

# Queensland responsible gambling Resource manual

Section A • V3.2 • 2020

# Hotels

Developed by Queensland Hotels Association and the Department of Justice and Attorney-General

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## Practice 1

# Provision of information

## Introduction

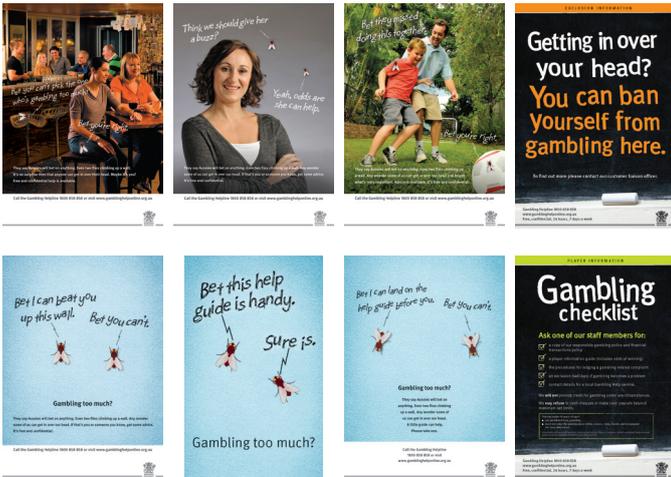
Hotels have a responsibility to offer their customers accurate and meaningful information so that they are able to make informed decisions about their gambling. This information will be readily available to all customers and will be placed in high traffic areas in and around designated gambling areas.

### 1.1 Potential risks

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

#### **Actions of the gambling provider**

The hotel will prominently display current responsible gambling signage and information on where to get help in designated gambling areas and near ATM and EFTPOS/cash out facilities servicing gambling areas. Current in-venue signage includes:



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

Ongoing maintenance of signage and information will be the responsibility of the gambling provider.

#### **Best practice**

Local gambling help services may have brochures that advertise their services and these can be used in locations around the gambling area and/or venue at the manager's discretion—for example, on the back of toilet doors. In addition, gambling providers could display responsible gambling signage and information in other areas of the venue, for example near the cashier's booth and/or stand-alone change dispensing devices.

### 1.2 Available on request

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

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

#### **Actions of the gambling provider**

Hotels will alert customers (this could be in the form of a board, sign or poster), that additional information is available on request, which includes:

- the Responsible gambling (house) policy (Example 1.2A) including policies for addressing problem gambling issues relevant to the local community
- Player information guide (Example 1.2B) detailing information on the nature of games, game rules, odds or returns to players
- exclusion provisions
- gambling-related compliant handling procedures
- key elements of the gambling provider's financial transaction practices.

#### **Best practice**

Gambling providers may choose to display their full or summarised Responsible gambling (house) policy and Player information guide in prominent location/s.

Any customer becoming a member of a loyalty program would automatically be provided with this information at some stage in their application process (upon initial application or on issue of a loyalty card or similar).

Members of the Queensland Hotels Association (QHA) will also have access to the fortnightly newsletter and monthly magazine that will provide them with informative articles, industry and *Queensland responsible gambling Code of Practice* (Code of Practice) updates particularly in relation to best practice initiatives and general gambling-related pieces. In addition to this, the QHA will provide a responsible gambling section in the *Members Only* area of their website.

Hotels could consider providing information in a range of languages other than English. Demographic information for each hotel's local community and languages spoken can be found at the Australian Bureau of Statistics website ([www.abs.gov.au](http://www.abs.gov.au)) and hotels could contact the relevant local community organisation for assistance with translation. Additionally hotels could also post information on their own websites.

## Example 1.2A Responsible gambling (house) policy

### Goal

This house policy broadly defines the range of responsible gambling initiatives and harm minimisation strategies within the venue. If you require further clarification on any of the information contained within this policy please ask one of our friendly staff to assist you. Enjoy responsible gambling.

### General

Management and staff of this hotel support the responsible provision of gambling products at the venue for our customers' enjoyment.

This hotel has a senior staff member who can assist you with all gambling-related enquiries.

Gambling products are offered at this venue in accordance with the relevant legislation related to that product.

### Practices

#### 1. Provision of information

The hotel has available a range of information, upon request, to assist customers with their decision to gamble, which includes:

- *Player information guide*
- signage on the potential harm of gambling
- Gambling Help services to assist those affected by gambling.

#### 2. Interaction with customers and community

The venue has available a senior staff member to assist with:

- customers' enquiries on gambling-related issues
- facilitating exclusion programs for customers
- liaison with community network groups
- resolving customer complaints.

The venue has a commitment to the ongoing training and development of staff and management in the responsible provision of gambling and gambling products.

The venue has in place detailed complaint handling procedures for the amicable and timely resolving of complaints.

#### 3. Exclusion provisions

The hotel will offer exclusion provisions as one of a range of proactive measures to assist those with gambling problems.

Please ask a staff member for the [insert position here], for example, customer liaison officer or manager.

#### 4. Physical environment

Minors are not permitted to gamble nor be in a designated gambling area, and the only acceptable forms of identification to ascertain age are:

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

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

Customers who are unduly intoxicated will be refused service of alcohol, will not be permitted to gamble and may be asked to leave the premises.

The hotel will provide a safe and clean gambling area at all times.

Customers' privacy and confidentiality will be a top priority all of the time.

Gaming machines will be maintained in premium condition all of the time and any machine unable to be played will be clearly marked.

The 'chocking' or continual depressing of buttons by insertion of a coaster, plastic peg or similar is not allowed at this hotel.

#### 5. Financial transactions

Credit betting is illegal.

No credit is available to anyone, at any time, under any circumstance.

The ATMs within this venue have access only to debit accounts.

Please refer to the hotel's *Financial transactions policy* for more information.

#### 6. Advertising and promotions

For more information on acceptable and unacceptable advertising and promotions, including player loyalty/rewards programs, please refer to the Advertising and promotions section of the *Queensland responsible gambling resource manual (Hotels)*.

'The [insert hotel name]—promoting responsible enjoyment'.

## Example 1.2B Player information guide

### Introduction

This guide is offered to ensure that customers of this hotel are provided with relevant information on a range of gambling products provided by the venue.

Gambling is a past time enjoyed by many Australians and has long been a part of Australian society. For some however, gambling may become a problem.

This venue is committed to providing any gambling product in such a way as to maximise the benefit most people gain from this ancillary form of entertainment, whilst minimising any potential harm that some people may experience when their gambling becomes a problem. Sometimes, this behaviour may affect the customer themselves, and/or their family and friends, and which may extend to the wider community.

Whilst offering players a general guide to gambling at the venue, this booklet also offers some helpful hints to assist customers control their use of gambling to ensure it is enjoyed for what it is—entertainment.

### What are your chances of winning?

Customers should be aware of their odds or chances of winning on a range of commonly used gambling services at the venue. These services include electronic gaming machines (known as EGMs or *pokies*) and Keno.

### Electronic Gaming Machines

All EGMs undergo stringent testing before they are installed in venues to ensure they comply with strict government regulations. By law, each EGM must also be approved in Queensland. This is noted by the presence of an official machine plate found on the side of the machine. These measures are taken for your protection.

By law, all EGMs in Queensland are programmed to return to player (RTP) between 85–92 per cent of takings. This means that for every \$1 invested, the machine is programmed an RTP of between 85 cents and 92 cents on average, over a long period of time. As stated, the RTP is a long term average and it means that, in the long run, the machine always comes out ahead.

The stopping position of each reel is completely random and is done separately and independently of each reel. The outcome of each spin is completely random and whether you win or lose is totally a matter of luck.

Gaming machines are not pre-programmed to pay at a specific time or after any particular cycle. In other words, a customer's chances of winning or losing are exactly the same for every play, regardless of any previous play.

So, it does not make a difference whether:

- you play a pokie straight after someone else has had a large payout
- you play a machine that has not had a large payout for sometime
- you play at certain times and/or certain days
- you press the button in certain ways.

### **Odds**

The chances of the same five symbols appearing in the highest winning combination depend on the game design and are generally very small (this can be as little as 1 in 7 million). This means that for up to every 7 million times the reels are spun, five symbols appearing in the highest winning combination may occur only once on average. Of course, there is an increased chance of winning a smaller prize which requires fewer matching symbols or lower paying symbols. An example may be as follows:

5 of the same lower paying symbols—1 chance in 4,784 spins

4 of the same symbols—1 chance in 490 spins

3 of the same symbols—1 chance in 45 spins

2 of the same symbols—1 chance in 9 spins.

Remember, the chances of specific combinations occurring are totally random.

### **Numbers games (Keno)**

Keno is found in hotels, clubs and casinos around the State. Games are drawn every three minutes. Like Lotto or Powerball, the numbers are drawn using a device that is basically a random number generator. In Keno there are 80 numbers—1 to 80. Under strict supervision 20 numbers are drawn, as mentioned, at random. Players can choose from 1 to 10 numbers, then 15, 20, and 40.

### **Odds**

If you choose 7, 8, 9 or 10 numbers, a proportion of your bet, or *wager*, will be allocated to the jackpot for 7, 8, 9 or 10 number games. Your chance of winning the jackpot on the 10 number game is 1 in 8,911,711. This basically means that on average, if you play over 8 million games, you may win the jackpot once.

### **Do you have a problem with gambling?**

Sometimes, a person's gambling behaviour may cause harm to themselves or their families or friends. Quite often, a person may not realise they have a problem with gambling.

Ask yourself—do you:

- think a lot about your previous or next gambling adventure?
- get irritable if you cannot gamble?
- find yourself increasing the amount you gamble?
- gamble to win back losses?
- try to hide how much time and money you spend on gambling?
- have problems in work or relationships as a result of gambling?
- borrow money or sell goods to assist in paying household bills?
- commit unlawful acts to finance gambling?
- have difficulty controlling your gambling?
- gamble to avoid thinking about or dealing with difficult issues?

If you answered 'yes' to one or more of these questions, you may have problems with gambling. If you would like more information or want to talk to someone about your gambling, call the Gambling Helpline on **1800 858 858** or contact one of the friendly staff at this hotel. Confidentiality and privacy are ensured.

## 1.3 Odds of winning major prizes

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

### **Actions of the gambling provider**

Information on the odds of winning major prizes on various forms of gambling will be displayed in all gambling areas and in proximity to relevant games.

### **Best practice**

To do this the hotel could:

- display odds of winning major prizes by displaying the chances of winning
- ensure gambling staff are informed about the odds of major prizes of gambling products offered at the venue
- prominently display the *Player information guide* (**Example 1.2B**) in accessible areas around the venue including in designated gambling areas and near ATMs, EFTPOS facilities and the cashier booth, for customers' use
- ensure adequate supply of these guides
- alert customers to its availability and promote its use.

Hotels could promote the availability of these guides via:

- machine 'talkers' attached to the side of gaming machines
- DL display stands in between gaming machines
- display stands near ATMs, EFTPOS/cash out facilities and cashier booths.

The *Player information guide* will contain information beneficial to the player, and may include:

- the odds or chances of winning prizes on gambling products and services—for example, gaming machines and Keno
- the potential harm that may result from gambling
- some common indicators that may alert customers that their (or their family member's or friend's) gambling behaviour is becoming a problem
- the availability of counselling and other support services
- general information to assist customers make informed decisions about their gambling expenditure and usage.

## 1.4 Predominant cultural groups

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

### **Actions of the gambling provider**

The hotel will:

- provide an information sheet in a language, other than English, if required by the demographic makeup of the membership or patronage
- ensure that the responsible gambling messages contained in the information sheet are culturally-appropriate
- include a note in the English language version of the information sheet that similar information is also available in other 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 [www.tisnational.gov.au](http://www.tisnational.gov.au)

### **Best practice**

The hotel may further develop or source a range of responsible gambling materials in languages other than English, which are stored electronically and printed upon request.

## Examples of acceptable/unacceptable actions

### **Acceptable**

Make customers aware that information is available on request that includes the venue's *Responsible gambling (house) policy* (**Example 1.2A**), information on odds and returns to players, exclusion provisions, complaint handling procedures and key elements of their financial transaction practices.

Ensure sufficient stock of where to get help signs and takeaway cards are maintained.

### **Unacceptable**

Placing responsible gambling information in hard-to-reach, inaccessible or hard-to-view locations in the venue.

Informing customers that responsible gambling information is unavailable.

# Interaction with customers and community

## Introduction

Hotels must ensure adequate liaison with customers and the relevant local community groups on an as required basis to effectively resolve problem gambling issues and to receive feedback and facilitate cooperation. Cooperation between the hotel and the relevant local community groups, or nearest available groups, has important advantages such as:

- community networking makes good business sense and offers hotels the opportunity to understand local community issues
- promoting the hotel as an active and responsible community partner.

## 2.1 Community liaison

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

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

### **Actions of the gambling provider**

The hotel will ensure a senior/responsible staff member performs the role of customer liaison officer (CLO) to establish and continue open communication channels with local gambling-related support services and relevant local community networks. This appointment is at the manager's discretion and in some instances this may be the manager. The tasks associated with this role do not warrant the development of a new position, but rather incorporate a current role.

Establish links between hotels and local relevant community networks and support services. The CLO could make contact with the local (nearest) Gambling Help service provider to open up communication and establish a relationship that will assist the gambling provider to deal with any problem gambling issues that may arise in the future.

The CLO could contact the local Gambling Help service and invite them to conduct a training session for the hotel staff. The training session could focus on equipping gaming staff with information and strategies to help customers with gambling problems, together with conflict resolution, physical and mental signs of stress and stress management.

The hotel will provide ongoing training for staff in responsible gambling services and products. The hotel will establish customer complaint handling procedures.

## 2.2 Customer liaison role

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

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

### **Actions of the gambling provider**

The hotel will nominate a senior/responsible gaming staff member (e.g. a gaming supervisor/manager or assistant/duty manager or indeed the hotel manager) as the CLO who will be responsible for all customer liaison matters concerning, in the primary instance, gambling-related issues. This staff member will:

- ensure information is displayed as required by **Practice 1.1**
- provide relevant information to hotel customers and staff who make it known to the staff member they have gambling-related problems, which includes at a minimum, information about the nearest support service
- support staff in providing assistance to customers with gambling-related problems
- offer venue staff and management regular updates on gambling-related issues and enquiries and appropriate action, whilst maintaining customers' and/or staff's privacy and confidentiality at all times
- attend relevant meetings as and when required.

### **Best practice**

Hotel staff meetings could have an update from the CLO on concerns/developments/actions taken on gambling-related issues.

The CLO would be responsible for internally and externally provided training in the responsible service of gambling, customer care and management of self-exclusions, venue-initiated exclusions, revocations and the handling of contraventions.

## **2.3 Customer complaints**

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

### **Actions of the gambling provider**

The hotel will establish and implement formal *Complaint handling procedures (Example 2.3A)*, if one does not already exist, to effectively resolve to each party's satisfaction, any complaints arising from gambling-related issues. **Example 2.3A** is offered as an example only and hotels are encouraged to develop their own complaint handling procedures.

The CLO will handle/record all complaints/incidents of a gambling nature using a *Gambling-related incident report (Example 2.3B)*. In their absence, a suitable alternative staff member should be nominated. Details of any incidents or complaints will be entered into the register of gambling-related complaints. Only designated people (e.g. the manager, the CLO or their nominated replacement) can complete the register in full.

The hotel and relevant staff should note that payout refusals may include the involvement of the Licensed Monitoring Operator and/or the Office of Liquor and Gaming Regulation (OLGR). All matters should be well documented with supporting evidence and information. Pursuant to s. 245 of the *Gaming Machine Act 1991*, a written notice in the case of a payout refusal must be provided.

### **Best practice**

In addition to the complaint handling procedures and the register, hotels could implement additional initiatives that may include:

- follow up complaint within 48 hours as a maximum
- advising customers of the relevant appeals processes (e.g. Licensed Monitoring Operators and OLGR) for payout refusals
- customer comment/feedback cards/forms in appropriate areas
- 'handling customer complaints' training at induction or further on-going training.

## **Example 2.3A Complaint handling procedures**

The [insert hotel name here] aims to provide great service and quality facilities for all our customers to enjoy all of the time.

We recognise that sometimes this may not happen. Appreciating the value of our customers and the importance of return business, please raise any query with the customer liaison officer (CLO) or the manager (venues please delete as required) and follow these steps to resolve the issue satisfactorily:

1. All comments and complaints are to be referred to the CLO. In their absence, please refer any issue to the manager.
2. If a gambling-related complaint, ensure the *Gambling-related incident report (Example 2.3B)* is completed.
3. The CLO will contact the customer to:
  - ensure the exact nature of the comment or complaint is known
  - advise the customer of action to be taken.
4. A decision will be made as to whether the comment or complaint can be resolved immediately by the CLO or whether it needs referral to a higher level, e.g. management or the Office of Liquor and Gaming Regulation (OLGR).
5. If referral to a higher level is required, the customer must be notified within 48 hours of the complaint being made as to the timeframe for response.
6. An initial written notice in relation to payout refusals is required (pursuant to s. 245 of the *Gaming Machine Act 1991*) to be made as soon as practicable after the decision is made.
7. Any solution arrived at should be supported by the appropriate hotel policy or procedural statement and/or legislative conditions. This should be advised in writing.
8. Should the customer not be satisfied with the result, they will be advised of the relevant appeals mechanisms, such as OLGR.

## Example 2.3B Gambling-related incident report

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

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

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

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

Address \_\_\_\_\_

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

Email \_\_\_\_\_

Incident details (attach additional pages if required)

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Immediate action taken (attach additional pages if required)

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

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### Staff member details

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

Staff member position (customer liaison officer/manager/other) \_\_\_\_\_

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 the gambling provider**

Management of the hotel and staff involved in gambling-related duties will undertake training in the responsible provision of gambling products including *Possible problem gambling risk indicators* (Example 2.4A) for staff. All such training will be regularly updated in the hotel's *Register of training* (Example 2.4B) and the relevant staff file, in collaboration with the staff member performing the customer liaison role. Training will be ongoing for staff and gambling providers which can take one or a combination of forms.

For example, mandatory responsible service of gambling training from a registered training organisation (e.g. QHA) can be completed either:

- in-house (e.g. QHA)
- by staff attending a 'public' course offered by a reputable training provider.

### **Best practice**

Staff and management are encouraged to investigate additional sources of gambling-related information pertaining to training and skills development—for example:

- professional development short courses and workshops
- attendance at trade shows featuring gambling products/services
- subscription to regulatory bodies' publications, newsletters, fact sheets, e.g. OLGR's *Responsible service* newsletter
- subscription to industry associations' newsletters and magazines, e.g. QHA's monthly *Review* and fortnightly update
- research on the internet—for example, [www.qha.org.au](http://www.qha.org.au) and [www.business.qld.gov.au/liquor-gaming](http://www.business.qld.gov.au/liquor-gaming)

## 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.

#### **Faulty cognition**

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

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

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

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

- Trying obsessively to win on a particular machine.
- Spending too much time and/or money gambling.

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

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

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

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

#### **Social behaviours**

- Friends or relatives call or arrive to ask if the person is still at the venue.

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

*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 term *gambling provider* is used, which refers to a hotel with one or more gambling products (pokies, TAB, Keno). The term *licensee* may also be used. This refers to the person or legal entity (company/incorporated body) in whose name the liquor and gaming licenses are issued. The responsibilities attributed to the licensee may be carried out by their nominated representative which may include the gaming nominee, manager or CLO.

The exclusion provisions are aimed at supporting customers who are, or who 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 a gambling provider (venue-initiated exclusion).

Exclusions offer the option of banning a customer from specific gambling providers, gambling products or services. This can be from either the whole of a venue or part of a venue, e.g. gaming machine area/ Keno/TAB/all of these areas.

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

- mutual agreement between the customer and the venue in the case of self-exclusion
- the gambling provider's discretion in the case of venue-initiated exclusion.

Specific actions of both the customer and gambling provider are prescribed in the legislation relating to exclusions. Options are available to gambling providers and customers to limit contact with gambling activities. The advice of a concerned third party may be taken into consideration by a gambling provider in any action taken. Penalties (including financial) may apply to both the customer and the licensee (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 venue from which he/she has been banned.

It is the responsibility of all gambling providers under legislation to actively enforce exclusion procedures with customers. Gambling providers are obliged to provide assistance to customers who present for self-exclusion and to follow through with the exclusion process.

At all times the customer who is seeking an exclusion will be required to make contact with the CLO or nominated person of the hotel in the first instance and apply for the exclusion in person.

Legislative references:

- *Gaming Machine Act 1991*
- *Keno Act 1996*
- *Wagering Act 1998*.

## 3.1 Exclusion procedures

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

### *Actions of the gambling provider*

Management/senior gaming/gambling staff and the CLO will familiarise themselves with the following:

- *Self-exclusion flowchart (Example 3.1A)*
- *Venue-initiated exclusion flowchart (Example 3.1B)*
- *Revocation process flowchart (Example 3.1C)*
- *Conditions of re-entry (participation in gambling activities) (Example 3.1D).*

The hotel will develop and implement the following minimum procedures for exclusions.

**Note:** approved exclusion Forms 3A–3I referred to in this section are available for download from [www.business.qld.gov.au/liquor-gaming](http://www.business.qld.gov.au/liquor-gaming)

### **Self-exclusion**

Upon being approached by a customer seeking assistance, hotel staff will listen intently to customer's request in a confidential manner and explain the need to refer the matter to the CLO.

If the customer refuses this, staff should emphasise that they cannot provide the most effective assistance and should suggest a meeting with the manager (if different to CLO).

The CLO should discuss with the customer the option of self-exclusion. The CLO should ensure that the customer is provided with sufficient information about the self-exclusion process to make an informed decision when accepting or declining self-exclusion. Specifically the CLO should discuss:

- the self-exclusion process
- the timeframe of self-exclusions
- options for exclusion from whole or part venue/ some or all gaming products
- contact with community support services
- the forms required
- legal implications
- the right to seek independent legal advice
- penalties that apply for breach of an exclusion.

The patron then makes a decision whether to proceed with the self exclusion. If the customer does not agree to proceed with a self-exclusion, the CLO should complete the *Gambling-related incident report* (**Example 2.3B**).

#### Implementing a self-exclusion

1. Once the CLO has informed the customer about the self-exclusion process and if the customer wishes to proceed, the CLO must provide the customer with a *Self-exclusion notice* (**Form 3A**).
2. The exclusion may only apply to some sections of the venue, taking into consideration the need for the customer to access some community services within the venue (such as ATM, dining/bistro). Where possible, the CLO should discuss with the customer the area or types of gaming they wish to be excluded from, e.g. TAB only/pokies area only/whole venue. In completing the *Self-exclusion notice*, the customer will need to indicate their choice of exclusion from the whole venue, or the area or gambling activity they wish to be excluded from.
3. The CLO may request that the customer provide a photo to assist staff to enforce the exclusion. The customer must provide a photo if requested by the hotel.
4. The customer completes and returns the *Self-exclusion notice* to the CLO. The *Self-exclusion notice* will need to be witnessed by an adult over 18 years of age. This may be another member of staff.
5. Once the customer has given the CLO the *Self-exclusion notice*, the CLO must as soon as practicable complete the *Self-exclusion order* (**Form 3B**). This can usually be done on the spot.
6. Once signed by the authorised person within the hotel, the *Self-exclusion order* must be served upon (given to) the customer and is effective from when it is given to the customer for a maximum

of five years, after which time it will automatically expire. In addition the CLO/venue:

- should ensure that the privacy statement of the hotel is attached to the documentation being provided to the customer
- must provide the customer with details of at least one community support service for advice, assistance and/or counselling relating to problem gambling.

7. The CLO should encourage the customer to consider self-exclusion from all venues operated by the licensee, where applicable, or other venues that the customer may access within the local area (refer to **Practice 3.3** p. 23 for more information).
8. It is the responsibility of the licensee to complete an entry in the *Register of excluded persons* (**Form 3G**) for each customer who is issued a *Self-exclusion order*.

A 24 hour cooling-off period is applicable to self-exclusion orders only. Within 24 hours of being served (receiving) a *Self-exclusion order*, a customer may request to revoke the Order. In this instance, the venue 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 *Revocation notice: self-exclusion order* is submitted by the customer to the venue within the 24 hour time limit, then the *Self-exclusion order* is considered void and the customer may freely re-enter the premises and gaming area/s as though the Order had never been in place.

If the *Revocation notice: self-exclusion order* is submitted after the 24 hour limit has lapsed, then the customer must wait a further 12 months/one year before making an application for revocation starting from the first anniversary of the issue of the Order. Refer to the revocations section (p. 16) for more details.

Once the *Self-exclusion order* is in place, a licensee or an employee of the licensee has an obligation to take reasonable steps to prevent the customer, who is known to be excluded, from entering or remaining in the licensed premises or gaming machine area. If a licensee or an employee of a licensee 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 the Executive Director of OLGR.

The excluded customer should be removed from any promotional or mailing database lists.

## Self-exclusion checklist (document exchange)

The customer will provide the hotel with:

- a completed *Self-exclusion notice*
- a recent, clear photo (if asked).

The hotel will provide the customer with:

- a *Self-exclusion order*
- details of at least one counselling service dealing with problem gambling
- a *Conditions of re-entry (participation in gambling activities)* document (**Example 3.1D**) (optional).

The hotel will provide OLGR with:

- a copy of the *Register of excluded persons* (when requested by OLGR)
- a *Notice of contravention of self-exclusion order/exclusion direction*, where applicable.

### Venue-initiated exclusion (Exclusion direction)

#### Implementation

If reasonable grounds exist to believe that a customer is a problem gambler, an exclusion may be put in place by the gambling provider. This option should only be pursued after reasonable steps have been taken by the CLO to approach the customer where possible and discuss self-exclusion with the customer.

1. If the customer refuses self-exclusion and/or CLO believes on reasonable grounds the customer is a problem gambler, the hotel may issue an *Exclusion direction (Form 3D)* to customer. The *Exclusion direction* may apply to the whole venue or alternatively only apply to some sections of the venue, taking into consideration the need for the customer to access some community services within the venue (such as ATM, dining/bistro). Where possible, the CLO should discuss this with the customer.
2. The *Exclusion direction* and a copy of the hotel's privacy statement must be served upon the customer.
3. Ensure that the *Statement of service* section of the hotel's copy of the *Exclusion direction* is completed.
4. A recent photo of the customer may be requested by the licensee to be kept by the licensee to assist staff to enforce the exclusion.

5. Where possible, the CLO is recommended to provide the customer with details of at least one community support service for advice, assistance and/or counselling, such as the local Gambling Help service provider (or equivalent local welfare service).
6. The licensee must accompany the *Exclusion direction* with an *Information notice—exclusion direction (Form 3I)* detailing the reasons for exclusion and the customer's further avenues of action, e.g. appeal. A hotel may also wish to provide a copy of their *Conditions of re-entry (participation in gambling activities)* (**Example 3.1D**) with the *Information notice—exclusion direction*.

The *Exclusion direction* is effective from the time it is given to the customer and has a maximum time frame of five years, unless revoked earlier. After five years the Direction will automatically expire.

Once an *Exclusion direction* is in place, a licensee or an employee of the licensee has an obligation to take reasonable steps to prevent the customer, who is known to be excluded, from entering or remaining in the licensed premises or gaming machine area. The excluded customer should be removed from any promotional or mailing database lists and ensure that any loyalty or smart cards held by the customer are cancelled or disabled so as to prevent the customer from using them to gamble.

It is the responsibility of the CLO to complete the details of each excluded customer in the *Register of excluded persons (Form 3G)* which should be kept in a secure place at the venue at all times. The CLO will ensure that the venue submits statistical data regarding exclusion activity (when requested by OLGR) by completing the *Report on excluded persons (Form 3R)*.

To enable the effective enforcement of the exclusion throughout the venue, the CLO must advise all relevant staff of the customer's exclusion in a discreet and confidential manner.

If a licensee or an employee of a licensee 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 the Executive Director of OLGR.

Customers may apply to revoke or cancel the *Exclusion direction* once every 12 months, starting from the first anniversary of the issue of the Direction.

**Note:** an *Exclusion direction* may relate to one or more premises operated by the licensee.

## Venue-initiated exclusion checklist (document exchange)

The customer may provide the hotel with:

- a recent, clear photo (if asked).

The hotel will provide customer with:

- an *Exclusion Direction*
- an *Information notice—exclusion direction*
- details of at least one counselling service dealing with problem gambling
- a *Conditions of re-entry (participation in gambling activities)* (**Example 3.1D**) optional.

The hotel will provide OLGR with:

- a copy of the *Register of excluded persons* (when requested by OLGR)
- a *Notice of contravention of exclusion order/direction*, where applicable.

### Approach by a third party

If a staff member is approached by a third party (e.g. husband, wife, partner, or someone with a significant relationship with the customer) requesting exclusion for another person, the staff member will refer the third party to the staff member performing the role of CLO. The CLO is to explain to the third party that:

- an exclusion may only be put in place either by the individual concerned (self-exclusion) or initiated by the hotel (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 customer by either suggesting self-exclusion or encouraging them to see the Gambling Help service.

The third party may wish to discuss the self-exclusion option with the customer believed to have a problem with gambling and/or encourage them to make contact with a counselling service or the hotel's CLO directly.

The CLO is to check with the third party if they wish to be identified to the customer in any discussions with the CLO. The CLO is to record the third party approach and any actions/outcomes in the *Gambling-related incident report* (**Example 2.3B**).

### Revoking/cancelling exclusions

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

process for a self-exclusion and venue-initiated exclusion is different. Please note the separate processes carefully. A hotel is obliged to assist a customer seeking a revocation of their exclusion.

### Revoking a self-exclusion

To revoke a *Self-exclusion order (Form 3B)* a customer must submit a completed *Revocation notice: self-exclusion order (Form 3C)* to the licensee either:

- within the 24 hour cooling-off period after receipt of *Self-exclusion order* from customer
- at least one year after the customer received the *Self-exclusion order*.

**Within the 24 hour cooling-off period:** If a *Revocation notice: self-exclusion order* is submitted by the customer to the hotel within the 24 hour cooling-off period, then the *Self-exclusion order* ceases from the time the *Revocation notice: self-exclusion order* is given to the CLO of the hotel (i.e. immediately) unless the licensee seeks to implement a venue-initiated exclusion.

**At least one year after the self-exclusion has been issued:** If the hotel supports the customer's request to revoke an exclusion there is no obligation for the hotel to respond to the *Revocation notice: self-exclusion order*. The Order will automatically cease after the 28 days, and the customer will be free to resume playing at the hotel.

If the hotel believes, on reasonable grounds, that the customer is a problem gambler, and should remain excluded, the licensee can issue an *Exclusion direction*. This can be done at any time, however in order to ensure that the customer continues to be excluded, gambling providers wishing to extend an exclusion should implement a venue-initiated exclusion (*Exclusion direction*) within the 28 day period after they have received the *Revocation notice: self-exclusion order*. The licensee may choose to provide the customer with a copy of the hotel's *Conditions of re-entry (participation in gambling activities)* (**Example 3.1D**) if applicable.

In all instances, the licensee must update the *Register of excluded persons (Form 3G)* as required.

### Revoking a venue-initiated exclusion (Exclusion direction)

A customer who has been issued an *Exclusion direction* may, after one year from its issue submit an *Application to revoke exclusion direction (Form 3E)*. The licensee has 28 days in which to respond.

If the hotel supports the customer's request to revoke exclusion and the licensee agrees that the *Exclusion direction* can be lifted, the customer is to be issued with a *Revocation notice—exclusion direction (Form 3F)* within the 28 day period. The licensee must also update the *Register of excluded persons (Form 3G)*.

The licensee may choose to provide the customer with a copy of the hotel's *Conditions of re-entry (participation in gambling activities)* (Example 3.1D) if applicable.

If the hotel has reasonable grounds to believe that the customer should not resume gambling, the licensee does not issue a *Revocation notice—exclusion direction* within the 28 days and the *Exclusion direction* automatically remains in place. However, the licensee must, as soon as practicable, provide the customer with an *Information notice—refusal to revoke an exclusion direction* (Form 3J) detailing why the revocation application was rejected and an explanation of their appeal rights. A customer may only submit one revocation application per year, starting at the first year anniversary of the issue of the exclusion.

**Appeal:** Where a licensee refuses an application to revoke an *Exclusion direction*, or issues an *Exclusion direction*, the customer may appeal this decision through the Queensland Civil and Administrative Tribunal.

Details regarding rights of appeal must be provided to the customer with their *Information notice—exclusion direction* (Form 3I) and *Information notice—refusal to revoke an exclusion direction* (Form 3J) at the time of issue.

### Active monitoring

Active monitoring is where hotel staff take special note of the activities and behaviour of a customer who may be at risk of problem gambling. Collecting and writing down information and data about an individual can only be done with the individual's consent. This consent may be gained either through:

- approaching a customer and discussing their gambling behaviour with them and requesting their consent for the hotel to actively monitor them
- as a condition of re-entry following a revocation of a *Self-exclusion order* or an *Exclusion direction* where the customer is informed that the hotel will be actively monitoring them as part of the process of approving the customer's re-entry to the hotel.

An active monitoring program should be implemented by the CLO. Active monitoring should involve, where possible, the cooperation of gambling support services, the customer and support networks of the customer, to assist them to limit any gambling behaviours which may put themselves or others at risk. The *Possible problem gambling risk indicators* (Example 2.4A) may assist the CLO to make a decision based on reasonable grounds.

### Active monitoring program framework

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

It is essential that the customer gives consent to have their gambling activities monitored under the active monitoring program. Consent is gained using a form such as the *Consent to monitor my gambling activities* (Example 3.1E).

Subsequent to the relevant consent being obtained using the *Consent to monitor my gambling activities* form, it is suggested that the following will assist in managing the active monitoring program:

- The CLO should ensure that all relevant staff have been advised that the customer is on the active monitoring program.
- The signed *Consent to monitor my gambling activities* form will be kept on the premises with a photograph of the customer.
- To enable an accurate review of activities over a period of time, daily gaming activities should be recorded in a register/log.
- Procedures should be implemented to ensure the CLO is alerted when the customer is on the premises. This could be a request for the customer to advise the CLO at the venue when they arrive and depart the premises.
- Where practicable, the CLO should record and assess the visitation time/rate spent at a gambling activity.
- Depending on the gaming activity, a customer may be required to be reviewed as to their suitability to remain gambling. This review may highlight a need for a reassessment of the exclusion provision options with the customer.
- To assist in determining your decision making, refer to the *Possible problem gambling risk indicators* in Practice 2 of this Resource manual (p. 11).

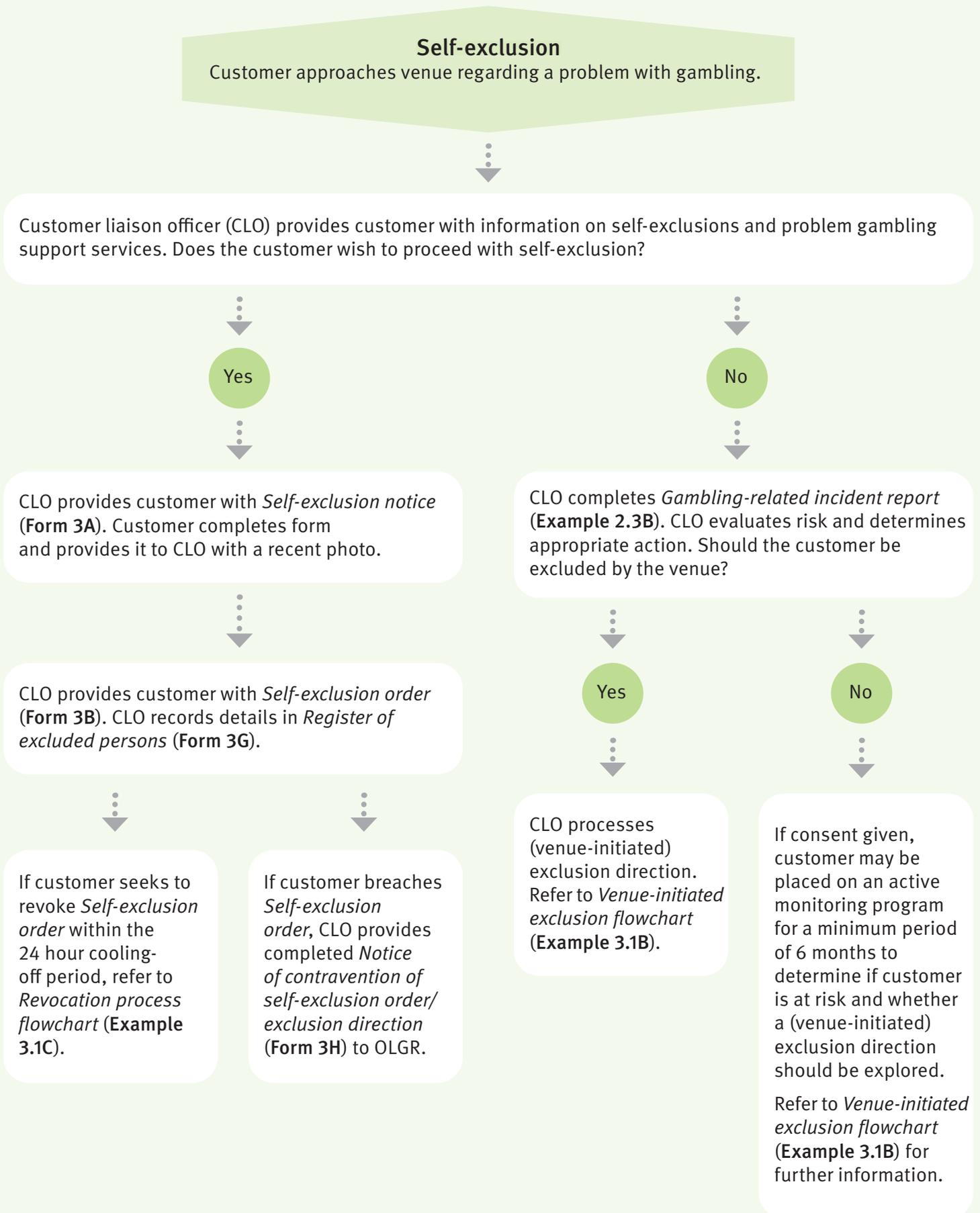
This framework is suggested to complement the processes that are currently in place.

### Assessment and review

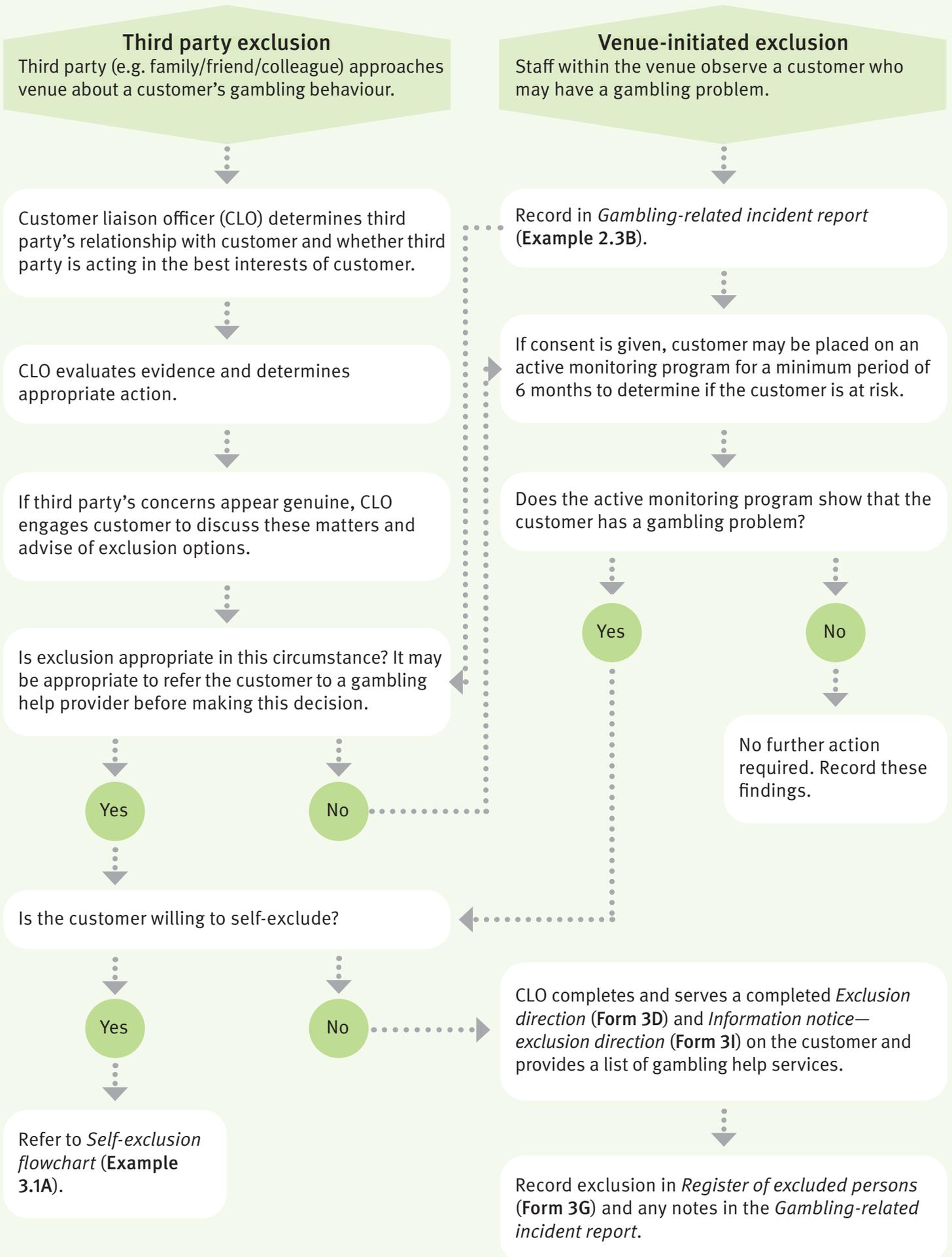
To ensure the effectiveness of exclusion practices, the hotel will:

- provide regular staff information and training on exclusions
- have clear reporting procedures (staff to management) of incidents (observations, enquiries, frequency) and actions taken by the hotel with regard to customers seeking exclusion
- review procedures for exclusions on a regular basis for currency and effectiveness purposes.

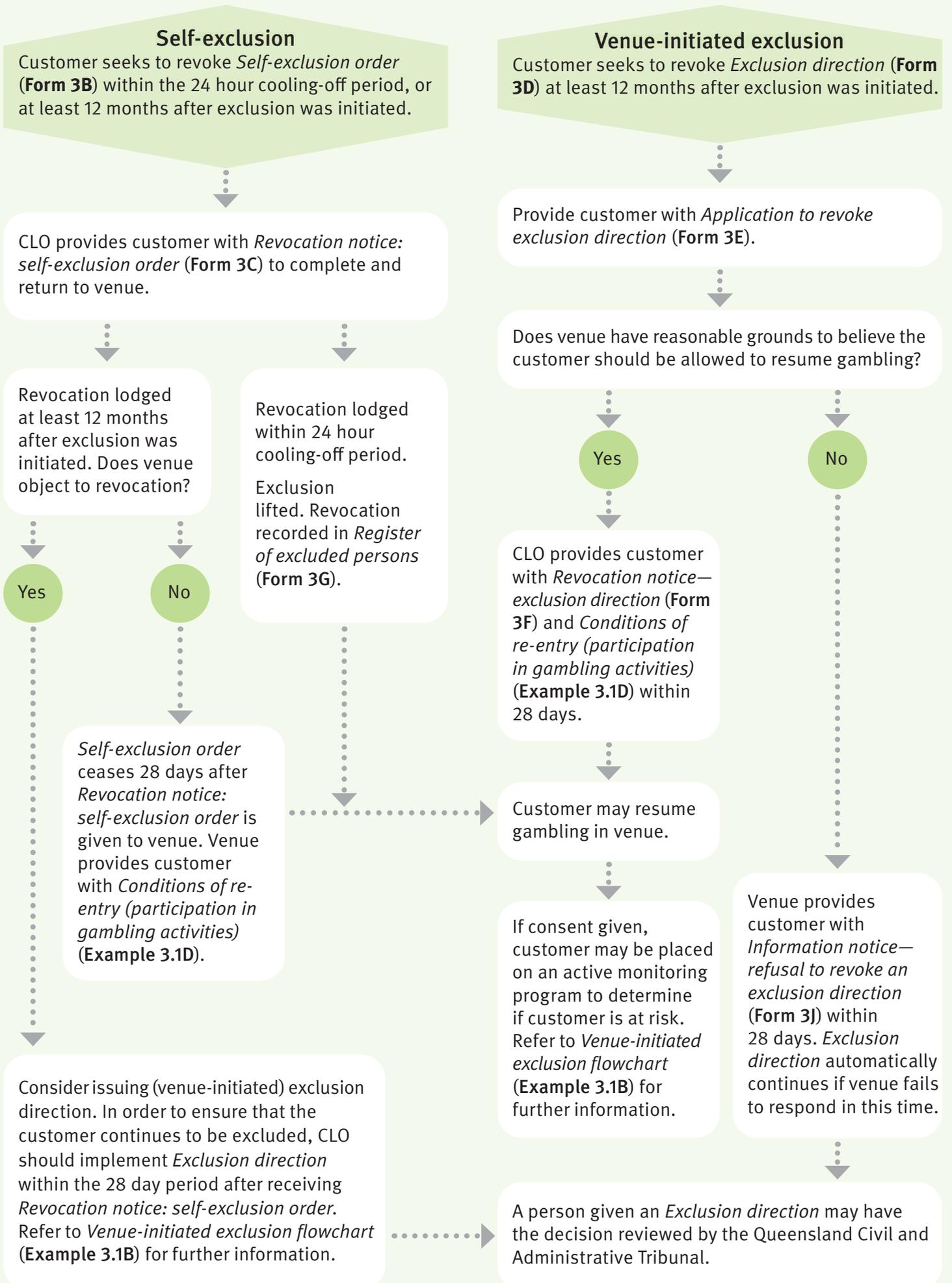
## Example 3.1A Self-exclusion flowchart



## 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 hotel 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 hotel 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 the gambling provider**

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

Information on support services will also be included with any *Self-exclusion notice (Form 3A)* and formal contact by the excluded customer should constitute a key step of any process.

The *Gaming Machine Act 1991 s. 261A(1)(b)* specifies that a gambling provider must give to the customer details, including the name and address, of at least one entity that provides counselling services for problem gamblers. This requirement is built into the approved form *Self-exclusion order (Form 3B)*.

Similarly the gambling provider should give the customer details of a counselling service when issuing an *Exclusion direction (Form 3D)*, where practicable.

## 3.3 Exclusion from other gambling providers

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

### **Actions of the gambling provider**

Where practicable, gambling providers will assist excluded customers seeking consensual exclusions from other gambling venues.

Specifically, this may occur in partnership with the Gambling Help service to support the customer in identifying venues the customer may need to be excluded from and following through with self-exclusions.

## 3.4 Correspondence to excluded customers

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

### **Actions of the gambling provider**

The gambling provider will ensure that no gambling-related correspondence or promotional material is sent to customers who are excluded or known to have formally requested that this information not be sent. Specifically, this may require that Loyalty cards or Smart cards are disabled and/or destroyed so as to eliminate the promotion of gambling.

## 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 self-exclude from other venues in the local community.

Developing and maintaining a positive partnership with a Gambling Help service (or equivalent in your area) to assist with creating a responsible gambling environment and support for customers.

### **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 been excluded (either self or venue).

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

## Glossary of terms

Active monitoring	When staff of a hotel maintain a close watch on a customer who is at risk of being a problem gambler. Active monitoring may include collection of data and keeping of written records and may only be done with the customer's written consent.
Customer liaison officer (CLO)	Person nominated by the hotel and acting for and on behalf of a nominee/licensee in carrying out the responsible gambling strategy and any requirements under legislation. In small hotels this may be a role that the manager takes on with their existing duties.
Exclusion	A prohibition against a customer from specific gambling products, services or gambling areas of particular gambling providers. There are two types of exclusions: <ul style="list-style-type: none"> <li>• self-exclusion (requested by the customer)</li> <li>• venue-initiated exclusion (directed by the hotel).</li> </ul>
Exclusion direction	A document initiated and issued by a licensee to a customer to exclude them from the venue or gambling products.
Executive Director	The Executive Director of the Office of Liquor and Gaming Regulation (OLGR).
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 exclusion and other pertinent information.
Notice of contravention of self-exclusion order/exclusion direction	Where hotel staff prevent an excluded customer from partaking in gambling activities and/or entering or remaining in the venue, 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.
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 licensee 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

<b>Form 3A</b> <i>Self-exclusion notice</i>	Completed by an individual wanting a self-exclusion from a venue or gambling activity and given to a gambling provider.
<b>Form 3B</b> <i>Self-exclusion order</i>	Completed by a gambling provider and presented to an individual following receipt of <i>Self-exclusion notice (Form 3A)</i> .
<b>Form 3C</b> <i>Revocation notice: self-exclusion order</i>	Completed by individuals requesting cancellation of <i>Self-exclusion order (Form 3B)</i> . May only be lodged within the 24 hour cooling-off period, or one year after receipt of <i>Self-exclusion order</i> .
<b>Form 3D</b> <i>Exclusion direction</i>	Completed by a gambling provider to exclude an individual from a venue or gambling activity.
<b>Form 3E</b> <i>Application to revoke exclusion direction</i>	Completed by individuals requesting cancellation of venue-initiated <i>Exclusion direction (Form 3D)</i> . May only be first lodged one year after commencement of <i>Exclusion direction</i> . Only one application may be made in any 12 month period.
<b>Form 3F</b> <i>Revocation notice—exclusion direction</i>	Completed by a gambling provider following receipt of <i>Application to revoke exclusion direction (Form 3E)</i> and given to the individual, confirming cancellation of <i>Exclusion direction</i> .
<b>Form 3G</b> <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.
<b>Form 3H</b> <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.
<b>Form 3I</b> <i>Information notice—exclusion direction</i>	Completed by a gambling provider and given to the individual with <i>Exclusion direction (Form 3D)</i> to provide information about why the <i>Exclusion direction</i> has been issued.
<b>Form 3J</b> <i>Information notice—refusal to revoke an exclusion direction</i>	Completed by a gambling provider following receipt of <i>Application to revoke exclusion direction (Form 3E)</i> and given to the individual to provide information about why the gambling provider has refused to cancel the <i>Exclusion direction</i> .
<b>Form 3R</b> <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

Hotels must ensure that the physical environment of the venue in which gaming is conducted is pleasant, comfortable and safe for all customers, all of the time. Hotels should endeavour to offer a safe gambling environment to customers. Minors are prohibited from all forms of gambling and are to be excluded from designated gambling areas.

### 4.1 Minors prohibited and 4.2 Minors excluded

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

#### **Actions of the gambling provider**

The hotel will prohibit minors from gambling and will enforce that no minors are permitted in designated gambling areas. The hotel will prominently display signs in and around designated gambling areas to reinforce this commitment.

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

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

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

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

#### **Car parks**

The venue may implement a policy of regularly checking any dedicated car park for any minors left in cars unattended.

### 4.3 Hospitality services

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

#### **Actions of the gambling provider**

The hotel will not use discounted drink promotions to promote any gaming activities and will not offer gaming customers free or discounted alcoholic drinks as an incentive to commence and/or continue playing.

The hotel will, where possible, have available non-alcoholic beverages (including water), tea and coffee facilities to encourage breaks in play.

### 4.4 Unduly intoxicated customers

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

#### **Actions of the gambling provider**

In accordance with the *Liquor Act 1992*, customers who display changes in behaviour that indicate undue intoxication will be refused service and may be asked to leave the premises.

The *Liquor Act 1992* s. 9A provides that a person is considered unduly intoxicated if:

- the person's speech, balance, coordination or behaviour is noticeably affected; and
- there are reasonable grounds for believing the affected speech, balance, coordination or behaviour is the result of the consumption of liquor, drugs or another intoxicating substance.

Customers who have been refused service of alcohol are not permitted to gamble in any form on the premises until the next trading period.

## 4.5 Child care and play areas

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

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

### **Actions of the gambling provider**

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

Schedule 1 of the *Education and Care Services Act 2013* provides the following definition, 'Adjunct care means education and care provided to a child—

- in conjunction with a meeting, function or other activity involving a relative or guardian of the child other than the paid employment of the relative or guardian; and
- on the premises in which the meeting, function or other activity is taking place; and
- for not more than 3 hours on each occasion the care is provided.'

Where child care facilities are provided at the venue, it is recommended that the gaming machines or designated gambling areas of a venue are not in view of the facilities provided, where safe and practicable, and without undue expense to the gambling provider.

## 4.6 Gratuities

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

### **Actions of the gambling provider**

Hotel staff working in gambling areas and outlets servicing these areas are not to encourage gambling customers to give them gratuities.

Any offer or acceptance of a gratuity is to be noted by the CLO in the first instance, or to a supervisor or manager.

All staff, upon commencement of employment, and at regular staff meetings, will be offered ways to politely deal with offers.

## 4.7 Passage of time

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

### **Actions of the gambling provider**

Hotels will place a clock in the gaming room so customers are aware of the passage of time.

### **Best practice**

Where practicable and reasonable, hotels could implement additional initiatives to make customers aware of the passage of time—for example, the availability of natural light through either skylights, windows or doors. In addition to this, other initiatives could be pursued such as:

- staff at the venue are required to wear a watch, so if a customer asks the time, there is an immediate response.
- promotions that include a time reference—for example, 'The Noon Giveaway', or the '2 o'clock Spin and Win'.
- announcements of the venues activities, announcement of the current time, and announcement of departure time/s for the courtesy coach to highlight to customers 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 the gambling provider**

The hotel will:

- discourage the 'choking' or continual holding down of buttons by insertion of a coaster or plastic card that automatically spins the reels without player intervention
- discourage extended intensive and repetitive play by providing and promoting a range of alternative leisure activities
- also refer to **Practice 4.3**.

### **Best practice**

Where appropriate, customers would be encouraged to participate in promotions that require a customer to electronically 'reserve' a machine then leave their seat or stool for participation in the promotion.

In addition to this, gambling providers may consider requiring gambling customers to purchase beverages from the venue's bar facilities, where safe and practicable, rather than providing a drinks service to the gaming machines. This may also incorporate locating self-service tea and coffee stations external to designated gambling areas or rooms.

Encourage gaming customers to become involved in other activities in the hotel that are not part of gaming (Keno, TAB) such as karaoke, pool competitions, darts, trivia, etc.

## 4.9 New gambling products and services

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

### **Actions of the gambling provider**

The venue may seek advice from a range of industry stakeholders including the QHA when considering the potential impacts of new and emerging products, services and technology on responsible gambling behaviours.

The venue may develop and implement a *New gambling service/product guideline—responsible gambling* (Example 4.9A).

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

- new or varied bet type (products)
- new electronic gaming machine product that varies from Queensland standard (products)
- new or varied voucher systems (products)
- new or varied way or method of servicing customers (services)
- new or varied IT system or program relating to a new or varied product or service (technology).

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

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

Does the new product or service require any amendment or addition to the appropriate information already made available so that customers are able to make informed decisions about their gambling?

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

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

1. minors
2. the provision of credit
3. player information
4. the responsible service of alcohol
5. advertising and promotions; and privacy.

### **Training**

Does the introduction of this new product or service necessitate any changes to the responsible gambling training programs and refresher training that is in place?

### **Irresponsible trading practices**

Does the new product or service encourage customers to:

1. chase their losses?
2. continue playing after they have indicated a desire to stop?

## Examples of acceptable/unacceptable actions

### **Acceptable**

Clearly displaying signage that minors are not permitted to gamble and are not permitted in designated gambling areas.

Encouraging gambling customers to take breaks in play, through various means.

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

Offering child care facilities that comply with relevant child care regulations.

Training staff to politely refuse gratuities from gambling customers.

Training staff in the responsible service of alcohol.

### **Unacceptable**

Allowing minors to gamble.

Allowing minors in designated gambling areas.

Accepting alternative means to ascertain proof of age other than those outlined in **Practice 4.2**.

Not making gambling customers aware of the passage of time.

Permitting the chocking of machine buttons that automatically spin the reels without player intervention—for example, inserting plastic peg or coaster into button.

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

Staff enticing customers to give them gratuities.

# Financial transactions

## Introduction

Hotels must provide an environment where customers are able to make independent, informed decisions in relation to their spending on gambling products.

### 5.1 ATM facilities

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

#### **Actions of the gambling provider**

Where safe and practicable, hotels will not locate ATMs in close proximity to designated gambling areas, or in the entry to gambling areas.

### 5.2 Cashing of cheques and payment of winnings

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

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

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

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

#### **Actions of the gambling provider**

A copy of the venue's *Financial transactions policy* (Example 5.2A) will be available on request at the cashier's change booth or centralised area for accessing change. The hotel will enforce its cash limit for gambling winnings. The balance of any amount over this limit will be paid by cheque.

Any gambling winnings in the form of cheques will not be cashed on the premises until the next trading day. Third party and multiple cheques will be cashed only by prior arrangement.

Management's discretion is advised when cashing wage cheques:

- Gambling providers may display their *Financial transactions policy* in an area associated with gambling, at their discretion.
- Gambling providers may wish to offer customers requiring cheque payment, that they can request the whole payment by cheque.
- Gambling providers may determine a policy whereby all payouts within one hour of closing time, over the venues cheque limit, are recommended to the player to take the whole payment in cheque. This may be a customer safety issue when leaving the venue late at night.

## Example 5.2A Financial transactions policy

The following is an example only. Gambling providers are encouraged to develop their own policy in accordance with their processes.

### ATMs and EFTPOS

The hotel will not locate ATMs in close proximity to designated gambling areas, or in the entry to gambling areas, where safe and reasonable.

ATMs will have access only to debit accounts.

### Credit

Customers are advised that the lending of money or the ascertaining of money on credit for the purpose of gambling is illegal and offenders will be prosecuted.

Please do not ask staff for credit as this request will be declined.

### Cashing of cheques

The hotel has a strict limit for cashing cheques which is \$ \_\_\_\_\_.

Third party and multiple cheques will be cashed only by prior arrangement.

Management may use discretion when cashing wage cheques.

Wage cheques are not to be cashed for the sole purpose of gambling.

The hotel has the right to refuse the cashing of a cheque at the manager's discretion.

### Payment of prize winnings

The hotel has a maximum cash payment of \$ \_\_\_\_\_ for any gambling wins.

The hotel will pay the balance over this amount by cheque.

Any cheques from gambling winnings will not be cashed at the hotel until the next trading day.

## 5.3 Credit betting (lending of money)

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

### Actions of the gambling provider

Pursuant to s. 238 of the *Gaming Machine Act 1991*, the hotel will not provide credit or lend money to anyone for the purpose of gambling.

Staff and management will not provide credit or make loans, of a personal nature, to anyone for the purpose of gambling. Staff and management will not gamble on credit themselves.

In addition to this, any induction or further gambling-related training should include as types of credit betting the following:

- goods and/or services purchased on credit cards or convenience cards that are returned for cash
- misrepresentation of credit card transactions— for example, giving \$200 cash and entering the transaction as 'meals' on the voucher
- providing credit in anticipation of future payment by personal, employer or government cheque
- providing credit in anticipation of cash payment (gambling) at a later date.

Staff should clearly advise customers that loaning or extending credit for the purpose of gambling is illegal and not in the venue's, the employee's, nor the customer's interest to provide it.

It should be reinforced to all levels of staff that they are not to partake in any gambling activity conducted on the premises.

## Examples of acceptable/unacceptable actions

### Acceptable

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

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

### Unacceptable

Cashing third party cheques without prior arrangement.

Cashing wage cheques for the sole purpose of gambling.

Providing credit for the purpose of gambling.

Cashing gaming-win cheques immediately or on the same day.

Staff or management gambling at venue/staff or management gambling at venue on credit.

## 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.)
- 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. The features and functions of the player loyalty/rewards program can include the promotional and operational functionality (e.g. ability to scroll electronic messages across a sandwich card reader screen), the side promotions undertaken at a venue, and/or the direct marketing materials.

## 6.1 Code of Ethics

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

### **Actions of the gambling provider**

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

### **Acceptable practices**

Any advertising or promotion that aligns with the *Code of Ethics*.

Any advertising of player loyalty/rewards program that accrues or enables the redemption of points across a range of venue services. For example, ‘Earn or redeem bonus points when you spend at our bars, bistro, bottle shop and gaming room’.

### **Unacceptable practices**

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

Developing advertising or promotional material that contradicts **Practice 6**. For example, where the player loyalty/rewards program is the dominant feature of advertising and/or where the player loyalty/rewards program accrues or redeems points for gambling use only and not across multiple venue activities.

## 6.2 False, misleading or deceptive

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

### **Actions of the gambling provider**

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

### **Acceptable practices**

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

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

Having available any terms and conditions to any promotion or condition of winning, e.g. 'Must be present to claim the prize'.

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

Any player loyalty/rewards program registration materials, and any statement, phrase or inclusion in any registration materials, is based on fact and will not mislead or deceive, or is not likely to be misleading or deceptive.

Any player loyalty/rewards program registration materials to include terms and conditions of participation.

Provide company's privacy information policy on request. For example, 'Our loyalty club's terms and conditions can be found on the back of our application form, and a copy of our privacy policy is available at any time. Just ask us'.

### **Unacceptable practices**

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

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

Any advertisement or promotion that misleads/deceives, is likely to mislead/deceive or is not based on fact, e.g. 'The hotel with the best odds'.

Any player loyalty/rewards program registration materials that are not based on fact, mislead/deceive, or are likely to mislead/deceive. For example, 'The loyalty club with the greatest rewards in the world' or not supplying terms and conditions of membership upon joining.

## 6.3 Misrepresentation of probabilities

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

### **Actions of the gambling provider**

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 show winning should be shown with a balance of winning and non-winning play images.

### **Acceptable practices**

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

Where appropriate and practical, gambling providers give consideration to any implied message in the naming of promotional activities, gaming rooms or promotional groups, in addition to key words and/or phrases in advertisements.

### **Unacceptable practices**

Statements, graphics or images, which may imply that winning is more likely at one venue over another:

- 'Winning is easy at the...'
- 'More chances of winning...'
- 'Win \$\$\$ Win \$\$\$ Win \$\$\$...'
- 'The jackpot will be won by a lucky...'

Any advertisement or promotion that suggests there is some relationship between past, present and future events, when there is not, e.g. 'No jackpot for the last 8 weeks, it must go off soon...'

Not adequately alerting customers to the existence of additional terms and conditions to promotions.

Statements, graphics or images which may imply there is some skill involved in winning on games based on complete randomness and chance.

**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 the gambling provider**

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

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

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

### **Acceptable practices**

Advertising and promotions which emphasise gambling as an ancillary form of entertainment.

Advertising and promotions depicting gambling as fun and enjoyable.

### **Unacceptable practices**

Statements, graphics or other content which may imply that gambling can be an alternative means of income, e.g. 'Buy that new boat with a flutter...'.  
Statements, graphics or other content which may imply that gambling can improve a person's social status or standard of living, e.g. 'Be the envy of all your friends'.  
Statements, graphics or other content which may suggest that gambling can be a means of paying for household essentials, e.g. education, groceries, utilities, rent or mortgage payments.  
Any promotional activity or advertisement with an undue focus on winning, e.g. 'Win Win Win...'.  
Statements, graphics or images which may imply there is some skill involved in winning on games based on complete randomness and chance.

Statements, graphics or other content which may imply that gambling can be an alternative means of income, e.g. 'Buy that new boat with a flutter...'.  
Statements, graphics or other content which may imply that gambling can improve a person's social status or standard of living, e.g. 'Be the envy of all your friends'.  
Statements, graphics or other content which may suggest that gambling can be a means of paying for household essentials, e.g. education, groceries, utilities, rent or mortgage payments.  
Any promotional activity or advertisement with an undue focus on winning, e.g. 'Win Win Win...'.  
Statements, graphics or images which may imply there is some skill involved in winning on games based on complete randomness and chance.

Statements, graphics or other content which may suggest that gambling can be a means of paying for household essentials, e.g. education, groceries, utilities, rent or mortgage payments.  
Any promotional activity or advertisement with an undue focus on winning, e.g. 'Win Win Win...'.  
Statements, graphics or images which may imply there is some skill involved in winning on games based on complete randomness and chance.

Any promotional activity or advertisement with an undue focus on winning, e.g. 'Win Win Win...'.  
Statements, graphics or images which may imply there is some skill involved in winning on games based on complete randomness and chance.

## 6.5 Misleading statements

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

### **Actions of the gambling provider**

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.

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

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

### **Acceptable practices**

Ensuring statements about prize amounts on offer (and the availability of the prize amounts) are factual.

Information on odds should be readily accessible by customers at the venue, e.g. displaying the *Chances of winning* sign and/or making information available from a staff member.

Any terms or conditions for the promotion are readily accessible by the customer, e.g. terms and conditions available from cashier's booth.

The possibility of winning a prize or jackpot is clearly stated, e.g. 'Jackpot could go off'.

### **Unacceptable practices**

Any advertisement or promotion that is confusing or ambiguous to a regular customer.

Any advertising or promotion which may misrepresent the chances of winning a prize, e.g. 'Everyone will win'.

Omitting terms and conditions or expiry dates from advertisements or promotional information.

Related **Practice 6.3**.

## 6.6 Community standards

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

### **Actions of the gambling provider**

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

### **Acceptable practices**

Advertising or promotions which support prevailing community standards.

Player loyalty/rewards program features and functions which support prevailing community standards in providing a responsible gambling culture and environment. For example, 'We take great pride in providing you with gambling entertainment and continually seek to raise our own standards and maintain those of our industry'.

### **Unacceptable practices**

Any features and functions of advertisements, promotions and/or player loyalty/rewards programs which:

- are sexually explicit or provocative in nature
- may offend people from different religious or ethnic backgrounds
- may offend minority groups. For example, using racist or sexist language and imagery
- involve minors, or any person reasonably construed as being under 18 years, in any stage or aspect of gambling. For example, using images of children in or near gambling areas, or imagery associated with and appealing to children in player loyalty/rewards program campaigns.

Related Practice 6.8.

## 6.7 Other activities to promote

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

### **Actions of the gambling provider**

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

### **Acceptable practices**

External advertisements promoting a range of venue facilities and services.

Having player loyalty/rewards program reward point accrual or redemption mechanisms that link with other venue activities where available and practicable. For example, 'Redeem your reward points in our bistro, bars, bottle shop and gaming room. Gift certificates also available'.

Ensuring cash vouchers have no reference to gambling. For example, 'Redeem your rewards points for hotel/venue dollars'.

Members redeeming their loyalty points away from a gaming machine.

### **Unacceptable practices**

External advertisements which focus exclusively on gambling or which are dominated by gambling.

Redemption of points for gaming credits only. For example, 'Rewards points can only be redeemed for \$10 pokies cash vouchers'.

Members able to redeem their loyalty points without leaving a gaming machine.

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

## 6.8 Minors or vulnerable or disadvantaged groups

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

### **Actions of the gambling provider**

#### **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**

Media selection and placement of all advertising and promotions is 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).

Any advertisement or promotion and/or player loyalty/rewards program material that is aimed at adults over 18 years of age.

Ensuring any advertisement or promotional and/or player loyalty/rewards program material is not directly sent to an excluded customer or a person who has requested such material not be sent. For example, 'We understand if you do not wish to receive our promotional material. Our staff recognise the importance of making sure this will never happen'.

Related **Practice 6.1**.

### **Unacceptable practices**

Advertising and promotions relating to gambling appearing in media directed primarily at minors (media selection and placement of all advertising and promotions that is not in accordance with the relevant legislative and code of practice/guideline requirements for all forms of advertising and promotions in Australia).

Any advertisement or promotion and/or player loyalty/rewards program material, which contains graphics, imagery or text which would ordinarily attract minors or disadvantaged groups, e.g. cartoon-related theme for gambling advertisement or 'Down & Out Winners Club'.

Prizes which may attract minors (e.g. children's video games) or disadvantaged groups (e.g. blankets).

**Note:** 'social media' is any venue-based site including websites, Facebook, Twitter, and any other electronic social media platform/s.

## **6.9 External signs**

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

### **Actions of the gambling provider**

External signs include signage able to be viewed from any external part of a hotel'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.

Passive web pages should be considered as internal promotion and **Practice 6.9** does not apply.

### **Acceptable practices**

No external messages advising of winnings paid.

### **Unacceptable practices**

External signs that advise of winnings paid, e.g. A-frame sign on footpath, banner on roof or advertisement stating 'payouts so far this month = \$XXX,XXX'.

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

## **6.10 Irresponsible trading practices**

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

### **Actions of the gambling provider**

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. Inappropriate inducements therefore have the potential to impact on people who are at risk of, or have, a gambling problem.

## Acceptable practices

Advertisements or promotions and/or player loyalty/rewards program features and functions which encourage and promote the use of a range of venue facilities and services. For example, 'Earn bonus points when you spend at our bars, bistro, bottle shop and gaming room'.

Player loyalty/rewards program redemption list prioritises non cash vouchers. For example, 'Redeem your loyalty points for meals/bar service/bottle shop/gift certificates/hotel dollars'.

## Unacceptable practices

Irresponsible inducement linked to an advertisement, e.g. '\$5 worth of free coins redeemable only in the gaming room'.

The offer of free or discounted alcohol for gambling customers only, e.g. 'Gaming room happy hour'.

The offer of a free meal only for gaming customers, e.g. 'Free breakfast for gaming customers before 10 am'.

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

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

- 'The privileges of membership...Join today and win more often'.
- 'The more you bet the more you win'.

A player loyalty/rewards program redemption list prioritises cash vouchers. For example, 'Redeem your loyalty points for hotel dollars/gift certificates/bottle shop/bar service/meals'.

Prizes or gifts directly linked to winning a particular game, promotions conditional to a person gambling or offers of free credit to customers or potential customers.

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

## 6.11 Consumption of alcohol

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

### Actions of the gambling provider

Hotels 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

Alcohol-free advertisements and promotions.

### Unacceptable practices

Advertisements or promotions which depict the consumption of alcohol whilst engaged in a gambling activity, e.g. customer drinking at a gaming machine.

Advertisements or promotions which promote consumption of alcohol whilst engaged in a gambling activity.

## 6.12 Consent of the person

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

### Actions of the gambling provider

A hotel 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

The express consent of the person is obtained prior to publishing or causing to be published anything which identifies the person as having won a prize.

### Unacceptable practices

Publishing (e.g. by displaying a promotional cheque) or causing to be published or advertised, the details of a person who has won a prize without their express consent.

## 6.13 Responsible gambling messages

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

### ***Actions of the gambling provider***

Hotels 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'.

Responsible gambling messages will be of a legible size relative to the overall size of the advertisement or promotion.

### ***Acceptable practices***

Using a responsible gambling message in advertisements and promotions, e.g. 'The responsible entertainment venue'.

Using a responsible message in player loyalty/rewards program advertisements and promotions. For example, 'This venue is committed to your responsible enjoyment of gambling'.

Ensuring responsible gambling messages are of an appropriate and legible size relative to the overall size of the advertisement or promotion.

### ***Unacceptable practices***

Using an irresponsible message in an advertisement or promotion (including player loyalty/rewards program). For example:

- 'Everyone is a winner...'
- 'You will win...'
- 'Guaranteed jackpot winners...'
- 'Queensland's most winning venue...'

Including responsible gambling messages that are illegible and/or not of an appropriate size relative to the overall size of the advertisement or promotion.

# 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](http://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.