

Queensland responsible gambling Resource manual

Section D • V3.2 • 2020

TAB

Developed by UBET QLD Limited and the Department of Justice and Attorney-General



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Practice 1

Provision of information

Introduction

Information about the potential risks associated with gambling and where to get help for problem gambling is supplied to minimise the potential impact of problem gambling on UBET QLD Limited (UBET) customers. Information is provided to allow customers to make informed decisions on their gambling behaviour. UBET will provide:

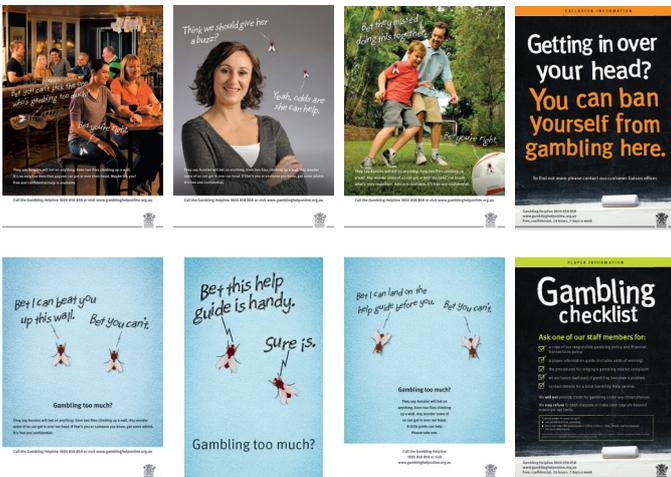
- signage on the gambling product, wagering rules and odds of winning
- problem gambling information
- customer information brochures and guides.

1.1 Potential risks

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

Actions of UBET

Agents will display the current responsible gambling signage and information on where to get help. Current in-venue signage includes:



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

Agents will display the *Important information notice (Example 1.1A)* containing information on responsible gambling, underage betting and cancellation rules near the betting terminal.

The UBET internet wagering site will include a prominently displayed link to a responsible gambling page on the website. This page includes Gambling Helpline information and links to the appropriate problem gambling support services.

New account betting customers will receive, as part of their account betting information kit, a notice that responsible gambling information is available on the UBET website.

UBET's owned and operated RadioTAB will feature responsible gambling commercials every Saturday. RadioTAB is broadcast throughout the State and reaches almost 95 per cent of Queensland households.

Best practice

UBET's internet account holders can opt into an email racing and sports news service when opening their account. Customers can unsubscribe to this service at any time. This email service includes a link to UBET's responsible gambling information.

A responsible gambling information page is included in the InfoTAB electronic information wagering and sportsbet service.

Currently UBET does not promote its business or produce wagering material in any other language. UBET can introduce another language version of the responsible gambling information for electronic display on InfoTabs and online in the event that wagering brochures are produced in that other language.

UBET has developed a responsible gambling information kit to be given to anyone making a responsible gambling enquiry. The kit contains UBET's responsible gambling brochure and a *Self-exclusion notice (Form 3A)*.

Alternatively, the *Self-exclusion notice* form can be downloaded directly from www.business.qld.gov.au/liquor-gaming

Example 1.1A Important information notice

Cancellations totalisator wagering

Tickets may be cancelled up until five minutes before the advertised starting time of the race.

An all-up ticket may be cancelled up until five minutes before the advertised starting time of the first race of the ticket.

Tickets presented for cancellation within five minutes of the advertised starting time of the race may be cancelled in the event of an error, provided the cancellation is requested at the office of issue within five minutes of the time of issue, and is completed prior to race close.

Any ticket which involves a late scratching may be cancelled at any office prior to race close.

Cancellations fixed odds wagering

Fixed price tickets may only be cancelled in the event of an error, and provided the cancellation is completed within two minutes of purchase and prior to race close or event close.

Underage betting

A minor (person under 18 years of age) must not place a bet.

A person shall not take part in any gambling activities on behalf of any other person who is a minor.

A person who is the operator of/assists in operating, a totalisator or fixed price betting service is not permitted to:

- accept a bet from, or give a ticket or other acknowledgement for a bet to, a minor
- allow a minor to establish an account for conducting betting by telephone or internet
- otherwise allow a minor to participate in any wagering activity.

Gambling Helpline

Free, confidential and professional support for people experiencing problems with their gambling or others that are affected by someone else's gambling is available 24 hours a day by contacting Gambling Helpline on **1800 858 858** or Gambling Help Queensland website (www.gamblinghelpqld.org.au)

1.2 Available on request

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

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

Actions of UBET

Agents will display the responsible gambling signage and information on where to get help as part of their product brochure display. The responsible gambling brochure display includes:

- advice that a copy of UBET's *Responsible gambling policy* (**Example 1.2A**) is available for perusal
- advice on the availability of self-exclusion provisions, gambling-related complaints procedures and restrictions limiting betting to cash transactions and cash payment of winnings
- other information on the nature of bet types, betting rules, odds and returns to players.

Agents have available for perusal a copy of UBET's *Responsible gambling policy* by customers on their InfoTAB units. The UBET website (<https://ubet.com>) will include a copy of UBET's *Responsible gambling policy*.

Agents will display the *Important information notice* (**Example 1.1A**) in close proximity to any terminal within the office.

Agents and UBET's account betting services will provide a copy of the *Self-exclusion notice* (**Form 3A**) on request.

Agents and UBET's account betting services will provide a copy of the responsible gambling *Gambling-related incident report* (**Example 2.3A**) on request.

UBET regional managers will monitor agencies' compliance (displaying brochures and signs) during their visits/call cycle. Repeated non-compliance will be recorded and may eventually result in a breach of the Agency Agreement.

Best practice

The Wagering Rule 2010, the *Responsible gambling policy* and the complaints and exclusion procedures are included on UBET's internet site and the in-store InfoTAB information units used by customers to access wagering information.

Example 1.2A Responsible gambling policy

Introduction

UBET QLD Limited (UBET) has developed the *Responsible gambling policy* to minimise the potential harm associated with gambling. In developing the policy, UBET has taken into account:

- community concerns on potential harm associated with gambling
- the role of UBET in providing a responsible gambling environment
- the rights and responsibilities of customers who may have a gambling-related problem.

As a self-regulatory and voluntary instrument, the *Responsible gambling policy* demonstrates UBET's commitment to minimising the potential harm associated with gambling on its employees, customers and the community.

Policy goals

The goals of the *Responsible gambling policy* are to:

- manage potential harm associated with gambling by creating a responsible gambling environment
- educate and inform employees, customers and the community about potential harm associated with gambling
- create awareness of significant benefits that will arise where employees, customers and the community assist UBET in its endeavours to minimise potential harm associated with gambling
- ensure compliance with the *Queensland responsible gambling Code of Practice* (Code of Practice).

What is problem gambling?

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

Potential harmful effects of problem gambling

Some potential harmful effects of problem gambling on individuals and the community are:

- personal (stress, depression and anxiety, poor health, suicide)
- work and study (job loss, absenteeism, and poor performance)
- financial (financial hardships, debts, asset losses, bankruptcy)
- legal (theft, fraud, scams)
- interpersonal (domestic violence, relationship breakdown, family neglect)
- community services (pressure on charities and the public purse).

What is responsible gambling?

Responsible gambling is the provision of safe, socially responsible and supportive gambling environments where the potential for harm associated with gambling is minimised and people can make informed decisions about their participation in gambling.

It occurs as a result of the collective actions and shared ownership of individuals, communities, the gambling industry and government.

Harm minimisation strategies

UBET has a responsibility to ensure that the *Wagering Act 1998*, the *Wagering Regulation 1999*, the *Wagering Rule 2010* and the *Code of Practice* are adhered to and will implement strategies to minimise the potential harm associated with gambling. The strategies are as follows:

1. Provision of information

Responsible gambling information—UBET and its Agents will make available responsible gambling information, signage on potential harm associated with gambling and brochures on where to get help for problem gambling, for customers.

2. Interaction with customers and community

Community liaison—UBET will appoint a responsible gambling customer liaison officer (CLO) to liaise with the community by facilitating discussion and establishing networks between UBET and community support agencies on responsible gambling issues.

Customer liaison—The CLO role is to provide support to customers and UBET staff dealing with problem gambling issues and to record all UBET's gambling-related complaints and incidents using the *Gambling-related incident report*. The CLO will assist customers to make contact with skilled counselling through the Gambling Helpline on **1800 858 858** or Gambling Help Queensland website (www.gamblinghelpqld.org.au)

Customer complaints—UBET will inform customers about its gambling-related complaints mechanism through the display of the 'Where to get help' materials and its responsible gambling brochure. UBET will strive to deal with customer complaints in a timely manner. Where the outcomes are not to the satisfaction of the complainant, UBET will inform the complainant of other avenues of redress, in particular the Office of Liquor and Gaming Regulation.

Training and skills development—UBET will ensure that gambling-related service staff receive appropriate information and training in the responsible provision of gambling and gambling products. UBET will also provide appropriate training to managers regarding the *Responsible gambling policy*.

3. Exclusion provisions

Self-exclusion—UBET will provide for self-exclusion as an option to assist people who perceive they may have a problem with gambling and will make customers aware of the existence of self-exclusion provisions by displaying relevant information within agencies. UBET and agents will encourage people who choose to exclude themselves from an agency and to also exclude themselves from other gambling venues in the area. UBET will undertake regular reviews of self-exclusion provisions to assess their effectiveness.

Third party exclusion—Following an approach from a third party (for example, family members or professional/welfare groups), UBET will suggest to any third party approach that self-exclusion documents and procedures are available, provide a copy of the *Self-exclusion notice* to the third party and encourage the third party to discuss the options with the person believed to have a problem with gambling.

4. Physical environment

Minors—UBET will prohibit persons under the age of 18 from participating in gambling.

Physical environment—UBET will ensure a pleasant environment for customers. UBET will display the time of day within agencies to make customers aware of the passage of time.

Gratuities—Agents and staff are not to encourage customers to give them gratuities.

Confidentiality—UBET and agents will ensure that all activities relating to gambling engaged in by customers shall remain confidential and shall not be discussed with other customers or members of the community.

5. Financial transactions

Financial transactions policy—UBET and agents will not extend credit for the purpose of gambling under any circumstances. A maximum cash limit of \$10,000 applies for payouts. If the winning amount is greater than this limit, either the whole amount can be paid by cheque, or paid partly in cash to the maximum limit with the balance of the payout paid by cheque. Cheques for winnings in excess of \$5000 issued by the agent will not be cashed by the agent until the next trading day.

6. Advertising and promotions

Advertising and promotions—UBET will ensure that any advertising or promotion complies with the *Code of Ethics* as adopted by the Australian Association of National Advertisers.

For more information on acceptable and unacceptable advertising and promotions, refer to the Advertising and promotions section of the *Queensland responsible gambling resource manual (TAB)*.

Policy review

UBET will review the *Responsible gambling policy* and make assessments of UBET's gambling environment on a regular basis. UBET will make such changes as are reasonably necessary to comply with this Policy and the ongoing responsible gambling environment.

1.3 Odds of winning major prizes

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

Actions of UBET

No specific action is required by the agent, as UBET's electronic odds display service will provide meaningful and accurate information on the prices payable on each \$1 bet placed.

InfoTAB's display a set of UBET documents that provide information about the nature and rules of each bet type.

A copy of the Wagering Rule 2010 is available in each agency on the InfoTAB units and on UBET's website.

UBET's website will include information about the nature and rules of each bet type.

Best practice

Other language customer information can be developed if and when customer demand is identified for these items.

1.4 Predominant cultural groups

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

Actions of UBET

Currently all information is provided in English. In the event that UBET was to provide information in other languages, then responsible gambling information would also be provided in those languages.

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

Examples of acceptable/unacceptable actions

Acceptable

Maintaining a copy of the *Important information notice* (**Example 1.1A**) on the race lists near the InfoTAB units.

Maintaining the current responsible gambling brochure and information on where to get help in the brochure holder in the information area of your office.

Maintaining a copy of UBET's *Responsible gambling policy* (**Example 1.2A**) on the InfoTAB units available for inspection.

Maintaining copies of the self-exclusion notices and the gambling-related incident reports in the work area and making these available for inspection on request.

Unacceptable

Not displaying the *Important information notice* in an easily accessible area of your outlet.

Not maintaining stocks of the responsible gambling brochures and information on where to get help in your public space brochure holder.

Not providing a copy of the *Responsible gambling policy* on the InfoTAB units.

Not providing copies of the self-exclusion notices and gambling-related incident reports for inspection on request.

Interaction with customers and community

Introduction

Interaction with customers and the community is designed to support early intervention and prevention strategies for problem gamblers. UBET provides responsible gambling material that directs customers to professional qualified community-based support services specifically designed to assist problem gamblers. UBET will:

- establish links between their outlets and local relevant community networks and support services
- provide training for staff member/s on customer liaison
- establish customer complaints procedures
- provide ongoing training for staff in responsible gambling services and products.

2.1 Community liaison

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

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

Actions of UBET

Agents will display the responsible gambling signage and information on where to get help on the race list board or near the service counter.

Agents will display the Gambling Helpline phone number (**1800 858 858**) adjacent to any betting terminal.

Agents will actively promote the information material and ensure that adequate supplies are always maintained and displayed.

UBET's website will provide responsible gambling information with links to the community-based Gambling Helpline phone number (**1800 858 858**) and/or Gambling Help Queensland website (www.gamblinghelpqld.org.au)

Best practice

A responsible gambling information page is included in the electronic betting information service.

Currently UBET does not promote its business or produce wagering material in any other language. UBET can introduce an alternative language version of the responsible gambling brochure in the event that betting information brochures are produced in that other language.

UBET responsible gambling formal training sessions include a segment presented by the local Gambling Help service provider.

2.2 Customer liaison role

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

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

Actions of UBET

The UBET customer liaison officer (CLO) is not a trained counsellor and will not provide problem gambling counselling.

However, the CLO will:

- assist customers to understand UBET's *Responsible gambling policy (Example 1.2A)* and associated support services
- assist customers to make contact with skilled counselling services through the Gambling Helpline on **1800 858 858** or Gambling Help Queensland website (www.gamblinghelpqld.org.au)
- provide support services to UBET account betting services and to agents and staff dealing with customer problem gambling issues
- provide support services for agents and staff with a personal gambling problem.

Best practice

UBET's CLO role is filled by a senior employee who is not responsible for the operations of UBET's gambling products.

2.3 Customer complaints

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

Actions of UBET

Gambling-related customer complaints will be treated with high priority and in the strictest confidence.

Agents are not trained counsellors and will not attempt to counsel customers on problem gambling.

However, agents will:

- provide customers who indicate a gambling problem with the responsible gambling brochure, information on where to get help and a *Self-exclusion notice (Form 3A)*
- advise customers of the availability of the self-exclusion option
- treat customers with respect and understanding and actively support any effort or expressed desire to address a problem with gambling
- refer customers to the help services as required
- encourage customers to seek the professional help available through the Gambling Helpline on **1800 858 858** or Gambling Help Queensland website (www.gamblinghelpqld.org.au)
- complete a *Gambling-related incident report (Example 2.3A)* whenever a gambling-related complaint is received or an incident occurs. A copy will be retained in their agency and a copy forwarded to the CLO
- advise the CLO as soon as practicable after a gambling-related complaint/incident is received.

Best practice

UBET has implemented a Responsible gambling audit committee consisting of the CLO, senior operational management and the audit manager to review major responsible gambling incidents and customer complaints.

Example 2.3A Gambling-related incident report

Site name _____

Incident date _____ Incident time _____

Staff member name _____

Staff member signature _____

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

Name _____ Phone _____

Address _____

City _____ State/Territory _____ Postcode _____

Email _____

Incident details (attach additional pages if required)

Immediate action taken (attach additional pages if required)

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

UBET office use only (customer liaison officer to complete)

Name _____

Signature _____ Date _____

2.4 Training and skills development

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

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

Actions of UBET

UBET account betting services and agents will provide induction training to all staff engaged in providing gambling products. Training will include information about *Possible problem gambling risk indicators* (Example 2.4A).

Training will be noted in the *Register of training* (Example 2.4B).

All staff engaged in providing gambling products will be required to read and sign a copy of UBET's *Responsible gambling policy* (Example 1.2A) document indicating they understand the policy and their responsibilities under that policy.

All agents and staff engaged in providing gambling products will be required to read and sign a copy of the *Queensland responsible gambling resource manual (TAB)* (Resource manual) to ensure they understand the Resource manual and their obligations to implement UBET's *Responsible gambling policy*.

Managers involved in the provision of gambling products will be provided with a copy of UBET's *Responsible gambling policy*, the Resource manual and instructions on their obligations with regard to responsible gambling issues.

UBET induction training for new agents will include a unit on responsible gambling, the *Queensland responsible gambling Code of Practice* (Code of Practice), UBET's *Responsible gambling policy* and the Resource manual.

Best practice

Training resource material used in formalised training is provided to agents to be used as a training aid when agents train point of sale staff.

The training register is audited by UBET regional managers during the regular office visitation process.

Example 2.4A Possible problem gambling risk indicators

Observed or reported signs

Emotional responses

- Suffering from depression and/or have thoughts of suicide due to gambling behaviour.
- Kicking or violently striking machines.
- Vocally displaying anger (swearing to themselves, grunts) and/or threatening or causing physical harm to others or self.
- Looking sad or depressed after gambling.
- Crying after losing a lot of money.
- Shaking/sweating/looking nervous/showing significant mood changes (while gambling).

Frequency, duration and intensity

- Gambling every day of the week.
- Gambling so intensely that the person barely reacts to what was going on around them.
- Significant changes in expenditure pattern, e.g. sudden increases in spending.

Impaired control/loss of control

- Starts gambling when the venue opens and only stops when venue is closing.

Irrational attributions/behaviours

- Complains to staff about losing/swears at venue staff because they are losing.

Other behaviours

- Gambles after having drunk a lot of alcohol.
- Significant decline in personal grooming and/or appearance over several days.

Raising funds/chasing behaviour

- Borrows money from other people at venues/asks for a loan or credit from venues.
- Leaves venue to find money for gambling/rummaging in purse/wallet for additional money.
- Appears to have run out of all money in purse/wallet when they leave venue.

Social behaviours

- Asks venue staff to not let other people know that they are there.
- Is rude or impolite to staff.
- Avoids contact/communication with anyone else/stays to gamble while friends leave venue.
- Brags about winning or makes a big show relating to how skilful they are as a gambler.

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

Practice 3

Exclusion provisions

Self-exclusions and venue-initiated exclusions for problem gambling

Introduction

In the following sections the responsibilities attributed to UBET may be carried out by their nominated representative. All references to the person in charge (PIC) in this document means the person on site at the time of the incident that is in charge of the agency. This person would normally be the agent, branch manager or the casual in charge (CIC).

Exclusions are aimed at supporting customers who are, or are at risk of, engaging in problem gambling behaviours. Exclusions may also be referred to as banning.

An exclusion can be either requested by a customer (self-exclusion) or directed by UBET (UBET-initiated exclusion).

Exclusions offer the option of banning a customer from all gambling products or a specific gambling product or service. This can mean that a customer is excluded from either:

- all race wagering, Sportsbet and Keno products
- from one or more product (customers should be encouraged to exclude from the whole of the agency and all products).

The products from which the customer is to be excluded can be determined either:

- by mutual agreement between the customer and UBET in the case of self-exclusion
- at UBET's discretion in the case of a UBET-initiated exclusion.

Specific actions of both the customer and UBET are prescribed in the legislation relating to exclusions. Options are available to UBET and customers to limit contact with gambling activities. The advice of a concerned third party may be taken into consideration by UBET in any action taken. Penalties (including financial) may apply to both parties, i.e. the customer and the agent (and/or staff) where the exclusion is not correctly followed, or breached by either party. An example of a breach may be where an excluded customer tries to re-enter a TAB from which he/she has been banned.

It is the responsibility of UBET under legislation to actively enforce exclusion procedures with customers. UBET is also responsible for providing maximum assistance to customers who present for self-exclusion and following through with the exclusion process.

At all times the customer who is seeking an exclusion will be required to make contact with the PIC at the agency or UBET's customer liaison officer (CLO) in the first instance and apply for the exclusion in person.

Agency management, all customer contact staff and the UBET's CLO will familiarise themselves with the following flowcharts:

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

Legislative references for exclusions are:

- *Wagering Act 1998*
- *Keno Act 1996.*

3.1 Exclusion procedures

Gambling providers to provide exclusion procedures and supporting documentation.

Actions of UBET

UBET has developed and implemented the following minimum procedures for exclusion, as follows:

Self-exclusion

If a customer approaches staff seeking assistance, staff will:

- listen intently to the customer's request in a confidential manner
- explain to the customer the need to refer the matter to the CLO.

Should the customer refuse this, staff are to emphasise that they cannot provide the most effective assistance and that perhaps they could organise a meeting with the manager (if different to the CLO).

The CLO should ensure that the customer is provided with sufficient information about the self-exclusion process, allowing them to make an informed decision about whether to proceed with self-exclusion.

The CLO should discuss:

- the self-exclusion process
- timeframe of self-exclusions
- options for exclusion from whole or part venue/ some or all gambling products
- contact with community support services
- forms required
- legal implications
- the right for the customer to seek independent legal advice
- penalties related to self-exclusions
- the 24 hour cooling-off period.

Within 24 hours of lodging a *Self-exclusion order*, a customer may give notice in writing to UBET to revoke the Order.

If the customer pursues a revocation within that 24 hour period, UBET must supply the customer with a *Revocation notice: self-exclusion order (Form 3C)* to complete and submit to the venue within the 24 hour time limit. If the customer submits the Notice to the venue within the 24 hour cooling-off period, the self-exclusion is considered void and the customer may freely re-enter the premises and gambling area/s as though the Order had never been in place.

If the customer submits the Notice to venue after the 24 hour cooling-off period, the customer must wait a further 12 months before making an application for revocation starting from the first anniversary of the issue of the Order. Only one application for revocation may be made in any 12 month period.

Self-exclusion not supported

If the customer does not agree to self-exclude the PIC:

- should complete the *Gambling-related incident report (Example 2.3A)*
- must refer the incident to the UBET CLO (the UBET CLO will, in consultation with the agency staff, determine whether an active monitoring program should be initiated with the customer's consent, or whether an *Exclusion direction (Form 3D)* initiated by UBET is required).

Self-exclusion supported—implementation

If the customer agrees to self-exclude:

- The PIC must provide the customer with a *Self-exclusion notice (Form 3A)*.
- The PIC may request that the customer provide a photo to assist staff to enforce the exclusion.
Note: *the customer must provide a photo if requested.*
- The PIC must await for the customer to complete and return the *Self-exclusion notice* to the PIC.
Note: *the Self-exclusion notice will need to be witnessed by an adult over 18 years of age. This may be the PIC or another member of staff.*

- The PIC must as soon as practicable, complete a *Self-exclusion order (Form 3B)*. This can usually be done on the spot.

Note: *ensure that UBET's privacy statement is attached to the documentation being provided to the customer.*

- The PIC must give the *Self-exclusion order* to the customer.
Note: *the Self-exclusion order is effective from when it is given to the customer for a maximum of five years, after which time it will automatically expire.*
- The PIC must provide the customer with details of at least one community support service for advice, assistance and/or counselling relating to problem gambling.
- The PIC should encourage the customer to consider self-exclusion from all TABs that the customer may access within the local area.

Other administrative duties

The agent/branch manager is to complete an entry in the *Register of excluded persons (Form 3G)* and forward a copy of the *Self-exclusion order* to UBET's CLO, Group Social Responsibility Manager at the Wooloongabba Head Office.

Note: *the agent/branch manager will maintain confidentiality of information recorded in the Register of excluded persons which is to be kept in the safe.*

The agent, branch manager/CLO should remove the customer from all advertising and promotional mail-out lists and ensure that these materials are not sent to the customer during the period of exclusion.

The CLO should ensure that any account betting account, loyalty or smart cards held by the customer are cancelled or disabled so as to prevent the customer from using them to gamble.

The CLO will ensure that UBET submits statistical data regarding exclusion activity periodically (upon request) to the Executive Director, Office of Liquor and Gaming Regulation (OLGR).

The PIC must advise all relevant staff of the customer's *Self-exclusion order* in a discreet and confidential manner.

Note: *the agent/branch manager or an employee of the agent/UBET, has an obligation to take reasonable steps to prevent the customer, who is known to be excluded, from entering or remaining in the TAB premises.*

If an agent/branch manager or an employee of the agent/UBET prevents an excluded customer from entering or remaining on the TAB premises, they must as soon as practicable, lodge a *completed Notice of contravention of self-exclusion order/exclusion direction (Form 3H)* with UBET's CLO, Group Social Responsibility Manager at the Wooloongabba Head Office.

Note: *UBET will then lodge this form with OLGR's Executive Director.*

UBET-initiated exclusion

If reasonable grounds exist that a customer is a problem gambler, or at significant risk of problem gambling, an *Exclusion direction (Form 3D)* may be put in place by UBET.

The *Exclusion direction* is a legally binding document with ramifications for breaches, including financial penalties. An *Exclusion direction* may relate to one or more premises operated by UBET.

Agent refers the matter to the UBET's CLO, who will, in consultation with the agency, make the decision as to what action is to be taken. These options include:

- no further action
- an active monitoring program
- an *Exclusion direction*.

An *Exclusion direction* will not be implemented unless reasonable steps have been taken by the agent or the CLO to approach and discuss self-exclusion with the customer.

If the customer refuses self-exclusion and the CLO believes, on reasonable grounds, that the customer is, or is at significant risk of being, a problem gambler, UBET may give an *Exclusion direction* to the customer. The *Exclusion direction* may only apply to some gambling products, taking into consideration the need for the customer to access some UBET services. Where possible, the CLO should discuss this with the customer.

The CLO must include with the *Exclusion direction* an *Information notice—exclusion direction (Form 3I)* detailing the reasons for the exclusion.

The CLO may also wish to attach a copy of the *Conditions of re-entry (participation in gambling activities) (Example 3.1D)* with the *Information notice*.

The *Exclusion direction* must be given to the person. The *Statement of service* section of UBET's copy of the *Exclusion direction* must be completed as soon as practicable after the Direction has been served upon the customer.

The *Exclusion direction* is effective from the time it is given to the customer and has a minimum time frame of one year (12 months from date of issue) and a maximum time frame of five years. After five years the Direction will automatically expire. Customers may apply once every 12 months, starting from the first anniversary of the issue of the Direction, to revoke or cancel the *Exclusion direction*.

The PIC must request that the customer provide a photo to assist staff to enforce the exclusion.

The PIC and/or the CLO must provide the customer with details of at least one community support service for advice, assistance and/or counselling relating to problem gambling.

Once the *Exclusion direction* is in place, if the customer enters or attempts to enter the premises from which they have been excluded, the PIC is required to take reasonable steps to remove or prevent them from entering the premises.

Reasonable steps do not include physically preventing the customer from entering or physically removing the customer. Customers are to be directed not to enter or asked to leave. If the customer fails to comply with a direction the police are to be called.

It is the responsibility of the PIC and CLO to complete the details of the excluded customer in the *Register of excluded persons (Form 3G)*. A register will be maintained by Head Office as well as at the agency. The register will be required to be submitted periodically (upon request) to the Executive Director, OLGR.

If an agent/branch manager or an employee of an agent/UBET prevents an excluded customer from entering or remaining on the licensed premises, they must as soon as practicable, provide a *Notice of contravention of self-exclusion order/exclusion direction (Form 3H)* to UBET's CLO at the Woolloongabba Head Office who will then lodge a copy of this form to the Executive Director of OLGR.

Further responsibilities of the agent and CLO

The agent and the CLO should take responsibility to ensure that advertising and promotional materials are not sent to the customer during the period of exclusion.

The CLO should ensure that any account betting account, loyalty or smart cards held by the customer are cancelled or disabled so as to prevent the customer from gambling.

It is the responsibility of the PIC and the CLO to accurately maintain the *Register of excluded persons* for viewing by OLGR when requested.

The agent and the CLO will maintain confidentiality of information recorded in the *Register of excluded persons*. The agencies *Register of excluded persons* is to be kept in the agency safe.

To enable the effective enforcement of the exclusion throughout the agency, the agent must advise all relevant staff of the customer's *Exclusion direction* in a discreet and confidential manner.

Approach by a third party

The following steps relate to a staff member being approached by a third party (e.g. husband, wife, partner, or someone with a significant relationship with the customer) requesting exclusion for another person:

- Staff member to refer the third party to the PIC.
- The PIC is to explain to the third party the following:
 - An exclusion may only be put in place either by the individual concerned (self-exclusion) or initiated by UBET (exclusion direction).
 - The third party cannot sign, or enter into an exclusion on another person's behalf.
 - The third party may provide support to the individual by either suggesting self-exclusion or encouraging them to contact a Gambling Help service.
 - Following the third party alerting UBET to an individual who may be at risk of problem gambling, it is then up to UBET to initiate an *Exclusion direction (Form 3D)* or place the individual on an active monitoring program if there are reasonable grounds to do so.
- If the third party continues to express a wish to assist an individual who may be at risk of problem gambling, the PIC will provide a copy of the *Self-exclusion notice (Form 3A)* and details of at least one local community Gambling Help service (refer to the responsible gambling kit) to the third party and encourage them to discuss the options with the person believed to have a problem with gambling and/or encourage them to make contact with these groups or UBET's CLO directly.
- PIC to reinforce the preference for the individual to approach the PIC directly for a self-exclusion.
- PIC to check with the third party if they wish to be identified to the customer in any discussions.
- PIC may elect to discreetly approach the customer, requesting an opportunity to have a chat. Once relationship has been established, discuss their gambling behaviour/habits and introduce the idea of self-exclusion. The decision to approach the customer will be made by Head Office in consultation with the agency and potentially the third party. The CLO will advise on how, when and who will approach the customer.
- PIC to complete a *Gambling-related incident report (Example 2.3A)* and forward the report to CLO. UBET may wish to consider implementing an active monitoring program if the customer refuses self-exclusion and if valid grounds exist for UBET to monitor their gambling behaviour.

Revocation (re-admitting a customer to a venue/ lifting exclusion)

A revocation is where an excluded customer advises UBET in writing that they wish to end the exclusion and re-enter the agency and resume participation in gambling activities.

Any request for revocation submitted by a customer will be referred to UBET's CLO for decision.

The revocation process for a *Self-exclusion order* and an *Exclusion direction* (UBET-initiated exclusion) is different. Please note the separate processes carefully.

UBET must provide assistance to a customer who may be seeking a revocation of their exclusion.

Revoking a self-exclusion order

To apply for a revocation of a self-exclusion order, a customer must submit a completed *Revocation notice: self-exclusion order (Form 3C)* to UBET either within the cooling-off period (within 24 hours of the *Self-exclusion order* being issued) or at least 12 months after the *Self-exclusion order* has been in place.

If the Revocation notice is lodged within the 24 hour cooling-off period, the *Self-exclusion order* ceases from the time the Revocation notice is given to UBET.

When lodging the Revocation notice the applicant may choose to submit any or all of the following in support of their application:

- a statement to the effect that the circumstances leading to their exclusion no longer apply and recognising the responsible gambling steps taken by the gambling provider's personnel
- a list of attendance from a recognised counselling service provider or qualified psychologist
- a statement from the original third party involved in a venue-initiated exclusion process (where applicable) to the effect that gambling no longer constitutes a risk to the welfare of that person or others
- a statement from a current third party considered to have a close personal interest in the welfare of the customer to the effect that gambling does not constitute a risk to the welfare of that person or others (this would apply where the previous third party relationship involved in a venue-initiated exclusion process no longer exists).

✦ Revocation supported

If the Revocation notice is lodged at least 12 months after the *Self-exclusion order* has been in place and is supported by the CLO, UBET may advise the customer in writing that the exclusion will be lifted 28 days from receipt of the Notice.

Should the customer not be advised within the 28 day period, the exclusion will automatically cease, and the customer will be free to resume playing at the venue. The CLO is to provide the customer with the *Conditions of re-entry (participation in gambling activities)* (Example 3.1D).

The CLO and the agent must also update and maintain a *Register of excluded persons*.

✦ Revocation not supported

If the Revocation notice is lodged at least 12 months after the *Self-exclusion order* has been in place and the CLO believes on reasonable grounds that the customer is still at risk of problem gambling, and should remain excluded, the CLO must issue an *Exclusion direction* (Form 3D).

This must be issued within 28 days of UBET receiving the *Revocation notice: self-exclusion order*. Failure to issue an *Exclusion direction* within the 28 days will result in the customer being able to resume gambling.

Revoking a UBET-initiated exclusion direction (venue-initiated exclusion)

A customer may only submit one Revocation notice or application per year, starting at the first year anniversary the Direction was issued.

If a customer submits a completed *Application to revoke exclusion direction* (Form 3E) with UBET, at least one year after it was issued, UBET has 28 days in which to respond.

✦ Revocation supported

If the revocation application is supported by the CLO the customer is to be issued with a *Revocation notice—exclusion direction* (Form 3F) within 28 days of receipt of the Notice. The customer may also be issued with a *Conditions of re-entry (participation in gambling activities)* (Example 3.1D).

The CLO and agent must also update and maintain a *Register of excluded persons*.

✦ Revocation not supported

If the revocation application is not supported by the CLO, UBET has 28 days in which to respond to the customer advising of such. If UBET does not respond within the 28 days, the *Exclusion direction* automatically remains in place.

The CLO must provide the customer with an *Information notice—refusal to revoke an exclusion direction* (Form 3J) detailing why the Revocation notice was rejected.

Appeal

Where UBET has issued the *Exclusion direction* or refused an application to revoke an *Exclusion direction*, the customer may have the decision reviewed by the Queensland Civil and Administrative Tribunal.

Details regarding this option will have been provided to the customer with their Information notice at the time of the issue of the *Exclusion direction* or decision to refuse to revoke the *Exclusion direction*.

Active monitoring

Active monitoring may apply in circumstances where a customer has either:

- refused self-exclusion
- recently ceased self-exclusion/exclusion direction
- displayed behaviours that may be consistent with problem gambling as per the *Possible problem gambling risk indicators* (Example 2.4A).

Active monitoring program framework

The following is a framework for managing the active monitoring program after it has been implemented:

- The signed *Consent to monitor my gambling activities* (Example 3.1E) document will be kept on the premises with a photograph of the customer.
- The CLO should ensure that all relevant staff have been advised that the customer is on the active monitoring program.
- To enable an accurate review of activities over a period of time, daily gambling activities should be recorded in a register/log.
- Procedures should be implemented to ensure the PIC is alerted when the customer is on the premises.
- Where practicable, the PIC should record and assess the visitation time/rate spent at a gambling activity.
- Depending on the gambling activity, the CLO may need to review the customer's gambling activity and subsequently, their suitability to remain gambling as per the *Possible problem gambling risk indicators*. This review may highlight a need for a re-assessment of the exclusion provision options with the customer.

Assessment and review

To ensure the effectiveness of exclusion practices, UBET and the agent will:

- provide regular staff information and training on self-exclusion
- have clear reporting procedures (staff to management) of relevant incidents (observations, enquiries, breaches, frequency) and actions taken by the agent with regard to customers seeking self-exclusion
- review the policy for self-exclusion on a regular basis to see if it is working and what areas may need improvement.

Best practice

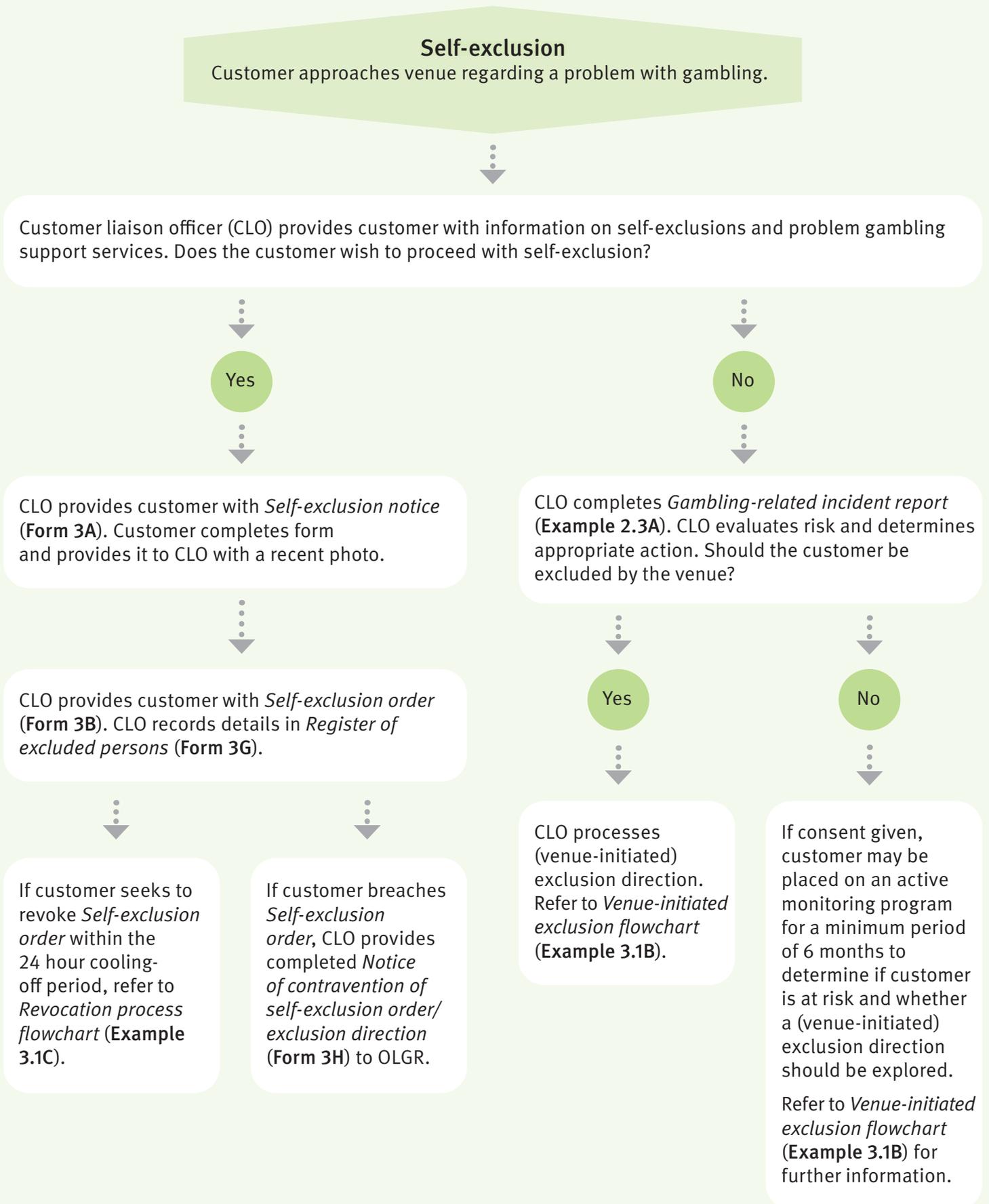
CLO to maintain a contact list of organisations/ individuals that may offer appropriate assistance to customers, e.g. legal aid, gambling help, local solicitors, doctors, other gambling assistance agencies.

Agent to maintain a contact list of CLOs at Pub and Club TABs in the local community and provide a copy to customers to assist them with accessing self-exclusion options at other venues.

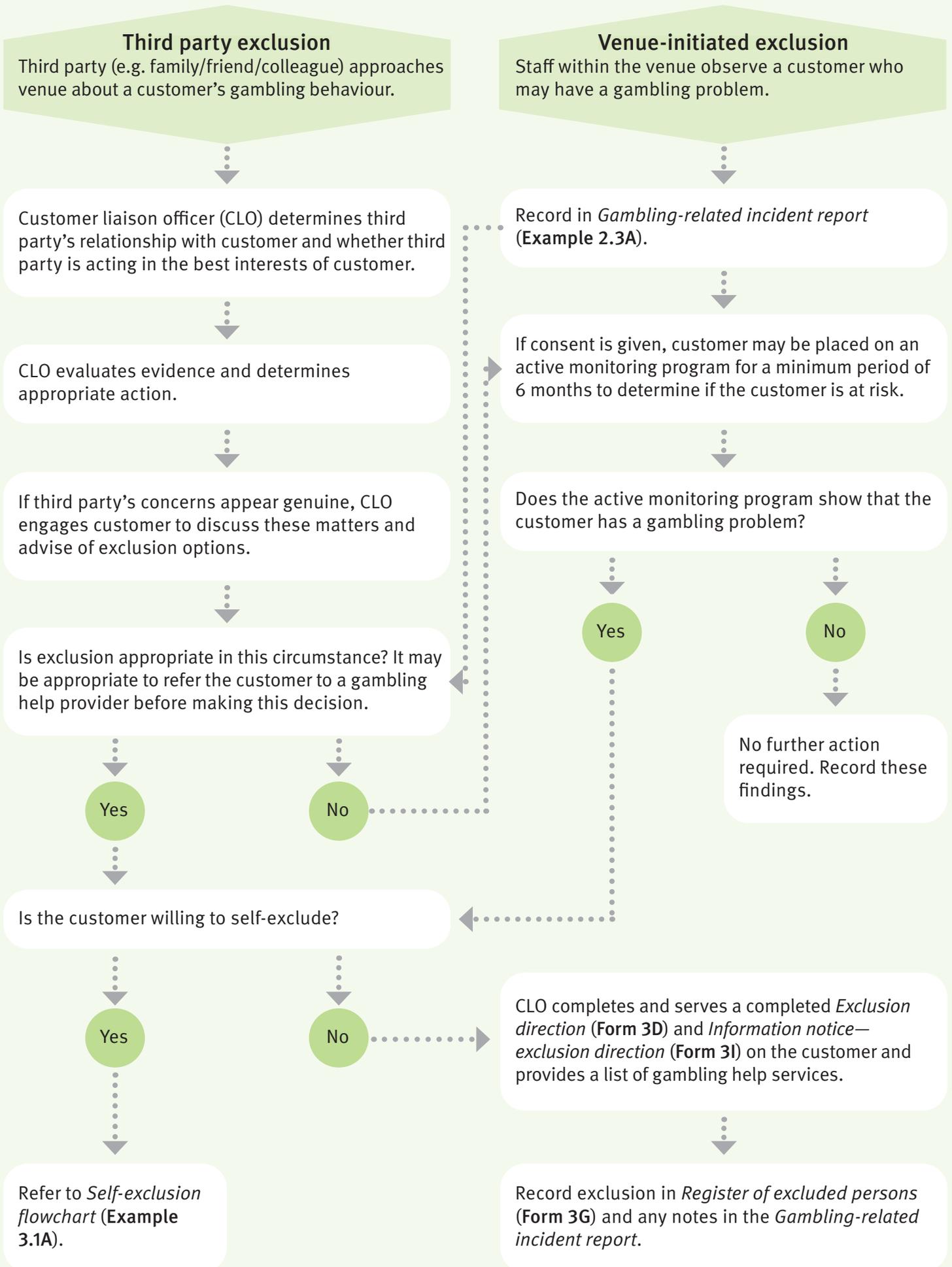
Agent to maintain a contact list for the Gambling Help provider in their local area.

Through UBET's *Responsible gambling policy*, the CLO will be identified as the initial source of information for exclusion provisions within UBET.

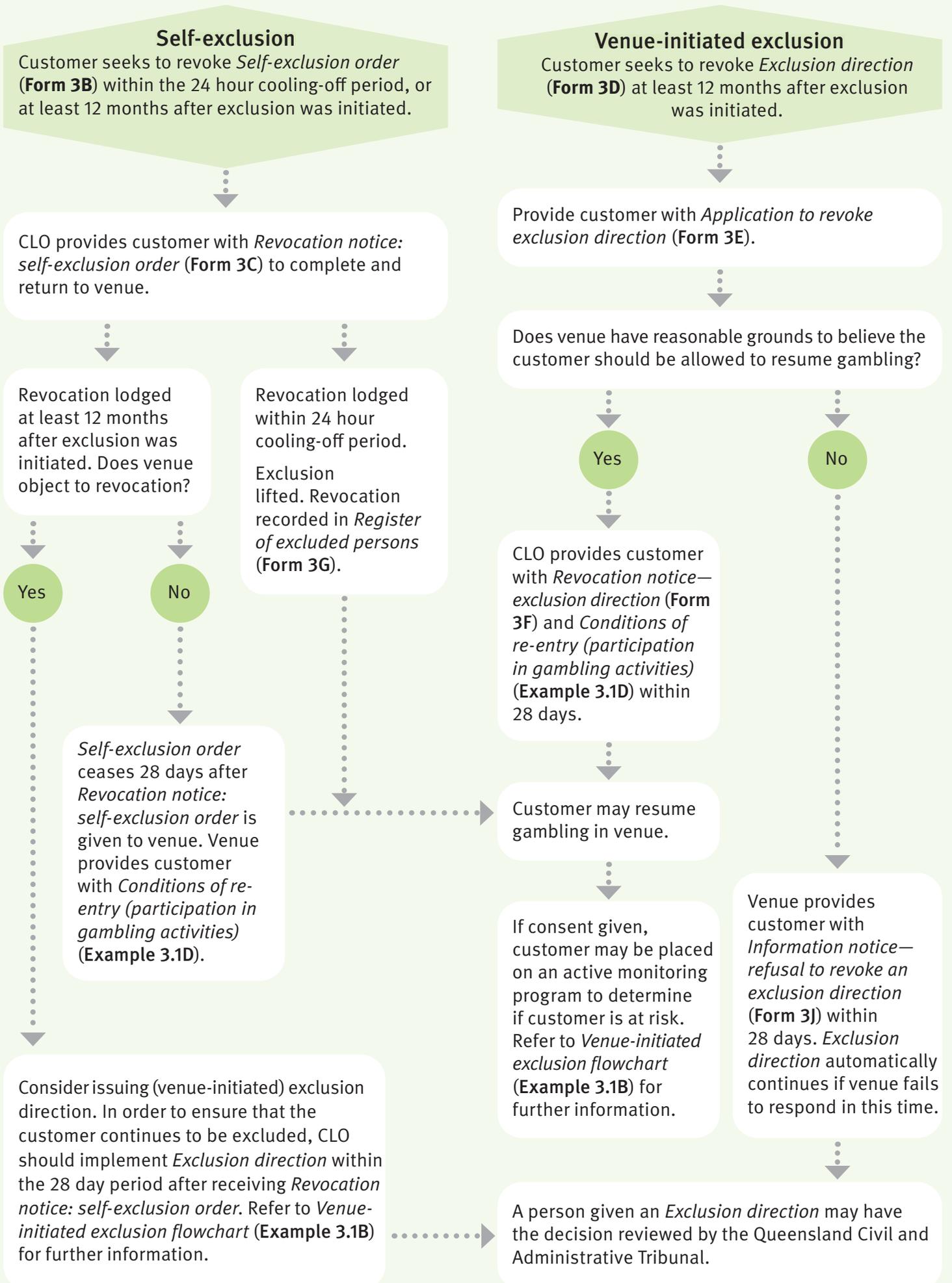
Example 3.1A Self-exclusion flowchart



Example 3.1B Venue-initiated exclusion flowchart



Example 3.1C Revocation process flowchart



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

Gambling provider name _____

Gambling is a popular recreational pastime. Gambling is also a risk-taking activity and this gambling provider is committed to the implementation of risk-management processes which are aimed at minimising harm to the physical, emotional, social and financial welfare of their customers as a result of gambling. It is a condition of re-entry that all customers participating in gambling schemes offered by this gambling provider acknowledge:

- the role of the gambling provider's staff
- that it is the customer's personal responsibility to gamble in a way that is unlikely to cause physical, emotional or financial distress to themselves or others
- that it is the customer's personal responsibility to access problem gambling information made available by the gambling provider, should the need arise
- that it is the customer's personal responsibility to seek the assistance of the gambling provider's staff, for their gambling-related problem, should the need arise
- that it is the customer's personal responsibility to assist the gambling provider's personnel in actively monitoring the continued welfare of the customer for a minimum period of six months from the revocation of the exclusion (for previously excluded customers only).

Customers are assured that their gambling-related information will be handled in accordance with the gambling provider's privacy policy. A copy of these privacy policies are available upon request.

Customers are advised that, where the gambling provider's staff are reasonably considered to have discharged their player protection obligations in good faith, any customers whom have falsified or withheld relevant information in relation to gambling-related problems or neglected to seek assistance in this regard may not be able to hold the gambling provider liable for any negative consequences of the customer's gambling behaviours.

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

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

- a statement to the effect that the circumstances leading to their exclusion no longer apply and recognising the responsible gambling steps taken by the gambling provider's personnel.
- a list of attendance from a recognised counselling service provider or qualified psychologist.
- a statement from the original third party involved in the venue-initiated exclusion process (where applicable) to the effect that gambling no longer constitutes a risk to the welfare of that person or others.
- a statement from a current third party considered to have a close personal interest in the welfare of the customer to the effect that gambling does not constitute a risk to the welfare of that person or others (this would apply where the previous third party relationship involved in a venue-initiated exclusion process no longer exists).

Example 3.1E Consent to monitor my gambling activities

Gambling provider name _____

Customer details

Customer's name _____

Address _____

City _____ State/Territory _____ Postcode _____

Membership no. (if applicable) _____ Phone no. _____

Consent to monitor

As a gambling provider, this venue has a commitment to promoting responsible gambling under the *Queensland responsible gambling Code of Practice* (Code of Practice).

In view of the concerns brought to your attention, this venue requests your consent to monitor your gambling activities in order to meet its obligations under the Code of Practice. This may consist of any or all of the following:

- the operational observations of staff performing their day-to-day venue duties
- information provided by a third party adjudged to have a close personal interest in your welfare
- recording and assessing the visitation rate/time spent at a gambling activity
- information concerning your gambling expenditure and/or personal details supplied to the gambling provider
- if a player account exists, assessing your average account depletion rate.

Customer declaration

I acknowledge that the venue has raised concerns about my gambling activities and I consent to the monitoring of my gambling activities as outlined above.

Customer signature _____ Date _____

Authorised person details

Name _____

Position (customer liaison officer/manager/other) _____

Signature _____ Date _____

3.2 Contact information for support services

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

Actions of UBET

As part of the customer liaison role to establish contacts with local support providers, the CLO and the agent (and/or the manager or suitable replacement in their absence) will have on hand Gambling Help services business cards with the local contact number that can be offered in a confidential manner to customers who seek information on exclusions or any general problem gambling-related issue.

Information on support services (refer to the responsible gambling kit) will also be included with any signing of a *Self-exclusion notice (Form 3A)* and the formal contacting of these by the excluded customer should constitute a key step of any self-exclusion process.

The *Wagering Act 1998* s. 216B(1)(b) provides that on receipt of a *Self-exclusion notice*, UBET must give to the person details, including the name and address, of at least one entity that provides counselling services for problem gamblers (refer to the responsible gambling kit). This requirement has been built into the approved *Self-exclusion order (Form 3B)*. Similarly a space for UBET to give the person details of a counselling service/s has been included in the *Exclusion direction (Form 3D)*.

Best practice

In addition to displaying rules ancillary to gaming (s. 237, *Gaming Machine Act 1991*) and displaying signage about support services (s. 28, *Gaming Machine Regulation 2002*), UBET provides responsible gambling advice, Gambling Help service contact numbers and UBET's *Responsible gambling policy* on its customer interactive InfoTAB units at all agencies and on UBET's website (<https://ubet.com>).

Customers can access this information in such a manner as to not to draw attention to themselves.

3.3 Exclusion from other gambling providers

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

Actions of UBET

Where practicable, UBET will assist excluded customers seeking consensual exclusions from other gambling operators.

Customers completing a *Self-exclusion notice (Form 3A)* at an agency should at all times be encouraged to undertake similar action, in person, with other venues.

Agents, branch managers and CIC's as well as the CLO will familiarise themselves with the following flowcharts:

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

Best practice

Where practicable, the agent should actively seek and develop networks with other agents and CLO's at licensed venues in their local area. This may take place through regular face-to-face meetings, or regular phone contact following an initial meeting.

As a minimum, the agent should maintain a list of responsible gambling officer contacts in venues within the local area to assist the customer to identify and access the correct channels for self-exclusion as easily as possible.

3.4 Correspondence to excluded customers

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

Actions of UBET

UBET and the agent will ensure that no gambling-related correspondence or promotional material is sent to customers who are excluded or are known to have formally requested that this information not be sent. Specifically, this may require that account betting accounts or Smart cards are disabled and/or destroyed so as to eliminate the promotion of gambling. The agent and CLO, or the person doing this role, must take responsibility to ensure that these customers are not sent advertising or promotional materials.

Any customer completing a *Self-exclusion notice (Form 3A)* or having an *Exclusion direction (Form 3D)* served upon them is to be informed that they will automatically be taken off all promotional mail lists and have their account betting account (where applicable) closed so as to prevent their ability to gamble or be in contact with gambling promotions.

Best practice

The CLO will make it a condition that customers who have requested that they not be sent gambling-related correspondence, including advertising and promotional materials can only change their preference by giving a written notice to UBET.

Examples of acceptable/unacceptable actions

Acceptable

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

Encouraging customers who request self-exclusion to seek independent legal advice before signing the *Self-exclusion notice (Form 3A)*.

Providing customers who request self-exclusion with a list of local community support agencies.

Encouraging customers who follow through with self-exclusion to also self-exclude from other venues in the local community.

Unacceptable

Ignoring a customer's request for self-exclusion.

Delaying in giving a customer a *Self-exclusion notice*.

Delaying in preparing and signing a *Self-exclusion order (Form 3B)*.

Staff providing counselling to customers who request self-exclusion.

Continuing to send correspondence and promotional materials that mention gambling to customers who have self-excluded.

Allowing self-excluded customers to enter gambling areas and to partake in gambling activities, without intervention.

Glossary of terms

Active monitoring	A process for staff of a venue to maintain close watch on customers who are, or who are at risk of, being a problem gambler, as detailed in the <i>Possible problem gambling risk indicators (Example 2.4A)</i> . Active monitoring may include collection of data and keeping of written records and may only be done with customer's consent.
Customer liaison officer (CLO)	Person nominated by UBET and acting for and on behalf of UBET in carrying out the responsible gambling strategy and any requirements under legislation.
Exclusion	A prohibition against a customer from specific gambling products, services or gambling areas of UBET.
Exclusion direction	A document initiated and issued by the UBET Customer liaison officer (CLO) to a customer to exclude them from the venue or gambling products.
Executive Director	The Executive Director Office of Liquor and Gaming Regulation (OLGR) Locked Bag 180 City East QLD 4002 May be referred to as Chief Executive in the legislation.
Information notice	A notice given to a customer when issued with an <i>Exclusion direction</i> , and/or refusal to revoke an <i>Exclusion direction</i> , detailing reasons for the decision and further avenues for action.
Notice of contravention of self-exclusion order/exclusion direction	Where an agent or an employee of an agent prevents an excluded customer from entering or remaining in the agency premises, and the customer has attempted to contravene their exclusion order or direction. A notice advising of the event is to be submitted to the Executive Director, OLGR.
Person in charge (PIC)	Individual with responsibility for the operations of an agency on duty at the time of a responsible gambling incident, typically the agent, branch manager or casual in charge (CIC).
Responsible gambling environment	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.
Revocation	Cancelling the <i>Self-exclusion order</i> or <i>Exclusion direction</i> issued to a customer. Following revocation the customer is able to re-enter the licensed premises and/or gaming area without interference. A revocation is initiated by the customer.
Self-exclusion order	A document issued by the UBET CLO upon receipt of a <i>Self-exclusion notice</i> from a person, to exclude that person from the venue or gambling products offered at the venue.
Venue	A generic term to refer to the location of gaming activities, such as hotel, club or casino.

Glossary of exclusion forms

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

Physical environment

Introduction

Agents must ensure that the physical environment at their venue is pleasant, comfortable and safe and does not encourage irresponsible gambling practices. Minors are prohibited from all forms of gambling.

4.1 Minors prohibited

Minors are prohibited from gambling.

Actions of UBET

Agents will request proof of age in any case where the agent reasonably suspects the customer may be a minor (under the age of 18) and will not accept bets unless proof of age is supplied.

Agents will display the essential information notice adjacent to any terminal within the office detailing underage betting information.

Agents will not open a UBET account betting facility in the name of a minor.

Best practice

Customers, who in the opinion of the operator, appear to be under the age of 21 years, will be asked for proof of age before being allowed to place bets.

4.2 Minors excluded

Minors are prohibited from designated gambling areas.

Actions of UBET

UBET is exempt from this practice.

4.3 Hospitality services

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

Actions of UBET

UBET does not provide hospitality services or serve alcohol and is exempt from this practice.

4.4 Unduly intoxicated customers

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

Actions of UBET

Agents will not accept bets from persons who, in the opinion of the agent, acting in good faith, appear unduly intoxicated.

Best practice

Service will be declined to customers who, in the opinion of the operator, appear unable to make an informed decision about their gambling due to the influence of alcohol or a drug.

4.5 Child care and play areas

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

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

Actions of UBET

Agents will not provide child care facilities within their agency.

4.6 Gratuities

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

Actions of UBET

Agents and staff will not encourage gambling customers to give them gratuities. Where a staff member believes that an offer of gratuity is made to improperly influence the conduct of a staff member, the staff must refuse such an offer and log this incident in the *Gambling-related incident report (Example 2.3A)*.

Best practice

Agents and staff are not to accept a gratuity from a customer that may in any way be construed to have been made in order to circumvent the requirements of the Code of Practice.

4.7 Passage of time

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

Actions of UBET

No specific action is required of UBET agents as the time of day is an integral part of UBET operations and is displayed at several sites and on all key information displays within the agency.

Race meeting telecasts are provided at all agencies, which display the real-time outside environment at the racecourse and indicate the passage of time.

4.8 Breaks in play

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

Actions of UBET

No specific action is required of UBET agents as the nature of race wagering and sports betting enforces breaks in play when events are not scheduled.

Breaks in play are also enforced during the conduct of races and sports events when betting is stopped on the event in progress.

4.9 New gambling products and services

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

Actions of UBET

During the development of new products and services including those which make use of emerging technology, due consideration is given to responsible gambling and what the impact of the new product or service may have on responsible gambling behaviours.

Best practice

The Gambling Helpline phone number (**1800 858 858**) or Gambling Help Queensland website (www.gamblinghelpqld.org.au) could be included in/on all new technology, products and services, where practicable.

Examples of acceptable/unacceptable actions

Acceptable

Declining a bet from a person who appears to be a minor without proof of age.

Declining bets from a person who appears unduly intoxicated.

Accepting a small tip for the provision of good service.

Unacceptable

Serving alcohol to customers to encourage betting.

Serving minors.

Serving unduly intoxicated persons.

Encouraging customers to pay gratuities to agents or staff.

Financial transactions

Introduction

The UBET Financial transactions policy (located within the agent's operations manual) is designed to allow UBET to meet the legitimate needs of its customers while assisting customers to make informed decisions about their gambling.

5.1 ATM facilities

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

Actions of UBET

UBET agencies do not provide ATM facilities. EFTPOS must not offer credit card facilities. UBET's EFTPOS facilities are restricted to debit card facilities and do not offer credit card facilities.

5.2 Cashing of cheques and payment of winnings

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

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

The following cheques can be cashed only by prior arrangement:

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

Actions of UBET

Agents will not accept personal or third party cheques as payment for cash betting.

Agents will pay all winnings in excess of \$10,000 by cheque or by electronic funds transfer.

Agents will not accept a UBET cheque issued by the agent in excess of \$5000 as payment for betting unless the cheque was issued on a previous day.

Best practice

Personal and third party cheques are not accepted as payment for bets. Cheques used to deposit funds into an account betting account are subject to a 10 day clearance before funds are made available to the customer.

5.3 Credit betting (lending of money)

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

Actions of UBET

Agents will not permit credit betting under any circumstances. Credit betting is unlawful and carries significant penalties under the provisions of the *Wagering Act 1998*.

Agents will not lend money for the purpose of gambling under any circumstances.

Examples of acceptable/unacceptable actions

Acceptable

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

Unacceptable

Accepting credit betting.

Practice 6

Advertising and promotions

Introduction

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

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

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

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

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

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

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

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

Note: *‘player loyalty/rewards program’ is 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.*

6.1 Code of Ethics

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

Actions of UBET

UBET will train staff and volunteers to implement the *Code of Ethics* as adopted by the Australian Association of National Advertisers (AANA), www.aana.com.au

Acceptable practices

UBET and its advertising agency subscribing to the *Code of Ethics* as adopted by the AANA.

UBET ensuring all advertising developed and delivered complies with the *Code of Ethics*.

Advertising or promoting a player loyalty/rewards program 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.

Unacceptable practices

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

Implementing a player loyalty/rewards program that provides rewards for expenditure above the customer’s normal spend or encourages customers to bet for longer periods than they would normally.

6.2 False, misleading or deceptive

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

Actions of UBET

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

Acceptable practices

When advertising jackpots (e.g. First4), UBET advising customers of the 'estimated' jackpot amount.

When advertising upcoming Telebet Express Payday payouts, UBET advising all Telebet Express customers of 'estimated' payout figure.

When advertising fixed odds prices in print or electronic mediums, UBET advising audience of the time at which the odds were current and where to access the current odds.

Providing a player loyalty/rewards program customer with UBET's privacy statement and obtaining an agreement from the customer to receive direct mail promotional material.

Providing customer with the conditions for participation in a player loyalty/rewards program, including all benefits and obligations.

Unacceptable practices

Advertising a jackpot (e.g. First4) where the amount advertised is not a true projection of the expected jackpot amount.

Using language that may imply that customers may win the total jackpot amount if they select the correct outcome (e.g. First4).

Inferring fixed odds prices are not subject to change.

Not providing customers with the full terms and conditions of the player loyalty/rewards program when they join the program.

Not providing customers with the option to opt out of any player loyalty/rewards program.

Explicitly stating or inferring a benefit that is not actually available to the customer participating in player loyalty/rewards program or implying inflated or exaggerated benefits or chances of winning through participation.

6.3 Misrepresentation of probabilities

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

Actions of UBET

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

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

Acceptable practices

UBET not using language that suggests that winning with the TAB is easy.

UBET providing customers with several different forms of racing information to assist customers to make their own selections and deductions.

Describing how exotic bet types work and the combinations covered by a particular exotic bet.

Unacceptable practices

Suggesting that a venue, product or distribution channel is 'lucky'.

Using language such as 'winning is easy', 'have a bet and win' or 'today is your lucky day'.

When advertising an exotic bet type, implying the odds of winning are greater than they actually are.

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

6.4 Reasonable strategy (financial betterment)

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

Actions of UBET

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

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

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

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

Acceptable practices

UBET's marketing strategy focusing on fun and entertainment, including what differentiates its products from random outcome-based gambling products. For example, customers can:

- have a bet on a live and unfolding event (in sport and racing)
- use a degree of knowledge and skill to influence the chance of winning.

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

UBET enhancing the enjoyment of a specific event through the use of UBET products offered on the event.

UBET not implying that using its services is a life-changing event or winning will improve standard of living.

Unacceptable practices

Using language that would imply that winning at the TAB is another way to earn an income or that it may alter your living standards.

6.5 Misleading statements

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

Actions of UBET

Responsible advertising and promotions will not make false promises/statements about the odds, prizes or chances of winning. This includes not suggesting that skill can influence games that are really games of chance. Luck should not be used in advertising or 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.

Acceptable practices

When advertising fixed odds prices in print or electronic mediums, UBET advising audience of the time at which the odds were current and where to access the current odds.

Printed material in-store advising customers that the prices for fixed odds are not set until the bet is sold.

On the back of all wagering tickets and on the website, UBET advising customers of all deductions.

When advertising jackpots (e.g. First4), UBET advising customers of the estimated jackpot amount.

When advertising upcoming Telebet Express Payday payouts, UBET advising Telebet Express customers of estimated payout figure.

Unacceptable practices

Advertising in a way that misleads or misrepresents the actual chance or odds of winning.

Leaving out-of-date advertising material displayed at point of sale that shows prize amounts that are no longer available.

Using language that may imply that customers may win the total jackpot amount if they select the correct outcome (e.g. First4).

6.6 Community standards

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

Actions of UBET

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

Acceptable practices

UBET not using images that may offend prevailing community standards.

Using text and images that are in step with prevailing community standards and that maintain a high industry standard.

Unacceptable practices

Using images of minors betting.

Using text or images that are overtly sexual in nature/sexually explicit, profane, mocking or degrading of a person's physical appearance, gender, race or religious beliefs.

6.7 Other activities to promote

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

Actions of UBET

Does not apply, as UBET has no other activities to promote.

6.8 Minors or vulnerable or disadvantaged groups

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

Actions of UBET

Minors

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

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

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

Acceptable practices

UBET specifically targeting 18+ audiences via electronic and print media.

Using graphics, photos and text that is specifically directed at an adult market.

UBET not intentionally advertising or promoting services to minors or vulnerable or disadvantaged groups.

UBET not using images of minors betting.

UBET not providing sponsorship to, or supporting, organisations, clubs or schools that are made up of minors.

Note: UBET's encumbered advertising agencies, KWP Advertising and The Partners, operate under the Code of Ethics and conduct all media buying.

Unacceptable practices

Intentionally placing media where it targets minors and disadvantaged groups.

Sponsoring/supporting clubs, organisations or schools that are made up predominantly of minors.

Using graphics or photos of recognised children's cartoon characters or children's entertainers.

Using advertising talent that projects the image of a minor.

6.9 External signs

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

Actions of UBET

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

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

Acceptable practices

UBET not advertising via external signs advising of winnings paid.

Unacceptable practices

UBET advertising via external signs advising of winnings paid.

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

6.10 Irresponsible trading practices

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

Actions of UBET

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

Irresponsible trading practices are actions designed to persuade an individual to gamble in an excessive and irresponsible manner by offering inappropriate inducements. Such inducements may involve individuals who are persuaded to gamble who, in the absence of an inappropriate inducement, would not have otherwise. This may result in individuals being persuaded to gamble for longer periods of time

and in a more excessive and irresponsible manner than they otherwise would have done. Inappropriate inducements therefore have the potential to impact on people who are at risk of, or have, a gambling problem.

Acceptable practices

UBET 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.

UBET having agents' agreements in place which provide for termination of the operator if it is found that credit betting has taken place.

Implementing player loyalty/rewards program promotions and features that provide customers with the actual benefits and the actual cost of participating in the player loyalty/rewards program.

Any advertising or promotion which aligns with the Association for Data-driven Marketing and Advertising (ADMA) *Direct Marketing Code Of Practice*, including respecting 'Do not contact' requests (respecting consumer preference).

Unacceptable practices

Providing customers credit for the purpose of betting.

Offering customers improper inducements to bet.

Running promotions on specific days (e.g. pension days) to encourage people to come when they have money.

Implementing player loyalty/rewards program promotions and features that imply the use of the player loyalty/rewards program increases a customer's luck or increases the likely winning outcome of the game or wager for the punter.

Implementing a player loyalty/rewards program that encourages irresponsible play by implying that the punter is due for a win, their luck is about to change or that they have a streak of losses so their luck must change.

Emailing or direct marketing in any way, gambling materials to excluded persons, or to customers who have not consented to receive such material or who have expressed a wish in writing not to receive such information.

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

6.11 Consumption of alcohol

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

Actions of UBET

UBET will not advertise or promote any of their gambling activities in a manner which promotes alcohol consumption while engaged in the activity of gambling.

Acceptable practices

Undertaking advertising or promotions that do not use images of individuals drinking while gambling.

Unacceptable practices

Using images of individuals drinking and gambling.

Running a joint promotion with an alcohol supplier to mutually promote goods and services.

6.12 Consent of the person

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

Actions of UBET

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

Acceptable practices

UBET's privacy guidelines in keeping with privacy laws which are implemented across all advertising and promotional activity.

Customers being advised of UBET's intentions in relation to promotional activities through the displaying of terms and conditions posters.

UBET agents running in-store promotions displaying terms and conditions posters to advise customers of their intentions.

UBET advising winners that they have the right to anonymity if they wish.

Unacceptable practices

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

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

6.13 Responsible gambling messages

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

Actions of UBET

UBET will include words and/or images that convey the message that gambling is fun only when done so in a responsible manner, e.g. 'Keep gambling enjoyable, gamble responsibly'.

Acceptable practices

Including words or images that convey the message that gambling is fun only when people play responsibly such as 'Gamble responsibly'.

Using a responsible message in player loyalty/rewards program advertisements and promotions.

Ensuring player loyalty/rewards program correspondence and marketing material supports responsible gambling and carries responsible gambling messages and where to get help information.

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

Unacceptable practices

Using terms that imply everyone is a winner or implies that participation in the player loyalty/rewards program increases the chance of winning.

Not ensuring responsible gambling messages are sized appropriately with respect to the ratio of advertising or promotional material.

Gambling help information

Phone

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

Face-to-face

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

- Centacare
- UnitingCare Community
- Relationships Australia Queensland
- Lifeline Darling Downs and South West Qld.

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

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

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

Online

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

Other services (available 24 hours)

Gamblers Anonymous **0467 655 799**

Lifeline **13 11 14**

Frequently asked questions

What are the effects of problem gambling?

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

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

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

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

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

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

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

Children are often first exposed to gambling within the family unit. Where problem gambling is prevalent in the family unit, those children may be at a higher risk of starting to gamble or use alcohol and tobacco at an early age. It is critical to understand that

problem gamblers don't overcome their problem by simply having more self control. Problem gambling is more complex than just a control problem.

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

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

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

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

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

For a comprehensive list of indicators refer to the *Possible problem gambling risk indicators* in **Practice 2** of this Resource manual (p. 11).

Examples of risk indicators

1. Loss of control

Obvious distress where someone is crying while playing or changing money at the cashier/bar. Slumped over body posture, head in hands and quiet misery can also be a sign of 'problem gambling'.

- 'I went back to the window to get another \$20 again six times with tears streaming down my face...no-one said anything to me, I just couldn't leave'—Annie, 67 years (pensioner).

2. Loss of control

Aggressive behaviour towards gaming machines or other customers or staff.

- 'This man started hitting and kicking the machine. I said that if he didn't stop I would call security, I asked him if he had a problem...it turned out that he had just lost his entire pay. He was OK with me giving him some info about counselling but I haven't seen him again'—Suzie, 32 years (gaming manager).

3. Personal remorse

Comments such as ‘There goes the rent’ or ‘I can’t afford to do this’ or worse ‘If this doesn’t win I may as well end it all’.

- ‘She said laughing “There goes the rent” which left me feeling uncomfortable. I went back and checked it out with her. She insisted it was a joke but I kept an eye on her for a few weeks afterwards’—Jan, 54 years (waitress).

4. Depression, or thoughts about suicide

- ‘There was this man at my blackjack table...he told me that if he didn’t win that he would be looking for a rafter to swing from. He wasn’t joking’—Paul, 20 years (croupier).

5. Negative impacts of gambling

Problem gamblers may sometimes spend relatively small amounts of money, but if they can’t afford to lose that money, then they have a problem with their gambling. The loss of even a small amount of money could increase a customer’s anxiety, resulting in a negative impact on themselves, their family and workplace. Questions such as ‘Is this machine working?’, ‘It must be broken/fixed...it should have won by now’ or ‘I’ve paid for this machine...I should own it now’.

- ‘I had a staff member who was not very reliable, always tired and during a discussion about her performance admitted that she had a problem. She insisted that she never played at work but that she was regularly losing at the casino. I offered to get in touch with John, our local counsellor, reassuring her that it was completely confidential. She tells me that she has chosen to access a Gambling Help service counsellor closer to home’—Pat, 42 years (gaming manager).

6. Loss of control/personal remorse

Long periods of play or frequent repeated periods of play.

- ‘They must have known I had a problem...I stole over \$250,000 to feed my habit and spent it all there. I practically lived there’—George, 45 years.

How successful is counselling in the treatment of ‘problem gambling’?

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

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

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

What should I do if I have a customer that:

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