	✓	✓	As appropriate	✓	✓	As appropriate	✓
4.5 Self-Exclusion From Other Gambling Providers		✓	X	✓	As appropriate	X	✓	As appropriate	✓
4.6 Correspondence or Promotional Material		✓	✓	✓	✓	✓	✓	✓	✓

Responsible Gambling Practices		Sectors of the Industry							
		Casino	Charity & Non-profit	Clubs & Hotels	Internet/Tel. Sports Bookmakers	Lotteries	NT Keno	Online Gaming	Wagering TAB and oncourse
5.	Physical Environment								
5.1	Passage of Time.	✓	X	✓	As appropriate	X	✓	As appropriate	✓
5.2	Intoxicated Customers	✓	X	✓	X	✓	✓	X	✓
5.3	Child Care Facilities	✓	X	✓	X	X	✓	X	✓
5.4	Procedures to Check Venues and Car Parks	✓	X	✓	X	X	✓	X	✓
6.	Minors								
6.1	Prohibition of Minors	✓	✓	✓	As appropriate	✓	✓	As appropriate	✓
6.2	Activities for Minors	✓	✓	✓	✓	✓	✓	✓	✓
6.3	Minors as Staff Members	✓	✓	✓	X	✓	✓	X	X
7.	Financial Transactions								
7.1	Signage	✓	X	✓	X	X	✓	X	✓
7.2	ATM and EFTPOS Facilities	✓	X	✓	X	X	✓	X	✓
7.3	Credit and Money Lending	✓	✓	✓	Except bookmakers	✓	✓	Except bookmakers	✓
7.4	Cashing of Cheques	X	✓	✓	X	✓	✓	X	✓
8.	Advertising and Promotions								
8.1	Compliance with Advertising Code of Ethics	✓	✓	✓	✓	✓	✓	✓	✓
8.2	Return to Player	✓	✓	✓	✓	✓	✓	✓	✓
8.3	Accurate Details	✓	✓	✓	✓	✓	✓	✓	✓
8.4	False Impressions	✓	✓	✓	✓	✓	✓	✓	✓
8.5	Minors	✓	✓	✓	✓	✓	✓	✓	✓
8.6	Problem Gambling Signage	✓	✓	✓	As appropriate	✓	✓	As appropriate	✓
8.7	Notices of individuals' winnings paid	✓	✓	✓	✓	✓	✓	✓	✓
8.8	Urging to buy	✓	✓	✓	✓	✓	✓	✓	✓
9.	Privacy Policy	✓	✓	✓	✓	✓	✓	✓	✓

Responsible Gambling Mandatory Code of Practice for Tasmania

Version 1.1
Effective 1 March 2012

Contents

Preamble	3
Definitions.....	4
Accountability and review	6
Application.....	7
Commission Rules	7
Commencement and transitional arrangements.....	7
1. Advertising.....	8
2. Inducements.....	10
3. Player loyalty programs.....	11
4. Access to cash.....	12
5. Payment of winnings	13
6. Lighting.....	14
7. Service of food and alcohol.....	15
8. Clocks in gambling areas.....	16
9. Staff training in recognising people with gambling problems	17
10. Information to players.....	18
Appendix A – Commencement dates	19

Preamble

The *Responsible Gambling Mandatory Code of Practice for Tasmania* has been developed to minimise harm from gambling in the Tasmanian community. It seeks to make gambling environments safer. It will make sure people have clear information about gambling so that they can better understand it and make informed choices about whether to participate.

While the Code affects all prescribed licence holders in Tasmania (with the exception of minor gaming permit holders, technicians and persons listed on the roll of recognised manufacturers, suppliers and testers of gaming equipment), the Code recognises that not all gambling products are the same. The Code applies to each form of gambling according to the level of likely harm that the Commission has associated with each gambling product.

In developing the Code, the Commission has sought to find a balance between minimising, where possible, the impact on recreational gamblers and minimising the harm from gambling, particularly for people with a gambling problem. It has been mindful of the issues raised in submissions made by the gambling industry, government and non-government stakeholders and, where possible, these are addressed in the Code.

The Code embodies a number of proxy measures to achieve harm minimisation goals (for example, interventions to interrupt long periods of gaming machine play). The Commission believes that these proxy measures are important and justified, as they avoid implementing significant changes to gaming practices that may have an unreasonably high impact on recreational gamblers and on industry.

The Code is being introduced at a time when the gambling environment in Australia is changing rapidly. The Commission acknowledges, for example, that should the recommendations from the 2010 Productivity Commission Report into gambling be adopted (including uniform “pre-commitment” smart card technology), the gambling environment in Tasmania will shift significantly.

The Commission recognises that the Code will need to adapt to this changing environment as issues evolve and new information around gambling and harm minimisation comes to light. The Commission seeks to ensure that the Code remains contemporary, practical and effective.



Peter Hoult
Chairman
Tasmanian Gaming Commission



Kate Warner
Member
Tasmanian Gaming Commission



Stuart Barry
Member
Tasmanian Gaming Commission

Definitions

Term	Description
Casino	For the purposes of the Code, this includes a premises where a casino operator licence has been issued or where there are gaming facilities on Bass Strait ferries operated by the TT-Line Company Pty Ltd.
Community standard	Includes but is not limited to, not: <ul style="list-style-type: none"> • involving minors; • offending people of different religions or ethnic backgrounds; • being linked to the irresponsible service of alcohol; • being sexually explicit in nature; and/or • being illegal.
Enhanced Responsible Conduct of Gambling training course	Either completion of the Responsible Conduct of Gambling training course (Version 2 – prior to 1 March 2012) and the 2012 Update or completion of the Responsible Conduct of Gambling training course (Version 3 – after 1 March 2012).
Gambling	The participation in either gaming or wagering.
Gaming Control Act 1993	An Act to make provision generally in respect of gaming and wagering, to provide for the supervision and control of casinos, gaming machines, keno, lotteries, lucky envelopes, gaming by telephone and other electronic means and other gaming and to provide for related matters. The Act is available at www.thelaw.tas.gov.au .
Incentive-based sponsorship	Is a sponsorship arrangement where the level of sponsorship to be provided is linked to the patronage or use of a prescribed licence holder's gambling product.
Premium player	A person that meets the criteria defined by the Commission, and who has been specifically identified by a casino operator and listed on a premium player register.
Premium player register	A list of individuals that fulfil the requirements, as defined by the Commission, of being a premium player.

Term	Description
Prescribed licence holder	<p>The holder of a prescribed licence. These are:</p> <ul style="list-style-type: none"> • casino licence; • gaming operator licence (Network Gaming); • gaming licence (TT-Line) • licensed premises gaming licence; • special employee licence; • technician licence; • listing on the roll; • Tasmanian gaming licence; • minor gaming permit; and • foreign games permit.
Private gaming area	A separate area at a casino, approved by the Commission, where invited players participate in table gaming and/or machine gaming.
Problem gambling	<p>“...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.”</p> <p>The national definition of problem gambling developed by Gambling Research Australia and endorsed by the Ministerial Council on Gambling (October 2005).</p> <p>For further information go to www.gamblingresearch.org.au.</p>
Productivity Commission Report	Productivity Commission Inquiry Report 2010, <i>Gambling</i> , Report no 50, Canberra, 26 February 2010.
Racing or sports broadcast	Includes any broadcast dedicated to a particular racing or sports event (eg Melbourne Cup, AFL football match or the Australian Open tennis tournament) or any radio or television station that is dedicated to racing or sports coverage.
Relevant prescribed licence holder	<p>A holder of a prescribed licence that is relevant to the Code.</p> <p>Minor gaming permit holders, technicians and persons listed on the roll of recognised manufacturers, suppliers and testers of gaming equipment have not been included as relevant prescribed licence holders in the Code.</p>

Term	Description
Responsible gambling	<p>Is a concept that is described differently across jurisdictions. It involves:</p> <ul style="list-style-type: none"> • minimising the harm from gambling; • ensuring safe gambling environments; and • people understanding the nature of gambling and making informed decisions about participating in gambling. <p>For further information go to <i>Problem Gambling and Harm: Towards a National Definition</i>, commissioned by Gambling Research Australia for the Ministerial Council on Gambling, December 2005.</p> <p>The report is available at www.gamblingresearch.org.au.</p>
Special employee	A person undertaking gaming or wagering functions in an approved venue or for a licensed provider or a gaming operator.
Table gaming tournament	An event where players pay an entry fee to play a casino table game against other players and to compete for prizes.

Accountability and review

Commitment to the Code is mandatory and all relevant prescribed licence holders in Tasmania are responsible for ensuring their compliance with the Code. The Commission may take disciplinary action against a relevant prescribed licence holder for failing to comply with any requirement contained within the Code.

The Code will be amended from time to time in response to new research findings, best practice, community expectations and national gambling agendas. The Commission will ensure that it remains contemporary, practical and effective. The Code will be reviewed by the Commission at least every five years and will be independently assessed for its effectiveness in:

- Contributing to minimising the harm from gambling and promoting responsible gambling practices in Tasmania.
- Providing for gambling environments that are safer, and presenting gambling products in a responsible manner.
- Ensuring that the public and the gambling industry have an understanding of their rights and responsibilities in relation to the matters covered by the Code.
- Assisting people to make informed decisions about their gambling practices.
- Ensuring that gambling staff have the opportunity to develop additional skills to assist them to engage with people who may be displaying problem gambling behaviours.

Application

The Code applies to all prescribed licence holders in Tasmania (excluding minor gaming permit holders, technicians and persons listed on the roll of recognised manufacturers, suppliers and testers of gaming equipment) and impacts on 10 areas of gambling operations:

- advertising
- inducements
- player loyalty programs
- access to cash
- payment of winnings
- lighting
- service of food and alcohol
- clocks in gambling areas
- staff training in recognising people with gambling problems
- information to players

Commission Rules

The practices required by the Commission are contained in the Code, but the means by which the practices are to be implemented are contained in the Commission Rules for each gaming and wagering licence type.

Commencement and transitional arrangements

Some of the practices commence when the Code starts on 1 March 2012 and others commence in line with transitional arrangements. The list of practices, with their commencement dates, can be found in Appendix A.

I. Advertising

Relevant prescribed licence holders must ensure that gambling advertising is conducted in a manner that takes account of the potential adverse impact that it can have on minors, people with gambling problems, people at risk of developing gambling problems and the community.

I. Advertising	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
All advertising of gambling products by relevant prescribed licence holders must:						
I.1 Comply with the 'Code of Ethics' adopted by the Australian Association of National Advertisers.	✓	✓	✓	✓	✓	✓
I.2 Be socially responsible and consistent with the expectation that gambling will be conducted responsibly so as to minimise harm.	✓	✓	✓	✓	✓	✓
I.3 Not be offensive or indecent in nature, and not offend prevailing community standards.	✓	✓	✓	✓	✓	✓
I.4 Not be false, misleading or deceptive, including not misrepresenting the odds, the probability of winning a prize, or the prizes that can be won.	✓	✓	✓	✓	✓	✓
I.5 Not give the impression that gambling is a reasonable strategy for financial betterment or enhancing social situation.	✓	✓	✓	✓	✓	✓
I.6 Not challenge or dare a person to play.	✓	✓	✓	✓	✓	✓
I.7 Not suggest that skill can influence games that are games of chance.	✓	✓	✓	✓	✓	✓
I.8 Not show or promote the consumption of alcohol while engaged in the activity of gambling. Any gambling advertising that shows the incidental consumption of alcohol in a gambling venue must reflect responsible customary behaviour and must be accompanied by a message which highlights the dangers of gambling whilst intoxicated. <i>This does not apply to advertising that shows celebrating a win in a responsible manner outside of a gambling venue.</i>	✓	✓	✓	✓	✓	✓
I.9 Not encourage or target people under 18 years of age to gamble.	✓	✓	✓	✓	✓	✓
I.10 Not show people that are under 25 years of age in gambling advertising unless: a) their appearance is incidental as part of a natural situation; and b) they are not located in a gambling venue; and c) there is no implication that the person will participate in gambling. <i>This does not apply to a person engaged to advertise or promote gambling as part of a sponsorship agreement, however the person must be over 18 years of age and must not be shown participating in gambling.</i>	✓	✓	✓	✓	✓	✓
I.11 Not be directed at vulnerable or disadvantaged groups, where people may not have a capacity to fully understand the information, such as refugees or people with intellectual disabilities.	✓	✓	✓	✓	✓	✓
I.12 Not procure, incite or encourage a person to commit an offence.	✓	✓	✓	✓	✓	✓
I.13 Include responsible gambling messages in all media advertising that incorporates the name and telephone number for the Gambling Helpline, to a size and form as approved by the Commission.	✓	✓	✓	✓	✓	✓
I.14 Not be directed at or provided to excluded persons.	✓	✓	✓	✓	✓	✓

I. Advertising	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
I.15 Not involve irresponsible trading practices.	✓	✓	✓	✓	✓	✓
I.16 Not violate the confidentiality of information relating to, or the privacy of, players without the consent of the player.	✓	✓	✓	✓	✓	✓
I.17 Not occur on television and/or radio between: a) 6:00am - 8:30am and 4:00pm - 7:00pm weekdays; and b) 6:00am - 8:30am and 4:00pm - 7:30pm on weekends. <i>The following forms of advertising are exempt from the above period:</i> a) advertising during a racing or sports broadcast; and b) advertising that focuses specifically on entertainment or dining facilities and does not depict or refer to gambling in any way.	✓	✓	✓	✓	✓	*
I.18 Sounds associated with gaming machine operation must not be included in any television or radio advertising.	✓	*	*	*	*	*

2. Inducements

Relevant prescribed licence holders must not provide specific inducements that may lead to problem gambling or exacerbate existing gambling problems. This includes persuading people to gamble when they wouldn't gamble normally or gamble outside of their normal gambling patterns.

2. Inducements	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
2.1 Incentive-based sponsorship must not be offered.	✓	✓	✓	✓	✓	✓
2.2 People must not be offered free vouchers (or tokens and the like) of a value greater than \$10 which can be used for gambling purposes. This includes multiple vouchers at the same time where the combined value would exceed \$10. <i>Any voucher or token, regardless of the amount that it is issued for, must be redeemable for services other than just gambling, for example, accommodation, dining or entertainment. Any voucher offered, other than for a specific event, must be valid for a minimum period of 30 days. This practice does not apply to premium players as defined by the Commission.</i>	✓	✓	✓	✓	*	✓
2.3 People must not be offered free or discounted alcohol for consumption on the premises (including vouchers for the purchase of alcohol) as an inducement or a reward for gambling. <i>This practice does not apply to private gaming areas at a casino, to players participating in a casino table gaming tournament or where alcohol is provided with food at a location outside of a gaming area.</i>	✓	✓	✓	✓	*	✓
2.4 People must not be required to gamble more than \$10 for a specific period of time in order to receive an inducement, obtain a prize or enter a specific prize draw. <i>This practice does not apply to premium players as defined by the Commission.</i>	✓	✓	✓	✓	*	*
2.5 An entrant in a promotional prize draw, where the value of any individual prize is greater than \$1 000, must not be required to attend the draw in order to win a prize in that draw.	✓	✓	✓	✓	*	✓

3. Player loyalty programs

In addition to the practices under Section 2 – Inducements, relevant prescribed licence holders who operate player loyalty programs must not contribute to the development of problem gambling or exacerbate existing gambling problems.

3. Player loyalty programs	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
3.1 Where player activity is recorded, player activity statements must be provided to members at least once a year and must show point's accrual separately for gambling and non-gambling activities (where applicable). For any gambling activity, the statement must show the amount, in dollars, of any expenditure during the period.	✓	✓	✓	✓	✓	✗
3.2 Foreign games permit holders must provide a player activity statement on request, but no more than once per year. The statement must show the amount, in dollars, of any expenditure during the period.	✗	✗	✗	✗	✗	✓
3.3 Detailed information about the operation of the program must be made available at the time of joining.	✓	✓	✓	✓	✓	✓
3.4 Program members must be sent self-exclusion and responsible gambling information, as approved and/or prescribed by the Commission, at least once each year.	✓	✓	✓	✓	✓	✗
3.5 Program members must be able to opt out of the program at any time and members must be notified at least once each year of their right to cease participation in the program.	✓	✓	✓	✓	✓	✗
3.6 Program members must be able to access any program information that the operator holds about them.	✓	✓	✓	✓	✓	✓
3.7 Information held about the program and its members must be made available to the Commission upon request. Where personal information is provided, the Commission will ensure that the Tasmanian Government's Information Privacy Principles will apply. Any information provided for research purposes must not identify individuals.	✓	✓	✓	✓	✓	✓
3.8 Program point accrual must not focus exclusively on gambling activities where other venue activities are available (for example, accommodation, dining or entertainment).	✓	✓	✓	✓	✓	✓
3.9 The accumulation rate of reward points for gambling activities and any benefits offered must be the same for all members of the program and must not vary.	✓	✓	✓	✓	✓	✓
3.10 Membership in a program must not be available to minors or excluded people.	✓	✓	✓	✓	✓	✓
3.11 Responsible gambling messages, as approved by the Commission, must be incorporated and prominently displayed in all program documentation.	✓	✓	✓	✓	✓	✓
3.12 Programs must not offer rewards to members greater than \$10 which can be used for gambling purposes.	✓	✓	✓	✓	✓	✓
3.13 Programs must not offend prevailing community standards.	✓	✓	✓	✓	✓	✓

4. Access to cash

Relevant prescribed licence holders must undertake practices to help minimise the potential for people to spend more than intended by limiting the:

- opportunity to make impulsive withdrawals of cash; and
- amount of cash that may be accessed at the venue.

4. Access to cash	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
4.1 Automatic teller machines must not be located on any premises (other than a casino) that operates gaming machines, keno or totalisator wagering.	✓	✓	✓	✓	✗	✗
4.2 Casino operators must ensure that customers are not able to withdraw more than \$400 per day from any debit or credit card at automatic teller machines located at a casino.	✓	✓	✓	✓	✗	✗
4.3 A casino operator must not allow a person to obtain, from a cash facility, a cash advance from a credit account.	✓	✓	✓	✓	✗	✗
4.4 Responsible gambling messages must be clearly visible on or near all automatic teller machines located on a casino premises.	✓	✓	✓	✓	✗	✗
4.5 EFTPOS cash withdrawal transactions for gambling purposes are limited to a maximum amount of \$200 and no more than one EFTPOS transaction is permitted, per day, per customer, for gambling purposes.	✓	✓	✓	✓	✗	✗
4.6 No more than one cheque for a maximum amount of \$200 is permitted to be cashed, per day, per customer, for gambling purposes. <i>This practice does not apply to approved cheque cashing facilities operated at a casino.</i>	✓	✓	✓	✓	✗	✗
4.7 Before a cheque is cashed for gambling purposes, the operator must check whether the person is excluded from gambling.	✓	✓	✓	✓	✗	✗

5. Payment of winnings

Relevant prescribed licence holders must undertake practices to help minimise the potential for people to spend more than intended by:

- checking the Tasmanian Gambling Exclusion Scheme database before winnings are paid;
- discouraging people from using large winnings to continue gambling;
- discouraging people from gambling longer than intended and accumulating losses; and
- providing people with a cooling off period after large wins.

5. Payment of winnings		Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
5.1	A maximum cash limit of \$1 000 applies for all keno and gaming machine payouts at any venue. Any payments above \$1 000 must be made by cheque.	✓	✗	✓	✗	✗	✗
5.2	People must be provided with the option of having gambling winnings in excess of \$300 paid by cheque. <i>Venues may take up to 24 hours to provide any cheque for the payment of winnings, except in the case of weekends or public holidays, where payment must be made by the next business day.</i>	✓	✗	✓	✗	✗	✗
5.3	Before a cheque for the payment of winnings is issued, the exclusion database must be checked to identify whether the person has been excluded from gambling.	✓	✗	✓	✗	✗	✗
5.4	All cheques provided to patrons for the payment of winnings from gaming machine or keno gaming must have the words "Gaming Machine Payout" or "Keno Payout" on the front of the cheque.	✓	✗	✓	✗	✗	✗
5.5	Cheques for the payment of winnings must not be cashed on the same trading day that they are issued. <i>This restriction does not apply to international customers at a casino.</i>	✓	✗	✓	✗	✗	✗

6. Lighting

Relevant prescribed licence holders must provide adequate lighting in gaming machine and table gaming areas.

Adequate lighting is important to assist in the identification of excluded people.

As it is important that gamblers retain a sense of their surrounding environment, operators are encouraged to provide people with:

- natural light (where possible), to enable people to be aware of the environment outside (that is, whether it is day or night);
- adequate light to readily identify consumer information (such as signs); and
- an environment to enable a connection with people and other things inside gaming rooms, other than gaming equipment.

6. Lighting	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
6.1 There must be adequate lighting in gaming machine and table gaming areas to enable clocks and signs to be easily read and the faces of people within the room to be easily identified. This can be achieved by: a) not removing natural light sources from gaming rooms; and b) using natural light as a source of lighting, where possible.	✓	✓	*	*	*	*

7. Service of food and alcohol

Relevant prescribed licence holders must limit the service of food and alcohol to people while playing gaming machines to create more opportunities for people to take a break from gambling.

Operators must prevent people who appear intoxicated from gambling at the venue as their ability to make informed decisions around gambling may be reduced.

7. Service of food and alcohol		Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
7.1	A person must not be served food or alcohol while playing, or seated at, a gaming machine between 6 pm and close of gambling each day.	✓	*	*	*	*	*
7.2	Any person who appears to be intoxicated must be prevented from gambling.	✓	✓	✓	✓	*	✓

8. Clocks in gambling areas

Relevant prescribed licence holders must ensure that clocks, that can be readily viewed by those people participating in gambling, are located in each area where gambling takes place, to assist people to be aware of the passage of time.

8. Clocks in gambling areas		Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
8.1	Analogue clocks must be located in each area where gambling takes place.	✓	✓	✓	✓	*	*
8.2	A clock must be clearly visible to any person participating in gambling.	✓	✓	✓	✓	*	*

9. Staff training in recognising people with gambling problems

Relevant prescribed licence holders must ensure that all special employees, along with staff in totalisator outlets and lottery agents, are trained in the responsible conduct of gambling.

This will assist staff to recognise and deal with people with gambling problems and people who are at risk of developing problems.

9. Staff training in recognising people with gambling problems		Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
9.1	Special employees are required to undertake the Responsible Conduct of Gambling training course.	✓	✓	✓	✓	✓	*
9.2	Totalisator employees are required to undertake the Responsible Conduct of Gambling training course.	*	*	*	✓	✓	*
9.3	At least one person who has completed the enhanced Responsible Conduct of Gambling training course must be on duty at all times in each area where gaming machines operate.	✓	*	*	*	*	*
9.4	Gambling operators must ensure that employees and agents are appropriately trained in the responsible conduct of gambling.	✓	✓	✓	✓	✓	✓

10. Information to players

Relevant prescribed licence holders must ensure that people are provided with information about gambling, regulatory requirements for gambling and gambling support services so that they can understand the nature of gambling and make informed decisions about participating in gambling.

10. Information to players		Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
10.1	Information must be made available to players on:						
a)	responsible gambling (including how to limit the amount of money that can be lost);	✓	✓	✓	✓	✓	✓
b)	where to get help if gambling becomes a problem;	✓	✓	✓	✓	✓	✓
c)	exclusion from gambling;	✓	✓	✓	✓	✓	*
d)	odds, pay scales, return to player and take out rates (where applicable).	✓	✓	✓	✓	✓	✓
10.2	Information must be displayed in high traffic areas, prominent positions and places of relative privacy.	✓	✓	✓	✓	*	*
10.3	Information must be displayed in prominent positions.	*	*	*	*	*	✓
10.4	Information must be accessible through a gambling operator's internet website, if one exists.	✓	✓	✓	✓	✓	✓

Appendix A – Commencement dates

Practice	Date
1. Advertising	All practices to apply from 1 September 2012. The restricted advertising periods specified in the Code in 1.17 will initially apply for 12 months from 1 September 2012 and are subject to review.
2. Inducements	All practices to apply from 1 September 2012.
3. Player loyalty programs	All practices to apply from 1 September 2012.
4. Access to cash	All practices to apply from 1 March 2012 with the exception of the restrictions on withdrawals at casino automatic teller machines which will apply from 1 September 2012.
5. Payment of winnings	All practices to apply from 1 March 2012.
6. Lighting	All practices to apply from 1 March 2012.
7. Service of food and alcohol	All practices to apply from 1 March 2012.
8. Clocks in gambling areas	All practices to apply from 1 March 2012.
9. Staff training	<p>A transition period of 12 months from 1 March 2012 will apply for existing special employees of online wagering operators, who currently are not required to undergo Responsible Conduct of Gambling training, to complete this training.</p> <p>Enhanced training elements will be incorporated into the current Responsible Conduct of Gambling training course by 1 March 2012. Once introduced, hotel, club and casino operators will have 12 months before relevant staff will be required to have completed the enhanced Responsible Conduct of Gaming course. This may be through completion of the Responsible Conduct of Gambling course (version 3) or through the completion of the 2012 Update course.</p> <p>Foreign games permit holders must have Tasmanian information concerning responsible conduct of gambling included in the training package provided to agents, by 1 March 2012.</p>
10. Information to players	<p>To be determined by the Commission once resources are developed and made available.</p> <p>All information must be displayed within one month of becoming available.</p>

Tasmanian Gaming Commission

Phone: (03) 6233 2475

Fax: (03) 6233 2886

Email: gaming@treasury.tas.gov.au

Web: www.gaming.tas.gov.au

