



Level 32, RBS Tower@Aurora Place
88 Phillip Street Sydney NSW 2000
E: acaadmin@auscasinos.com
P: +612 8211 0639 F: +612 8211 0555W:
www.auscasinos.com

5 September 2012

Ms Lyn Beverley
Committee Secretary
Joint Select Committee on Gambling Reform
Parliament House
Canberra ACT 2600

By Email: Lynette.Beverley@aph.gov.au

Dear Ms Beverley,

Please find attached the Australasian Casino Association's response to the Questions on Notice attached to your letter dated 29 June 2012.

If you require further information please do not hesitate to contact me on the numbers above or by email.

Yours sincerely,

Chris Downy
Executive Director

Questions on Notice: Submission 46 (Australasian Casino Association)

INTRODUCTION

The Australasian Casino Association (ACA) appreciates the opportunity to provide additional information regarding its submission to the Joint Select Committee Inquiry into the Prevention and Treatment of Problem Gambling.

Before providing a response to the questions proposed by the Committee, the ACA wishes to make the following points:

- ▶ Casinos are regulated under each state and territory's specific legislation. Requirements regarding casino operations are generally stricter as a result of licensing requirements in each state and territory. This point has been outlined in the ACA's submission.
- ▶ These strict and extensive statutory regulatory frameworks include:
 - casino specific legislation;
 - subsidiary legislation (and in some cases additional contractual commitments);
 - government approved controls and operating procedures;
 - external government audits and compliance assessments;
 - government inspectors;
 - security and surveillance requirements;
 - extensive Responsible Service of Gaming (RSG) programs; as well as
 - robust codes of practice.
- ▶ Casinos also employ internal mechanisms and controls to audit compliance with those codes and frameworks (both via external and via their own internal audit) incorporating regular review processes aligned with an ongoing commitment to continuous improvement.
- ▶ Each state and territory casino regulator is actively involved in the ongoing regulation and monitoring of the casinos located in their jurisdiction.
- ▶ Many of the references to evidence that are contained within the questions on notice refer to licensed venues other than casinos. It appears that no attempt has been made to differentiate casinos from these venues.

It should be noted that the Commonwealth published a *National Snapshot of Gambling* in April 2010 that provides an overview of the legislation that covers the operation of casinos and other licensed gaming venues in each particular jurisdiction. This is attached for the information of the Joint Select Committee as it is still relevant.

STAFF INTERVENTION

The original ACA submission outlines Australian casinos' extensive Responsible Service of Gaming Training Programs and refresher training program frequencies.

All casinos train their staff, at a minimum at the mandated level in the responsible service of gaming. Furthermore, the ACA supports the principle that casinos should train their staff in this area to higher standards than mandated. Training in all casinos is specific and checks for competency in how each individual casino's processes deal with responsible gaming enquiries.

All casinos have trained, and the larger casinos have both specially trained and dedicated, responsible gaming staff to assist those customers who may be experiencing difficulties with their gambling behaviours. Management at the larger operators are trained at higher levels in the responsible service of gaming for escalation paths that aim to provide for sustainable and responsible operations.

The service ethos of casinos includes a fundamental and superior customer service principle, which necessarily requires interaction by staff with customers who appear to be in distress, for whatever reason/s. Inherent in the delivery of any goods or services is the training and expectation to do so in a responsible and compliant manner to achieve relevant and appropriate outcomes for all stakeholders. Casinos train their staff to report observable signs that may indicate problem gambling behaviours.

The major report conducted by Paul Delfabbro (referred to in Question 7) into the identification of problem gamblers within the gaming venue was completed in 2007 (in association with a number of others) for Gambling Research Australia (GRA). ACA member casinos are aware of this research and in many cases it has been used to develop many of the processes, resources and staff training programs related to identification of problem gambling behaviours.

Some examples of the extent of training conducted follows:

- At Lasseters Casino in Alice Springs, all gaming related staff are required to undergo training under a nationally accredited course. Staff are also required to undergo external training sessions provided by Amity Community Services.
- At Wrest Point and Country Club Casino in Tasmania, all licensed gaming staff must undertake a Responsible Conduct of Gambling course within three months of being licensed. Additionally all gaming and relevant non-gaming staff are required to undertake a course that outlines the processes and resources under which the two casinos deliver Responsible Gambling practices.
- At Echo Entertainment Group's (Echo) Queensland casinos (Jupiters Gold Coast, Jupiters Townsville and Treasury Brisbane) , an on-line learning course has been developed and is made available to all staff through their designated Learning Centres on-site. Echo has developed a training DVD based on the Delfabbro research for use by its employees in its four casinos. Additionally, Echo has also developed a list of possible problem gambling risk indicators to identify problem gamblers in the casino using observable signs, reported signs and a combination of observed and/or reported signs. Professor Paul Delfabbro was consulted to peer review the list and he provided positive confirmation that the indicators developed were appropriate for the casino environment.
- At Crown Limited casinos (Crown Melbourne and Burswood Entertainment Complex, soon to be Crown Perth), training is regularly conducted and reviewed and takes into account relevant peer reviewed and evidence based research such as Professor Paul Delfabbro's '*Identifying Problem Gamblers in Gambling Venues*', and '*Current issues related to identifying the problem gambler in the gambling venue*' which was in fact co-authored by one of Crown Melbourne's Responsible Gaming Psychologists.

Staff dedicated to assist players who may need help with their gambling are specially recruited and trained. Chiefly, their duties include the education and provision of strategies to assist customers in managing their gambling behaviours; foster responsible gambling and assisting in preventing difficulties from arising and to deliver the casino's responsible gaming programs. For example, Host Responsibility staff at SKYCITY Adelaide provide ongoing support through case management and referral to Gambling Help Services. Responsible Gaming Liaison Officers at Crown Melbourne provide assistance and information on Crown Melbourne's Responsible Gaming Programs; provide referral information about Gambler's Help and other community services and facilitate the Crown Melbourne's Self-Exclusion program. Referrals come from other casino staff, customers, friends and family of customers who may be experiencing difficulties with their gambling behaviours, counselling staff and Gambling Help services. Burswood Entertainment Complex's 24/7 functionality of their Responsible Gambling Information Centre and dedicated Responsible Gambling Advisors commences in September this year.

Close working relationships with problem gambling help services have been established by casinos, or indeed they have engaged them as a third party provider - e.g. BetCare has been appointed by The Star in Sydney to provide gambling counselling and assistance for customers who identify with problem gambling behaviours. Both Wrest Point and Country Club Casinos have a close relationship with Gambler's Help counsellors and both encourage them to attend both properties regularly. By welcoming Gambler's Help counsellors to the properties, a better understanding of the gaming environment is facilitated for the counsellors and staff are able to have higher levels of contact with counsellors so that they are comfortable in contacting them for advice or referral.

Casinos do not train their staff to be counsellors. An exception may exist, such as at Crown Melbourne where professionals are specifically employed to provide an immediate and on site response counselling service, for example, the Responsible Gaming Psychologists that are employed at Crown Melbourne are employed to assist in many areas, including staff and patron welfare. Any crisis intervention (if required) is handled immediately and sensitively, at relevant properties often by dedicated responsible gaming staff or others, security or similar staff aligned always with the superior customer service ethos of our represented members. Given the many and varied visitors to our member properties for a variety of different entertainment options, any crisis event is various in nature and so is not necessarily linked to problem gambling behaviours.

Casinos have processes that enable employees to report any behaviours they may feel require investigation. This is achieved through escalation paths to managers. Whistle-blower policies and third party reporting arrangements also exist. The casino industry has well-developed and effective compliance and complaints handling arrangements in place. It should be noted that:

- ▶ Any gaming customer can make complaints directly to the relevant casino regulator. In addition, due to the industry's high service ethos and the obvious commercial incentive that comes with it, casinos all have in place a process to receive customer feedback (including complaints) from a wide variety of customers. These complaints are dealt with in an appropriate and time-efficient manner.
- ▶ In relation to staff, casinos provide staff with a multitude of training options, in addition to RSG training, dependent on their roles:
 - Casinos have HR processes in place to ensure that staff are able to freely raise any issues of concern with management or an HR representative.
 - In addition, many casinos operate an independent (third party operated) "Whistle-blower" service to take and handle any staff or supplier complaint or concern (which may be made anonymously) in relation to matters including, but not limited to, any issues of integrity, including harm minimisation matters. Casino operators regularly conduct awareness programs about the service.
- ▶ Many casino operators also already promote complaints and dispute resolution processes and staff are well trained to direct customers to these processes.
- ▶ State and territory casino regulators, in their regular reviews of casino operations, publish the number of complaints and statements as to their resolution or otherwise. In addition, most regulators publish disciplinary actions and fines against casino operators when an operator does not comply with its existing obligations, which as identified above, are numerous.
- ▶ Where investigations by the state/territory regulator reveal a breach of legislation or enforceable processes then the regulator has sufficient power to impose penalties and disciplinary action in an already robust regime.

SELF-EXCLUSION

Comprehensive information regarding Self-Exclusion was included with the submission. It is attached again for the Committee's information.

In addition, the ACA contends that casinos' experience in Self-Exclusion Programs is robust and extensive. Whilst there are slight variations in casino Self-Exclusion Programs due largely to individual state jurisdictional differences, all operate on the principle that Self-Exclusion is a tool made available for those persons who wish to use it in assisting to manage and/or address their problem gambling behaviours. This tool importantly allows the individual to take a pro-active step towards making a positive change in their behaviours.

All casinos provide Self-Exclusion on site, with a 24 hours a day, 7 days a week availability. Some state regulations require different casino responses in this area; for example, Tasmanian regulations require the presence of a counsellor to effect such an exclusion. This option may not always support the individual if a decision by them is made at a time the counsellor is not available. The ACA supports flexibility in options being important as individuals have personal preferences, which casinos strive to respect.

Professor Alex Blaszczynski notes that:

'Self-exclusion is one of the most important services offered by the industry to assist problem gamblers. It is important to highlight that this service does not constitute a formal treatment

intervention. Rather, in principle, it provides an immediate mechanism for problem gamblers to limit further financial loss by refusing direct access to gambling venues. A voluntary request for self-exclusion demonstrates a degree of acceptance by individuals that their gambling is excessive and is causing damage, the recognition that there is a need to take personal responsibility to address the issue, and the motivation to become active participants in the process. Most importantly, self-exclusion can be utilised to provide a gateway and referral pathway for adjunctive treatments.¹

Casinos will assist self-excluded persons in honouring their commitment to abstain from entering the gaming areas. Persons detected breaching their Self-Exclusion are offered the ongoing assistance of casino responsible gaming services, including referral to problem gambling help services.

Sanctions for breaches by Self-Excluded persons vary from state to state. For example, Victorian legislation provides for the prosecution of persons who breach their exclusion in the casino. In addition, Self-Excluded persons must forfeit their winnings (including prizes) to the State for payment into the Community Support Fund (*Casino Control Act 1991* (Vic) s 77A and s 78B respectively).

All casinos provide follow-up for persons who Self-Exclude. For example, Crown Melbourne applicants for Self-Exclusion are asked at the time of Self-Exclusion if they would like to be contacted by a Responsible Gaming Psychologist after three months of Self-Exclusion. Contact is made with those who elect to participate, and Responsible Gaming Psychologists will discuss their progress and find out if the referral to counselling has been taken up; whether they need any other assistance and how could the process of Self Exclusion be improved. The Star has also developed an external voluntary exclusion program that allows persons to Self-Exclude without attending The Star.

Some casinos' jurisdictions (e.g. Tasmania, Western Australia, Queensland) have third party exclusion available, where an individual with a close personal interest in and/or relationship with the welfare of a person, or a professional who recommends abstinence as part of treatment, wishing to seek the prohibition of that person from gambling at a casino should have the opportunity to present their case for the purpose of excluding that person. In Tasmania, the commitment of both casinos to the Tasmanian Gambling Exclusion Scheme (TGES) is very high. Staff are trained to be aware of persons who are excluded and have an obligation to report someone they suspect is excluded in the gaming area.

Echo casinos in Queensland encourage multi site exclusions. A state-wide register of self-excluded persons has been developed including a photograph of the excluded person. An automated technical solution has also been developed whereby the Register of Excluded Persons is linked to the Casino Management System so that a player's account in the Casino Management System is automatically suspended and their mail and contact options are turned off.

Also, all casinos have operator exclusions or similar processes available, where the casino can exclude a person if they believe that person's behaviour is inappropriate in that it may affect their own welfare or the welfare of others. The ACA notes that any such "involuntary Self Exclusion" must respect the rights and privacy of the individual; according to the principles of natural justice, whilst balancing the needs of those that may be experiencing actual harm as demonstrated by significant others (and taking care to avoid vexatious claims). The correct balance is not always an easy one to find and must take account of existing legal parameters.

Persons successfully applying for Self-Exclusion from a casino are required and requested to agree and adhere to legal and casino requirements. These include the request for the person to seek counselling and treatment, and the release of liability against the casino. In many jurisdictions, such as Tasmania's TGES, the existence of a Self-Exclusion Program is required at law, but this is chiefly to assist a person in their choices when seeking help for any problem gambling behaviours. The onus is on the person, and research supports this pathway.

The ACA considers Self-Exclusion Programs to be of great value to its members and their customers and an important part of their suite of responsible gaming services and programs. It is important to provide choice and flexibility and cater to the needs of the individual, the option of Self-Exclusion is a vital pathway to

¹ 'Self Exclusion: A gateway to Treatment'; Professor Alex Blaszczynski, Ph.D., Professor Robert Ladouceur, Ph.D., Lia Nower, J.D., Ph.D.; 2007

treatment. The *Productivity Commission 2010, Gambling, Report no. 50, Canberra* notes in relation to Self-Exclusion on page 10.7 that:

'There are significant benefits...

Though the evidence is not comprehensive (appendix E), it suggests that this type of pre-commitment arrangement has significant benefits for problem gamblers and their families. These include:

- *considerable reductions in spending. For instance, one assessment found that around 70 per cent of self-excluded parties had more than halved the amount they spent on gambling (Croucher et al. 2007). This finding was broadly echoed by a Macquarie University study in 2003 (sub. 175, p. 87)*
- *better family relationships — with the Macquarie University study finding that 65 per cent cited significant improvement in their personal relationships*
- *reductions in the urge to gamble, large perceived increases in control over gambling, and significant reductions in the negative consequences of gambling for social life, work performance and mental health (based on the overseas research discussed in appendix E).'*

As stated earlier, Australian casinos are highly regulated via numerous pieces of legislation both gaming and non-gaming related. Regulators have substantial powers of enforcement under such legislation in all states and territories, including those in relation to the provision of responsible gaming as required under each casinos' individual jurisdiction. In addition, Australian casinos already are and remain subject to extensive common law principles and duties that apply to gaming and non gaming activities

The Australian Churches Gambling Taskforce's suggestion that there should be legislated duty of care provision is based on the false assumption that there is something so insidious or systematically improper about the gambling industry that it requires the introduction of a new statutory cause of action, which is not faced by businesses in other industries. This suggestion is based on the mistaken assumption that resolving conflicts through the courts is a desirable or optimal state of affairs. This assumption is fundamentally flawed. The underlying assumption appears to be that because very few gamblers have successfully brought proceedings against gambling venue operators that this means the law needs to be changed.

The ACA submits that it is more likely that this is indicative that gambling venue operators have not breached their duties and responsibilities to gamblers and this is in fact why few successful cases have been brought. The ACA would further submit that in order for a problem gambler to deal with his or her problem they must recognise that they have a problem and commit to deal with the problem. This is an accepted point by many researchers in this area. Accordingly, the threshold tests for a breach of common law duty of care or breach of existing consumer protection legislation should remain relatively high, as they are now. The Productivity Commission also accepted that it would be preferable for governments to pursue the enhancement of compliance and complaints handling mechanisms and that this "would improve incentives for venues to effectively implement and apply harm minimisation requirements."²

Currently, there are a variety of both common (and equitable) law and statutory offences and causes of action already in existence. Such causes of action include negligence (breach of duty of care); unjust enrichment; unconscionable conduct, occupier's liability and in certain circumstances unjust enrichment as money had and received.

The common law contains sensible and well-worked safeguards including burden of proof, causation and remoteness tests. These safeguards are necessary because without them there is a fundamental shift away from a plaintiff having to prove its case to an assumption that the operator is at fault and effectively reversing the well-established onus of proof and standards.

As to the duty of care/negligence cases, the law, as it currently stands in Australia, leaves open the very real possibility that casinos owe a duty to "vulnerable persons" not to take deliberate advantage of that vulnerability.

² Productivity Commission, Inquiry Report – Gambling Vol.1 (February 2010), p. 12.32

Self-excluded persons who return to casinos and lose money have often sued casinos for breach of duty of care and other causes of action. Most academics and gambling treatment professionals and courts in various jurisdictions have decided against a policy that would impose on a casino or gambling venue a duty of care in these circumstances as it would allow the self-excluded gambler to shift responsibility from himself to another entity.

Most have concluded that the burden of self-exclusion should be on the gambler alone and an attempt to shift even part of the burden to the operator would be unproductive. Problem gambling experts have noted that the only way people can truly get better is if they take control and take responsibility for keeping themselves out of the casinos and it is wrong and unhelpful to put the responsibility in the casino's hands because the individual never takes a step in acknowledging his problem or trying to fix it, and this ultimately allows him to blame the casino if he fails. Further, many gamblers may see a ban as a challenge to see if they can beat the system.

This is not to say that there should not be reasonable steps taken by a casino to assist persons experiencing difficulties with their gambling. Casinos have done this pro-actively and voluntarily and all have robust Self-Exclusion processes in place, including many other responsible gaming measures. If the Churches Taskforce's concern relates to adequate incentives the ACA would submit that there are already many incentives for casinos to act in a proper and appropriate way (and significant disincentives to do the reverse) within current well defined and understood legal parameters, casino legislative frameworks and consumer protection laws particularly.

ACA member casinos have developed and implemented a significant number of harm minimisation measures and responsible gaming services, examples are in the Gambling Compliance 'Australian Casinos: Responsible Gambling Initiatives 1999 – 2008' report (*attached*). The ACA supports ongoing harm minimisation initiatives to promote sustainable and responsible operations.

RESEARCH

The ACA refers to its submission for information pertaining to Gambling Policy and Research:

'The ACA believes that there is an opportunity to establish a nationally focussed research capability that will focus on issues surrounding gambling in a more systematic and strategic way and to inform future policy development in relation to gambling issues. Such a capability should also draw on the expertise of industry. Such a body could be co-ordinated and funded by the Commonwealth, together with additional funding from the states.' (p. 10)

A number of casinos have participated in research or research advisory panels. For example, the Crown Melbourne General Manager Responsible Gaming participated in the Monash and Melbourne Universities Problem Gambling Research and Treatment Centre's Expert Advisory Panel for the development of the 'Guideline for screening, assessment and treatment in problem gambling'. Echo casinos have also participated in research conducted by Southern Cross University into assessment of staff and problem gambling behaviours in 2010, 2011 and 2012.

The current research approach is fragmented without any minimum national standards or approvals. The ACA supports a national approach to problem gambling research with best practice research standards adopted including peer review. The implementation of such practice would encourage ACA member casinos to further participate in evidence based research complying with minimum accepted standards.

PLAYER TRACKING AND LOYALTY PROGRAMS

All casinos operate a Loyalty Program, being a legitimate and common business practice, utilised as an important customer communication and promotions tool. Some larger casino Loyalty Programs provide the opportunity to accumulate loyalty points for non-gaming products such as restaurant and general retail offers. In addition, in some casinos the Loyalty Program allows customers to set time and loss limits for play on gaming machines (voluntary pre commitment) and so forms an important component of casino responsible gaming programs.

Members of Loyalty Programs can elect to receive membership magazines and other information, which offer the opportunity to inform and educate customers on responsible gaming programs. Many casinos make available Player Activity Statements ('PAS') for members of their Loyalty Programs. A customer can elect the frequency of their PAS delivery. In some jurisdictions, a customer is required to view their PAS at least once per annum (e.g. Victoria). Also for example, in Tasmania, under the Responsible Gambling Mandatory Code of Practice, both casinos are required to provide a PAS to all player loyalty program players. The ACA is aware of a program that asserts the identification of problem gambling behaviours via Loyalty Program data. The ACA's observations in relation to this system are that whilst the concept appears to have had some peer review, the actual system has not. The process of establishing the system is by using a problem gambling formula developed by its developer, which is not widely used anywhere. Although the formula has been tested against a commonly used index, the *Canadian Problem Gambling Severity Index*, there is no longevity of use and reliable information to suggest that it is robust.

Jon Kelly, CEO, Responsible Gambling Council, Canada, notes:

'Algorithms and other forms of play analytics can be very useful tools. But, like all tools, they are only as good as the people who use them. These tools need to complement—rather than replace—other safeguards. Sometimes the introduction of new technologies leads to the abandonment of old processes. The risk is that organizations may rely on these emerging technologies instead of other people-based strategies. Identifying and assisting players with problems on the gaming floor will always rely on capable, knowledgeable and well-trained staff.'

The ACA understands that the system is used on gaming machines only. This excludes table games players, where conventional methods must still be employed. It also excludes players who are not Loyalty Program members. It would not seem best practice to exclude identification of any at risk players (even if they could be so identified which is not proven or accepted) in these groups, as can currently be achieved with conventional and practical methods.

Much research supports the idea and use of 'observable signs' when staff are trained and know what to do, which is the case with current ACA supported Responsible Service of Gaming Training.

Whilst the concept of a system that purports to be able to identify 'risky gambling patterns' may have some initial appeal which may well be touted by the developers of systems professing to be able to do this, the ACA is not convinced that there is enough practical and research based evidence to support implementation. Casinos' current approach has the support of research as well as wide employment of practice and interactions which are consistent across all gambling product and real time, based on awareness and intervention.

The ACA is unaware of any casinos, which are using a software system called 'Tibco' to market to their customers.

GENERAL

- Responsible Service of Alcohol ('RSA') is of paramount importance to the casino industry. Casinos have rigorous RSA training programs and implement a number of policies and processes to ensure appropriate and robust RSA practice. Each casino is governed by and must comply with their state's relevant liquor and liquor licensing laws and regulations.
- Staff in most casinos are not permitted to gamble at the casino. In those casinos where gambling by staff is permitted, policies provide limited access to gaming for some casino staff. As an example, Lasseters in Alice Springs has the following government approved policy in place:
 - ▶ Non-licensed staff are permitted to play Electronic Gaming Machines (EGMs) while off duty, but are not permitted to play machines with a jackpot link totalling \$30,000 or more.
 - ▶ Staff holding a casino operatives licence are not permitted to play EGMs at any time.
 - ▶ A person cannot play an EGM on behalf of a licensed employee under any circumstances.
 - ▶ No staff, licensed or unlicensed are permitted to play table games.
 - ▶ Licensed and unlicensed staff are permitted to play KENO and bet at the TAB while off duty as these are not considered casino games.

All casinos provide an employee assistance program to assist employees with a range of issues including those that have identified with, or believe they may be at risk of developing, a gambling problem. This

support is provided free of charge and may be provided via face to face (both on and off site) or telephone counselling.

Through employee training and the RSG culture in casinos, casino employees are well educated in observable signs and where to get assistance should they be experiencing problems with their gambling behaviours.

In relation to the two recent employee gambling studies conducted by researchers from Southern Cross University, the ACA notes limitations as discussed in the Australasian Gaming Council's Research updates:

Hing, N & Nisbet, S, '*Accessibility and gambling problems amongst gaming venue staff*', Southern Cross University, 2009:

'The authors identified several limitations in the study that need to be considered. Non-random sampling and the non-inclusion of casino employees in this study meant that the results cannot be generalised to the population of gaming venue staff in Victoria, or elsewhere. Similarly, the qualitative results derived from the 40 interviews do not claim to be representative of the population.'

Inherent weaknesses also exist when using a cross-sectional survey methodology, that is, when investigating a link between access to gambling and problem gambling, cause and effect are unclear. It seems that actual gambling behaviour can (and did) shape respondents' assessments of their accessibility to gambling, at least in the social and cognitive domains. Whether social and cognitive access affect gambling behaviour, or whether gambling behaviour affects social and cognitive access, remains unclear.'

Hing, N & Gainsbury, S, '*Risky business: Gambling problems amongst gaming venue employees in Queensland, Australia*', Southern Cross University, 2011:

'Despite efforts made to generate a representative sample of gaming venue employees, for privacy reasons, researchers were not permitted to contact employees directly to solicit participation.'

The recruitment methods used were not completely successful in producing a sample that was entirely representative of the population in question. For similar reasons, the recruitment strategies were modified during the research, resulting in potential differences between participants, for example, between those who completed the survey on-line and received compensation and those who did not.'

Furthermore, because the researchers were not directly responsible for distributing and collecting the questionnaires, the response rate of participants and characteristics of non-responders cannot be determined. This may have resulted in a somewhat biased sample, as participants were, essentially, self-selected. As such, the authors warn that results should be interpreted with some caution because the extent to which they can be generalised to gaming venue staff as a whole is difficult to determine.'

- The ACA is supportive of a government initiated national public information and consumer education campaign to raise awareness of responsible gaming practices and the risks of problem gambling. This could involve the use of online technology and be introduced into secondary schools, similar to education programs on road safety, drug and alcohol use and the like.
- As problem gamblers have such a high rate of co-morbid conditions, it is the ACA's view that work with health professionals in the primary care area to improve detection and treatment of problem gamblers will have the best outcomes for the individual and the community.
- Responsible gambling is the shared responsibility of individuals, communities, the gaming industry and the government, working in partnership to achieve socially responsible outcomes which are responsive to community concerns.
- Casinos' responsible gambling initiatives are focussed on minimising the potential risks for those small numbers of customers who may develop difficulties associated with their gambling behaviours. Treatment and counselling should always form part of the suite of services that are available to those identifying with problem gambling behaviours.

- The ACA refers to its submission for information pertaining to Player Information:

'The Productivity Commission in its Report noted that the provision of in-venue information materials were a cost-effective and important resource referral for customers seeking assistance.³ The Productivity Commission also noted that there was a need for research to "target optimal language and visual images ... messages should also be reviewed and /or changed as it is found that their effectiveness wanes."⁴ (p. 4)

- Casinos welcome any evidence-based research that would assist in the efficacy of responsible gaming signage.

The ACA notes that research has been put to tender by the Victorian Department of Justice for 'In-Venue Signage' (closed in May 2011, it is unknown when results are expected).

'This study will:

Examine the channels and messages used to promote responsible gambling in venues in Australia and New Zealand (for New Zealand a literature review only is required).

- *examine the channels and messages used to promote responsible gambling in venues in Australia and New Zealand*
- *examine the effectiveness, and measure the impact of responsible gambling messages in venues on gambling behaviour*
- *identify effective ways of communicating responsible gambling to at-risk gamblers in venues'*

(Taken from the Tender Specification, p. 3)

- The ACA refers to its submission for information pertaining to Loyalty Programs and pre-commitment:

'Loyalty Programs and Pre-commitment

The ACA supports a pre-commitment system for EGMs that is compulsory for operators to provide but voluntary for players to use.

*Currently five Australian casinos have voluntary pre-commitment systems in place. They are Crown Casino, Burswood Entertainment Complex, Jupiters Gold Coast, Treasury Brisbane and Jupiters Townsville. In each case the voluntary pre-commitment system is linked to the casino's loyalty program – in the case of Crown and Burswood it is called **Play Safe**; in the case of the three Queensland casinos (all owned by Echo Entertainment Group) – it is called **Absolute Assist**.*

The combination of loyalty programs and pre-commitment in these five casinos provides a demonstration of how it is possible to offer venue-based voluntary pre-commitment without rendering gaming machine hardware and software redundant. They provide a useful tool for assisting players to better manage their time and budget.

The main characteristics of these programs are as follows:

- *Players can set, in advance of play, individual time and spend limits;*
- *Once a player's daily limit has been reached the player can no longer accrue loyalty points for a set period of time, usually 24 hours;*
- *Players can make their own decision based on their own circumstances when setting limits;*
- *To change or remove limits a player must request a change by visiting a loyalty club desk and in the case of Crown and Burswood these casinos' responsible gambling support centre; and*
- *A decrease in the limit can take place immediately but an increase to a limit will not take place until 24 hours after the player has made the change and the customer will be required to confirm the increase at a loyalty club desk, and at some casinos - terminal/kiosk.*

³ Productivity Commission, Inquiry Report – Gambling Vol.1 (February 2010), p. 8.7

⁴ Ibid, p. 8.15

Linking a pre-commitment mechanism to a loyalty program provides a mechanism for encouraging players to take up the option of voluntary pre-commitment and provides a platform for player communication, especially for responsible gambling.

Furthermore the infrastructure is already in place and it provides a faster and more cost- effective means of implementation. Loyalty programs allow for human interaction, which is important in any pre-commitment system. Responsible Gambling staff can interact with those customers where it is felt further action is required. Player activity statements are available for loyalty players – regardless of whether they participate in pre-commitment or not.’ (p. 6 and p. 7).

- Casinos are highly regulated organisations and are required to and do comply with their legal and regulatory obligations including those that relate to responsible gaming and harm minimisation, and they take these matters very seriously. Regular reviews of casinos and their operations are undertaken by a variety of regulators and bodies including state gaming and liquor regulators, AUSTRAC and law enforcement agencies to ensure that casinos operate in compliance with all relevant laws as a minimum standard, but also that their owners/operators continue to be appropriate persons and bodies to operate casinos in their jurisdiction including matters of probity and cultures of compliance.

Casinos have dedicated compliance staff and programs that ensure adherence to relevant state and federal laws governing all aspects of their operations, including responsible gaming and harm minimisation.

Casinos are legally obliged to and do self report a variety of regulatory compliance matters to their regulators who then investigate and take appropriate action, including issuing penalties and letters of censure and, for significant breaches, they have the powers to withdraw mandates to operate and terminate licences to operate. Inspectors are often on site at casinos (24/7 at the larger casinos) and so they can also identify and investigate any breaches and they can and regularly do request information from the casinos and conduct a variety of regular and spot audits of regulatory compliance at casinos. Casinos are obliged to and do assist and respond to those requests and permit those audits.

A National Snapshot of Harm Minimisation Strategies

Introduction

State and Territory Governments have the primary responsibility for the regulation of gambling in Australia.

In the past decade State and Territory Governments have introduced a wide range of measures to reduce the incidence of gambling related harm through various mechanisms including:

- Legislative and Regulatory changes; and
- Voluntary or Mandatory Codes of Practice implemented and administered by government regulators and/or industry stakeholders.

In general over the past five years, States and Territories have spent more than \$200 million on responsible gambling and harm minimisation. This includes telephone and face-to-face counselling services, public awareness and education, campaigning, research, intervention strategies, partnerships with community groups and support for individuals and families.

The regulatory environment

Providing a snapshot of harm minimisation measures in Australia is not an easy task. Regulatory and legislative environments across States and Territories differ considerably and are continually evolving. For example, New South Wales has made significant amendments to legislation governing the use and operation of gaming machines. In November 2009, the Tasmanian Parliament passed a number of legislative amendments in response to a social and economic impact study into gambling.

This is largely a reflection of the history of the legalisation of gambling in each state and territory and the specific political context at the time. For example New South Wales has had electronic gaming machines in clubs since the 1950s, whereas in Victoria they were introduced as late as 1992. In Western Australia electronic gaming machines are confined to the Burswood Casino.

Money Management

All states and territories have a range of mechanisms in place to support players to gamble within their monetary limits.

Access to credit

All States and Territories prohibit gambling operators from offering credit to a patron for the purposes of gambling. In addition, some jurisdictions have a ban on cash advances from credit cards through ATM facilities in their venues.

Cashing of cheques

Jurisdictions have a number of restrictions on the cashing of cheques in gambling venues. For example, in NSW gaming venues cannot exchange a cheque for cash

unless the cheque is made payable to the venue. A restriction of one transaction per day for no more than \$400 is in place. These provisions also stop a third party cheque being endorsed by payee to gaming venue.

Restricted access to ATMs and EFTPOS

ATMs and EFTPOS facilities are not permitted in gaming areas of pubs, clubs and casinos across Australia.

Tasmania is the only state that currently prohibits ATMs in hotels and club gambling venues, however Victoria has enacted legislation to take effect from 1 July 2012 that will also remove ATMs from gambling venues.

Limits on withdrawals from ATMs

The Northern Territory, Victoria and South Australia have limited the amount of cash that can be withdrawn from ATMs at gambling venues to \$200 per transaction per card.

In addition to Tasmanian hotels and clubs, Tasmania is exploring potential options for a new mandatory code of practice to be established by the Gaming Commission to limit EFTPOS transactions to one transaction for gaming per day in the two casinos. This follows legislative amendments in 2009 expanding the Gaming Commission's power to extend the current restriction.

In Victoria, ATMs are prohibited in gaming venues, or within 50 metres of an entrance to the gaming area of the Melbourne casino, unless withdrawals are limited to \$400 per card per 24 hour period. The same restriction applies to ATMs within 40 metres of the casino gaming area in WA.

Certain winnings to be paid by cheque

In all states and territories there is some provision for paying certain gaming winnings by cheque. In the Australian Capital Territory and New South Wales it is mandatory that electronic gaming machine winnings over \$1,200 and \$2,000 respectively be paid by cheque. In NSW winnings can also be made by means of electronic transfer of funds to an account nominated by the prize winner. In the Northern Territory and Queensland winnings over a certain amount must be paid by cheque; the amounts vary from \$250 to \$2,000.

In Tasmania, the prohibition of cashing of winning cheques on the day they are won is now in place. Options for a new mandatory code to be established by the Gaming Commission in relation to limiting the cash payout from gaming machines and keno to \$1,000 (above this amount is to be paid by cheque) are also being explored.

In Victoria, accumulated credits from gaming machines of \$1,000 or more must be paid by cheque. Accumulated credits under \$1,000 must be paid by cheque if requested by the patron.

Cashless / card-based gaming

Clubs, hotels and the casino in New South Wales have approved ticket-in, ticket-out technology whilst clubs and hotels in the Australian Capital Territory have been approved for ticket-out only.

Queensland has conducted three trials of pre-commitment card-based gaming systems with approval for a voluntary roll-out of the systems. To date pre-commitment card-based gaming is operational across 47 gambling venues in Queensland with two of these sites approved for full cashless card-based gaming. The other venues are using a combination of cash and card play.

Queensland's card-based gaming trials also feature pre-commitment tools that allow users to set loss, expenditure and time limits.

Pre-commitment Tools

South Australia is implementing trials of systems that allow patrons to set monetary and time limits on their gambling. These systems track player behaviour to notify the patron, and potentially the venue, if limits are exceeded. They can also provide a record of gambling behaviour to the patron and, with consent, to gambling help services. This work is in its early development stages, but it offers direct support to patrons who want to better manage their gambling expenditure.

New South Wales has provision for pre-commitment on loss limits on cashless / card-based gambling only.

In Victoria all next generation gaming machines will have a pre-commitment mechanism that allows a player to pre-set time and loss limits from 2010. Victoria will mandate pre-commitment mechanisms on all gaming machines from 2013 and a more stringent pre-commitment regime will be rolled out in 2015-1016.

Tasmania provides for pre-commitment for internet-based gambling operators, such as Betfair.

Structural Characteristics and Machine Design

Caps on number of electronic gaming machines

	Restrictions		Total
	Clubs / hotels	Casinos	
ACT	5,200	N/A [^]	5,200
NSW	99,000	1,500	100,500
NT	1,190	Nil*	2,195
QLD	44,015	Limited by ratio of tables to gaming machines	44,015**
SA	12,900***	995****	13,895
TAS	2,500	Nil	3,680*****
VIC	27,500 and regional caps in 20 regions^^	2,500	30,000
WA	N/A	1,750	1,750

* Machine numbers in NT casinos limited by regulatory approval process.

** This total does not include approved machines in casinos, currently sitting at 3,796. There is no formal cap on Casino gaming machines.

*** Declining to 12,118 through forfeiture requirements in the approved trading system.

**** Determined by formula relating to the number of club and hotel gaming machines.

***** State-wide cap on total gaming machines. The cap excludes gaming machines operated on vessels operated by the Trans Tasman-Line.

[^] The casino in the ACT is prohibited from operating electronic gaming machines.

^{^^} A maximum density of ten gaming machines per 1,000 adults for all municipalities, not covered by a regional cap (except for Melbourne CBD, Docklands and Southbank) also applies.

Maximum density of gaming machines in all municipal areas to be capped at 10 per 1,000 adults by 2010.

Rate of loss – bet and win limits

Bet limits are in place in hotels and clubs across all jurisdictions, these range from \$5.00 to \$10.00. The Tasmanian Gaming Commission recently approved amendments to the Tasmanian Appendix to the *Australian and New Zealand Gaming Machine National Standard* to reduce bet limits from \$10 to \$5 per spin in all gaming venues effective for new games from 1 April 2010. Existing games are to be updated by 30 June 2013. New South Wales has a bet limit of \$100 for multi-terminal gaming machines in clubs. Most casinos do not have a bet limit. At the NSW casino the bet limit is the same as for hotels and clubs unless the gaming machine is in a private gaming area, in which case there is no bet limit. Victoria has a gaming machine bet limit of \$5 (\$10 at the Melbourne casino, except on machines in a specified area) Western Australia has a range of bet limits depending on the game.

Win limits are in place in hotels and clubs in New South Wales (\$10,000 for a stand alone gaming machine, \$125,000 for inter-venue linked gaming machines, and \$100,000 for multi-terminal gaming machines). Queensland (\$10,000, for stand alone machines), and South Australia (\$10,000). There are no win limits in casinos for non-jackpot prizes.

Note acceptors

In South Australia note acceptors are prohibited in gaming machines. Tasmania and the Northern Territory have banned note acceptors in both pubs and clubs, but not in

casinos. The Tasmanian Gaming Commission has approved amendments to the Tasmanian Appendix to the *Australian and New Zealand Gaming Machine National Standard* to reduce the maximum machine cash input limit for note acceptors from \$9,899 to \$500 effective from 1 April 2010 for new games, and by 30 June 2013 for existing games. Other states and territories, aside from New South Wales, have placed limits on the maximum denomination of notes accepted.

These range from \$20 in Queensland and the Australian Capital Territory and \$50 in Victoria to \$100 in Western Australia.

Display of odds and return to player

Odds are displayed for gaming machines in clubs, hotels and casinos across all jurisdictions. The minimum return to player ranges from 85% to 92% in clubs, hotels and casinos.

The Gambling Environment

Provisions for exclusion / self exclusion

All jurisdictions have provisions for self exclusion. In New South Wales, Queensland, the Australian Capital Territory and Northern Territory it is mandatory for a venue to have self-exclusion schemes in place. The Australian Capital Territory also places statutory responsibility on gambling venue licensees to exclude a person where the licensee has reasonable grounds for believing that the welfare of the person, or any of the person's dependants, is seriously at risk because of the person's gambling problem.

It is an offence in Queensland for gambling providers to distribute promotional material to known excluded persons.

In Tasmania, people can be excluded from gaming in a number of different ways – self-exclusion, third-party exclusion, venue operator exclusion and exclusion by the Commissioner of Police. Self-exclusion is available from TOTE and Betfair activities.

In Victoria, from December 2008 it has been a condition of a venue operator's licence to have a self exclusion program. Venue operators must have their self-exclusion program approved by the Victorian Commission for Gambling Regulation (VCGR) by 1 June 2009.

In South Australia, the Independent Gambling Authority has conducted an inquiry into exclusion provisions. A report was released in September 2009.

In Western Australia, self exclusion is available at the Burswood Casino and all TAB agencies.

Clocks to be displayed

All jurisdictions other than Western Australia require clocks to be displayed either on the gaming machine or within the gaming area. Clocks have been installed on a voluntary basis in the casino in Western Australia.

Limitations on 24 hour gaming in pubs and clubs

All jurisdictions have some enforced break in gaming operations in pubs and clubs (Western Australia does not have gaming machines outside of the casino). The period of the enforced break in operation over a 24 hour period ranges from three to six hours. This is legislated in all states and territories.

In Tasmania the limitation on 24 hour gambling for hotels and clubs is specified in the Tasmanian Gaming Commission Rules. Disciplinary action can be taken against a venue which does not comply with Commission Rules. South Australia is planning to impose additional responsibilities on late trading venues. NSW research has found that the shutdown period was effective.

Requirement for proper lighting

The Australian Capital Territory and Victoria have requirements for proper lighting in gambling venues. It should be noted that the ability to provide natural light in gambling venues is inhibited in some cases by licensing conditions which state that gaming machines must not be visible from public thoroughfares.

In Western Australia, developments to the Burswood Entertainment Complex now provide for natural lighting in areas of the approved gaming floor.

In Tasmania, the introduction of minimum lighting standards is currently being explored as part of a mandatory code of practice to be established by the Gaming Commission under its recently expanded rule making powers.

Options for a new mandatory code of practice are also being explored by the Gaming Commission in relation to:

- advertising gambling products;
- player loyalty programs;
- inducements that may lead to problem gambling behaviour;
- clocks in gaming areas;
- further restrictions on access to cash; and
- improved signage.

Advertising restrictions

All states and territories have restrictions on advertising related to gaming machines. The nature of the restrictions varies across jurisdictions. For example, in some states and territories advertising restrictions apply to all gambling products; while in others they apply only to gaming machines.

Restrictions on player loyalty systems / programs

The Australian Capital Territory, New South Wales, Northern Territory, South Australia and Victoria have restrictions on player loyalty systems/programs. For example, in some states cash cannot be offered as a prize, participants are able to limit time play and net loss, and excluded persons are prohibited from participating.

Promotions and inducement restrictions

Gambling related inducements are banned in New South Wales, the Northern Territory and South Australia (from December 2008).

In NSW gaming machine venues are prohibited from offering free or discounted liquor, or free credits, as inducements for people to play gaming machines. Action may also be taken against individual promotions or inducements offered by a club or hotel that offend responsible gambling practices.

Prize restrictions

In NSW there are restrictions on the value and nature of prizes and bonuses that can be offered to market gaming machines. These apply to all promotional, reward, loyalty or bonus schemes. There is a prohibition on any promotional or loyalty prizes by cash and prizes cannot be exchanged for cash. The limit of the value of a prize is \$1,000. Bonus points cannot be converted to cash.

Minors banned from gaming machine areas

Minors are not permitted in gaming areas across Australia. Penalties are in place for the individual, venue operator and staff. In Tasmania, legislative amendments which took effect in 2009 have created a new offence to apply to special employees¹ for allowing minors to enter or remain in a restricted gaming area.

Ban on smoking in gaming areas

Smoking is not permitted in gaming areas in all states and territories except Western Australia and Queensland. The Northern Territory has a provision for smoking only in the high roller rooms of the casino. In Western Australia smoking is banned in all casino gaming areas other than those in the international gaming facility. Queensland and Victoria currently allow smoking in the premium gaming areas of their casinos. In NSW the smoke-free environment laws apply to all enclosed venues, including all areas of a club or hotel since July 2007. NSW only allows smoking in a private gaming area of the casino.

Staff training in responsible gambling

All states and territories except Western Australia have mandated for staff training in responsible gambling.

Queensland has mandated staff training on the responsible service of gambling for hotel and club staff who carry out gaming duties or gaming tasks. Practical implementation of mandatory training will commence in October 2010.

In Western Australia the Casino Licensee has voluntarily introduced responsible service of gambling training for all staff.

In Tasmania, options are being explored by the Gaming Commission to enhance the existing Responsible Conduct of Gaming course, focusing on problem gambler identification and appropriate intervention. Consultation on the content of the enhanced course begins in 2010, with the new course expected to be operating by 1 July 2011.

Ban on gambling products that undermine a responsible gambling objective

In Victoria from 1 March 2009, the Minister for Gaming is able to ban a gambling product or practice that the Minister considers undermines a responsible gambling objective of the *Gambling Regulation Act 2003*.

¹ For definition of “special employee” see *Tasmanian Gaming Control Act 1993, Section 49*

Educational, Public Awareness Programs and Treatment Services

In addition to harm minimisation strategies, State and Territory Governments also fund a range of gambling help services, prevention, and community education programs.

Public awareness

All states and territories provide information on problem gambling, through:

- gambling awareness weeks
- gambling websites
- media campaigns
- problem gambling information materials (provided in various languages), and
- school education materials on problem gambling.

Treatment Services

All states and territories provide treatment services for problem gamblers. These include the national gambling hotline number (1800 858 858) which links to state gambling hotlines, face to face counselling (including the option of financial counselling).

All jurisdictions have also collaborated on a national website for the online treatment of problem gamblers. The service, launched on 8 October 2009, provides online 24-hour, seven day a week counselling for problem gamblers. In Tasmania, a review is underway to evaluate the effectiveness of the gambling support helpline.

**Interstate Comparison Table
Harm Minimisation Strategies**

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Ban on credit gambling	Yes.	Yes.	Yes, credit gambling is prohibited.	<p>Yes, <i>Gaming Machine Act 1991 (GMA)</i> states that a licensee or employee must not make a loan or extend credit.</p> <p>The <i>Casino Control Act 1982 (CCA)</i> provides that a casino operator must not extend credit in any form to any person in connection with any gaming.</p> <p>Equivalent provisions banning credit gambling under the <i>Keno Act 1996</i>, <i>Wagering Act 1998</i>, <i>Interactive Gambling (Player Protection) Act 1998</i> & <i>Charitable & Non-profit Gaming Act 1999</i>.</p>	Yes.	Yes, prohibited in clubs, hotels and casinos under <i>Gaming Control Act 1993</i> , <i>Tasmanian Gaming Commission Rules and Gambling Industry Group Code of Practice</i> .	Yes.	Yes, for casino. No EGMs in hotels and clubs.

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Limitations on 24 hour gambling (not for casinos)	Yes, enforced break of 5 hours.	Yes, enforced daily break in gaming machine operations in clubs/hotels of a specified 6 hours per day 4am to 10am. Venues can seek approval to close for only 3 hours on Saturdays, Sundays and public holidays. Legislative amendments allow venues to apply for approval to close for only 3 hours on other days, on grounds of hardship, subject to guidelines.	Yes, for hotels and clubs - limited to trading hours. Gaming is banned under legislation between 4.00am and 10.00am daily and no gaming permitted Christmas Day and Good Friday.	Yes, there are no 24 hour hotel and club operators. No gaming Christmas Day, Good Friday or before 1pm on Anzac Day. Machine gaming has not been permitted to commence before 10am since 1 January 2009. Club and hotel operators are not permitted to operate gaming machines after midnight without first seeking a special licence to do so. These licenses are issued on a yearly basis.	Yes, for hotels and clubs - compulsory break in trading times for 6 hours a day. Additional responsibilities for late trading venues planned.	The Tasmanian Gaming Commission Rules, July 2008, stipulate that gaming facilities can only be operated at the licensed premises for a maximum of 20 hours within any 24-hour period. There must be at least four continuous hours each day when gaming machines and/or keno are not in use.	Yes, for hotels and clubs - 20 hours max unless approved for 24 hour trading but there are no 24 hour gaming venues other than the Melbourne Casino.	No – with the exception of Good Friday, Christmas Day and the morning of Anzac Day.

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Restricted access to ATMs and EFTPOS	Yes, ATMs and EFTPOS facilities are prohibited in gambling areas. EFTPOS facilities are permitted in the restaurant and bar area of the casino. However patrons are only allowed to pay for food and beverages using an EFTPOS debit facility. Cash advances or access to credit from any EFTPOS facility in the casino is prohibited.	Yes, not permitted in gaming machine areas of clubs/hotels. No access to cash from a credit card account from ATMs or EFTPOS facilities.	Yes, for hotels, clubs and casinos. Cannot be sited within gaming area. Limit of amount of cash withdrawals and no access to credit facilities.	Yes, GMA provides that ATMs and EFTPOS are not permitted in, or close to, gaming areas. ATMs must only be available for the use of debit cards.	Yes, not in gaming areas. Withdrawals from ATM or EFTPOS limited to \$200 per transaction per card.	Yes, ATMs are banned from gaming venues, EFTPOS limited to one transaction for gaming per day. Legislative amendments passed in November 2009 have expanded the Tasmanian Gaming Commission's rule making power to extend the current restriction on EFTPOS transactions from hotels and clubs to the two casinos. New mandatory codes are being developed in relation to this matter. No access to credit accounts or credit cards.	Yes, casino: Legislation places a \$200 limit per transaction per card and no cash advances from a credit account on facilities within 50m of any entrance to the casino. From 1 Jan 2010 ATMs in casino or within 50m of entrance to casino must not dispense more than \$400 on any one debit or credit card within a 24hr period. From 2012, ATMs will be prohibited within 50m of an entrance to the casino gaming floor. Yes, hotels and clubs: VCGR Rules state that ATM and EFTPOS facilities must not be accessible by any person within the gaming machine area of an approved venue for the purposes of withdrawing cash. Legislation places a \$200 limit per transaction per card and no cash advances from credit accounts. From 1 Jan 2012 ATMs in any part of an approved venue must not dispense more than \$400 on any one debit or credit card within a 24hr period.	N/A for hotels and clubs. Yes, for casino. ATM's are not permitted to be located on the gaming floor areas. The Gaming and Wagering Commission prohibits the placement of ATMs in the area covered by the casino gaming licence, and within 40 metres of any entrance to the gaming floor, unless the ATM has a daily withdrawal limit of \$400. EFTPOS withdrawals within the licensed gaming area is only available at the Main Cage and have had credit access disabled so patrons cannot access funds through any credit account.

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Provisions for exclusion / self exclusion	<p>Yes, mandatory Code of Practice requires all gambling venue licensees to offer self-exclusion. There is also a statutory responsibility on gambling venue licensees to exclude a person where the licensee has reasonable grounds for believing that the welfare of the person, or any of the person's dependants, is seriously at risk because of the person's gambling problem.</p>	<p>Yes, legal waiver provided for clubs/hotels since 2000.</p> <p>From 2 Oct 2002, compulsory for clubs/hotels to have a self-exclusion arrangement in place.</p> <p>Casino has exclusion and self-exclusion schemes.</p>	<p>Yes, application forms are to be available at reception, within gambling area, adjacent to gambling products.</p>	<p>Yes. The Gaming Machine Act 1991 provides for self-exclusion provisions and provides gaming machine licensees with a power to exclude any person that a licensee believes on reasonable grounds is a problem gambler.</p> <p>Legislative requirement under Part 10 of the Casino Control Act 1982 for self-exclusion provisions and provides casino operators and managers with a power to exclude any person that an operator or manager believes on reasonable grounds is a problem gambler.</p> <p>It is an offence under the Gaming Machine Act, Casino Control Act, Interactive Gambling (Player Protection) Act, Keno Act and Wagering Act for promotional material to be distributed to excluded persons. A maximum penalty of 40 penalty units (ie \$4000) applies.</p> <p>Venues with gaming machines need to correlate their exclusions database with their promotions.</p>	<p>Yes, both in-venue and, voluntarily through the Independent Gambling Authority.</p> <p>Independent Gambling Authority has conducted an inquiry into exclusion provisions. Government is considering the recommendations.</p>	<p>Yes, self-exclusion possible, as well as exclusion by venue operator, Gaming Commission (through third-party applications) and Commissioner of Police.</p> <p>Changes to the gambling exclusions scheme for self-excluded gamblers are expected to be implemented during the latter half of 2010.</p>	<p>Yes, for casino.</p> <p>From 1 June 2009, clubs and hotels must have a self-exclusion program that has been approved by the VCGR.</p>	<p>N/A for hotels and clubs.</p> <p>Yes, for casino. The <i>Casino Control Act</i> provides that the Casino Licensee or Commissioner of Police can issue a written direction prohibited entry to the casino. The Casino Licensee also maintains a voluntary self exclusion program for those persons who are identified as potentially at risk of harm.</p>

**Interstate Comparison Table
Harm Minimisation Strategies**

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Clocks to be displayed	Yes, required under the mandatory Code of Practice.	Yes, compulsory for clubs, hotels and casino.	Yes, contained in mandatory Northern Territory Code of Practice for Responsible Gambling.	Section 4.7 of the voluntary QLD Responsible Gambling Code of Practice states that gambling providers are to implement practices to ensure that customers are made aware of the passage of time. Queensland Communication (QCOM) protocol 1.6 requirement that all QCOM 1.6 compliant EGMs must have the ability to display a clock to be located either in the top right hand side of the EGM's primary display or in the bottom left hand corner of EGM's primary display.	Yes.	Yes, a new mandatory code of practice requiring the display of clocks on walls is being developed.	Yes, regulations provide for a clock on each EGM in hotels, clubs and casinos.	N/A for hotels and clubs. No requirement for casino although clocks have been installed around the gaming floor areas on voluntary basis.

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Staff training in responsible gambling	Yes, required under the mandatory Code of Practice.	Yes, compulsory for clubs, hotels and casino.	Yes, contained in mandatory Northern Territory Code of Practice for Responsible Gambling.	Yes, training on the Responsible Service of Gambling (RSG) is mandatory for club and hotel employees who carry out gaming duties or gaming tasks. This requirement will become mandatory in October 2010.	Yes, Mandatory Code of Practice.	Yes, compulsory Responsible Conduct of Gaming training. Gaming venue staff are given a refresher of some aspects of Responsible Conduct of Gaming training, as part of Responsible Gambling Awareness Week. Enhancements to the Responsible Conduct of Gaming (RCG) course with a specific focus on problem gambler identification and appropriate intervention are being developed.	Yes, gaming industry employees who are working in the gaming machine area of an approved venue or the casino must complete an approved training course within six months after starting employment and a refresher course at least once every three years thereafter.	N/A for hotels and clubs. Yes, for casino. Burswood Entertainment Complex has a compulsory staff training requirement. Staff can then be nominated for further training so that they can respond appropriately to patrons with specific gaming related issues.

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Certain winnings to be paid by cheque	Yes, under the mandatory Code of Practice. Maximum cash payout for winnings for gaming machines is \$1,200 and cash limits also apply to other forms of gambling.	Yes, for clubs and hotels. Compulsory for amounts over \$2,000 (changed from \$1,000 on 19 May 2006). Also applies to that portion of the prize under \$2,000, where requested by club/hotel patron. Winnings can also be made by means of electronic transfer of funds to an account nominated by the prize winner. For casino, operator must notify winner of a prize above \$2,000 of capacity for prize to be paid by cheque and, where requested, pay the prize by cheque. A prize winning cheque must be clearly marked with the words 'Prize winning cheque – cashing rules apply'.	Yes, over \$500.00 in hotels and clubs or if requested by player.	Yes, over \$250.00 in hotels and clubs unless a higher cash payment limit is approved. Such a limit would not normally exceed \$1,000. Available in casinos where requested by the patron.	Yes, under the Mandatory Code of Practice cheques can be requested for payouts over \$1,000.	Yes, recent legislative amendments have expanded the Tasmanian Gaming Commission's rule making power in relation to access to cash. The prohibition on cashing of winning cheques on the day they are won is now in place. A new mandatory code is being developed in relation to setting a maximum cash payout of \$1,000 for winnings from gaming machines and keno (above this amount must be paid by cheque.)	Yes, accumulated credits on a gaming machine of \$1,000 or more must be paid out in full by cheque that is not payable to cash. The casino operator must not pay out accumulated winnings in excess of \$2,000 in cash (this does not apply to certain gaming machines in specified areas of the casino). Credits must be paid by cheque if requested by a patron; a cheque cannot be exchanged for cash or gaming tokens.	N/A for hotels and clubs. In the casino, patrons may request winnings in the form of a cheque for any amount. Approved procedures detail the process for the issue of a winner's cheque. AUSTRAC reporting requirements apply.

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Ban on smoking, eating and drinking in gaming areas	There are no restrictions on food or drinks in gambling areas of licensed venues. Smoking is however not permitted at the casino or in the gaming machine areas of clubs and hotels.	No ban for eating and drinking. Smoke-free Environment law applies (Health initiative). Smoking is prohibited in all enclosed areas of clubs, hotels and the casino except in a private gaming area.	Ban on smoking in all indoor areas except high roller rooms. Ban for outdoor eating and drinking areas to take effect from 2 Jan 2011 – some capacity for liquor licensed premises to have some outdoor smoking with strict conditions from 2 Jan 2011.	Smoking ban in eating areas of hotels and clubs and main casino floor (table games but premium gaming rooms exempted). Total ban on smoking inside venues under Health Act from 1 July 2006. Casino premium gaming rooms exempt under the Tobacco and Other Smoking Products Act 1998.	No, for eating and drinking. From 1 Nov 2007, complete ban on smoking.	No, for eating and drinking. Legislated ban on smoking in gaming areas from 1 Jan 2005. Recent legislative amendments have expanded the Tasmanian Gaming Commission's power to establish a mandatory code of practice. A new mandatory code is being developed in relation to attendant service of alcohol and food in public gaming areas between the hours of 9pm and close of gaming operations each day.	No, for eating and drinking. Yes, for smoking. Banned in all gaming areas of the casino (except in a declared smoking area) and in the gaming machine area of approved venues (clubs and hotels).	Casino is now smoke free, with the exception of the international gaming facilities and associated private gaming room. Eating and drinking permitted.
Requirement for proper lighting	Yes, the mandatory Code of Practice requires there to be adequate lighting so that clocks and signage are clearly visible.	No.	Mandatory Northern Territory Code of Practice for Responsible Gambling requires it where possible.	No - natural light could conflict with licence conditions whereby EGMs must not be visible from public thoroughfares.	No gaming specific requirements.	Yes, a new mandatory code relating to minimum lighting standards is being developed.	Yes, regulations in place to provide for proper lighting.	N/A for hotels and clubs. The casino provides for natural lighting in areas of the approved gaming floor. Adequate lighting required in Casino to enable clear camera coverage in all areas, gaming tables and pits inclusive, where closed circuit camera coverage is required.

**Interstate Comparison Table
Harm Minimisation Strategies**

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
On-site problem gambling assistance or referral	Yes, referral.	Yes, referral.	Yes, referral.	Yes, <i>Gaming Machine Act</i> and <i>Casino Control Act</i> require venues to provide contact details of gambling counselling services to a person who initiates self exclusion. Queensland casino operators have appropriately trained and qualified RSG officers on site. Help services and information regarding risks of gambling displayed at gaming venues as per voluntary requirement in Code of Practice and a customer liaison officer to provide assistance.	Yes, referral. Incentives for licensees to have a management relationship with a gambling help service.	Yes, posters and brochures.	Yes, referral.	N/A for hotels and clubs. Yes, for casino. The Casino Licensee has appropriately trained and qualified RSG officers on site. The Casino also provides an on-site counsellor. Brochures, posters and gaming information terminals in the casino also provide referral information.

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Service of alcohol in gaming areas	Permitted.	Yes.	Permitted.	<p>Under Voluntary Code of Practice licensees must take all practicable steps to:</p> <ul style="list-style-type: none"> - prevent a person who appears to be intoxicated from being allowed to gamble. - prevent an intoxicated person from entering a gambling area or remaining there. - ensure that alcohol is not supplied to reward, promote or encourage continued gambling. <p>A person is not to be served alcohol while seated or standing at a gaming machine.</p> <p>Casinos: Section 65C of the Casino Control Act restricts a casino operator from providing liquor in gaming areas unless approved.</p> <p>Gold Coast and Brisbane Casino: Alcohol served to gaming tables in private high roller gaming areas.</p> <p>Cairns Casino: Alcohol served on all gaming floors.</p> <p>Townsville Casino: No alcohol served to gaming areas.</p>	<p>Yes, Mandatory Code of Practice.</p> <p>Licensees must take all practicable steps to:</p> <ul style="list-style-type: none"> - prevent a person who appears to be intoxicated from being allowed to gamble. - prevent an intoxicated person from entering a gambling area or remaining there. - ensure that alcohol is not supplied to reward, promote or encourage continued gambling. <p>A person is not to be served alcohol while seated or standing at a gaming machine.</p>	<p>Yes, limitations on serving gaming to people appearing to be intoxicated through the GIG voluntary code of practice.</p>	<p>Yes, it is an offence for a venue operator to knowingly allow a person who is in a state of intoxication to play a gaming machine. The Act includes a definition of intoxication.</p>	<p>Permitted in accordance with <i>Liquor Control Act</i>.</p>

**Interstate Comparison Table
Harm Minimisation Strategies**

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Restrictions on entry	Yes – minors and excluded persons are not permitted in gambling areas and intoxicated persons are not permitted to gamble. Clubs are only permitted to allow members and invited guests to play gaming machines.	Yes - based on age, dress, intoxication, excluded persons.	Minors not permitted in gaming area. No direct street access to gaming area. Patrons must first enter main licensed area before accessing gaming area.	Yes – minors and excluded persons are not permitted in gambling areas (legislated). Persons may be restricted entry at the discretion of the licensee.	Based on age, dress, intoxication, excluded persons.	Yes. Special employees are prohibited from allowing minors to enter or remain in a restricted gaming area.	Based on age, dress, intoxication, excluded persons.	Yes, <i>Casino Control Act</i> and <i>Liquor Control Act</i> . Restrictions based on age, intoxication and exclusions.

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
<p>Restrictions on minors and penalties:</p> <ul style="list-style-type: none"> • Venue operator • Staff • Adult supervisor 	<p>Minors are not permitted to gamble or enter gambling areas. There are penalties on licensees and persons using false identification.</p>	<p>Yes, for all three.</p>	<p>Minors not permitted in gaming areas.</p> <p>Penalties apply to venue operator and minor.</p>	<p>In casinos, minors are not permitted within the licensed gaming area of the casino during operation hours.</p> <p>A maximum of 100 penalty units (\$100,000) for a casino operator who allows a minor within a casino.</p> <p>Casino employees and casino agent who allows or does not remove a minor from the premises is liable for 40 penalty units (\$4,000).</p> <p>Keno operators are liable for 40 penalty units (\$4000) if they allow a minor to participate in keno gaming.</p> <p>In clubs and hotels, minors are not permitted to operate a gaming machine on licensed premises. Maximum penalty for minor 25 penalty units (\$2,500), maximum penalty for licensee or licensee's nominee 250 penalty units (\$25,000) or another person 40 penalty units (\$4,000).</p> <p>Penalties have increased from maximum 10 penalty units (\$1,000) to 25 penalty units for a minor participating in casino or keno gaming. New penalties (25 penalty units) were introduced in October 2009 for minors who participate in lottery or wagering activities.</p>	<p>Minors must not be employed in gaming operations, maximum penalty \$10,000 or imprisonment for 6 months.</p> <p>Minors are not permitted in designated gaming areas or operate a gaming machine on licensed premises. Maximum penalty for minor \$2,500, maximum penalty for licensee and manager on duty \$10,000.</p> <p>A licensee or an approved gaming machine manager who permits a minor to enter or remain in a gaming area of the licensed premises, or to operate a gaming machine on the premises faces a maximum penalty of \$20,000.</p>	<p>Minors must not enter or remain in a restricted area (10 penalty units). Minors must not participate in gaming (20 penalty units).</p> <p>Venue operator is guilty of an offence if minor enters restricted gaming area (20 penalty units) and must not allow minor to participate in gaming (20 penalty units).</p> <p>Person must not place a wager on behalf of a minor (20 penalty units).</p> <p>Note: penalty units are reviewed annually in line with CPI, as from July 2008. Current value is \$120.</p> <p>Penalties for gaming to be aligned with those for liquor licensing following legislative amendments passed by the Tasmanian Parliament in November 2009.</p>	<p>In 2008, the Gambling Legislation Amendment (Responsible Gambling and Other Measures Act) 2008 consolidated offences relating to gambling by minors and provided a new objective in the Gambling Regulation Act to "ensure that minors are neither encouraged to gamble nor allowed to do so". All the new provisions, including the new objective, come into force on 1 June 2009.</p>	<p>Yes, <i>Casino Control Act</i>.</p> <p>Minor (under the age of 18 years) must not enter or remain in casino.</p> <p>Penalty:</p> <p>Licensee - \$5,000 Offender - \$500</p> <p>Minor participating in gaming in casino</p> <p>Penalty:</p> <p>Licensee - \$5,000 Offender - \$1,000</p>

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Staff licensed	Yes, all gambling staff must be licensed.	Yes, for casino special employees – e.g. those involved in gaming, movement or change of chips or money, operation or maintenance of gaming equipment, casino security, supervision of gaming, or in managerial capacity at the casino. After changes to the Casino Control Act in May 2010, special employees are licensed against a certificate of competency issued by the casino operator, to standards set by the Casino, Liquor and Gaming Control Authority.	Yes.	Yes. The <i>Casino Control Act</i> requires a person working in a casino to be licensed as either a key casino employee or casino employee depending on the nature of their duties and responsibilities. The <i>Gaming Machine Act 1991</i> requires persons performing certain gaming duties or functions, or having certain gaming related responsibilities, to be licensed.	Licencees of venues are required to seek the approval of a person who performs certain duties in a gaming area as either a gaming machine manager or gaming machine employee (depending on the duties performed by the person).	Yes, all staff licensed.	Yes, those that perform duties of a gaming industry employee as defined in the <i>Gambling Regulation Act</i> . Duties are prescribed in the <i>Gambling Regulation Regulations 2005</i> .	Yes, for casino gaming. Casino staff employed or working in a licensed casino whose duties or responsibilities relate to or are in support of the licensed casino, but does not include casino key employee must be licensed as Casino Employees. Casino employees employed or working in a licensed casino in a managerial capacity or empowered to make decisions, involving the exercise of his discretion, that regulate the operation of a licensed casino, or who the GWC determines in the public interest by reason of his influence.

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Ban on note acceptors	\$100 and \$50 notes banned.	No.	Yes, for hotels and clubs. No, for casinos.	Limited to \$20 notes, however legislative amendments were passed in October 2009 to provide for a maximum denomination for gaming machine note acceptors in casinos, clubs and hotels to be prescribed in a regulation. (Regulation yet to be made)	Yes.	Yes, for hotels and clubs. No, for casinos. However, the maximum cash input limit for note acceptors has been reduced from \$9,899 to \$500 for new machines. Existing machines must be adapted by 30 June 2013.	\$100 note acceptors banned except for gaming machines located in areas specified by the VCGR.	N/A for hotels and clubs. Casino – Note acceptors limited to \$100
Cashless / card-based gaming	Ticket-out approved. N/A for casino.	Yes, from 2 April 02, card-based gaming machines allowed in clubs and hotels, subject to conditions. Since 23 Feb 2007 approval for Ticket In Ticket Out (TITO) technology to operate on standalone gaming machines in clubs and hotels. Ticket out operates in the casino.	No, for hotels, clubs and casino.	A number of card-based gaming (CBG) trials have been conducted and approval has been given for a voluntary roll-out with CBG pre-commitment operational in 47 sites to date. Two sites are approved for full cashless CBG. Remaining venues are using a combination of cash and card play. QLD has developed detailed guidelines for the approval of CBG systems. Pre-commitment to both money and time was a major feature of both trials.	No. Report of inquiry conducted by IGA (June 2005) http://www.iga.sa.gov.au/pubcons.html	No.	Not available in hotels and clubs.	N/A for hotels and clubs. No, for casino.

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Pre-commitment - loss limits	No. N/A for casino.	Is possible in regard to card-based gaming, but not otherwise No, for casino.	No.	The CBG systems operational in QLD allow players to set the following limits – 1) maximum account limit; 2) transfer limit per session; and 3) a maximum net loss expenditure per day/session limit. It is likely pre-commitment features would be a part of any approved card-based gaming system.	Trials of pre-commitment and player tracking have been conducted, with some trials still in progress. Can set limits based on loss expenditure and time. Being evaluated by the Responsible Gambling Working Party.	Pre-commitment limits are provided for internet-based gambling operators, such as Betfair.	No, for pubs and clubs. In Victoria all next generation gaming machines will have to have a pre-commitment mechanism that allows a player to pre-set time and loss limits from 2010. Victoria will mandate pre-commitment mechanisms on all gaming machines from 2013 and a more stringent pre-commitment regime will be rolled out in 2015-2016. Available for casino loyalty club members only.	No. N/A for hotels and clubs.
Enforced player breaks	No, for hotels, taverns and clubs. N/A for casino.	No, IPART recommended that pop-up messages appear every 60 minutes. Research into the content of the messages has been finalised and consideration of the way forward is occurring. No, for casino.	No.	No, Sections 4.3 and 4.8 of voluntary QLD Responsible Gambling Code of Practice provide that service of alcohol on gambling provider's premises is managed in such a way as to encourage customers to take breaks in play and gambling providers are to implement practices to ensure that customers are discouraged from participating in extended, intensive and repetitive play.	No.	No.	No.	N/A for hotels and clubs. No, for casino.

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Limitations on frequency of games	No.	No.	No, specific NT requirements conform to national standards version 9.	Yes, Section 3.34 of QLD Appendix to Australian/New Zealand Gaming Machine National Standard requires the time between the start of a play and the end of a play must be at least 3 seconds.	New games must not have a spin rate less than 3.5 seconds, or for games without reels, a bet cannot be placed more than 17 times per minute.	Yes, minimum spin rate of games 3 seconds on all games.	Games must not have a spin rate of less than 2.14 seconds, except for certain machines located in specified areas of the casino.	N/A for hotels and clubs. Yes, for casino. Max game speed provided in WA Appendix to EGM National Standards. No spin rate as spinning reel machines are prohibited.
Rate of loss - bet and win limits	Hotels and clubs: - bet limit \$10.00 - no win limit. N/A for casino.	Bet limit of \$10.00. Win limit of \$10,000 on stand-alone machines. Win limits of \$100,000 on intra-venue linked machines, and \$500,000 on inter-venue linked machines. Casino not linked to other venues.	Hotels and clubs: - bet limit \$5.00 - no win limit. Casino: - no limits.	Hotels and clubs: bet limit \$5.00, win limit \$10,000 for machines with no jackpot, \$25,000 where stand alone jackpot, and no limit on linked jackpot arrangements. However, the highest approved jackpot is currently \$110,000. Casino: no legislative limits for either stand alone jackpot or linked jackpot. However, the highest approved linked jackpot is currently \$1M. Inspectors attend gaming machine venue for jackpots over \$5,000 to verify the win.	Hotels and clubs: - bet limit \$10.00 - win limit \$10,000 per spin. Casino: - bet limit \$10 - no win limit.	From 1 April 2010 bet limits on all gaming machines have been reduced from \$10 to \$5 for new games submitted on or after this date. For existing games, bet limits are to be reduced to \$5 by 30 June 2013.	Pubs and clubs: Maximum bet limit of \$5 for all machines. Casino: - gaming machine bet limit of \$10 (unless located in a specified area) - no win limits.	Hotels and clubs: - N/A Casino – Bet and Win limits dependent on game and machine. Bets can range from 2c to \$255.00 No limit on winning Jackpots capped at \$1,000,000.00.

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Requirements for dealing with jackpots	Linked jackpot arrangements for gaming machines must be approved by the Commission.	No.	Approval must be obtained to commission a jackpot system, vary system parameters, connect or disconnect an EGM to or from a jackpot system or decommission a system. An EGM can only be connected to one jackpot system at any time and machines linked to a jackpot system must be clearly marked and obvious to patrons.	Yes, jackpot arrangements are subject to the following documents which incorporate harm minimisation measures: - Jackpot System Technical Requirements - Jackpot Display System Requirements. Additional conditions may apply to specific jackpot approvals.	N/A for clubs and hotels.	Yes, jackpot rules approved. Additional conditions may also apply to specific game approvals.	Yes, linked jackpot arrangements must be approved.	Yes, for casino. Rules are approved by the Gaming and Wagering Commission additional conditions may apply to specific game approvals. Signage must be posted in areas adjacent to the EGMs indicating where a Jackpot Prize is for something other than cash. Jackpot payouts must be verified and approved by a manager or supervisor.
Limits on lines/ways	No.	No.	No.	Games that offer more than 25 possible lines may be accepted as long as there is sufficient clarity for a player to accurately identify all wins. To date maximum number of lines approved is 50.	No.	Yes, from 1 April 2010 the maximum possible lines on gaming machines have been reduced from 50 to 30 for new games. Existing games are to be reduced to 30 lines by 30 June 2013.	No limits.	Whilst spinning reel machines are not permitted the WA Appendix to the EGM National Std provides guidance on what may be accepted.

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Statutory obligation on the regulator to foster responsible gambling and minimize problem gambling	Yes.	Yes, <i>Gaming Machines Act 2001</i> (for hotels and clubs) and <i>Casino Control Act 1992</i> (for casino).	An object of the Gaming Machine Act is to “reduce any adverse social impact of gaming”.	Yes, overarching objective in all gambling legislation which requires, on balance, State and community must benefit. Balance achieved through, amongst other things, minimising potential harm. Funding provided through the Community Investment Fund for Gambling Help will be approx. \$4.9 million per year.	Yes, <i>Independent Gambling Authority Act 1995</i> .	Yes, there is a statutory obligation that the Tasmanian Gaming Commission foster responsible gambling and minimise problem gambling.	Yes, Section 10.1.3 of the <i>Gambling Regulation Act 2003</i> specifies that the objectives of the VCGR are to minimise harm caused by problem gambling and accommodate those who gamble without harming themselves or others.	N/A for clubs and hotels. Yes, for casino. Object of Gaming and Wagering Commission to minimize harm to the community caused by gambling.
Return to player	Minimum of 87%.	Minimum 85%.	Minimum 85% for clubs 88% for casinos.	Clubs and hotels, 85%-92%. Minimum 90% for casinos. Maximum additional amount a non-EGM triggered jackpot system can contribute to return to player is 7% for hotels and clubs (with total return to player not to exceed 92%) and 10% for casinos (desirable for total return to player not to exceed 100% but no maximum limit).	Games installed before 1 Oct 2001, minimum 85%. After 1 Oct 2001, minimum 87.5%.	Minimum of 85%.	Minimum of 87% per venue, per annum. In practice, the VCGR will only approve games that return at least 87%.	N/A for clubs and hotels. Minimum of 90% for casino.

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Display of odds	Chances of winning major prizes must be available to customers under the mandatory Code of Practice.	Yes, compulsory for clubs, hotels and casino.	Yes, contained in mandatory Northern Territory Code of Practice for Responsible Gambling.	<p>Yes –s.3.73 of Queensland Appendix to Australian/New Zealand Gaming Machine National Standard require Player Information Displays to be accessible on screen. Information includes chance of winning maximum prize and possible spend rate (implemented in new QCOM 1.6 machines)</p> <p>Section 1.4 of voluntary QLD Responsible Gambling Code of Practice states that each gambling provider is to provide meaningful and accurate information on the odds of winning major prizes and that this information is prominently displayed in all gambling areas and in proximity to relevant games.</p>	Yes, for hotels, clubs and casino. Only in relation to an advertisement or promotion that relies on value of a prize or frequency of winning.	<p>Provided through player information displays in casinos (based on Crown) and in clubs and hotels (based on QOGR).</p> <p>A mandatory code of practice is being established by the Tasmanian Gaming Commission, relating to improved signage.</p>	Regulations require EGMs to display, at the election of a player, certain information about each game including the chances or odds of achieving the top 5 and bottom 5 (in value) individual winning combinations and the max and min bet options available.	<p>N/A for clubs and hotels.</p> <p>RTP% only for casino. Odds available at Gaming Information Terminals in Casino.</p> <p>Available in brochures</p>

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Warnings on gaming machines	Yes, mandatory for clubs, hotels and taverns. A variety of warnings can be chosen. The casino does not have gaming machines.	Yes, compulsory for clubs, hotels and casino.	No specific requirements for warnings on machines. Information about the potential risks and where to get help is to be prominently displayed in all gaming areas and near ATMs and EFTPOS.	Yes, Section 3.73 of QLD Appendix to Australian/New Zealand Gaming Machine National Standard requires Player Information Displays to be accessible on screen. Information includes each spin is random and your chances of winning do not improve the longer you play (implemented in new QCOM 1.6 machines).	Yes, under mandatory code of practice. Helpline sticker to be displayed on the cabinet of machine and a warning message on a second screen if the machine is capable of displaying a message on a second screen in a manner approved by the Independent Gambling Authority.	Yes, warnings regarding minors must be placed on all machines. Information and help line signage only in clubs and hotels. Warnings regarding minors displayed at entry. The feasibility of amending gaming machines in hotels and clubs to provide improved player information display is being assessed.	Yes, regulations require a "Player Information Talker" as per the Ministers specification to be displayed on each gaming machine so that it is clearly visible from the front of the machine.	N/A for clubs and hotels. Casino has recently displayed help-line information on voluntary basis. Available in brochures

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Advertising restrictions	<p>Yes, the mandatory Code of Practice restricts advertising by all gambling licensees. Licensees must not publish advertising that:</p> <ul style="list-style-type: none"> • is false or misleading; • encourages anyone to contravene a gaming law; • encourages under 18s to gamble or targets them; • shows under 25s gambling; • suggests that gambling is a form of financial investment; • suggests that skill can influence a game of chance; and • promotes the consumption of alcohol while gambling. <p>The licensee of a gambling facility must also not:</p> <ul style="list-style-type: none"> • Publish advertising that does not include the details of an approved gambling counselling service in the ACT; or 	<p>Yes, total ban on all off-premises gaming machine advertising, and gaming machine advertising outside venues.</p> <p>Exemptions for:</p> <ul style="list-style-type: none"> - trade publications and conventions - Government responsible gambling campaigns - accidental or incidental accompaniment to news broadcasts etc. - if part of other promotional material sent to member by the club or casino and the patron has consented to receiving it. <p>Restrictions apply to casino advertising (ie, advertising other than gaming machine advertising).</p>	<p>Advertising is to be delivered in an honest and responsible manner. No false impressions of financial gain to be advertised.</p> <p>Advertising must comply with the Advertising Code of Ethics as adopted by the Australian Association of National Advertisers or the Advertising Federation of Australia.</p> <p>TV adverts to comply with the Federation of Commercial Television Stations (FACTS) Code of Practice.</p>	<p>Yes. Advertising related to gaming machines must not be indecent or offensive and must be based on fact. It cannot be false, deceptive or misleading.</p> <p>Machine gaming must not dominate external signage or promotions.</p> <p>The voluntary Responsible Gambling Advertising and Promotions Guideline helps the gambling industry ensure advertising and promotions are delivered in a responsible manner with consideration given to the potential impact on people adversely affected by gambling.</p> <p>It is an offence for promotional material to be distributed to excluded persons.</p>	<p>Yes, mandatory code of practice from 30 April 2004.</p>	<p>Yes, Gambling Industry Group Voluntary Code of Practice.</p> <p>A new mandatory code is being established by the Gaming Commission in relation to advertising gambling products.</p>	<p>Yes, ban from 1 Jan 2005 on the publishing of any gaming machine advertising outside the gaming machine area of an approved venue or the boundaries of a casino. The <i>Gambling Regulation Amendment (Licensing) Act 2009</i> made amendments to further strengthen the prohibition.</p>	<p>N/A for clubs and hotels.</p> <p>Regulation 43 of the Gaming and Wagering Commission Regulations 1988 states that betting operators (including casino) are prohibited from publishing advertisements which:</p> <ul style="list-style-type: none"> • procures, incites or encourages a person to commit an offence; • shows a child gambling or at a place where gambling is, or is depicted as, occurring; • is false, misleading or deceptive; • suggests that every bet placed with or accepted through the operator will be successful; • offers a benefit, consideration or return for the person participating in gambling, continuing to gamble or opening a betting account with the operator;

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Advertising Restrictions (continued)	<ul style="list-style-type: none"> • Give any information or promotional material about gambling at the facility directly to a person excluded by the licensee. <p>There are additional requirements on gaming machine licensees including prohibiting the display of external signs advertising gaming machines.</p>							
Restrictions on player loyalty systems / programs	<p>Yes, the mandatory Code of Practice has restrictions on inducements and promotions that apply to player loyalty systems across all forms of gambling. For gaming machines specifically, player reward schemes may require or encourage people to gamble a minimum amount to qualify for rewards generally only where the scheme is advertised within the venue or to members directly.</p>	<p>Yes, cash cannot be offered as a prize and maximum value of prizes limited to \$1,000. Player activity statements must also be made available to participants.</p>	<p>No, but since cashless gaming is not allowed, any loyalty programs based on cashless gaming are not allowed.</p>	<p>Voluntary Player Loyalty Guidelines have been developed and support the Code of Practice.</p> <p>The Voluntary code, which covers all gambling operators, has Guidelines for PLP's, which propose:</p> <ul style="list-style-type: none"> • Relevant information is provided at registration to enable players to make informed decisions <p>Positive responsible gambling messages are incorporated into PLP features.</p>	<p>Yes, outlined in Mandatory Code of Practice.</p>	<p>A new mandatory code of practice is being developed in relation to player loyalty programs.</p>	<p>Yes, restrictions effective from 1 July 2003 include:</p> <ul style="list-style-type: none"> - prescribed information to be provided to new participants and in compulsory annual player activity statements - distribution of statements and continued participation - ability for participants to limit time play and net loss - excluded persons prohibited from participating. 	<p>N/A for clubs and hotels.</p> <p>No for casino.</p>

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Ban on inducements	No, however the mandatory Code of Practice places restrictions on inducements including a prohibition on offering free or discounted alcohol.	Yes, legislation bans gambling-related inducements offered by clubs, hotels and casino. Inducements cannot include free or discounted liquor or offer free credits to players.	Yes, bans on gambling related inducements.	It is an offence for promotional material to be distributed to excluded persons. No other legislated bans on gambling inducements (there is a ban on inducing a third party to acquire gaming machines, equipment or services). However, certain controls may be exercised as a condition of licence, e.g. external signage and promotional material limits. Section 6.10 of the voluntary QLD Responsible Gambling Code of Practice provides that gambling providers are to develop and implement strategies to ensure advertising and promotions do not involve any irresponsible trading practices by the gambling provider.	Yes, outlined in Mandatory Code of Practice.	A new mandatory code is being established by the TGC relating to inducements that may lead to problem gambling behaviour.	No.	N/A for clubs and hotels. • Regulation 43 of the Gaming and Wagering Commission Regulations 1988 states that betting operators (including casino) are prohibited from publishing advertisements which offer a benefit, consideration or return for the person participating in gambling, continuing to gamble or opening a betting account with the operator; and contains an expressed or implied inducement for a person to contact the gambling operator.

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Player information displayed	<p>Signage in gaming areas must inform players about gambling restrictions applying to minors and intoxicated persons.</p> <p>Signage in the gambling venue must inform patrons of the availability of rules, exclusion programs, Gambling Contact Officer details, counselling services, maximum cash payouts, and return to player information. In addition, a variety of notices warning about problem gambling are to be displayed for the information of players.</p>	<p>Only provided on request.</p> <p>Signage required regarding the odds of winning a major prize on a gaming machine; gambling warning notices and GamblingHELP contact details on every gaming machine; counselling services signage to be displayed at the venue; GamblingHELP notice at ATMs at hotels and clubs and within the casino environs. (ATMs banned within the casino)</p>	<p>Yes, on machines in clubs and hotels.</p> <p>Considering requirement of return to player information on casino gaming machines.</p>	<p>Under the <i>Gaming Machine Act</i> venues are required to display Rules Ancillary to Gaming, details of help services and nominee details.</p> <p>Under the <i>Casino Control Act</i> the operator is required to display certain player information and produce game rules upon request.</p> <p>Under voluntary Code of Practice venues are required to display odds of winning and alert customers that more information such as a player information guide, financial transactions policy and responsible gambling house policy is available on request.</p>	<p>Warning to minors sign at each entrance and sticker on each machine.</p> <p>Rules Ancillary to Gaming Sign.</p> <p>Governed by Code of Practice Sign.</p> <p>Code of Practice available.</p> <p>Playing of more than one machine sign and sticker on each machine.</p> <p>Responsible Gambling Poster.</p> <p>Gambling Helpline Sticker (on each machine and ATM/EFTPOS).</p> <p>Gambling Helpline Cards.</p> <p>Responsible Gambling Pamphlets displayed.</p>	Yes.	Yes.	<p>Yes, casino on-screen rules and help. Additional information is provided at Gaming Information Terminals located around the gaming floor and in the international gaming facility.</p> <p>Rules of games displayed on gaming machine.</p> <p>Stickers with Gambling Helpline and Gambling Help WA contact details on machines.</p> <p>Posters and brochures displayed in vicinity of gaming machines.</p>

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Pre-commitment	No.	Yes, if card based gaming system in place. Must be available so patrons can set weekly limits. Not compulsory.	No.	Reports on the evaluation of card-based gaming trials and pre-commitment are available on the OLGR website: www.olgr.qld.gov.au . 47 sites currently operating pre-commitment card-based gaming systems.	Trials of pre-commitment and player tracking in progress, with some trials completed. Can set limits based on loss expenditure and time. Being evaluated by the Responsible Gambling Working Party.	Under development..	In Victoria all next generation gaming machines will have to have a pre-commitment mechanism that allows a player to pre-set time and loss limits from 2010. Victoria will mandate pre-commitment mechanisms on all gaming machines from 2013 and a more stringent pre-commitment regime will be rolled out in 2015-2016.	No.
Loyalty program	Yes, restrictions on promotions and inducements apply.	Yes, restrictions on promotional prizes.	Permitted.	Voluntary Player Loyalty Program Guidelines developed to ensure responsible conduct of programs and advertising of programs.	Yes, permitted but subject to Mandatory Code of Practice.	Yes, but not a reward program.	Yes, at casino.	Yes, at Casino.
Gambling hotline	Yes	Yes.	Yes.	Yes.	Yes.	Yes.	Yes.	Yes.
Gambling awareness week	Yes.	Yes.	Yes.	Yes.	Yes.	Yes.	Yes.	Yes.
Gambling website	Yes.	Yes.	Yes.	Yes.	Yes.	Yes.	Yes.	Yes.
Face to face counselling	Yes.	Yes.	Yes.	Yes.	Yes.	Yes.	Yes.	Yes.
Financial counselling	Yes.	Yes.	Yes.	Yes.	Yes.	Yes.	Yes.	Yes.
Online counselling	Yes, as part of national initiative.	Yes, as part of national initiative.	Yes, as part of national initiative.	Yes, as part of national initiative.	Yes, as part of national initiative.	Yes, as part of national initiative.	Yes, as part of national initiative.	Yes, as part of national initiative.
Media campaign	Yes.	Yes.	Yes.	Yes.	Yes.	Yes.	Yes.	Yes.
Problem gambling information materials	Yes.	Yes.	Yes.	Yes.	Yes.	Yes.	Yes.	Yes.
Information materials provided in various languages	Yes.	Yes.	Yes.	Yes.	Yes.	No.	Yes.	Yes.
School education materials on problem gambling	Yes.	Yes.	Yes.	Yes.	Yes.	Yes.	Yes.	

**Interstate Comparison Table
Harm Minimisation Strategies**

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Record of problem gambling incidences	Yes.	Yes, not mandatory.	Yes.	Yes, not mandatory.	Yes.	Yes, mandatory.	Yes	Not mandatory
Gambling contact officer in venue	Yes.	Yes	Yes.	Yes, not mandatory.	Yes.	No.	Yes.	Yes for Casino
Responsible agency	ACT Gambling and Racing Commission	NSW Office of Liquor, Gaming and Racing, within Communities NSW.	Licensing, Regulation and Alcohol Strategy Division of the Department of Justice and Northern Territory Licensing Commission	Dept of Employment, Economic Development and Innovation. Office of Regulatory Policy (policy matters) Office of Liquor and Gaming Regulation (operational matters) Office of Racing	Office of the Liquor and Gambling Commissioner Independent Gambling Authority	Tasmanian Gaming Commission and Liquor and Gaming Branch, Department of Treasury and Finance	Victorian Commission for Gambling Regulation (operational matters). Office of Gaming and Racing, Department of Justice (policy matters)	Gaming and Wagering Commission of Western Australia

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Legislation Administered	<i>Casino Control Act 2006</i> <i>Gambling and Racing Control Act 1999</i> <i>Gaming Machine Act 2004</i> <i>Interactive Gambling Act 1998</i> <i>Lotteries Act 1964</i> <i>Pool Betting Act 1964</i> <i>Race and Sports Bookmaking Act 2001</i> <i>Racing Act 1999</i> <i>Unlawful Gambling Act 2009</i>	<i>Gaming Machines Act 2001</i> <i>Casino Control Act 1992</i>	<i>Gaming Control Act</i> <i>Gaming Machine Act</i>	<i>Casino Control Act 1982</i> <i>Casino Control Regulation 1999</i> <i>Casino Gaming Rule 1999</i> <i>Gaming Machine Act 1991</i> <i>Gaming Machine Regulation 2002</i> <i>Charitable and Non-Profit Gaming Act 1999</i> <i>Charitable and Non-Profit Gaming Regulation 1999</i> <i>Charitable and Non-Profit Gaming Rule 1999</i> <i>Interactive Gambling (Player Protection) Act 1998</i> <i>Interactive Gambling (Player Protection – Disqualified persons) Regulation 1999</i> <i>Interactive Gambling (Player Protection) Regulation 1998</i> <i>Keno Act 1996</i> <i>Keno Regulation 2007</i> <i>Keno Rule 2007</i> <i>Lotteries Act 1997</i> <i>Lotteries Regulation 2007</i> <i>Lotteries Rule 1998</i> <i>Wagering Act 1998</i> <i>Wagering Regulation 1999</i> <i>Wagering Rule 1999</i> <i>Racing Act 2002</i> <i>Racing Regulation 2003</i>	<i>Casino Control Act 1992</i> <i>Casino Act 1997</i> <i>Independent Gambling Authority Act 1995</i> <i>Lottery and Gaming Act 1936</i> <i>Problem Gambling Family Protection Orders Act 2004</i> <i>Authorised Betting Operations Act 2000</i> <i>State Lotteries Act 1966</i>	<i>Gaming Control Act 1993</i> <i>TT-Line Gaming Act 1993</i>	<i>Gambling Regulation Act 2003</i> <i>Gambling Regulation Regulations 2005</i> <i>Casino Control Act 1991</i> <i>Casino Management Agreement Act</i>	<i>Gaming and Wagering Commission Act 1987</i> <i>Casino Control Act 1984</i> <i>Casino (Burswood Island) Agreement Act 1985</i>

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Consultative committees	Gambling Advisory Reference Group	First, of likely ongoing, NSW Problem Gambling Roundtable held in July 2008	In the process of re-establishing a gambling prevention consultative group.	Responsible Gambling Advisory Committee	Minister for Gambling has convened a Responsible Gambling Working Party	Tasmanian Gambling Industry Group Tasmanian Gambling Consultative Group	Responsible Gambling Ministerial Advisory Council	None
Statistical data by municipality	Limited data on a Territory-wide basis.	Yes, grouped for clubs and hotels. N/A for casino.	Yes, by ABS regional classification.	Yes, grouped for clubs and hotels. No for casinos.	Yes, grouped for clubs and hotels No for casino.	Venues and number of machines by local government area available on website.	Yes, for clubs and hotels. N/A for casino.	N/A for clubs and hotels. No for casino (one location).
Most recent prevalence rate for problem gambling	1.9% Survey of the nature and extent of gambling and problem gambling in the ACT, 2001	0.4% NSW Population Health Survey 2008-2009 February 2010	0.64% NT Gaming Prevalence Study, 2005	0.37% Queensland Household Gambling Survey conducted in 2008/09. Sample size of 15,000 adults.	1.6% problem gamblers (1.4% moderate risk + 0.2% high risk) 2005 prevalence survey (approx 18,000 surveyed-17,000 adults): CPGI used	0.54% problem gamblers, 0.86% "moderate at risk". Social and Economic Impact Study Volume 2 (undertaken by the South Australian Centre for Economic Studies)	0.7% 2009 A Study of Gambling in Victoria: Problem gambling from a public health perspective	0.17% 1999 Productivity Commission

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Social impact assessment	Yes, for all gaming machine licence applications, ie clubs and hotels. N/A for casino.	Yes, for clubs and hotels - for new premises approval and increase in gaming machine numbers. No for casino.	Yes, required for new application and when a venue applies for an increase of five or more machines.	Yes, legislative requirement under the <i>Gaming Machine Act 1991</i> for clubs and hotels to submit Community Impact Statement (CIS) for new gaming machine licence applications or significant increases (10 or more for hotels, 20 or more for clubs). CIS usual for significant casino changes (eg extended opening hours, increase in gaming machine/table game numbers).	Yes, social effects test.	Legislated requirement for independent review into social and economic impact of gambling in Tasmania every three years. The first study was completed and released in 2008. Government response to address issues raised in the report have, or will be implemented, in the coming months. The tender process for the next Social and Economic Impact Study of Gambling in Tasmania has commenced. This study is to be completed in late 2011.	Yes, for clubs and hotels - for new premises approval, any increase in EGM numbers and 24 hour gaming. No for casino.	N/A for clubs and hotels. Yes for casino (under <i>Casino Control Act</i>).

**Interstate Comparison Table
Harm Minimisation Strategies**

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Quantity restrictions (Venue specific)	Clubs, no restriction. Hotels, 10 machines. Taverns, 2 machines. Casino, nil (within overall cap).	Clubs, no restrictions Hotels, maximum 30 machines. Casino, maximum is 1,500 machines.	Clubs, 45 machines. Hotels, 10 machines. Casinos, limited by regulatory approval processes.	Clubs, 280 machines. Hotels, 40 machines. Section 62(3D) of the <i>Casino Control Act 1982</i> provides that the Minister may, by written notice given to a casino operator, fix a limit on the number of gaming machines to be permitted in the casino or a particular part of the casino. Ratio of 12 machines to one table game currently applied.	Clubs, 40 machines. Hotels, 40 machines. Casino, 995	Individual clubs, 40 machines. Individual hotels, 30 machines. State-wide cap of 2,500 for hotels and clubs in total and a cap on total machines in the state of 3,680 including casinos.	Clubs, 105 machines. Hotels, 105 machines. Casino, 2,500 machines.	N/A clubs and hotels Casino, 1,750 on gaming floor. 150 EGMs not available to the general public as a result of being located within the international gaming facility.

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Quantity restrictions (State specific)	Clubs and hotels, 5,200 machines. Casino, nil.	State-wide cap of 99,000 machines. (Note: this State- wide cap will be reduced further) Casino, 1,500 machines (since 1993).	NT-wide cap of 1,190 community gaming machines (i.e. excludes casinos). Currently 1,190 community gaming machines approved for operation therefore cap reached. Casinos are limited by regulatory approval processes. Currently total of 1,005 gaming machines across the two casinos.	Yes, state-wide cap for hotels set at 20,000 machines. Moratorium on release of further operating authorities means effective current cap for hotels is 19,310 machines. A re-allocation scheme exists for hotel gaming machine operating authorities by tender pool within the cap and within three regions – South East, Coastal and Western. The moratorium on the release of government hotel operating authorities means 690 are frozen until 30 April 2012. A state-wide permanent cap on the number of gaming machines in clubs has also been set at 24,705. A market-based reallocation scheme operates within the cap.	Restricted to one casino only. Currently 12,900 gaming machine entitlements declining to 12,118 gaming machine entitlements.	Yes, a state-wide cap of 2,500 for hotels and clubs in total and a cap on total machines in the state of 3,680 including casinos, but excluding the TT-Line ferries.	Yes, 30,000 machines in total: - 2,500 for the casino - 13,750 each for club venues and hotel venues. Regional caps in place to restrict the number of gaming machines in 19 regions. Cap set at 10 gaming machines per 1,000 adults or existing density, whichever is lower. Maximum density of gaming machines in all municipal areas to be capped at 10 per 1,000 adults by 2010.	N/A for clubs and hotels. Single venue restriction for casino.

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Number of EGMs at time of last update: <ul style="list-style-type: none"> • State-wide • Venue 	Clubs: 5,014 Hotels: 60 Taverns: 10 Casino: nil	Clubs: 71,534 Hotels: 23,679 Casino: 1,500	Clubs and hotels: 1,190 Darwin Casino: 753 Alice Springs Casino: 252	Clubs – 23,473 ; Hotels - 18,811 Casinos - 3,475 operational EGMs as at end April 2010.	Clubs: 1,558 Hotels: 11,179 Casino: 983	Clubs and hotels: 2,377 Casinos: 1,280 Wrest Pt 745, Country Club 535. 46 (23 and 23) on Spirit of Tasmania I and II respectively.	Clubs and hotels: 26,772 at 30 June 2009 Casino: 2,500	Clubs and hotels: N/A Casino: 1,750
Number of Casinos	One	One	Two	Four – Brisbane, Gold Coast, Townsville and Cairns.	One	Two terrestrial casinos.	One	One
Requirement for public hearings (Clubs and Hotels only)	New gaming machine licence or additional machines applications require a social impact assessment which includes a 6 week period for public consultation.	Requirement for advertising of new licence and other applications, but no requirement for public hearing unless a club/hotel application is contested.	No.	No, all new applicants for a gaming machine licence and certain increases require a Community Impact Statement (CIS). The CIS requires public consultation and advertising of the application.	Requirement for advertising of new licence and other applications, but no requirement for public hearing. IGA holds public hearings when conducting inquiries.	No.	Yes.	N/A

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Major licensee owner/operators	Casino Canberra.	Casino: TABCORP / Star City Pty Ltd.	Lasseters and Sky City – Casinos. Various for clubs and hotels.	Each venue is licensed separately to an individual / partnership / trust or corporate entity. Gold Coast Casino: Licensee: Jupiters Custodian. Operator: Jupiters Limited Brisbane Casino: Licensee: Jupiters Limited Operator: Jupiters Limited Cairns Casino: Licensee: Reef Corporate Services Ltd Operator: Casinos Austria International (Cairns) Pty Ltd Townsville Casino: Licensee: Breakwater Island Limited Operator: Jupiters Limited	Each venue is licensed separately to an individual / partnership / trust or corporate entity.	Australian National Hotels Pty Ltd. Tasman Country Club Casinos Pty Ltd. Both are wholly owned subsidiaries of the Federal Hotels Pty Ltd...	Currently two gaming operators Tattersall's and Tabcorp (post 2012 to move to a venue operator model). Casino Operator Crown Melbourne Limited.	Casino Licensee: Burswood Nominees Limited subsidiary of Crown Limited.

Interstate Comparison Table Harm Minimisation Strategies

ISSUE	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
As at 30 April 2010								
Fund allocation (General community services)	A minimum legislatively prescribed level of community contributions must be made by licensed clubs, 7% of Net Gaming Machine Revenue (as defined in the <i>Gaming Machine Act 2004</i>).	Optional for clubs (allocations may qualify for a Government tax rebate). No for hotels. Unclaimed jackpot prizes and unclaimed gaming machine tickets not claimed within 12 months are paid into the Community Development Fund.	Hotels contribute 10% of EGM player loss to a Community Benefit Fund. Clubs are expected to contribute to the community through financial and in kind contribution. N/A for casinos.	Yes, the Gambling Community Benefit Fund – funded via Community Investment Fund – receives 8.5% of tax revenue from lotteries, wagering, keno and gaming machines. The 1% community benefit fund levy that was payable by the four respective casinos was abolished on 1 July 2009. However, the casino community benefit funds are preserved within the Community Investment Fund.	Yes, for clubs and hotels No for casino.	Yes, for clubs and hotels. - 4% of gross profits from gaming machines must be allocated to the Community Support Levy - 25% of the levy is distributed to sport and recreation clubs - 25% is distributed to charitable organisations. No for casinos. Note: 50% component of the Levy (see below) also allows for provision of “other health services”.	Yes. 8.33% from hotels is paid to the Community Support Fund for community and problem gambling services. Community benefit levy of 1% (gaming machines and table games) from casino.	N/A for clubs and hotels. Gaming machine levy increased from 1% to 2% from 1 January 2008. The increased levy is to be spent for the protection and enhancement of ecological and community benefits and amenity of the Swan and Canning Rivers and associated lands..
Fund allocation (Problem gambling assistance)	A minimum legislatively prescribed level of community contributions must be made by licensed clubs, 7% of Net Gaming Machine Revenue (as defined in the <i>Gaming Machine Act 2004</i>). As part of an incentive scheme, licensees may claim \$4 in eligible contributions for every \$3 allocated to problem gambling	Responsible gambling levy calculated by reference to 2% of casino gaming revenue and paid to the Responsible Gambling Fund	Yes, for hotels. Clubs must make contribution to satisfy community obligation. N/A for casinos.	Yes. \$4.9 million for 2009/10 to fund 14 face-to-face Gambling Help Services, a residential treatment program and Gambling Help Line.	Yes for clubs and hotels (voluntary). Yes for casino (voluntary).	Yes for clubs and hotels. 50% of the Community Support Levy is provided for research into gambling, services for the treatment and prevention of compulsive gambling, community education concerning gambling, and other health services. No for casinos.	Yes, 8.33% from hotels is paid to the Community Support Fund for community and problem gambling services. No for casino.	N/A for clubs and hotels. Yes, casino contributes a voluntary amount to the Problem Gambling Support Services Committee.

ATTACHMENT 3 – SELF-EXCLUSION IN AUSTRALIAN CASINOS

STATE	CASINO	PROGRAM DETAILS
NSW	The Star	<p>Agreements are for a minimum period of 12 months. They cannot be revoked within the first 12 months. Requests for revocation must be in writing accompanied by a gambling assessment conducted by a qualified gambling counsellor from BetCare and a letter of support from a family member.</p> <p>The Exclusion Review Committee considers requests. The casino issues non-voluntary exclusions when it is concerned about the welfare of a patron and his / her gambling behaviours. Identification of a Self-Excluded patron in the casino requires the attendance of an Independent Liquor & Gaming Authority Inspector. There are no penalties for self excluded patrons breaching the exclusion order.</p>
VIC	Crown Casino	<p>The period of Self-Exclusion is usually indefinite. A Self-Excluded person may appeal in writing to the VCGLR to revoke an agreement within 28 days of signing. A Self-Excluded person may request revocation of the Self-Exclusion by writing to Crown with an accompanying report provided by a gambling counsellor or psychologist or similar. This request is considered by the Crown Self-Exclusion Revocation Committee. Revocation is generally not considered by the Committee until a 12-month breach free period has passed.</p> <p>Identification of a Self-Excluded person in the Casino requires the attendance of a VCGLR Government inspector. The law provides for a fine consisting of 20 Penalty Units (current amount per Penalty Unit is \$122.14 until 30 June 2012) for a Self-Excluded person entering the Casino although this has not been enforced in practice.</p>
QLD	<p>All casinos</p> <ul style="list-style-type: none"> - Treasury Casino & Hotel (Brisbane) - Jupiters Hotel & Casino (Gold Coast) - Jupiters Townsville - Reef Casino (Cairns) 	<p>The Queensland Casino Control Act 1982 provides a pathway for Self Exclusions and Exclusion Directions for Problem Gambling. Both types of exclusion have a 5 year sunset period after which time they expire.</p> <p>Self-exclusions may be revoked either within 24 hours (cooling off period) or after a period of 1 year, provided a Revocation Notice is given to the Casino operator. Once a Revocation Notice for Self Exclusion has been received by the Casino Operator, the self exclusion expires after a period of 28 days or immediately if provided within 24 hours.</p> <p>An Exclusion Direction for Problem Gambling can be issued by the Casino Operator if the Casino Operator believes on reasonable grounds, that a person is a problem gambler. If the person disagrees with the Exclusion Direction, they may appeal to the QLD Civil and Administrative Tribunal within 3 months of the day the person receives the Direction to the Tribunal for a review of the Direction. This type of exclusion</p>

		<p>remains in force for 5 years or until a Revocation Notice – Exclusion Direction is issued by the Casino Operator.</p> <p>Details, including the name, address and phone numbers of counselling services for problem gamblers are provided for all persons who self exclude or are excluded by the Casino Operator for problem gambling.</p> <p>Conditions of entry and re-entry are provided to every person who either self excludes or is issued with an Exclusion Direction for Problem Gambling. These conditions require further information to be provided to the Casino Operator at the time a revocation request is received. All revocation requests are reviewed by the Exclusions Review Committee within 28 days of their receipt.</p> <p>Consequences of breaching either type of exclusion will generally incur penalties and may involve OLGR Government Inspector and the police – Maximum fine \$4000</p>
SA	Adelaide Casino	<p>The Host Responsibility Coordinator (HRC) department offers a range of strategies to help customers maintain responsible gambling habits. Venue-based exclusion agreements are offered <i>within a mix of tools</i>, to those seeking help. Agreements to stay away from the premises will include a referral to Gambling Help Services (GHS) and a pre-commitment component. A range of customers are closely 'Case Managed'. Official Licensee Orders (previously called self exclusion) are usually 12 months minimum, with breaches attracting fines of up to \$2500. Rescission applications contain various conditions (also under 'Case Management') for up to 18 months, if approved. Any concerns for welfare detected by the HRC or a third party, can be escalated to an imposed barring under the Casino Act 1997 and should still include a referral to GHS.</p>

WA	Burswood Casino	<p>While not required by legislation the casino voluntarily has a self-exclusion program. The minimum period for an agreement is 12 months and they do not expire..</p> <p>Revocation requires that the patron has attended gambling counselling. The patron has to attend interviews when revoking and at 6 and 12 weeks after revoking. The casino has a third party exclusion process and may involuntarily bar patrons through this process.</p>
TAS	<p>All casinos</p> <ul style="list-style-type: none"> - Wrest Point Casino - Country Club Casino (Launceston) 	<p>The Tasmanian Gambling Exclusion Scheme is legislated through the <i>Gaming Control Act 1993</i> and managed by the Tasmanian Gaming Commission. The scheme is supported and implemented in the two Tasmanian casinos.</p> <p>The Act allows a person to be excluded in four different ways:</p> <ul style="list-style-type: none"> • Self-exclusion • Venue operator exclusion • Third party exclusion • Exclusion by the Commissioner of Police <p>A person may be excluded from either a whole venue, or participating in gambling at a venue. The scheme is supported by an online database which allows venue operators and Gamblers' Help providers secure access to information about excluded people</p> <p>Self-exclusion is done via a Gamblers' Help counsellor who assists in the process. The self-exclusion places responsibility on the excluded person not to enter gambling venues or participate in gambling. Operators have a responsibility to enforce the exclusion. Breaches of the exclusion by a person or an operator may result in penalties.</p> <p>A person commences the process of self-exclusion by contacting Gamblers' Help on 1800 858 858 to make an appointment to discuss and arrange a self-exclusion. The Helpline number is promoted heavily in casinos and other gaming venues, as well as through a range of other community facilities and services. A self-exclusion lasts for a maximum of three years and may not be revoked within the first six months. After it has been in place for six months it may be revoked through a Gamblers Help counsellor. Casinos make sure that all employees required to enforce exclusions are aware of the identity of excluded people. Casinos prevent entry or remove excluded people upon discovery.</p>
NT	SKYCITY Casino (Darwin)	<p>Provision of a self-exclusion program is compulsory under the NT Code of Practice for Responsible Gambling (gazetted June 2006). Under this code there is a minimum period of 3 premises. Self-exclusion may only be revoked with a letter from a gambling counselling service provider that supports the revocation. A breach of a self-exclusion order does not constitute an offence under NT law. Any detected breach is personally followed up by a warning from the compliance</p>

		and host responsibility manager. Upon the third breach self excluded patrons are issued with a section 33 barring notice under the Gaming Control Act for which penalties may be incurred. Staff are encouraged under a SKYCITY staff program to identify and report self-excluded patrons.
	Lasseters (Alice Springs)	<p>Provision of a self-exclusion program is compulsory under the NT Code of Practice for Responsible Gambling (gazetted June 2006). Under this code there is a minimum period of 3 months with an indefinite maximum period. Customers may exclude from a gaming area, all gaming areas, or the entire premises. Self-exclusion may only be revoked with a letter from a gambling counselling service provider that supports the revocation and then considered by the compliance manager. A breach of a self-exclusion order does not constitute an offence under NT law. Upon the third breach self excluded patrons are issued with a section 33 barring notice under the Gaming Control Act for which penalties may be incurred. The excluded patron will also receive a document that states the terms of their self-exclusion, such as:</p> <ul style="list-style-type: none"> • If the patron gambles during the self exclusion period they do so at their own risk; • No claim can be made for any financial loss incurred if they gamble during the exclusion period; • The licensee is authorised to remove the patron from the exclusion area during the exclusion period; and <p>At the conclusion of the exclusion period the patron will be required to meet with the compliance manager prior to re-entering the exclusion area.</p>
ACT	Casino Canberra	Self- exclusion is a voluntary exclusion and is generally for a minimum period of three months. Revocation of the exclusion order is made in writing to the Gambling Contact Officer or to the Exclusion Committee for review. If the patron is still deemed to be at risk the exclusion period may be continued. All exclusions are capable of being reviewed by the casino or by the Gambling and Racing Commission. If the self-exclusion order is breached the patron will be warned in the first instance and will be removed form the casino. Subsequent braches will result in the casino reporting them to the ACT police.

GamblingCompliance

Australian Casinos: Responsible Gambling Initiatives 1999-2008

Australasian Casino Association with Executive Analysis by GamblingCompliance
Research Team

Contents

Executive Analysis.....	3
VICTORIA - Crown Entertainment Complex	10
NEW SOUTH WALES - Star City Casino, Sydney	20
WESTERN AUSTRALIA - Burswood Casino, Perth	26
AUSTRALIAN CAPITAL TERRITORY - Casino Canberra	34
NORTHERN TERRITORY -Lasseters Hotel Casino	37
NORTHERN TERRITORY - SKYCITY Darwin.....	40
QUEENSLAND - Reef Hotel Casino	46
QUEENSLAND - Conrad Jupiters, Conrad Treasury & Jupiters Townsville Casinos.....	50
SOUTH AUSTRALIA - SKYCITY Adelaide.....	59
TASMANIA - Wrest Point and Country Club Tasmania	64

Authors

Australasian Casino Association

Executive Analysis

GamblingCompliance – Harry Ashton & Laurie Korpi

Design and graphics:

Martin Dekkers

Editing:

Tom O'Meara

More information

For more information on GamblingCompliance research reports, please contact +44(0)207 960 2801 or email info@gamblingcompliance.com.

GamblingCompliance is an impartial provider of legal and market analysis for the global gaming industry, consisting of a renowned team of lawyers and journalists with experience across multiple jurisdictions.

© Gambling Compliance Ltd 2008 www.gamblingcompliance.com

91 Waterloo Road | SE1 8RT | London | Tel: +44(0)207 921 9980 | Fax: +44(0)207 960 2885 | Email: info@gamblingcompliance.com

Whilst every effort has been made to ensure that this research has been performed to a high level of accuracy, GamblingCompliance Ltd does not guarantee nor provide any warranty that the information is entirely accurate.

Executive Analysis

GamblingCompliance have been commissioned to produce an executive analysis of the attached responsible gambling/harm minimisation report prepared by the Australasian Casino Association and comment on the initiatives implemented with reference to findings of the 1999 Productivity Commission (PC) inquiry.

The harm minimisation and responsible gambling framework that Australian casinos operate in, is world leading in its scope, consistency and implementation. This has been illustrated on a number of occasions by TABCORP being rated as the global leader in the promotion of responsible gambling by the Dow Jones Sustainability Index. Further in 2008 the Victorian Commission for Gambling Regulation (VCGR) found that Crown Melbourne is recognised as a world leader in the promotion of responsible gambling when considering the renewal of the casino licence in Victoria.

The initiatives outlined in this report show that while the Australian casinos have implemented many initiatives in response to findings contained in the last PC report, some initiatives actually pre-date the PC report, indicating that Australian casinos have a long history of commitment to responsible gambling policies. Moreover, the initiatives contained in this report which post date the PC report of 1999 can be divided into two general categories:

1. Those that have been introduced independent of regulatory or legislative initiatives, and
2. Those that have been introduced as a result of legislative or regulatory changes.

Key Findings

- **Positive Response to Productivity Commission Findings in 1999.** Casinos have seriously considered and responded positively to the PC's findings.
- **Compliance with State and Territory Responsible Gaming Legislative Initiatives.** Casinos have complied with all state and territory government initiatives in the wake of the PC's 1999 findings.
- **Pre-Emptive Action in the Absence of Government Initiative.** In some instances casinos have taken measures before government initiatives have been implemented, for example Crown has Play Safe in operation which allows Crown Club Members to set time and spend limits for their gaming machine activity.
- **Commitment to Responsible Gambling.** There is a demonstrated ongoing commitment to responsible gambling by Australian casinos. Since 1999 there has been no expansion in the number of casinos, yet there has been a rapid expansion in the responsible gambling initiatives implemented since that time.
- **Staff Training To Ensure Gaming Is Conducted Responsibly.** There is a continued commitment to staff training to ensure that all measures are taken to prevent and treat problem gambling.

How the Industry Has Responded

The Australian casinos have worked closely with their respective state and territory governments to ensure that the concerns raised in the PC's 1999 report have been addressed. In many instances casinos have gone further, and through extensive staff training and self regulatory measures a responsible gaming culture has been maintained and furthered.

Information about the "price" and nature of gambling products (especially gaming machines)

Information is made available in all casinos about the potential social costs of gambling, in particular relating to gaming machines. In addition, information on the odds and return to the player on casino games including gaming machines is available and on display in all the casinos.

A pertinent example of the information provided is the awareness campaign in Victoria which spells out that 'In the end the machine always wins'. Examples such as this are available in every casino in every jurisdiction.

Another example of this commitment to provision of information is TABCORP's engagement of KPMG to provide an annual independent audit to ensure adequate provision of information relating to gambling products and compliance with legislation.

Further, in Western Australia Burswood Entertainment Complex has introduced Electronic Gaming Information Terminals that display information about the chances of winning on various casino games and also responsible gambling.

The Australian casinos are not alone in this approach. The Gaming Technology Association (GTA) has circulated information to gaming machine venues relating to the functionality of gaming machines explaining 'why players cannot expect to win over the long term'. The GTA also provide factsheets regarding gaming machines stating 'the chance of NO PRIZE on an individual line is around 9 in 10'.

Information about the Risks of Problem Gambling

Responsible gambling information and awareness programs including players' guides exist across all 13 of Australia's casinos. This includes information for customers concerning the chances of winning and information regarding responsible gambling in gaming areas, at ATMs and in other areas of a casino.

In Western Australia the Responsible Service of Gambling (RSG) website was launched with detailed information and assistance dealing with problem gambling. The casino also operates under a Responsible Gambling Code of Practice which provides for the display of signage and brochures in major public traffic areas.

Problem gambling information has been delivered taking into account the multi-cultural nature of casino clientele. For example, TABCORP has problem gambling information in its

code of conduct in 9 different languages. Similarly, in South Australia the Responsible Gambling Code of Practice requires that information in relation to responsible gaming be made available in 6 different languages.

The world's first on-site responsible gaming support centre was initiated by an Australian casino. In 2002 Crown launched the Crown Responsible Gaming Support Centre, a world first initiative. A similar service was subsequently adopted in the Canadian province of Manitoba.

Many jurisdictions require warnings regarding the risks of problem gambling on gaming machines. Some jurisdictions have legislative measures while others do this on a voluntary basis.

In South Australia the Responsible Gambling Code of Practice requires that a warning message be displayed on the cabinet with a helpline sticker. It is also compulsory to have warnings on machines in NSW, while Queensland's appendix to the Gaming Machine National Standard requires player information displays to be accessible on the screen.

The Burswood Entertainment Complex displays help-line information on machines on a voluntary basis.

Controls on Advertising and Increased Awareness Campaigns

Most state and territory governments have provisions restricting the promotion of gambling and all of the casinos have adopted self regulatory measures to complement these legislative measures.

Examples of legislative measures, are illustrated by the approach taken by NSW and Victoria, where Australia's two largest casinos are located. In NSW, It is condition of a casino licence that the casino operator must not publish any advertisement relating to gaming machines. In Victoria any gaming machine advertising outside the boundaries of the casino is prohibited.

In South Australia Sky City Adelaide has an advertising code of practice which was mandated by legislation¹. A similar responsible marketing and advertising policy applies in Sky City's Darwin casino.

The measures to control advertising are not just directed at venues, but also apply to the manufacture of machines. For example it is noted under the NSW appendix to the Gaming Machine National Standard that the manufacturer must ensure that the equipment is designed such that the machine display is not used by a venue for unauthorised advertising or promotional purposes.

To complement legislative measures all casinos have self-regulatory measures in relation to advertising. Often these are contained within the overall responsible gambling code for a casino. For example, under the Responsible Gambling Code of Practice for Burswood Entertainment Complex there are comprehensive provisions under section 9.1 which relate to responsible advertising.

TABCORP's responsible gambling code of practice which applies at all of its casinos and has been adopted as an approved code by the VCGR. It is available in 9 different languages and has extensive provisions in relation to advertising².

In addition to controls on advertising, since 1999 all State Governments have expanded exponentially awareness campaigns regarding the risks of problem gambling with advertising on prime time TV, print media, trains, buses and billboards. There have been a number of campaigns which have portrayed the message “in the end the machine will win”³. This has contributed to a growing awareness concerning the risks of Problem Gambling.

Availability of ATMs and Credit

All casinos have ATMs placed in secure and safe areas, outside the licensed gaming footprint of the casino. In all jurisdictions the location of ATMs has met the requirement of approval by the relevant consent authority. ATM locations have been utilised in all casinos to further responsible gambling awareness messages and treatment programs.

In some jurisdictions, a limit is imposed upon the amount that may be withdrawn in a single transaction. Victoria, for example, has implemented legislation that provides that no ATM will be allowed within 50m of any entrance to the gaming floor of the casino unless it can limit the amount a customer can withdraw to a total of \$400 cash within a 24 hour period.

While some jurisdictions have express legislative measures, Western Australia’s code of ethics and gaming practice provides that ATMs must be located outside the casino gaming area. In July 2008 the Gaming and Wagering Commission implemented a policy regarding the positioning of ATMs within Burswood Entertainment Complex. ATMs must not be in the area to which the casino gaming licence refers to; or within 40m of any entrance to the gaming floor unless the ATM restricts a person to a cash withdrawal of \$400 daily on any debit or credit card.

In all states and territories extending credit is prohibited in casinos for non international VIP customers.

Lack Of Pre-Commitment Options Including Self Exclusion Arrangements

All casinos have self- exclusion programs. In some states it is mandatory for casinos to have these programs in place, in others it is an initiative of the casino, or began as an initiative of a casino in the absence of legislative requirements.

Self-exclusion programs allow patrons to exclude, or ban themselves from entering the gaming area of a casino. Some casinos such as Burswood Entertainment Complex also have third party exclusion programs in place whereby family members or other third parties can apply to have a person excluded. Similarly, in Tasmania and South Australia third party exclusion are also possible. In Victoria exclusion schemes need to be approved by the regulator. Generally, exclusion review procedures are in place, information packs are available and importantly staff training is an integrated aspect of casinos’ self exclusion programs.

Many casinos have had self exclusion procedures and policies in place which both pre-date the 1999 PC report and in some cases, statutory requirements. For example, Star City’s self exclusion program has been in operation since the casino opened in September 1995. In contrast “self exclusion” was first mentioned in legislation/regulations after the PC 1999 report: the Registered Clubs Amendment (Responsible Gambling) Regulation 2000, the Casino Control Regulation of 2001 and Gaming Machine Act of 2001 were among the first such NSW statutory instruments to contain the term.

Pre-commitment is a term used to describe responsible gambling initiatives which allow players to set spending limits away from a gambling environment. Australian casinos have led the way in pre-commitment initiatives. Crown Melbourne was the first casino in the world to address and trial pre-commitment. Crown Melbourne's Play Safe was introduced in 2003 and the program allows members to set, in advance of play, individual time and spend limits relating to their gaming machine activity. There is a current legislative timetable for a Victoria wide use of pre-commitment technology, with first stage implementation by the end of 2013, and a more stringent regime by 2015-16.

SKYCITY Adelaide has also implemented a pre-commitment initiative with respect to self-excluded patrons. If a patron wishes to have their self-exclusion lifted, they will need to pre-commit to a spend and visitation limit, along with meeting other requirements which includes counselling.

Currently a number of states are considering pre-commitment initiatives. GamblingCompliance understands individual casinos are engaged on this issue with their respective state and territory governments.

New technologies have been said to be important in developing pre-commitment responsible gambling strategies further. However, the role existing technologies and practices can play in furthering pre-commitment choices by patrons should not be overlooked. Some jurisdictions and casinos have already implemented initiatives since the 1999 PC report, which are in themselves important facets in a pre-commitment and spending-limit mindset, by requiring players to make a choice as to their spending capacity. Some of these have included:

- Restricted limits on withdrawals from ATMs
- Paying certain winnings by cheques
- Systems have been trialled that allow customers to set monetary and time limits on their gambling
- Approved ticket in ticket out technology in NSW. The ticket in ticket out (TITO) systems in NSW can foster pre-commitment choices by requiring players to make a choice as to spend-limits on gaming before engaged in the gaming activity.

A Commitment to Responsible Gaming

Australian casinos are required to conform to responsible gambling measures – either mandated by their respective regulatory authorities, voluntarily through state industry codes or company codes, or through property specific policies. Many casinos self report on their activities thus reducing the burden on regulators and law enforcement agencies and consequently providing greater confidence in their activities. This varies from jurisdiction to jurisdiction.

TABCORP casinos in NSW and Queensland follow the TABCORP Responsible Gambling Code of Practice. TABCORP's casinos in Queensland are also required to adhere to the Queensland Responsible Gambling Code. SKYCITY Adelaide adheres to both a mandated Responsible Gambling Code of Practice and an Advertising Code of Practice. Similarly in

Tasmania Wrest Point and Country Club Tasmania casinos follow a strict company developed Marketing Code of Ethics. In 2005 Burswood released its own Responsible Gambling Code of Practice. This year Crown will introduce its own “Responsible Gambling Code of Conduct”.

This commitment to responsible gambling measures has not been without recognition with Australia’s two largest casino operators commended for their measures. TABCORP has been rated by the Dow Jones Sustainability Index as the global leader in the promotion of responsible gambling. In 2008 the independent review and report by the Victorian Commission for Gambling Regulation to the Victorian Minister on the suitability of the Casino Operator to continue to hold the Melbourne Casino Licence, as required by the Casino Control Act 1991 (Vic), found that Crown Melbourne is recognised as a world leader in the promotion of responsible gambling.

Since 1999 additional specialist responsible gambling staff have been employed in a number of Australian casinos to deal specifically with any responsible gambling issues that may arise. Examples are as follows:

- Burswood has a Community Relations Manager who heads up a Responsible Service of Gambling Team which includes a qualified psychologist.
- Casino Canberra has employed Gambling Contact Officers who are available at all times during opening hours.
- Lasseters Hotel Casino has trained Gambling Liaison Officers.
- SKYCITY casinos in Darwin and Adelaide have Host Responsibility Managers.
- Reef Casino in Cairns has a Responsible Gambling Manager and Responsible Gambling Liaison Officers.
- Crown Entertainment Complex in Melbourne has established an onsite Responsible Gambling Support Centre. Crown’s centre also has a chaplaincy service on call.
- TABCORP casinos in NSW and Queensland employ Responsible Gambling Managers and Liaison Officers.

Responsible gambling measures taken by the casinos do not just relate to preventative measures. Indeed there is a strong emphasis on commitment to treatment of problem gambling. The casinos have forged strong partnerships with counselling services and organisations such as Lifeline, the Salvation Army, Amity, GABA, Relationships Australia, Anglicare, Break Even, Wesley Gambling Counselling Services and various gambling helpline providers. These counselling services are promoted throughout the respective casinos.

The Role Of Self Regulation Since 1999

One of the findings of the PC’s 1999 report stated that with respect to responsible gambling policies:

“self-regulatory approaches are unlikely to be as effective as explicit regulatory requirements. In most cases, regulation can be designed to enhance, rather than restrict consumer choice, by allowing better information and control”.

The practical experience of the last ten years has illustrated how self regulation can complement regulatory requirements. In some instances regulatory requirements have taken longer to implement and come online than industry generated initiatives; and it has been these self-regulatory responses that have played a key role in bridging a 'regulatory lag' in responsible gambling policy and its further development.

For example, some self-exclusion initiatives were in place prior to self exclusion mandated by legislation. The recent announcement by the Victorian government of its pre-commitment initiative, once in effect, will be 10 years after Crown Melbourne's pre-commitment initiative began.

Australia's casinos differ in size and capacity. The over 200 initiatives which have been introduced since 1999 reflect this diversity in local conditions and illustrate that a one size fits all approach is not necessarily applicable with regard to the implementation of responsible gambling measures. Local conditions including self regulatory codes of conduct, staff training and responsible gambling initiatives in place, as well as the degree of regulatory oversight imposed by state and territory governments need to be considered when looking at what is appropriate for a casino and its community.

VICTORIA - Crown Entertainment Complex

Pre 1999

Prior to 1999, Crown already had in place various Responsible Gaming programs including:

Responsible Service of Gaming Training (RSG Training)

Crown developed and conducted Responsible Service of Gaming Training well in advance of any legislative requirements. Participation in RSG training included gaming and security staff.

Crown Assistance Program

The Crown Assistance Program (“CAP”) was established at the time of the opening of the temporary Casino in June 1994. The Program was replaced by the functions of the Crown Responsible Gaming Support Centre in March 2002.

CAP was a confidential, professional counselling service available to patrons who may have had problems associated with their gambling behaviour; the first session was free. The service was available 24 hours a day, 7 days a week. Brochures were on display at all entry points to the gaming floor.

Self Exclusion Program

The Crown Self Exclusion Program has operated since the opening of the Casino in June 1994. Self-exclusion is where a person makes a voluntary application to exclude themselves from entering the gaming floor. The period for exclusion is generally indefinite although applications may be made for revocation. Crown developed the procedures in regard to both self-exclusions and revocation.

2000 – 2001

RSG Labels on Gambling Products and ATMs

Initiatives in this area introduced by Crown included:

- RSG labels on Table Games lollypop signage displaying RSG messages and Gambler’s Help telephone number;
- RSG labels on gaming machines apprising customers of what assistance is available should gambling be a problem for them. Labels included the Crown Responsible Gaming Support Centre and Gambler’s Help contact phone numbers; and

- RSG labels on all ATMs apprising customers of what assistance is available should gambling be a problem for them. Labels included the Crown Responsible Gaming Support Centre and Gambler's Help contact phone numbers.

Advertising Regulations

Crown has complied with all advertising requirements since their introduction in April 2001. Initial regulations required print and broadcast advertisements to carry the following messages on a rotational basis:

- "Excessive gambling may cause financial problems for some people",
- "Excessive gambling may cause personal problems for some people",
- "Excessive gambling may cause family problems for some people", and
- "Gambling can become addictive for some people".

This requirement was superseded on 1 July 2004 when relevant provisions of the Gambling Regulation Act 2003 ("GRA") came into force (see Player Information section).

The Gaming Machine Control (Advertising) Regulations 2001 were introduced (revoked in 2004 and replaced with the Gaming Machine Advertising provisions of the GRA) prohibiting any advertising that:

- Offers some types of inducements to commence playing a gaming machine;
- Depicts minors playing, or encourages minors to play, gaming machines; and
- Contains information that is factually incorrect; misleading or deceptive; or conveys a false impression of playing gaming machines.

Clocks Regulations

Effective 30 June 2001 all gaming machines were required to display the time of day so that players could be aware of the time of day and the passage of time.

Some time before this requirement Crown had introduced clocks at strategic locations throughout the gaming floor, for example, at all cashier facilities.

National Standards for Electronic Gaming Machines

The Victorian Casino and Gaming Authority ("VCGA", "Authority") successfully implemented two responsible gaming initiatives, which were incorporated into the National Standards for Gaming Machines document. These were:

- The requirement for new games to display credit balance in both a dollar amount and credit amount.
- The reduction in the number of spins required for a game on a gaming machine to achieve its return to player

2001-2002

Crown Responsible Gaming Support Centre

On 13 March 2002 Crown formally launched the Crown Responsible Gaming Support Centre ("Centre", "RGSC"), a world first initiative. The Centre is staffed by Responsible Gaming Liaison Officers who are available 24 hours a day, 7 days a week, a Chaplain and two registered psychologists. Centre staff facilitate self exclusions and provide referrals to Government funded problem gambling support and/or other welfare services as required. Informational brochures relating to the Centre are available at the Centre, at all entry points to the gaming floor and at locations throughout the gaming floor.

Self – Exclusion Kit

Self - Exclusions have been available to patrons since Crown's inception. The Casino Control Act 1991 included a provision that a person may make application to be self-excluded.

In addition to the above stated legislative requirements and in conjunction with the launch of the RGSC, Crown reviewed and updated the Self-Exclusion kit that is made available to all patrons who self exclude. To this end, Crown has implemented a process specifically for effecting a self exclusion which includes the person being provided with a Self – Exclusion Kit ("Kit"). Each Kit contains printed material (some of which is available in Languages other than English) in regards to the various support services that are available to patrons both within, and external to, the Crown complex.

Self – Exclusion Revocation Committee

As a general rule Self – Exclusions are issued for an indefinite period. In May 2002, Crown established the Self - Exclusion Revocation Committee which is responsible for reviewing and approving or otherwise applications for revocations of self – exclusions. Applicants for revocations must demonstrate and provide supporting information that they have addressed their problem gambling behaviour with a health care provider or equivalent.

Lighting Regulations

Lighting regulations were introduced on 2 January 2002 requiring lighting levels at gaming machines to be set at a prescribed lux level. This prescribed lux level was introduced to foster an environment that allowed patrons to maintain alert functionality. It included the requirement that windows on the gaming floor were not to be removed or obscured.

2002-2003

The Authority at the time completed the Third Triennial Review of the Melbourne Casino Operator Licence. Findings reported to the Minister for Gaming June 2003 noted "Crown's participation in Responsible Gambling working parties and the initiatives it has introduced to its operations are an indication of its commitment to responsible gambling policies."

Printed Player Information

From 1 December 2002, the Casino was required to display the following printed player information, each containing information determined by the Minister for Gaming:

- Posters - One poster for every 15 gaming machines displayed in a manner so as to be clearly visible to gaming machine players sitting or standing in front of a gaming machine
- Talkers - One talker affixed to each gaming machine so as to be clearly visible from the front of the gaming machine
- Brochures - Brochures must be available at each cashier area and the total number of brochures available must be at least equal to the total number of gaming machines at Crown.

New Electronic Gaming Machine Design Requirements:

'Restricted' gaming machines: All new gaming machines and games approved on and from 1 January 2003 by the VCGA were required to include design restrictions which:

- ban note acceptors on machines from accepting \$100 notes
- ensure spin rates do not exceed 2.14 seconds
- ban autoplay facilities; and
- set a maximum bet limit of \$10.

'Restricted' gaming machines were also required to have any winnings or accumulated credits exceeding \$2,000 paid only by cheque.

Games approved by the Authority prior to 1 January 2003 had to comply with the above provisions by 1 January 2008.

Gaming machines located in an area of the Casino specified by the Authority - "Specified Areas" – are exempt from these restrictions, subject to the conditions for unrestricted gaming machines.

'Unrestricted' Gaming Machines

Gaming machines can operate without restrictions provided that:

- The patron has a valid Loyalty Program Card with pre-commitment limits enabled on the card including a Daily Spend and Daily Duration limit; and
- The machines are in a Specified Area.

Player Information

From 1 January 2003, the following electronic gaming machine requirements became effective:

Each gaming machine must display, at the election of a player, the following electronic game information for each game:

- the return to players of that game;
- the average number of individual games played per any win, based on one line being played per game; and
- the chances or odds of achieving the top 5 and bottom 5 (in value) individual winning combinations, and the maximum and minimum bet options available.

Additionally, each gaming machine must display, at the election of a player, the following electronic player information in relation to each game (note that all amounts must be expressed in dollars and cents):

- the amount the player has put into the gaming machine during a session;
- the amount wagered by the player on the gaming machine during a session;
- the session win or loss;
- the amount collected from the gaming machine by the player during a session;
- credits available;
- the time the player began the session;
- the current time of day; and
- the length of the session.

All gaming machines that form part of a linked jackpot arrangement must be able to generate and display jackpot information including but not limited to a statement that the machine is part of a linked jackpot arrangement, the total return to the player of the game and the return to the player of the game contributed by the linked jackpot arrangement.

The requirement for generating and displaying electronic game and player information applies for any game approved by the Authority after 1 January 2003 and for any other approved game on and after 1 January 2008.

Use of ATMs and EFTPOS Facilities

New measures for the use of Automatic Teller Machines (ATMs) and EFTPOS facilities came into operation on 1 January 2003. At the Casino, within 50 metres of any entrance, a \$200 limit per transaction per card and an inability to access cash advances from credit accounts was introduced.

The new requirements (post January 2010) state that all ATMs within the 50 metre rule (of any entry point to the casino) must be restricted to \$400 daily (24 hour period) withdrawal limits. Subject to any further legislative changes, if the banks do not roll out

technology to support the new restrictions of withdrawal limits, all ATMs within 50 metres of the entry point will need to be removed.

Payment of Winnings and Accumulated Credits above \$2,000

From 1 January 2003, requirements that winnings on gaming machines above \$2,000 must be paid by cheque were introduced. The casino operator gained an exemption from this provision for gaming machines located in a specified area. Other provisions introduced at this time include a requirement that all winnings must be paid by cheque if requested by a patron and that a winnings cheque cannot be exchanged for cash or gaming tokens at the Casino.

Player Activity Statements

Player Activity Statements (PAS) were introduced at Crown on 1 March 2003.

The PAS provides gaming machine players with a summary of their gaming machine activity and must be made available to gaming machine players at least once per annum.

A PAS can be viewed on a Voucher Issuance Kiosk (VIK), can be collected from any Crown Club or a member can elect to have it mailed to them.

Failure to view/collect a PAS statement in any 12-month period results in the suspension of membership.

Pre-commitment

Crown's pre-commitment program (Play Safe) was introduced on 1 June 2003.

The program allows members to set, in advance of play, individual time and spend limits relating to their gaming machine activity.

The Play Safe Program is conducted through Crown's Loyalty Scheme (Crown Club) whereby members who play gaming machines can set the following limits:

- A daily limit on time spent playing gaming machines.
- A daily limit on spend when playing gaming machines.
- An annual limit on spend when playing gaming machines (this can only be set if a daily spend limit has been set).

Members make their own decision based on their own circumstances when setting limits. Crown does not advise members on the level of their time and spend limits.

If any set Play Safe limit is exceeded, an audible warning sounds and a message appears on the Point Display of the gaming machine indicating that a limit has been exceeded. Once this occurs for daily limits, Crown Club Pokie points can no longer be accrued until 6am the following day.

A member can request a change to or removal of any or all limits at any time. To change or remove any limits, the member must visit any Crown Club or the Crown Responsible Gaming Support Centre. Decreases or removal of any limit/s will take effect immediately. Increases to any limit/s will not apply until 24 hours after the member has made the change/s. If any limit is increased, the member is required to confirm this increase at any Crown Club or a terminal. Failure to confirm the increase within the member's next 3 visits to Crown will result in the previous limit being reinstated.

The availability of Play Safe is advertised in the regular Crown Club Newsletter publication and Play Safe brochures are on display at Crown Clubs, the centre and at entry points to the gaming floor.

Loyalty Scheme Provisions

Crown's loyalty scheme is prohibited from allowing a person to participate in the loyalty scheme unless the person is provided with a written statement of prescribed information and the opportunity to set time and spend limits; is prohibited from allowing the participant to continue to play games under the scheme after his or her time and spend limits are met and is prohibited from knowingly allowing an excluded or self excluded person from participating in a scheme at a casino.

Crown must provide player activity statements to participants within 7 days of request, otherwise at least once a year.

Loyalty scheme participants suspended from the program (including excluded and self excluded patrons) do not receive advertising material.

Gaming Machine Advertising

Crown continues to comply with relevant provisions of the GRA that require Crown not to publish or cause to be published any gaming machine advertisement outside the boundaries of the Casino other than to participants of the Loyalty Scheme who have elected to receive information or any other person who requests gaming machine advertising.

Ministerial Directions

The following Ministerial Directions were made:

- that the total number of gaming machines, in all areas specified by notice under section 62AB(4), 62AC(2) or 81AAB(2) of the Casino Control Act 1991 must not exceed 1,000; and
- that, under section 12(1)(g) (of the Gaming Machine Control Act 1991), the condition that the Authority must specify in a notice under section 12(1)(f) is that a gaming machine located in an area specified by a notice under section 12(1)(f) may only operate in a mode where spin rate, bet limit, autoplay and note acceptors are unrestricted if that gaming machine may only be played in that mode by means of a card,

Personal Identification Number (PIN) or similar technology which requires the player to nominate limits on time and net loss before play can commence.

2003 – 2004

Responsible Gambling Ministerial Advisory Council and Working Parties

Established in late 2004, the Responsible Gambling Ministerial Advisory Council (“RGMAC”) advises the Victorian Government, through the Minister for Gaming, on issues relating to responsible gambling and minimising the negative impacts of gambling on Victorians.

The RGMAC, consisting of representatives drawn mainly from industry and community groups, has established a number of working groups to progress work on particular objectives and initiatives.

Crown (as operator and licence holder of the casino) and its parent Crown Limited each have one representative on RGMAC and each participates in working groups.

2004 – 2005

Responsible Gambling Training for Licensed Special Employees

The Gambling Regulation Act 2003 required licensed employees working in gaming venues to complete an approved training course within the first six months after commencing employment and an approved refresher course at least once every three years following completion of the approved training course.

On-line training was introduced at Crown on 20 October 2003; however Crown commenced internal RSG training for gaming employees in July 1997, well in advance of any legal requirements.

Crown provides advanced Responsible Service of Gaming training, conducted in the Responsible Gaming Support Centre, to various gaming staff.

Gaming Machine related signs

Restrictions on the display of gaming machine related signs (external to gaming floor) were introduced 1 July 2005 to be compliant by 1 July 2006.

The term “gaming machine related sign” is defined in section 3.5.35(5) of the GRA to mean:

“any sign (whether consisting of words, symbols, pictures or any other thing) –

(a) that draws attention to, or can reasonably be taken to draw attention to, the availability of gaming machines for gaming; or

(b) that uses a term or expression frequently associated with gaming machines –

but does not include any sign that is excluded from the operation of this section by the regulations.”

Responsible Gambling Awareness Week

The 2005 Responsible Gambling Awareness Week, a state-wide initiative involving government, industry and community groups to raise awareness of responsible gambling and responsible gambling practices, was actively supported by Crown in May 2005. This is an annual event that Crown has actively supported each and every year including, most recently, in 2008.

Gaming Machine Advertising

Effective from 1 January 2005, no advertising, whether written or verbal, could be communicated to customers outside the gaming floor unless the customer specifically requests the information.

2005 – 2006

Gaming Machine related signs

Restrictions on the display of gaming machine related signs (external to gaming floor) compliant by 1 July 2006.

Verbal encouragement of breaks

Crown has offered a complimentary beverage service to gaming machine players since the Casino opened. Beverage trolleys commenced operation in January 1999 and from 1 March 2006 at Crown’s initiative, gaming machine customers have been verbally encouraged to take a “refreshment break” by Beverage Program Assistants, thereby providing breaks in play.

2006 – 2007

Chaplaincy Support via the Crown Responsible Gaming Support Centre

As another world first, Crown introduced the Chaplaincy Support Service in April 2007 which provides support to those people who from time to time may feel they would be helped by some form of spiritual support. Chaplaincy support is available through the Responsible Gaming Support Centre and is another responsible gaming initiative Crown has made available to patrons who may experience difficulties with their gambling behaviours. This initiative attracted media attention and enquiries from other properties seeking to introduce a similar service.

Responsible Gaming logo

Crown Melbourne introduced the Responsible Gaming logo on gaming related collateral.

2007 – 2008

New Electronic Gaming Machine Design Requirements

On 1 January 2008 all gaming machines were compliant with Legislation which came into operation from 1 January 2003 which required that all new gaming machines and games approved by the Victorian Casino and Gaming Authority after that date must include design restrictions which:

- ban note acceptors on machines from accepting \$100 notes;
- ensure spin rates do not exceed 2.14 seconds;
- ban autoplay facilities; and
- set a maximum bet limit of \$10.

These conditions apply except in special circumstances as prescribed in a Ministerial Direction

Gambling Resumption Information Program

The Gambling Resumption Information Program (“GRIP”) was developed and introduced by Crown in May 2007. Patrons who have applied and been successful in revoking their Self – Exclusion from Crown are invited to attend the Responsible Gaming Support Centre for a general discussion in relation to their resumption of gambling at the Casino. The discussion includes mention of the various programs that are and remain available at Crown and through Government Support Services that can assist the customer in their strategies when resuming gambling at the Casino.

Responsible Service of Alcohol/Responsible Service of Gaming

From December 1, 2008, new legislation became effective which prevents any person in a state of intoxication from gambling anywhere within the Casino. This is in addition to existing laws which prevent any person in a state of intoxication from being served further alcoholic beverages. Crown treats the Responsible Serving of Alcohol and Gaming very seriously and will actively comply with these legal requirements.

Foreshadowed for 2009

Introduction of a Responsible Gambling Code of Conduct

In June 2009, Crown will introduce its “Responsible Gambling Code of Conduct”. The Code of Conduct will demonstrate Crown’s commitment to the delivery of gaming in a responsible manner, its objective will be to ensure that it remains a world leader in responsible gambling practices and complies with the requirement of the Casino Control Act (Vic) 1991 to have such a code which will be enforced by the Casino’s Regulator.

Responsible Gambling Awareness Week

In May 2009, Crown will once again participate in Responsible Gambling Awareness Week activities, a state-wide initiative involving government, industry and community groups to raise awareness of responsible gambling and responsible gambling practices.

NEW SOUTH WALES - Star City Casino, Sydney

Pre 1999

Prior to 1999 Star City (formerly known as Sydney Harbour Casino) had in place a number of responsible gambling initiatives including:

Specialised Staff

A full time Responsible Gambling Manager position was created to oversee policy and implementation of Responsible Gambling strategy.

Counselling Services

- In 1995 an external problem gambling expert was engaged to provide counselling for customers;
- In 1995 an external problem gambling service was engaged to provide 24 / 7 crisis intervention for customers;
- In 1998 Wesley Gambling Counselling Services (WGCS) was engaged to provide counselling for customers, crisis intervention and develop and deliver Responsible Gambling specific training.
- The Star City Helpline, providing 24 hour telephone and gambling counselling information, operated from 1995 to 1999 when the G-line (NSW) service was established.

Staff Training

Star City developed, in conjunction the Wesley Gambling Counselling Service, a customised Responsible Gambling classroom- based training which was delivered to staff. All staff participated in this training as part of the casino induction program. The RG course contained the following modules:

- Star City's commitment to Responsible Gambling;
- Gambling in NSW;
- Laws for Responsible Gambling;
- Problem Gambling;
- Applying Responsible Gambling; and
- Benefits of Responsible Gambling.

Multilingual resources

Information was provided in 13 community languages (brochures) for customers re the gambling help services available, and the self exclusion program throughout the casino gaming areas.

Self exclusion program

The Star City Self exclusion program has operated since the casino opened in September 1995. The program provides customers the option of self excluding from the gambling areas within the casino if they feel they are experiencing difficulties with their gambling. All self exclusions are issued for a minimum period of twelve months, and will not be considered for revocation within the initial twelve month period. In addition, all revocation requests for self exclusions must be accompanied by a gambling assessment conducted by a qualified gambling counsellor and a letter of support for the revocation from a family member.

Exclusion Review Committee

Star City established an Exclusion Review Committee which is responsible for reviewing all requests for revocation of exclusion orders, including self exclusion and non voluntary exclusions. All persons seeking revocation of self exclusion orders are required to submit a gambling assessment and a letter of support for the revocation from a family member. The committee meets on a monthly basis and has representation from Security, Surveillance, Table Games, Electronic Gaming, and is chaired by the Responsible Gambling Manager.

Responsible Gambling Signage / collateral

Star City displayed throughout the gaming areas responsible gambling signage providing customers with the G-line (NSW) telephone counselling and referral service contact details. This signage was displayed at table games, electronic gaming machines, ATM's, and on light boxes throughout the casino complex.

2000 – 2001

Staff training

The development of a customised Responsible Gambling (RG) on-line and classroom based training program in conjunction with Wesley Gambling Counselling Service and Accenture.

Responsible Gambling Code

In October 2001, Star City's parent company, Tabcorp developed its own Responsible Gambling Code of Practice following extensive consultation with industry, community, government and regulatory stakeholders. The Code committed Tabcorp to providing information to customers about responsible gambling, providing information about our products including the chances of winning, providing information about problem gambling support services, staff training in responsible gambling, and stakeholder engagement.

Development of Self exclusion information pack

Star City developed an information pack which is provided to all customers who self exclude. The information pack provides each customer with contact details for gambling counselling services located throughout the Sydney metropolitan area, and the contact details for other support services including financial and legal gambling specialists.

2002 – 2003

Staff training

The roll out and delivery of the customised Responsible Gambling online training and classroom component to all staff involved with customers.

2003 – 2004

Staff training & Specialised Staff

The development and delivery of Responsible Gambling refresher training. The purpose of this training is to provide staff with updated information regarding responsible gambling, including any legislative changes that have occurred since their last training. Staff are required to complete the Responsible Gambling refresher training every two years.

Independent Compliance Reviews & Measurement

Since 2003 Tabcorp Casinos have engaged KPMG to conduct an annual independent review of compliance with the Tabcorp Responsible Gambling Code across the company's relevant operations including those at Star City. The findings of the initial review formed the development of a revised Responsible Gambling Code of Practice, which was launched in January 2006. The revised Code was more comprehensive and had a greater emphasis on commitment to customer care rather than compliance, committing the organisation to:

- Providing information regarding gambling products to enable a customer to make an informed choice about their gambling activity;
- Complying with all relevant laws and regulations;
- Training employees in responsible gambling;
- Encouraging customers not to chase losses, continue to play longer than they wanted or play for excessive periods of time;
- Assessing new products for their likely impact on the potential for customers to develop gambling problems;
- Engaging with government and community stakeholders, including problem gambling support services regarding responsible gambling and problem gambling issues; and

- Advertising and promoting our products, in line with the standards set out in the Advertiser Code of Ethics as adopted by the Australian Association of National Advertisers
- Star City has adopted a responsible gambling compliance framework which is in accordance with Australian Standard AS3806.
- Star City engages independent experts to conduct regular measurement of the effectiveness of responsible gambling training and the related awareness/understanding from employees of responsible gambling policies and practices.

2004 – 2005

Awards

Tabcorp is committed to ensuring its products are enjoyed by its customers and delivered responsibly. In recognition of its efforts, Tabcorp has been recognised as global leader in the promotion of responsible gambling by the Dow Jones Sustainability Index in both 2004 and 2005.

Awareness

The first Star City Responsible Gambling Awareness Week for staff was held. The purpose of the week was to provide staff with additional information about responsible gambling initiatives available at the casino. More than 1500 staff participated in this activity.

Evaluation and review

- In late 2004 Tabcorp engaged international consulting services firm KPMG to assist with a review and redevelopment of the existing Tabcorp Responsible Gambling Code.
- Star City engaged KPMG to conduct a review of the effectiveness of Responsible Gambling training. The recommendations resulting from the review were implemented to enhance the delivery of training.
- Review and relaunch of Tabcorp Responsible Gambling Code. The Code was written in plain English for staff and customers, and was available in 13 community languages.
- The content of the Responsible Gambling training was revised to ensure the currency of the information provided to staff.
- Development of Responsible Gambling manual – this manual provides a step-by-step guide for compliance with revised Responsible Gambling Code.

Training

- Star City recognised the need for additional training in responsible gambling. As a result the casino developed, in conjunction with Wesley Gambling Counselling Service, a specialised training program to be delivered to senior staff in key operational areas. The training program is known as RGLM training (Responsible Gambling Liaison Managers).

- The initial intake resulted in 20 senior operational staff, representing Table Games, Electronic Gaming, VIP Services and Security participating in the 2 day RGLM training course. The content of the course included modules in advanced communication skills, conflict resolution, suicide prevention and awareness and problem gambling.

Information for Patrons

Star City provides a range of written and where appropriate electronic information to help inform customers and the wider community of the nature of its products, including information on the operation of games and the likely chances of winning/losing.

2005 – 2006

Training and awareness

- 2nd annual Responsible Gambling Awareness week.
- RGLM training delivered to an additional 18 senior operational staff.

Research

During 2005 Tabcorp has worked closely with the Australian Gaming Council in order to better understand the principles behind informed choice as it relates to gambling. This work has culminated in the development of a paper aimed at clarifying the issue of personal responsibility and the role of industry in providing relevant and full information necessary for informed decision-making. The paper, titled “Informed Choice and Gambling: Principles for Consumer Protection” has been researched and authored by three leading expert academic researchers from Australia, the United States of America and Canada.

Funding and Partnerships with Counselling Providers

- Tabcorp funding of a fulltime counsellor at Odyssey House, in the City of Sydney (New South Wales) to provide a residential treatment program for problem gamblers.
- Star City engaged Wesley Gambling Counselling Services to provide crisis counselling to patrons and assistance with operation of the casinos’ exclusion program.

Updated Responsible Gambling Code

As a result of an extensive review conducted by KPMG, Star City launched an improved Code in January 2006. The Code is available in seven key languages other than English.

2006 – 2007

Training and awareness

- 3rd annual Responsible Gambling Awareness week.
- RGLM training and refresher training conducted.

- Star City supports problem gambling counselling services by displaying material about their services in its casinos, outlets and venues, and through regular liaison with representatives of the support service providers.

Security Staff specialist training

A customised training course was developed and delivered by Wesley Gambling Counselling Service to Security Managers and Supervisors to provide additional information about the self exclusion process, and to provide these staff with additional skills to assist customers during the self exclusion.

2007 -2008

Training and awareness

- 4th Responsible Gambling Awareness week.
- The development and production of Responsible Gambling training video which is part of the online and classroom based RG training and refresher programs.
- RGLM training conducted - to date 62 senior operational staff completed RGLM training.
- Engagement of Betcare to provide Responsible Gambling services, including crisis intervention, Responsible Gambling training, gambling assessments and counselling for patrons and their families.

Dow Jones Sustainability Index

According to the respected Dow Jones Sustainability Index (DJSI) for 2008/09, Tabcorp Holdings Limited was again recognised as the global leader in the gambling industry and a world leader in Responsible Gambling. The company achieved an overall score of 77 per cent in the DJSI, up five per cent on last year, to be the best in the world gambling sector for the second year in a row. Tabcorp was also recognised as a world leader in Responsible Gambling, gaining a 100 per cent score for the promotion of Responsible Gambling.

Foreshadowed Initiatives - 2009

- Refresher training program for RGLM's.
- Continuing of training program for new RGLM's.
- The Office of Liquor, Gaming & Racing (OLGR) and Star City will launch an RG Awareness week activity in May 2009. A "break out" room will be trialled near the hotel entry where patrons can go for a cup of coffee and advice on gambling, whilst they take a break from the gaming floor. The launch will showcase Star City as a leader in the field of responsible gambling.
- Development and adoption of Star City Responsible Gambling Code of Practice, as Tabcorp Responsible Gambling Code will cease to exist.

WESTERN AUSTRALIA - Burswood Entertainment Complex, Perth

1999 – 2004

Prior to the adoption of Burswood Casino's current Responsible Gambling Code of Practice (and the practices contained therein), which represents the outcome of an exhaustive review and adoption of Industry best practice, Burswood operated in accordance with a Code of Ethics and Gaming Practice.

Code of Ethics and Gambling Practice

This Code of Ethics and Gaming Practice encouraged responsible gaming practices and promoted responsible gambling behaviour, and reflected the following practices (this list is not exhaustive):

- The operation of a self exclusion program administered by the Security department;
- The display of signage and brochures in major public traffic areas – this included information on accredited counselling services, multi-lingual information and access to a toll free 24-hour telephone counselling hotline, G-Line;
- Free access to player information on rules etc for patrons;
- Participation on, and provision of funding to, an industry representative body known as the Gambling Support Services Advisory Committee which in turn supported free consultation and counselling services via BreakEven WA and G-Line;
- The location of ATMs outside the licensed Casino gaming area;
- Limiting EFTPOS facilities to withdrawals from savings and cheque accounts only;
- Prohibiting employees from gaming; and
- Compliance with the Media Council's Advertising Code of Ethics.

2004

Review and evaluation

- Review of the organisation's Code of Ethics and Gaming Practice was undertaken, with the objective of updating and implementing a revised and improved Responsible Gambling Code of Practice.
- A review by BetSafe and its principal Paul Symond formed the basis of a new Responsible Gambling Code of Practice. The outcome of the review can be summarised by the following finding:

“Burswood has a long history of responsible conduct in relation to the provision of gambling products.”

2005

Code of Practice and Training Manual

- Responsible Gambling Code of Practice and accompanying Operations Manual was developed which sets out the detailed Policies and Procedures underpinning the commitments in the Code, was adopted.
- A Responsible Gambling Management Committee was established to oversee Burswood’s Responsible Service of Gambling Program. The Committee comprises the Chief Executive Officer and other key executives, and key operational managers.

2006

Trained Staff

- The Responsible Service of Gambling Code of Practice was published. The Code is distributed to all staff as part of their orientation. The Responsible Service of Gambling Code of Practice was published. The Code is distributed to all staff as part of their orientation.
- The Responsible Service of Gambling Online Training Centre was opened. This is a 24/7 training centre in which staff complete the mandated RSG online training course. The course covers, among other things (This list of topics is not exhaustive):
 - An explanation of Problem Gambling
 - Burswood’s Commitment to RSG
 - Staff Responsibilities with respect to RSG
 - The Gambling Industry and reasons why people gamble
 - Legislative and Regulatory Framework
 - VIP Gaming
 - Minors and Unattended Children
 - Unacceptable Behaviour
 - Removal of Customers from the Casino
 - Liaison with Law Enforcement Agencies
 - Customer Feedback
 - Responsible Service of Alcohol

The Gambling Code of Practice

- The Code covers:

Mission Statement

Responsible Gambling

Problem Gambling

Provision of Information

- Burswood's Mission Statement
- Customer Information
- Gaming Information
- Problem Gambling Counselling Services
- Responsible Gambling Information

Interaction with Customers and Community

- Customer Service Staff
- Customer Complaints
- Problem Gambling Support Counselling
- Persons Under 18 Years
- Staff Training and Skills Development
- Staff Gambling Prohibition
- Privacy

Exclusion

- Self-Exclusion
- Involuntary Exclusion
- Counselling for Exclusion Customers
- Removal from Mailing Lists
- Re-entry following Self-Exclusion or Involuntary Exclusion

Physical Environment

- Breaks in Play
- Responsible Service of Alcohol
- Clocks
- Lighting

Financial Transactions

- ATMs
- EFTPOS
- Credit
- Cheque Cashing Restrictions
- Cooling-Off
- Staff Interaction with Customers
- TAB Agency

Advertising and Promotions

- Advertising and Promotions Code of Practice
- Promotion of Responsible Gambling
- Complmentaries Policy

Cultural and Geographic Diversity

- Sensitivity
- Information in Community Languages
- Other Community Groups

Accountability and Review

- Responsible Gambling Management Committee
- Internal Compliance Audits

Research

- Terms Used in the Code of Practice
- The Gaming & Wagering Commission of Western Australia has endorsed the Code.
 - It should be noted there are no legislative or regulatory requirements for Burswood to adopt a Code of Practice or implement Responsible Service of Gambling measures. However, Burswood views the Responsible Service of Gambling as an integral part of the way it conducts its business, and has an extensive Responsible Service of Gambling (RSG) framework to promote RSG, and educate staff and patrons on RSG. Burswood also has a range of RSG programs in place to identify and respond to problem gambling behaviours.

Information Terminals

Electronic Gaming Information Terminals (GITs) were introduced into the Casino to provide information about rules and chances of winning at the various casino games. The content of the GITs is approved by the Gaming & Wagering Commission of Western Australia. Essentially, the GITs cover (This list of topics is not exhaustive):

- o *Casino Information*
 - Game Play Rules
 - CCTV Coverage
 - Age and other Entry Requirements
 - Resolution of Complaints
- o *Electronic Gaming & Keno*
- o *Table Games*
- o *Responsible Gambling*
 - Code of Practice
 - Signs of Problem Gambling
 - Knowing the Odds of Winning

- Self-Exclusion
- Information for Family and Friends
- o *Self-Exclusion Programme*
- o *Responsible Service of Alcohol*
- o *VIP Gaming*
- o *Club Burswood*
- o *Government Inspectors*

Self-help Guide

A new Gambling Help WA Book titled, “Moving Beyond Gambling – A Self-Help Guide” was launched – this book is included in the material provided to patrons who self-exclude from the Casino.

Community Relations Manager

The Community Relations Manager (CRM), who heads the Responsible Service of Gambling team, was appointed. The CRM reports to the Responsible Gambling Management Committee and has a social services background.

Three Year Strategic Plan

A three year strategic plan for the Responsible Service of Gambling was adopted – this plan formed the basis for the evaluation and implementation of new initiatives over the next 3 years.

Awareness

A new RSG logo was adopted for inclusion on all RSG material, and all gaming related advertising and promotion or collateral.

Security Staff

Expressions of Interest were sought from Security Officers to conduct self-exclusion interviews. Security Officers play an important role in self-exclusion and it was determined that it is desirable to identify those officers with the requisite skills and motivation to participate in this process, which recognises the sensitive nature of the task.

Training - Indicator Awareness Program

A face-to-face training program on the observation and reporting of patron behaviours indicative of problem gambling was adopted – this Problem Gambling Indicator Awareness program is delivered to staff involved in gaming and gaming related services.

Third Party Exclusion Program

A program to assess applications from Third Parties who are concerned about a family member's or other person's gambling behaviour was adopted. A robust process is in place and a person may be involuntarily excluded from the Casino if significant concerns are substantiated.

Self Exclusion

- Initiatives to improve the identification of patrons who frequent the Casino in breach of their Self-Exclusion Agreement were adopted.
- A review of the Self Exclusion Agreement and process of revoking an Agreement was undertaken – a Self Exclusion Agreement has a minimum term of 12 months, and does not expire automatically but requires patrons who are a party to a Self Exclusion Agreement to undergo counselling before Burswood will consider a revocation of the Agreement. Burswood requires evidence of meaningful counselling, and interviews a patron before determining whether or not to grant a revocation. A follow up process is conducted at 6 and 12 weeks after revocation.
- Burswood Casino also provides referral request application forms to patrons seeking assistance.

2007

Awareness

A new suite of RSG posters was adopted to raise the awareness of the Responsible Service of Gambling and the organisation's RSG programs. Help details are displayed at machine bank ends, on toilet doors, on all machines, on wallet cards and on all ATMs.

Specialised Staff

The Responsible Gambling Advisor (RGA) was appointed to join the RSG team. The RGA is a qualified psychologist.

2008

Website

A new comprehensive RSG website was launched: www.gamblersresponsibly.com.au

The site was designed to provide members of the community with detailed information and assistance in dealing with problem gambling. Some topics covered include:

- What is responsible gambling
- What is problem gambling
- Warning signs of problem gambling

- Strategies to control your gambling
- Information for family and friends
- What to expect from counselling
- Options for accessing help
- Self Exclusion

The site includes an interactive self assessment questionnaire as well as an option to download information about our programs and Code of Practice.

Online Training Program

A review of the Online Learning training program was completed. The new program is interactive and provides more guidance to staff about noticing and reporting patron behaviours that may be indicative of a problem. The new program is expected to be launched in early 2009.

RSG Information and Resource Centre

A Responsible Gambling Information Centre was opened in January 2009. The Centre is dedicated to raising awareness of problem gambling and providing gambling related assistance, referral information and advice. The Centre is prominently located at a main entry to the Casino and patrons are not required to make an appointment if they wish to speak to someone about gambling related issues.

Responsible Gambling Awareness Week

Responsible Gambling Awareness Week presents an opportunity for Burswood to raise awareness of responsible gambling and for a number of years Burswood has operated a free coffee service to patrons for several hours each day during the week. This service is staffed by the RSG team and senior managers. Counsellors from Gambling Help WA also attend each coffee session and speak directly to patrons.

An annual forum has also been conducted for a number of years. Management and frontline staff attend this annual forum where information is shared and collaboration undertaken between Gambling Help WA and Burswood.

ATM Locations

The ATM Police recently formulated and approved by the Gaming & Wagering Commission of WA stipulates that ATMs must be 40 metres from the entrance to the gaming floor or there must be a restriction of \$400 daily cash withdrawals.

AUSTRALIAN CAPITAL TERRITORY - Casino Canberra

Pre 1999

Prior to 1999 the Legislative and Regulatory Initiatives were as follows:

Exclusion programs

- Casino Canberra provides access to a self-exclusion program, allowing people to 'ban' themselves from the gaming floor if they wish.
- Casino Canberra also has a policy whereby staff must exclude patrons who "appear not to understand the implications of gambling".

Internal Environment

- ATM's must be located outside the casino's licensed gaming floor.
- No credit facilities are available on the gaming floor.
- Casino Canberra has no electronic gaming machines.

Casino Canberra introduced:

Specialised staff & Involvement

- Specialised staff (Gambling Contact Officers) are trained to conduct close observation and monitoring for problem gambling in the casino. Training is a PowerPoint/workbook presentation which has been approved by the regulators.
- Casino Canberra also participates in the industry voluntary code of practice.
- Responsible gambling information is provided to staff on induction.

Awareness

Responsible gambling messages are displayed throughout Casino Canberra in the way of signage displays. Statistics, which outlined the likelihood of winning the major jackpots and messages promoting responsible gambling, are also prevalent.

Internal Environment

Clocks are displayed throughout the casino to ensure patrons are aware of how long they have been in the casino, this assists many patrons who set time limits for themselves to ensure they gamble responsibly.

2001 – 2002

Casino Canberra introduced:

Gambling Code of Practice

Active participation and leadership in the development of the Responsible Gambling Code of Practice.

Technology & staff awareness

A comprehensive computer database of photos is maintained for all excluded patrons. The database is readily accessible by all casino staff to ensure that if an excluded patron tries to enter the gaming floor staff can act quickly in identifying them.

2002 - 2003

Legislative and Regulatory Initiatives were introduced including:

Code of Practice

- Gambling and Racing Control (Code of Practice) 2002 introduced.
- The casino cannot pay out more than \$20k winnings in cash in one day. Additional winnings may be paid by cheque or by direct credit to an account.

Casino Canberra introduced:

Awareness of counselling services

- Casino Canberra promotes counselling services in an effort to offer assistance to those who may have a gambling problem. For example Lifeline counselling signage is prominent on all access and cubicle doors in the casino toilets and next to ATMs.
- Casino Canberra staff are trained in the documentation, investigation and action of individuals showing signs of problem gambling.

2003 - 2004

Casino Canberra introduced:

Specialised staff training

Casino Canberra provides training for every staff member in responsible gambling. Responsible service of alcohol training is included as part of Responsible Gambling training.

Access to information

- Further signage with information about assistance for problem gambling is placed throughout casino and at ATMs to ensure that patrons are informed about where they can seek advice on responsible gambling matters.
- Brochures with problem gambling information on display throughout casino in English and Chinese. Signage is on table games, in toilets, on table surfaces (non-gaming),

references are made on every advertisement, at public telephones and references are made in all media advertising (print, TV, radio).

2005 – 2006

Casino Canberra introduced:

Partnerships

Casino Canberra is working with local counselling service providers. For example, a Casino Canberra representative sits on Lifeline Marketing Committee.

2006 – 2007

Legislative and Regulatory Initiatives

Casino Control Act 2006 introduced

Casino Canberra introduced:

Specialised staff at all times

- Gambling Contact Officers available at all times during operating hours. Officers are trained specifically to deal with any problem gambling incidents.
- Patrons that feel they need assistance can arrange to have a confidential interview with a Gambling Contact Officer. Gambling Contact Officers can provide patrons with a handout pack of brochures and contact details for professional assistance and self exclusion options.

Procedures for self-exclusion

- Comprehensive procedure document prepared to assist staff and patrons who wish to self exclude from the casino.
- Gambling Contact Officers are specially trained to assist patrons in the self exclusion process.

2007 - 2008

Casino Canberra introduced:

Awareness

- Casino Canberra seeks to promote responsible gambling awareness by actively participating in Gambling & Racing Commission Responsible Gambling Awareness Week.
- Signage and brochures created for responsible gambling week remains on display.

Automatic Teller Machines (ATMs)

- ATMs are located outside the entry to the foyer, not on the gaming floor.

* Casino Canberra has no electronic gaming machines

NORTHERN TERRITORY -Lasseters Hotel Casino

Pre 1999

Prior to 1999 the following initiatives were introduced:

Self Exclusion Program

Self exclusion provisions put in place for patrons who choose to exclude themselves from the gaming floor.

Specialised Staff

- Trained Gambling Liaison Officers available in case of any responsible gambling incidents (Security Personnel)
- Lasseters Hotel Casino works with counselling service provider, Anglicare NT. Anglicare NT conduct 'Responsible Gambling Awareness Program' training for all staff at the casino.
- Staff have been trained to offer information such as brochures and cards where appropriate. All written information is made easily accessible to patrons and is kept in clear view.

Environment and Location of ATMs

- Natural lighting on sections of gaming floor;
- Prohibition of minors from the casino;
- ATM & EFTPOS facilities located away from gaming floor as per Northern Territory Government requirements; and
- Venue and car park surveillance introduced.

2001 – 2002

Community Liaison

Appropriate link made with local gambling related support services, such as Anglicare NT and Amity Community Services.

Information

- Responsible gambling and gambling support services information displayed on gaming floor.

- Collaboration with Amity Community Services on production of brochure “Gaming Machines – A Player’s Guide”.
- Information is available in a variety of languages including; English, Italian, Greek, Thai and Vietnamese.

2002 – 2003

Awareness

Responsible Gambling Awareness training commenced for all gaming and security employees facilitated by Anglicare.

Partnerships

In 2003, Lasseters partnered with 16 other industry, government and community bodies to form a Working Party responsible for developing a Code of Practice for the Northern Territory gambling providers. The Code contains practices to be implemented to achieve industry ‘best practice’ in the delivery of gambling services.

2003 – 2004

Gambling Code of Practice

- NT Responsible Gambling Code of Practice (voluntary compliance) launched in April 2003. Lasseters Hotel Casino represented in the Responsible Gambling Advisory Committee in development of code.
- 95% voluntary compliance of code recommendations which includes the following regulations:
 - Provision of Information
 - Interaction with Customers and Community
 - Training and Skills Development
 - Exclusion of Problem Gamblers
 - Physical Environment
 - Minors
 - Financial Transactions
 - Advertising and Promotions
 - Privacy Policy

Environment

Clocks on all electronic gaming machines are introduced, a voluntary initiative.

2005 – 2006

Partnerships and monitoring

- Quarterly meetings – AHA, community service groups, NT industry representatives.
- Return to player and player tracking information – approximately 8% of machines.

2006 – 2007

Code of Practice

Mandatory compliance of Northern Territory Responsible Gambling Code of Practice – Lasseters Hotel Casino - 100% compliant.

Partnership and Awareness

Active involvement in NT Gambling Awareness Week in collaboration with Amity Community Services, local industry and Northern Territory Government.

2007 – 2008

Specialised Staff Training

- Introduction and facilitation of in-house Responsible Gambling Awareness training. Nationally recognised qualification certified by Charles Darwin University required within three (3) months of employee commencement.
- Trained identified Gambling Liaison Officers.

Partnership and Awareness

Active involvement in NT Gambling Awareness Week in collaboration with Amity Community Services, local industry and Northern Territory Government.

Financial Transactions

- Cheques are encouraged for winnings over \$5,000 (or less if the restricted cash flow is low).
- Signage is displayed near ATMs, providing specific information to service providers such as Anglicare Gambling Counselling as well as other financial counselling options.
- EFTPOS can only be used for retail transactions such as at restaurants and in bars.

- ATMs are located off the main casino gaming floor, near the entrance to the restaurant.

Foreshadowed Initiatives - 2009

- Change of layout – display gambling helpline.
- Northern Territory government proposed return to player disclosure.

NORTHERN TERRITORY - SKYCITY Darwin

Pre 1999

Self Barring Program First Introduced

Self Barring provisions became available for persons wishing to self exclude.

Links with Community Service Providers

Appropriate Links established with local gambling related support service providers, Amity Community Services.

ATMs - Restrictions of Credit Accounts

- ATMs located away from Gaming Footprint and out of sight from the Gaming Floor
- Restriction of Credit Accounts; on site ATMs will not allow Customers to access credit accounts.

Provision of Information

- Prominent “Advice to Players” signage displayed on Blackjack tables; advice included recommended method of play such as splitting aces and eights and not splitting 10 count cards – as per NT Government requirements.
- Gambling Help information displayed and available in Gaming areas.

Responsible Service of Alcohol

Introduction of Responsible Service of Alcohol training. Key staff involved in the areas of Security, Food and Beverage, Gaming and Customer Service are given the skills and knowledge to provide a safe, enjoyable and responsible environment for customers.

Staff Gambling Ban

Licensed Gaming staff prohibited from gambling on the property.

2000 – 2004

Provision of Information

- Information about the potential risks of Gambling and local gambling related support services available in gaming areas in a variety of languages.
- Counselling/Help information became more readily available; displayed more prominently throughout the property.

Community Liaison

Links with local gambling related support services are extended and strengthened with a view to assisting with early intervention and prevention strategies.

Participation & Partnerships

Darwin Property was represented on the Responsible Gambling Advisory Committee; participated in the development of the NT Code of Practice for Responsible Gambling.

2004 – 2005

Participation & Partnerships

- SKYCITY Darwin continued participation in the NT Responsible Gambling Advisory Committee.
- Voluntary compliance with the NT Code of Responsible Gambling

Responsible Marketing & Advertising policy

SKYCITY Darwin is a responsible gaming operator. Our advertisements and promotions are delivered in an honest and responsible manner with consideration being given to the potential impact on people adversely affected by gambling. We comply with the national Advertising Standards Authority and its regulatory authority guidelines for responsible marketing and advertising of its facilities, which include:

- Promotions that are conducted responsibly and are not designed to induce patrons to either drink or gamble to excess
- Advertising that is not false, deceptive or misleading and complies with the Australian Association of National Advertisers Code of Ethics and the SKYCITY Darwin Responsible Advertising Code of Practice
- Advertising that does not target persons that might be considered at risk of developing gambling problems.

Staff Gambling Ban

SKYCITY Darwin staff are not permitted to game at any SKYCITY site.

Referrals to Treatment Providers

Customers who seek to self-exclude or express a concern that they have a gambling problem are provided with contact information for appropriate treatment providers and are actively encouraged to make contact with them for help and support.

Passage of Time

Clocks are displayed in Gaming areas and the current time is displayed on all EGMs to ensure that patrons are aware of the passage of time whilst gambling at the casino.

Information for Problem Gamblers

- Gambling Helpline numbers are displayed throughout property; printed onto the table layouts of all table games and displayed on adhesive labels attached prominently to all EGMs and ATMs.
- Information brochures available about the potential risks associated with gambling and where to get help.
- Easily understood information brochures on the odds or win rates of major prizes available at the Loyalty Club Counter and gaming areas.

Educational Campaigns

"Go easy ... Gambling with more than just money?" educational campaign - An information campaign for customers including posters, wallet cards and brochures, detailing the signs of problem gambling and where to seek help, advertising materials are prominently displayed throughout the complex, brochures are widely available and accessible.

Standards of Behaviour

- SKYCITY Policy established; Should a person be detected intoxicated, abusing or threatening staff or other customers, causing conflict with other customers or staff, or otherwise behaving in a manner which affects the peace or comfort of other patrons, then SKYCITY Darwin staff will take appropriate steps to stop the behaviour, including, in appropriate circumstances, having the customer escorted from the premises.
- Any customers detected loan sharking or begging will be required to leave SKYCITY Darwin. In some instances, SKYCITY Darwin may also exclude the customer from the premises.

2005 – 2006

Host Responsibility Program & Information for staff

SKYCITY Host Responsibility Program is established and prominent and permanent notice boards displaying information about Responsible Gambling are established in Staff dining areas.

Community Liaison

- Membership of National Association for Gambling Studies (NAGS). The SKYCITY Darwin Host Responsibility Manager is appointed NT representative in 2006.
- Member of the Australian Casinos Association – Responsible Gambling Taskforce

2006 – 2007

SKYCITY develops the following:

Mission

SKYCITY Darwin's Responsible Gambling Mission Statement is prominently displayed at all entrances to encourage the growing organisational culture and promote responsible gambling within SKYCITY Darwin.

Modified, User-friendly Self-Exclusion Program

- New and simplified Self Exclusion policy introduced.
- SKYCITY Darwin offers this self-exclusion option to customers who believe they may have a gambling problem. Under this option, customers volunteer to exclude themselves from entering SKYCITY Darwin.
- Self Exclusion agreements can be arranged for a 3 month period(the minimum)or longer timeframes up to and including unending periods can be arranged.

Gambling Information

- Provision of information on win rates of major prizes is available on gaming floor to enable customers to make more informed decisions about their gambling.
- Host Responsibility Section added to the SKYCITY Darwin website. A prominent Link to the Host Responsibility Section is displayed on each page of the SKYCITY Darwin Website. Section contains the following pages, information, links, and documents:
 - Help is at Hand
 - Self-Exclusion
 - What We Do About Problem Gambling
 - Responsible Service of Alcohol
 - Unattended Children
 - Responsible Marketing & Advertising policy
 - Standards of behaviour

- Host Responsibility management
- Links and contact information for Amity Community Services and Anglicare
- Self Exclusion Notice forms available for download
- NT Code of Responsible Gambling available for download.

Specialised Staff & Host Responsibility Management

- Host Responsibility Manager appointed.
- To manage these policies and ensure continual review and enhancement of harm minimisation initiatives, a Host Responsibility Department was established within the SKYCITY Entertainment Group, led by a Senior Group Manager.
- Based at the company's head office in New Zealand, this department has responsibility for managing and implementing problem gambling and alcohol management initiatives at all SKYCITY gaming and entertainment sites.

Education and Training

- All SKYCITY Darwin staff, irrespective of their areas of operation, receives training in Host Responsibility.
- A Compulsory Host Responsibility training module is included in the property's Orientation/Induction program. The module is an interactive classroom style
- Host Responsibility Manager attends the National Association for Gambling Studies annual conference.

Community Liaison

Host Responsibility Manager establishes links and regular and semi-regular visits with various local groups/organisations:

- Amity Community Services
- Somerville Community Services
- Anglicare
- Community Benefit Fund
- Member of National Association for Gambling Studies – attendance at annual conference
- Member of the Australian Casinos Association – Responsible Gambling Taskforce

Gambling Awareness Week

- SKYCITY participated in and hosted all Gambling Awareness Week (GAW) Organising Committee meetings. SKYCITY played a major role in organising activities and provided assistance and support through resources with the development and provision of art work for posters, coasters, advertising, balloons, invitations, etc. .
- GAW was strongly supported at SKYCITY Darwin with the prominent display of Posters, coasters and information in both back of house and front of house areas.

2007 -2008

Financial Transactions

- ATMs are located off the main casino gaming floor, in a dedicated ATM room. The ATM room is located off the gaming footprint adjacent to a side entrance (as opposed to the main entrance). This entrance is situated next to an undercover section of the driveway that has a two minute drop off zone. Persons often utilise this two minute parking zone for the sole purpose of utilising the ATM facilities; it is considered as a safe, well lit and secure area.
- EFTPOS is available at non-gaming outlets within the complex; however cash withdrawals are not permitted.

Information for players

- SKYCITY introduced Responsible Gambling messages on Keno Tickets .
- Responsible Gambling statements such as, “Gambling is a form of entertainment not a strategy for financial success” and “Please gamble responsibly” included on gaming and loyalty club collateral.

Gambling Awareness Week

Continued support and involvement in GAW included the development of Responsible Gambling messages, assistance with the engagement of the NT Responsible Gambling Ambassador, Michael Long , continued provision of Artwork, display of posters, and utilisation of coasters displaying Responsible Gambling messages throughout the property during the week. The NT GAW 2008/2009 Theme, “The secret to winning is knowing when to stop” was embraced by all at SKYCITY Darwin, it was displayed throughout the property along with the gambling helpline number on all EGM Led displays All executives and many senior staff attended the GAW launch.

Responsible Service of Alcohol

In house accredited training capability for the provision of Responsible Service of Alcohol training. All staff involved in the areas of Security, Food and Beverage, Gaming and Customer Service are given the skills and knowledge to provide a safe, enjoyable and responsible environment for customers.

Hosting

SKYCITY Darwin continues to host the Gambling Awareness Week organising committee meetings.

Education and Training

- SKYCITY Darwin assists Amity Community Services with the development of, “What’s your Game Plan” a Territory wide venue training program to assist venue staff to recognise(level 1) and respond to (level 2) Problem Gambling. SKYCITY Darwin roles out, “What’s your Game Plan (level 1 & 2) training to senior front line gaming area staff and senior security staff. Training provided by Amity Community Services.
- Host Responsibility Manager in conjunction with Amity Community Services presents a joint paper about cross industry collaboration at the National Association for Gambling Studies annual conference.

Staff Awareness; Incentives and Rewards

Staff that notice and report self excluded customers on property in breach of their agreement are acknowledged with a letter of appreciation and rewarded with a (much sought after)coffee voucher.

Foreshadowed Initiatives – 2008-2009

Information for players

- Responsible gambling statements, Gambling Helpline number and self exclusion programme advertised on loyalty club application forms and associated information.
- “Please Gamble Responsibly” printed prominently on all new loyalty program membership cards

QUEENSLAND - Reef Hotel Casino

2002-2003

Queensland Responsible Gambling Code of Practice

Launched in May 2002

Commitment to Qld Responsible Gambling Code of Practice – Reef Hotel Casino has been assessed by QOGR as being 100% committed to the Code through ongoing assessment since our first review in May 2003.

Since 2002 the Reef Hotel Casino has implemented the Queensland Responsible Gambling Code as follows:

Provision of Information

- Making an informed decision brochures
- Don't wait till you hit rock bottom cards
- Gaming guides (rules of the game and odds of winning)
- Information display boards
- Exclusions Brochures

This information is located in various places within the casino precinct (e.g. bathrooms, ATMs, near the cage, in hotel rooms, in the casino gaming areas and high traffic public areas)

Queensland Responsible Gambling Resource Manual was written in 2002.

Partnerships

Counselling service provider, 'Gambling Help Line' is promoted throughout the casino for patrons who feel they may need assistance in controlling their gambling. The Gambling Help Line is an independently run service that offers private and confidential support for problem gamblers and others who may be affected by problem gamblers. The phone service is free and is available 24 hours a day.

Community Liaison

The Responsible Gambling Manager for Reef Hotel Casino has meetings with

- Gambling Help Services (Lifeline Cairns).
- Member of Australian Casino Association – Responsible Gambling Taskforce.

Responsible Gambling Incident Register

An electronic register database has been developed for the purpose of recording all Responsible Gambling Incidents that occur in the casino.

Physical Environment

As a part of the Customer Awareness Program, Reef Hotel Casino have a commitment to provide a safe, secure and responsible environment in which members of the community are able to enjoy themselves.

- Signage delineating licensed areas where minors are prohibited has been erected.
- Policies, procedures and training have been implemented to identify minors and stop them from entering licensed gambling areas.

- Responsible Service of Alcohol training is delivered on an ongoing basis to all staff serving drinks, security and senior gaming employees are also trained.
- Guidelines for the protection of unattended children have been developed and offenders are either given a Written Warning or Excluded for participating in these acts.
- All employees who hold a casino license are prohibited from accepting gratuities.
- All employees are prohibited from gambling in the workplace (exclusive to casinos).
- Passage of time – The Reef Hotel Casino has taken measures to ensure customers are aware of the passage of time whilst they are gambling. Intensive, repetitive and extended play is not encouraged.

Financial Transactions

- All ATMs are located outside of the licensed gambling area and all of them carry, responsible gaming brochures as well as 'Where to get help Barbecue cards'.
- EFTPOS is available for retail purchases only.

Advertising and Promotions

All advertising is tested to ensure compliance with all practices under the Queensland Responsible Gambling Code of Practice.

2004 – 2005

Exclusion Provisions

Customers may consider exclusion from the casino as a valuable deterrent. Reef Hotel Casino offers an exclusion program for customers wishing to ban themselves from entering a gambling area. The 2005 Exclusions Legislation was implemented as follows:

- Responsible Gambling Liaison Officers are trained to assist with exclusions processes
- Implementation of manual checking systems to ensure the removal of all excluded persons from the data base to make sure persons are removed from mailing lists
- Memberships are suspended with associated benefits no longer available to the excluded person.
- Persons entering the gambling area of Reef Hotel Casino, once a self exclusion agreement has been signed are considered to be committing an offence by law and are subject to prosecution and penalties, including fines of up to \$3,000.

2006 – 2007

Queensland Responsible Gambling Code of Practice

Queensland Responsible Gambling Resource Manual was updated.

Responsible Gambling Liaison Officers (RGLOs) were appointed and trained in 2007

There are currently nine RGLOs trained and at least one of them is on duty at all times. They have been trained to ensure they have the knowledge and skills to provide assistance and information to customers and/or other staff in the area of problem gambling and related matters.

Responsible Gambling Training

3-4 hour training delivered to all Casino staff. (Refresher training now conducted each 3 years at a minimum).

2008

Research

We have provided assistance to Southern Cross University in the form of participants in a pilot and later a full research project on a Study of gambling by gaming venue staff funded by QOGR. We provided a number of employees for the main study who completed a 30 minute interview in paid time.

Complaint Resolution Processes

Reef Hotel Casino has in place a comprehensive complaints resolution process for gambling and responsible gambling related matters. All complaints are referred through this process for resolution by the appropriate level of management.

Responsible Service of Alcohol

As part of the Reef Hotel Casino's commitment to responsible gambling, persons who are unduly intoxicated are not permitted to gamble. Relevant staff are trained in the responsible service of alcohol.

Contributed to the following development and reviews

- Responsible Gambling Code of Practice Implementation Review
- Responsible Gambling Code of Practice Cultural Shift Review
- Responsible Gambling Code of Practice Sustainability Review
- Queensland Responsible Gambling guidelines for Player Loyalty Programs 2008

QUEENSLAND - Conrad Jupiters, Conrad Treasury & Jupiters Townsville Casinos

Pre 1999

Partnerships

In 1994 Conrad Jupiters Casino began meeting with the Break Even Service (operated under the auspice of Relationships Australia Queensland) and the Department of Families, Youth and Community Care (now the Department of Communities) about potential impacts of gambling on the community and industry.

These informal discussions coupled with recommendations from research into the social and economic impacts of gaming machines, paved the way to formally establish the Problem Gambling Advisory Committee in August 1996. The Committee's name was changed to the Responsible Gambling Advisory Committee (RGAC) in 1998 to reflect its proactive approach to harm minimisation and its recognition that gambling is a leisure activity for many people although harmful effects may be experienced by a small proportion of the population.

The RGAC is a partnership between community, industry and government. Its membership includes gambling support providers, industry groups, community groups and Government bodies.

Since 2000 the RGAC has reported to the Treasurer of Queensland. The RGAC provides advice to the Queensland Government on minimising any negative impacts of gambling on Queenslanders and developing a responsible gambling environment.

The RGAC is recognised as the cornerstone of the Queensland Government's approach to responsible gambling as well as being a primary source of advice on emerging social concerns associated with gambling in Queensland.

The SEQ Casinos (Conrad Jupiters & Conrad Treasury) have held the role of either Chair or Deputy Chair of the RGAC since its inception. We have always provided at least one representative to all RGAC Working Parties from 1996 until current. In 1999 the RGAC implemented the Gambling Help Line Project.

Patron Assistance Program

On 26th October, 1995 a Patron Assistance Program was launched at Conrad Jupiters and Conrad Treasury Casinos. This program involved a series of promotional items in the form of posters, brochures and business cards being made available to patrons in the bathroom areas of the Casinos. The introduction of this initiative created a distinct increase in referrals to Break Even from the Gambling Industry which was directly attributed to the success of this project. Break Even told the Productivity Commission 1999 that they believed the high number of self referrals were partially attributable to the Casino project coupled with the acceptance of Break Even by the local community, Community Agencies and good support from the local media (press, radio and television).

Hosting

Conrad Jupiters hosted the National Association for Gambling Studies Conference in November.

1999

Responsible Gambling Advisory Committee (RGAC)

Formerly Problem Gambling Advisory Committee commenced August 1996. The SEQ Casinos have held the role of either Chair or Deputy Chair of the RGAC since its inception.

We have always provided at least one representative to all RGAC Working Parties over the years.

Responsible Service of Alcohol

Conrad Jupiters, Conrad Treasury and Jupiters Townsville casinos do not serve alcoholic beverages to gaming tables or gaming machines in their main public gambling areas. Should a customer who is gambling in these areas wish to consume an alcoholic drink in these areas, they must leave the table or machine they are playing at and go to the bar to purchase a drink. This practice supports the idea of breaks in play to discourage extended, intensive and repetitive play. Non-alcoholic beverages, including tea and coffee are available to customers.

Persons who are unduly intoxicated are not permitted to continue to gamble. Responsible Service of Alcohol training is provided to Food and Beverage, Safety and Security, Pit Managers and Gaming Shift Managers who are trained to follow RSA procedures. All employees are trained to report anyone who is nearing intoxication. Unduly intoxicated players are asked to leave the gambling areas.

2000 – 2001

Policy Direction

The SEQ Casinos contributed to the Review of Gaming and Green Paper that led to the development of the Policy Direction for Gambling in Queensland in 2000.

Tabcorp Responsible Gambling Code of Practice

Tabcorp's Responsible Gambling Code of Practice was launched in late 2001 and has been sustainably revised to shape the Code today. Tabcorp's Responsible Gambling Code of Practice works in conjunction with the Queensland Code of Practice. The Tabcorp Responsible Code of Practice was created as a part of Tabcorp's aspiration to lead the way in providing responsible gambling entertainment. This means striving for the highest levels of customer care, and assisting customers to make informed decisions about their participation in gambling.

National Advisory Body on Gambling

In 2001 the National Advisory Body on Gambling was established to provide advice to the Federal Minister for Family and Community Services on gambling policy, with a strong focus on problem gambling. The General Manager of Conrad Jupiters represented the Casino Industry on this body.

2002 - 2003

Specialised Staff

In January 2002 the SEQ Casinos employed a Responsible Gambling Liaison Manager to implement the Queensland Responsible Gambling Code within their business prior to the official launch of the Code in May 2002.

Queensland Responsible Gambling Code of Practice

The Queensland Responsible Gambling Code of Practice was launched in May 2002. All Tabcorp Casinos are committed to all of the responsible gambling practices in the code.

Commitment to Qld Responsible Gambling Code of Practice – All casinos in Queensland have been assessed by QOGR as being 100% committed to the Code through ongoing assessment since our first review in May 2003.

Currently, Hotels = 82% commitment and Clubs = 74% commitment.

Queensland Responsible Gambling Resource Manual was written in 2002.

Since 2002, Tabcorp Qld Casinos have implemented the Queensland Responsible Gambling Code as follows:

Provision of Information

- Making an informed decision brochures (exclusive to Tabcorp casinos)
- Don't wait till you hit rock bottom cards
- Wanna bet? Posters (6 styles)
- Unattended Children brochures (exclusive to Tabcorp casinos)
- Gaming guides (rules of the game and odds of winning) (exclusive to casinos)
- Information display boards
- Exclusions Brochures
- The odds of winning for each game in the house

This information is located in various places within the casino precinct (e.g. bathrooms, ATMs, near the cage, in hotel rooms, in the casino gaming areas and high traffic public

areas. Problem Gambling messages are also placed on signs throughout in roving light boxes and on the casino's websites.)

Community Liaison

The Responsible Gambling Manager for Qld has regular meetings and forums with members of local groups:

- Gambling Help Services on the Gold Coast, in Brisbane and Townsville viz. Relationships Australia Qld and Centacare Townsville.
- Gold Coast Responsible Gambling Network – hosted by Conrad Jupiters on three occasions – currently the Responsible Gambling Manager for Tabcorp Qld casinos holds the Chair of the Network.
- Brisbane Responsible Gambling Network.
- Chair of Australian Casinos Association – Responsible Gambling Taskforce.
- Member and former President of the National Association for Gambling Studies.
- Former member of the National Advisory Body on Gambling.

Responsible Gambling Incident Register

An electronic register database has been developed for the purpose of recording all Responsible Gambling Incidents that occur in the business. The register is accessible to the entire Responsible Gambling team (exclusive to Tabcorp casinos).

Physical Environment

- Signage delineating licensed areas where minors are prohibited has been erected.
- Policies, procedures and training have been implemented to identify minors and stop them from entering licensed gambling areas.
- Alcoholic beverages are not served to tables or EGMs in the main gaming floor areas.
- Responsible Service of Alcohol training has been delivered to all staff serving drinks, security and senior gaming employees are also trained.
- No More It's the Law cards have been printed and are used in the business (exclusive to Tabcorp casinos).
- Guidelines for the protection of unattended children have been developed and offenders are either given a Written Warning or Excluded for participating in these acts. (exclusive to Tabcorp casinos).
- All employees who hold a casino license are prohibited from accepting gratuities (exclusive to casinos).

- All employees are prohibited from gambling in the workplace (exclusive to casinos).
- All EGMs have a current time display.
- Conrad Treasury – 1st Venue in Qld to launch the ‘I’ button and PID machines.
- Passage of Time – Measures have been taken to ensure that customers are aware of the passage of time whilst they are gambling. Clocks have been installed in the gaming areas of the casinos. The time is also displayed on many of the new LCD screens which are located throughout the casinos. Recently, gaming machines were fitted with scrolling real-time messages that provides accurate information on the current time.
- With the completion of renovations at all Queensland Tabcorp properties, windows and balconies have been introduced which lead off the gaming floors. This allows natural light to enter the casino, assisting customers with their understanding of the passage of time.
- Reserve functions are now available on machines which allow the machine to be reserved for up to 7 minutes.

Financial Transactions

- All ATMs are located outside of the licensed gambling area.
- All casinos have ATMs fitted with Braille pads and facilities for the hearing impaired.
- All ATMs have receipts with the printed logo and phone number of the Gambling Helpline on the reverse side.
- Gambling helpline posters, cards and Responsible Gambling brochures are displayed near ATMs.
- EFTPOS is not available in the gaming areas or TAB outlets. EFTPOS is only available for retail purchases in shops, bars and restaurants.
- Gambling winnings above \$10,000 on the main floor and \$50,000 in the private gaming areas are paid by cheque and are not cashed by the casinos within 24 hours of the win.

Advertising and Promotions

- Tabcorp has its own responsible gambling message that is used on all gaming collateral – ‘Bet with your head, not over it’.
- All advertising is tested by our ‘Law of the Jungle’ compliance program to ensure compliance with all practices under the Queensland Responsible Gambling Code of Practice. Gaming collateral is reviewed by our in house Legal Team (exclusive to Tabcorp casinos).

2004 – 2005

Tabcorp Responsible Gambling Code of Practice

Applies to all of Tabcorp casinos and where there is any conflict or inconsistency between the Tabcorp Code and Qld Code the highest standard applies.

Exclusion Provisions

The 2005 Exclusions Legislation was implemented as follows: (all exclusive to Tabcorp casinos)

- Developed and delivered an Exclusions Training program
- Developed and circulated an Exclusions Procedures Manual
- A state wide electronic Register for Excluded Persons database has been specifically designed and implemented and is shared between the 3 Qld casinos.
- Developed standard exclusion forms with information on Gambling Help Services hard coded in the documents.
- Developed exclusions forms in languages other than English viz. Cantonese, Mandarin and Vietnamese
- Responsible Gambling Liaison Officers trained to assist with exclusions processes
- Implementation of manual checking systems to ensure the removal of all excluded persons from the Casino Management system to make sure persons are removed from mailing lists
- Developing an interface between the Casino Management System and the Register for Excluded Persons

KPMG Audits(exclusive to Tabcorp Casinos)

Tabcorp engaged KPMG to complete an analysis of its Queensland Casinos Responsible Gambling (“RG”) Survey to measure the effectiveness of Responsible Gambling training and initiatives at its casino operations at the Gold Coast, Brisbane and Townsville in September 2005 and again in November 2006.

Contributed to the following development and reviews

- Responsible Gambling Training Framework for Industry 2004
- Exclusions Model with Pathways and Protocols 2004
- Queensland Responsible Gambling Code of Practice Industry Training Kit 2005
- Queensland Responsible Gambling Advertising and Promotions Guideline 2005

Hosting

Conrad Jupiters hosted the National Association for Gambling Studies Conference in November 2004.

2006 – 2007

Queensland Responsible Gambling Code of Practice

Queensland Responsible Gambling Resource Manual was updated.

Responsible Gambling Liaison Officers (RGLOs)

Were appointed and trained at each of Tabcorp's QLD Casinos in 2007.

- 15 at Conrad Jupiters
- 13 at Conrad Treasury
- 11 at Jupiters Townsville

At least one RGLO is on duty 24 x 7 at each property. This team has received a specially designed two day training course tailored to our casino environments to ensure our RGLOs have the knowledge and skills to provide assistance and information to customers and/or other staff in the area of problem gambling and related matters.

Responsible Gambling Training(exclusive to Tabcorp casinos)

Tabcorp casinos in Queensland train every employee in Responsible Gambling. i.e. from the most senior executives, the gaming staff to the people who wash the dishes back of house.

In addition, annual Responsible Gambling Refresher Training is run for the entire team. New employees receive training during their orientation in their first month of employment. The exclusive slogan for Responsible Gambling Training is 'Respond with Respect and Refer'.

QHA Awards for Excellence in the area of Responsible Service of Gaming were won by:

- 2006 Conrad Jupiters
- 2007 Conrad Treasury

Dow Jones Sustainability Index

In 2007, Tabcorp once again met the criteria for inclusion in the Dow Jones Sustainability Index and was scored overall leader in the Australian gambling sector. Importantly, in the promotion of responsible gambling, Tabcorp scored 100% which is the highest score in the sector.

Measuring the effectiveness of Responsible Gambling Initiatives

KPMG were engaged in 2006 to measure the effectiveness of the Responsible Gambling initiatives put in place at Conrad Treasury, Conrad Jupiters and Jupiters Townsville. 300 employees were asked to complete a questionnaire to assess their knowledge and personal opinions of the current Responsible Gambling training program. Highlights of the KPMG Survey results were 87% of respondents stated that they would know how to respond to an approach for help from a problem gambler. This demonstrates an ongoing maintenance of cultural shift for staff awareness as the training program had only been in existence for a little over four years at the time of the Survey.

There was strong awareness of the self-exclusion program, 90%. 89% said they felt their training had been very effective or somewhat effective in assisting awareness in Responsible Gambling and 89% also said they felt either very comfortable or somewhat comfortable talking to their supervisor about Responsible Gambling issues.

Awards

Conrad Jupiters received the QHA Award for Excellence in 2006 – Responsible Serving – Gaming.

Conrad Treasury Brisbane became the first venue in Queensland to install new gaming machines that enable players to monitor their time on a machine as well as make more informed decisions regarding their gambling spend. Launched at the casino in November 2006, the new player information screens provide a range of data, including details on the odds of winning the maximum prize, how much the player will spend each game if they make a particular choice and an average of how much will be spent per minute and per hour.

2008

KPMG Audits(exclusive to Tabcorp casinos)

KPMG were engaged by Tabcorp to complete an assessment on the compliance with the Tabcorp Responsible Gambling Code in January 2007 and again in March 2008. This assessment also reviewed the commitment to the Queensland Responsible Gambling Code. KPMG's findings state that the Tabcorp Casinos Division show a strong Responsible Gambling compliance culture and commitment to compliance within the venue. Staff are well trained and undertake refresher training. Everyone interviewed knew their job well and what was expected of them in terms of dealing with patrons from a Responsible Gambling perspective.

Awareness

Internal Responsible Gambling Awareness Week has been rolled out to employees annually for the past two years and ran again in May 2008. Exclusive collateral to link to the QOGR Responsible Gambling Awareness Campaigns using the hot chili designs was printed (exclusive to Tabcorp casinos).

Compliance

A compliance program named Cura is used by Tabcorp for the purpose of measuring our commitment to various legislative requirements. For Responsible Gambling we test 17 specific areas of compliance with the Queensland Responsible Gambling Code of Practice (exclusive to Tabcorp casinos). The system sends monthly, electronic reminders to the manager for completion of the task requesting written confirmation that the tasks are completed.

Staff are also committed to compliance. Managers in each department are primarily responsible for showing leadership in ensuring that we comply with both the spirit and the letter of the law in their areas. Whilst the Queensland Code of Practice is self-regulatory, Tabcorp is committed to all practices within the code.

Research

We have provided assistance to Southern Cross University in the form of participants in a pilot and later a full research project on a Study of gambling by gaming venue staff funded by QOGR. We provided a total of 280 employees for the main study who completed a 30 minute interview in paid time.

Contributed to the following development and reviews

- Responsible Gambling Code of Practice Implementation Review
- Responsible Gambling Code of Practice Cultural Shift Review
- Responsible Gambling Code of Practice Sustainability Review
- Queensland Responsible Gambling guidelines for Player Loyalty Programs 2008
- Evaluation of the Queensland Responsible Gambling Strategy (QRGS)

Foreshadowed Initiatives

During the month of November 2008 a detailed Internal Audit was conducted to measure adherence to the spirit of the Queensland Responsible Gambling Code of Practice. The Queensland Code is a self-regulatory model.

Development and production of a Tabcorp Casinos Division Responsible Gambling Awareness training DVD is currently in the process of completion – this should be available for release early in 2009.

Currently an integration system is under development between the Register of Excluded Persons and the Casino Management System to ensure that people who are excluded are removed from mailing lists.

SOUTH AUSTRALIA - SKYCITY Adelaide

Pre 1999

The SA Casino Act 1997

The SA Casino Act 1997 contains a range of measures designed to ensure the casino operator acts with probity and integrity. All staff must be approved and staff are not permitted to gamble. Children are excluded from the casino. People may be barred from the casino for their own welfare.

SKYCITY Adelaide has an Approved Licensing Agreement (ALA) with the SA Government. The ALA:

- Requires all games, gaming systems and gaming equipment to be approved
- Requires the Casino to deny gambling services to intoxicated persons
- Limits the number of machines and table games

2000 – 2001

Amendments to the SA Casino Act were made in 2001

These include:

- Requiring the Commissioner, when approving new machines, to take into account any gaming machine guidelines issued by the Independent Gambling Authority;
- Requiring the Commissioner to refuse applications for new EGMs if he is of the belief that approval of the game would lead to an exacerbation of problem gambling;
- Increasing the minimum return to player of machines from 85% to 87.5%;
- Requiring the casino to comply with Advertising Codes of Practice published by the Independent Gambling Authority;
- Requiring the casino to comply with Responsible Gambling Codes of Practice published by the Independent Gambling Authority;
- Prohibiting gambling on credit;
- Limiting ATM transactions to \$200 per transaction; and
- Preventing EGMs from being operated other than by insertion of a coin (ie prohibiting bank note acceptors and cashless gaming).

SKYCITY introduced a 'Corporate Host Responsibility Program'

This Program set out SKYCITY policies and procedures for promoting responsible gambling (including alcohol management), minors, standards of dress and behaviour. The Program

was aimed at ensuring that SKYCITY was at the forefront of harm minimisation initiatives among South Australian gaming licensees; a place we have occupied ever since.

Responsible Service of Alcohol

- SKYCITY's Responsible Service of Alcohol policy includes a compulsory training program for all staff. Staff members involved in Host Responsibility, Security, Food and Beverage, Gaming and Customer Service are given the skills and knowledge to provide a safe, enjoyable and responsible environment for customers.
- SKYCITY Adelaide has also installed three breathalyser units and produces tent cards outlining guidelines for consuming alcohol responsibly. These are widely available in gaming and food and beverage areas.

Standards of Behaviour

- Should a person be detected intoxicated, abusing or threatening staff or other customers, causing conflict with other customers or staff, or otherwise behaving in a manner which affects the peace or comfort of other patrons, then SKYCITY Adelaide staff will take appropriate steps to stop the behaviour including, in appropriate circumstances, having the customer escorted from the premises.
- Any customers detected loan-sharking or begging will be required to leave SKYCITY Adelaide. In some instances, SKYCITY Adelaide may also bar the customer from the premises.

Staff Gambling Ban

SKYCITY Adelaide staff are not permitted to game at any SKYCITY site.

2003 – 2004

The Independent Gambling Authority issued its first Responsible Gambling Code of Practice

The Code required SKYCITY Adelaide to:

- Display responsible gambling materials (such as posters, pamphlets, wallet cards, and stickers) in several languages;
- Display a helpline sticker on each gaming machine;
- Display a helpline sticker on each ATM;
- Display clocks prominently throughout the public areas of the licensed premises;
- Train all staff in problem gambling issues, including recognition, identification and appropriate referral of problem gamblers;
- Have a system for voluntarily excluding problem gamblers;
- Take active steps to prevent parents leaving their children unsupervised; and

- Ensure that alcohol is not supplied to reward continued play.

Advertising

The Independent Gambling Authority issued its first Advertising Codes of Practice, requiring SKYCITY Adelaide to ensure advertising:

- Is socially responsible;
- Does not mislead or deceive the customer;
- Is not directed at minors;
- Does not portray minors engaging in gambling activities;
- Is not explicitly or exclusively directed at vulnerable or disadvantaged groups (including recovering problem gamblers);
- Does not promote gambling as a means of relieving financial or personal difficulties;
- Does not promote gambling as a means of enhancing social standing or employment, social or sexual prospects;
- Does not state or imply that gambling is a means to pay for household staples, education, rent, or to meet mortgage commitments;
- Does not make claims related to winning, or prizes that can be won, that are not based on fact, are unable to be proven, or are exaggerated;
- Does not state or imply that a player's skill can influence the outcome of a game where this is not the case;
- Does not associate gaming with excessive alcohol consumption;
- Does not exaggerate the connection between the gambling activity and the use to which the profits may be put; and
- Must include the odds of winning if a prize is mentioned.

Staff on Patrol

In December 2004, SKYCITY Adelaide introduced its 'Host Responsibility Coordinator' program, where at least one of a team of staff patrol the casino looking for people displaying signs of problem gambling. The team are trained to identify the signs, intervene appropriately and, if the person wishes, refer the person to appropriate counselling.

2005 – 2006

Staff Training

- SKYCITY Adelaide delivered Problem Gambling refresher training for all staff (as per Codes requirement).
- At SKYCITY, it is compulsory for all staff to receive training on host responsibility - from senior management to dealers, cleaners, waiters and admin staff. Training ranges from an introductory level for back-of-house staff to specialist advanced training for senior front-of-house staff, security and management.
- Training modules are developed very carefully to take a variety of issues into account, such as cultural, gender and social differences, ethnicity, age and those requiring special attention.
- Time was spent consulting with leading problem gambling treatment providers such as Break Even Services to ensure their expertise and knowledge were incorporated in the training modules.
- Four levels of staff training were created and staff are required to undertake refresher training every two years. Staff are kept informed of the latest in responsible gambling practices through information in newsletters, magazines and on noticeboards in back of house areas.

Self - Exclusion Program

SKYCITY Adelaide recognise that a small percentage of people are at risk of developing gambling problems and whether the customer identifies a problem themselves, or a third party (i.e. family member), identifies a problem, SKYCITY has a program in place to help. SKYCITY voluntarily introduced a minimum 12-month exclusion period for people choosing to self-bar from the casino. We encourage customers to seek help and support during this period. Those that make a request to lift their exclusion are required to agree to several steps before an application can be approved: Must attend counselling, after which a letter confirming attendance is required, agree to enter into the Case Management program (3 months minimum) and set re-entry criteria for spend and visitation (pre-commitment), which can also be set in conjunction with their nominated counsellor.

Financial Transactions

ATM machines are located outside of the casino gaming area in an ATM room. EFTPOS is used in the restaurants, cashiers outlets, at promotional desks and at bars.

2006 – 2007

Partnerships with Counselling Services

The Host Responsibility Coordinators (HRCs) formalised links with Gambling Help Services. Requirements to build and maintain relationships with counselling agencies are built into the key performance indicators of the HRCs duties. The HRCs are also required to conduct formal liaisons with other departments within SKYCITY Adelaide.

Referrals to treatment providers

All customers who elect the self-exclusion option or approach SKYCITY Adelaide about gambling problems are encouraged to contact appropriate treatment providers for help and support, and SKYCITY can make these appointments on behalf of the customer, if they wish. We've also designed a document that, once signed by the applicant, is faxed (emailed) to a nominated service provider to make contact with the customer to discuss their situation and/or make an appointment.

Host Responsibility Coordinators

The HRC's introduced a customer 'Case Management' program where customers most at risk are assigned to one of the HRCs (with other HRCs playing a supporting role) and the customer is actively managed. All those returning from exclusion (Self-exclusion, TAB or IGA) are automatically placed on the program.

This important function of the team is crucial in effectively managing the many customers coming to and those that experience harm. To drive each case and ensure informed regular contact is made with each customer, mapping their progress, thereby allowing the HRC's to make an informed judgement as to whether the customer remains in the "Customer of Concern" category, referred to support services, or barred as a result of welfare concerns.

If the customer gives permission, the customers detailed are discussed with a gambling counselling agency and the counsellor is then directly involved in the case management of the customer of concern.

SKYCITY Adelaide also promotes eight other counselling service providers, including: UnitingCare Wesley Adelaide, Salvation Army Oasis Centres, Relationships Australia SA, UnitingCare Wesley Bowden, and Vietnamese Community in Australia, Overseas Chinese Association, the Cambodian Australian Association and Statewide Gambling Therapy Services.

Awareness

A new suite of posters, brochures and related material was designed to continue to raise awareness of Responsible Gambling, and SKYCITY's Host Responsibility Program. Information within the brochure was reviewed by a local physiologist and gambling help services to ensure it was relevant and correct. All material is displayed throughout the site including all gaming areas, restaurants, toilets and bars.

2007 -2008

Advertising Code of Practice

New Responsible Gambling and Advertising Codes of Practice will come into force on 1 December 2008. These will require SKYCITY Adelaide to have additional warning message

on machines and to change warning messages of posters every six months (simultaneously with pubs and clubs).

Awareness

The 1800 phone number for the Problem Gambling Helpline is now printed on the back of all receipts from ATMs at SKYCITY Adelaide. Information is also displayed on EFTPOS machines, on gaming tables, in toilets, in light boxes, at customer information areas and at cashiers.

SKYCITY Adelaide also promotes seven other counselling service providers, including: UnitingCare Wesley Adelaide, Salvation Army Oasis Centres, Relationships Australia SA, UnitingCare Wesley Bowden, Vietnamese Community in Australia, Overseas Chinese Association and the Cambodian Australian Association.

Responsible Gambling Awareness Week

Responsible Gambling Awareness Week: SKYCITY and the Host Responsibility Team have, and continue to provide support to local Gambling Help Services. This is a state-wide program to raise awareness of gambling issues in the community and the help and support available. The Host Responsibility Manager is a member of the Gamblers Rehabilitation Fund Communications and Community Education Reference Group held Office of Problem Gambling.

Foreshadowed Initiatives

Case Management System

Foreshadowed changes include SKYCITY expanding the Host Responsibility Case Management system to develop individual 'Customer Care Plans'

Signage

The SA Government is about to conduct a review of signage in licensed gaming venues.

TASMANIA - Wrest Point and Country Club Tasmania

TASMANIA - Wrest Point and Country Club Tasmania

Pre 1999

Formation of the Gambling Industry Group (GIG)

The Gambling Industry Group (GIG) was established in 1995 as the peak industry representative body to address the issues of responsible advertising, patron care and codes of conduct.

Senior representatives from all codes of the industry and relevant government departments meet on a bimonthly basis to develop cooperative strategies and codes of practice to enhance the efforts in responsible advertising and patron care.

Since inception, the Managing Director of The Federal Group, Mr. Greg D. Farrell has been the Chairman of the GIG. At present, membership comprises:

- | | |
|--|----------------------|
| • The Federal Group | Mr. Greg D. Farrell |
| • Mr. John Mortensen | |
| • TOTE | Mr. Mick Edwards |
| • Tattersalls | Mr. Tim Sloan |
| • Admirals Casinos | Mr. Michael Hackman |
| • Betfair | Mr. Peter Church |
| • Intralot Australia | Mr. Peter Baoustanos |
| • Australian Hotels Association (Tas Division) | Mr. Steven Old |
| • Registered Clubs of Tasmania | Mrs. Lyn Hedges |

Representatives of the Tasmanian Gaming Commission and Health Department attend as observers and provide advisory services.

- | | |
|-------------------------------|-------------------|
| • Tasmanian Gaming Commission | Ms. Wendy Sawford |
| • Health Department | Mr. Gavin Miller |

Since establishment, the GIG has been directly responsible for the implementation of many of the responsible gaming initiatives. The GIG continually monitors the impact of gambling in Tasmania and, where required, responds appropriately.

Training

Responsible Service of Gaming Training Program (1998 Version) is implemented.

Awareness

Brochures and player information are displayed at the cash desks, in hotel rooms and at KENO terminals. Details of counselling service providers are also on display on all EGMs, in toilets, are referenced on every advertising sign and in all media advertisements in print, on TV or radio.

2002 - 2003

Formation of Gambling Consultative Group

The Tasmanian Gambling Consultative Group (TGCG) was formed in April 2002 to encourage its representative membership to work together to address current issues relating to the impact of gambling in Tasmania. This organisation meets on a quarterly basis.

Membership of the TGCG is comprised of one appointee from each of the following organisations:

Gambling Codes:

- The Federal Group
- Tattersalls
- TOTE
- Betfair

Industry Peak Bodies:

- Registered Clubs of Tasmania
- The Australian Hotels Association (Tasmanian Division)

Government Funded Gambling Service Providers:

- Relationships Australia
- Anglicare Tasmania
- Gambling Helpline Tasmania

Government bodies responsible for Gambling Policy:

- Department of Treasury & Finance, Liquor & Gaming branch
- Department of Treasury & Finance, Intergovernmental and Financial Policy branch
- Department of Health and Human Services, Gambling Support Program
- Tasmanian Gaming Commission (ex-officio)

Peak Community Organisations with Involvement in Gambling issues:

- Tasmanian Council of Social Services (TasCOSS)
- Interchurch Gambling Task Force

The role of the TGCG is to:

- Improve knowledge of current directions and trends in policy and industry developments.
- Monitor and examine industry developments in gambling matters at a local, state, national and international level.
- Work towards a common understanding on matters relevant to the Tasmanian community on gambling, in order to promote the adoption of best practice by all stakeholders.
- Encourage and promote partnerships with the member organisations and their subsidiaries to develop effective communication systems on gambling matters
- Facilitate relations and cooperation between the government, the community sector and the business sector on gambling matters.
- As appropriate, act as a consultative body on matters with gambling impact.

Communication with Patrons

Federal Hotels developed an RSG Handbook and staff quiz, as well as developing Management Responsibilities Guidelines. This was to ensure that the language used in interactions with patrons was more user-friendly.

State-wide machine cap

As part of a new agreement with the Tasmanian Government, the Federal Group negotiated a state-wide cap of 3,680 machines. This effectively capped both casinos at their current trading levels.

2003 – 2004

Development and Implementation of Gambling Code of Practice and Advertising Code of Conduct

In 2004, the GIG developed and implemented The Gambling Code of Practice and The Advertising Code of Ethics.

Both industry codes outline the way in which the Tasmanian casinos undertake to conduct all aspects of gaming and promotion of that activity.

- Areas covered in the Code of Practice include:
- Compliance with all legislative requirements
- Payment of prizes, winnings and promotions
- Signage
- Customer comfort and services
- Hours of operation
- Patron care
- Provision of Responsible Gaming literature
- Self-exclusion
- Responsible service of gaming courses
- Service of alcohol
- Gambling on credit
- Compliance with the Code of Advertising Ethics
- Access to cash
- Community Support Levy
- Resolving complaints or concerns

The Code of Advertising Ethics applies to the communication activities of both Casinos, including advertising and promotion in all traditional media, in-venue point of sale, leaflets, displays and any other materials designed to inform the public.

Both industry codes are regularly reviewed and updated where required. The Gambling Code of Practice is prominently displayed throughout both casinos.

Payment of Winnings and Accumulated Credits above \$2,000

It is the practice of both casinos that any prizes or winnings of \$2,000 or more will be paid by cheque with at least \$500 in cash, unless the original wager is higher than \$2,000 (at the discretion of management).

Federal Hotels developed RSG Leaders Guide for Supervisors

This program was initiated by Wrest Point and ensured that entry-point managers were upgraded in their knowledge of RSG and how to administer the legislative requirements as managers. This program is regularly undertaken by managers and ensures a greater understanding of Responsible Service of Gaming policy at the management team level.

2004 – 2005

Federal Hotels developed a link between RSA to RSG for both Wrest Point and Country Club Tasmania

Patrons considered to be under the influence of alcohol were not permitted to conduct gaming. This was in line with escalating responsibility of RSA meant more patrons were prohibited from gaming as a dual focus with alcohol.

Updated handbook in regards to RSG

Further regular updates ensured that the language and approach of our staff remained in line with current trends and research findings.

RSG program updated

Both Casinos were very active in developing the self-exclusion and third party exclusion process in concert with the AHA. This led to better record keeping, improved communication and therefore improved identification of excluded patrons.

2006 – 2007

Introduction of new RSG training policy, Tasmanian Gaming Commission initiative

Both casinos embraced the changes and ensured that all training programs supported the new RSG developments.

Foreshadowed Initiatives

Financial Transactions

ATMs are located off the main casino gaming floor. New regulations will require ATMs to be located 20 meters from the entrance to gaming areas. No signage will be permitted and ATMs will need to be out of the line of sight of customers in the gaming areas.

Participation and support of Gambling Awareness Week

This was an initiative introduced by the Tasmanian Gaming Commission and supported by both casinos. This week-long awareness program includes display and distribution of collateral featuring messages educating on problem gambling.

On behalf of the industry, Federal Hotels distribute the material to all gaming venues. In addition, Federal Hotels makes training room facilities available to staff from the Department of Health and Human Services (DHHS) for staff training information sessions. Federal Hotels also assist the DHHS with the design and production of material and a company representative regularly attends quarterly meetings with the Department.

¹ under section 41A of the Casino Act 1997

² Under section 4.5

³ For example in publications by South Australia's Independent Gambling Authority and on display in Sky City Adelaide. Also the publication on the VCGR website

Addendum to Australian Casinos: Responsible Gambling Initiatives 1999-2008 by Gambling Compliance

UPDATE OF INITIATIVES SINCE 2008

Adelaide Casino

Since 2008 Adelaide Casino has implemented the following additional measures:

- ▶ Information brochures are displayed in all gaming areas, on or near each gaming machine including on or near each gaming table, cashiers, in bars, restaurants, toilets and ATM rooms.
- ▶ Information brochures are available in six different languages.
- ▶ ATMs have scrolling messages as screen savers, including details for the Gambling Helpline, the Host Responsibility Coordinator number and expanded warning messages

Burswood Entertainment Complex (soon to be Crown Perth)

Since 2008, Burswood has implemented the following measures:

- ▶ Burswood Casino employs a Manager for Responsible Gambling, a Responsible Gambling Advisor and a Responsible Gambling Coordinator. All of these positions are fulltime.
- ▶ Burswood has a purpose built Responsible Gambling Information Centre that operates from 8:30am to 6pm.
- ▶ All frontline staff and relevant back of house staff complete an online course in Responsible Service of Gambling. Frontline staff also attend a 1.5 hour face to face training session on the indicators of problem gambling
- ▶ Player information brochures are now available in five different languages.
- ▶ Players' Activity Statements and player pre-commitment is available for gaming machine patrons.
- ▶ A revocation program is available for those that wish to end their self-exclusion.
- ▶ Burswood have a responsible gambling website, www.gamblerresponsibly.com.au.
- ▶ Burswood has the ability to operate EFTPOS, however it is not used. EPFTPOS is available at some food and beverage outlets for the purchase of goods and services only.

Casino Canberra

Since 2008, Casino Canberra has employed seven Gambling Contact Officers. (Note: there are no EGMs in Casino Canberra)

Crown Melbourne

Since 2008 Crown Melbourne has implemented the following measures:

2009

- ▶ Crown Melbourne has actively participated in Responsible Gambling Awareness Week, a statewide government, community and industry initiative, since its inception. Responsible Gaming staff participate in many of the week's activities.
- ▶ Established the Responsible Gambling Management Committee in June. The Responsible Gambling Management Committee is an internal committee comprising Crown senior management. The committee is focused on the Crown Melbourne Responsible Gambling Code of Conduct and its delivery and review, as well as responsible gaming services and programs at Crown Melbourne in general.

- ▶ Crown Melbourne also introduced its 'Responsible Gambling Code of Conduct' in June. The Code of Conduct demonstrates Crown Melbourne's commitment to the delivery of gaming in a responsible manner. The Code complies with the requirement of the *Casino Control Act 1991* (Vic) to have such a Code, which is enforced by the Casino's Regulator.
- ▶ In June Crown Melbourne introduced a new in-house television commercial to communicate information about the Crown Responsible Gaming Support Centre and the Responsible Gambling Code of Conduct. This commercial is shown throughout the Complex
- ▶ A new webpage as part of the Crown Melbourne website was introduced in June and includes information relating to Crown Melbourne's Responsible Gaming Programs and Services, including Responsible Gaming Support Centre information. Crown Melbourne's responsible gaming brochures are available to print, as well as the Responsible Gambling Code of Conduct in all Code languages
- ▶ In October Crown Melbourne introduced its new Loyalty Program, the Crown Signature Club. Responsible gaming telephone numbers, logo and Crown Melbourne's responsible gaming message are printed on all Crown Signature Club member cards.

2010

- ▶ In June Crown Limited established a Board Committee dedicated to overseeing responsible gaming. The committee meets regularly to review and monitor Crown's responsible gaming programs, recommending policies and procedures to enhance effectiveness of those programs.
- ▶ In July Crown introduced responsible gaming features on Voucher Issuance Kiosks ('VIKS'), which are located throughout the gaming floor. They are a touch screen facility utilised by Crown Signature Club members to manage their accounts, print Player Activity Statements and enter competitions.
- ▶ In July Crown Melbourne also introduced a new feature, the 'Responsible Gaming' button located on the VIK Welcome Screen. This means that non-members can also access the information. Available information includes responsible gaming information relating to the Responsible Gaming Support Centre, Play Safe limits (a voluntary time and loss limit program available to Crown Signature Club members playing gaming machines and fully automated table games) and the Responsible Gambling Code of Conduct. All screens are printable.
- ▶ In September Crown Melbourne introduced responsible gaming information on gaming machine bank end advertising screens (Motion trans), highlighting Crown Melbourne's responsible gaming message, availability of the Responsible Gambling Code of Conduct and responsible gaming programs and services available at Crown Melbourne.
- ▶ In November a Responsible Gaming Noticeboard for employees was introduced, dedicated to Responsible Gaming, Compliance and Legal & Regulatory updates. The noticeboard is positioned in a back of house area between Wardrobe and Workforce Planning, ensuring maximum exposure for employees. Also available at this location is a brochure holder containing customer and employee responsible gaming information and the Responsible Gambling Code of Conduct.
- ▶ In December frames containing responsible gaming information were introduced in gaming floor bathrooms. Information displayed can include government campaigns appropriate for Crown Melbourne, as well as Crown Melbourne specific responsible gaming information.

2011

- ▶ In March, Responsible gaming information has always featured in the new employee Induction Program. In March, Responsible Gaming department staff re-commenced delivering this information, which focuses on the Responsible Gaming Support Centre, the Responsible Gambling Code of Conduct (with a focus on 'Observable Signs') and self-care. The attendance of Responsible Gaming staff ensures new employees are introduced personally, and subject-matter-experts are delivering the topic.
- ▶ In March, electronic display frames featuring information on the availability of the Responsible Gambling Code of Conduct in English and all other 'Code' languages (Chinese simplified and traditional, Vietnamese, Arabic, Greek, Italian, Cambodian and Hindi) were introduced and are displayed at Crown Signature Club information desks and the Responsible Gaming Support Centre.
- ▶ In September, the Responsible Gaming message "Have you had a break?" was introduced on gaming machines and fully automated table games. This is part of the 'attract' message displayed on the machine's Vacuum Fluorescent Display, and displays every 30 seconds. This message is supported by motion tran advertising throughout the gaming floor.
- ▶ In December, information in relation to Unattended Children, and the Responsible Gaming Support Centre, was introduced in Crown Promenade, Crown Metropol and Crown Towers Hotels' in room guest information folders. This initiative recognises the importance of broad customer communication regarding expected behaviours in relation to minors staying at any Crown Hotel and increasing the awareness of responsible gaming services available at Crown Melbourne.

2012

- ▶ The Crown Responsible Gaming Support Centre had been operating for ten years in March having opened on 25 March 2002.
- ▶ In June, Crown Melbourne introduced the 'Responsible Gaming' channel in all Crown Melbourne Hotels. This channel plays the Responsible Gaming television commercial.
- ▶ In July, following amendments to legislation, no ATM is located within 50 metres of any casino entrance.
- ▶ In July, Crown Melbourne introduced Wayfinding Kiosks strategically located throughout the Complex. These Kiosks allow patrons to locate outlets and services, including information about, and the location of, the Responsible Gaming Support Centre.
- ▶ In July, Crown Melbourne introduced updated signage in all car park lobbies including static maps with a full directory listing, including the location of the Responsible Gaming Support Centre.

Lasseters Hotel and Casino Alice Springs

Since 2008 Lasseters has implemented the following:

- ▶ Lasseters has a number of trained Gambling Liaison Officers who are trained to deal with any problem gambling incidents. Patrons are provided with a handout pack of brochures and contact details for professional assistance. Lasseters also has a dedicated Compliance Manager who analyses patron transactions from an AML and RSG perspective and also handles all self-exclusion applications.
- ▶ All licensed employees who work in security, surveillance, electronic gaming, table games and cash desk as well as all non-licensed staff in Club Lasseters, TAB & Keno must attend Responsible Gambling training within three months of employment. All participants are required to undertake a written assessment approved by Charles Darwin University. Refresher training is provided every two years.
- ▶ An internal audit was conducted in February 2010 to assess Lasseters adherence to all 38 components of the Northern Territory Code of Practice for Responsible Gambling.

- ▶ Information brochures are available in a number of different languages.
- ▶ Lasseters has a Community Network Register that contains the details of all local counseling providers. This register is also provided to all patrons who wish to self-exclude.
- ▶ An 'Understanding Self-Exclusion' brochure has been developed that is prominently displayed throughout the venue which articulates the self-exclusion process and contains the phone number and email address of the Compliance Manager should patrons require further information or to arrange for a meeting.
- ▶ Regular patron transaction monitoring is carried out by the Compliance Manager to pick up on any trends that could imply that a patron may have a gambling problem, meetings are then held with gaming managers to discuss the appropriate next steps.

Wrest Point and Country Club Tasmania

Since 2008, Federal Resorts casino in Tasmania have implemented a number of measures including:

- ▶ Player information screens on each machine display return to player, game rules and probability of pays.
- ▶ New Responsible Gambling Policy commenced in June 2012 including new processes, resources and training of staff.
- ▶ Stronger relationships with Gamblers Help counselors including:
 - Counsellor involvement in staff training;
 - Counsellor involvement in the development of responsible gambling practices; and
 - Counsellor attendance at staff meetings.
- ▶ Both casinos operate and have introduced the necessary changes as outlined in the Tasmanian Responsible Gambling Mandatory Code of Practice, including \$400 daily withdrawal limits on ATMs in both venues.
- ▶ Both casinos also now provide player activity statements to all player loyalty program members. Responsible Gambling information is also sent to members every year.

The Star Sydney

Since 2008, The Star has implemented the following changes:

- ▶ A full-time Patron Liaison Manager has been appointed (Echo has appointed a full-time Customer Engagement Manager to support all four Echo Entertainment Group casinos).
- ▶ The Star employs 90 Responsible Gaming Liaison Officers.
- ▶ The Star has developed an external voluntary exclusion program that allows patrons to exclude themselves without attending The Star.
- ▶ Voluntary pre-commitment is expected to be rolled out at the end of August 2012.
- ▶ Assessment of staff for problem gambling has been conducted by Southern Cross University for the Echo Entertainment Group at The Star in 2010, 2011 and 2012 as a criteria mandated by the Dow Jones Sustainability Index to achieve world leader in Responsible Gambling status. This research is also used to inform RG best practice initiatives.
- ▶ Echo has developed a list of possible problem gambling risk indicators to identify problem gamblers in the casino using observable signs, reported signs and a combination of observed and/or reported signs as a training tool for staff. The document was based upon the research conducted by Delfabbro (2007) *Identifying Problem Gamblers in Gaming Venues* for GRA. Prior to completion of the document Dr Delfabbro was consulted to peer review the list and he provided positive confirmation that our indicators were appropriate for the casino environment.

Jupiters Hotel & Casino Gold Coast, Jupiters Hotel & Casino Townsville & Treasury Casino & Hotel Brisbane

Since 2008, the following additional measures have been implemented:

- ▶ 50 Responsible Gambling Liaison Officers have been trained (RGLOs) across all three casinos.
- ▶ Responsible Gambling services at Jupiters Gold Coast and Treasury Brisbane are available 24-hours-a-day, seven-days-a-week and during opening hours at Jupiters Townsville due to a revamped Responsible Gambling Program which commenced in December 2007. Training consists of:
 - Four Hour Training Program - This program is delivered on-line and is a unit specifically designed and delivered by Club Training Australia for Echo Entertainment Group employees only. The unit is appropriate for all staff working in a gambling environment. The target audience for this program is all gaming, security and surveillance staff together with supervisors and managers from every department across the business. An RSG Certificate is provided to the participants upon completion of the course.
 - Induction Briefing - The target audience for this program are all hotel, food & beverage, facility cleaning and all other remaining staff.
 - Refresher Training Course - Target audience is all employees. An on-line learning course has been developed and is made available to all staff through designated Learning Centres on-site at Jupiters Gold Coast, Treasury Brisbane and Jupiters Townsville Casinos.
 - Responsible Gambling DVD - a training DVD has been developed to assist staff to identify problem gambling behaviour on the casino floor. The DVD was filmed with the use of actors and staff volunteers at The Star and Jupiters Hotel & Casino. The DVD used the research commissioned by Gambling Research Australia '*Identifying Problem Gamblers in Gambling Venues*' as a basis for developing the scripts for the production. Upon completion of the DVD it was sent to Dr Paul Delfabbro from the University of Adelaide for peer review. Dr Delfabbro was the researcher who completed the research for GRA. His feedback was extremely positive and supportive.
- ▶ Echo employs 2 full-time Patron Liaison Managers in Queensland (1 x Jupiters Gold Coast and 1 x Treasury Casino Brisbane). One full-time Customer Engagement Manager has been appointed who supports all 4 of the Echo Casinos both in Queensland and NSW.
- ▶ Internal Audit team completed a review of Responsible Gambling at Jupiters Gold Coast and Treasury Brisbane casinos again in 2010 and were satisfied that the Queensland RG Code requirements are adhered to by the business. An Employee Opinion Survey was conducted in January 2010. Employees answered favourably to the question, "*I am sufficiently informed about our Responsible Gambling policies and practices*" scoring an average of 89% favourable response rates across Qld.
- ▶ The three Queensland casinos now offer, as part of the Absolute Rewards membership, the option of setting a limit on electronic gaming machine spend - Absolute Assist Pre-commitment Program.
- ▶ The three Queensland casinos encourage multi site exclusions. All persons excluding are provided with referral information for local counselling services. Additionally:
 - In Qld a state wide electronic *Register of Excluded Persons* database has been designed to include all the information contained of Excluded Persons together with a current photograph of the excluded person. This register is used by surveillance and gaming operations teams to identify persons entering the casino whilst excluded.

- An automated technical solution has been developed and implemented to link the *Register of Excluded Persons* with our *Casino Management System*. When a person is excluded and entered in our Register for Excluded Persons their account in the *Casino Management System* is automatically suspended and their mail and contact options turned off. This program also assists in identifying excluded persons attempting to apply for loyalty program membership.
- ▶ The receipt slips on all ATMs at the three Queensland Casinos have the printed telephone number and logo of the gambling help service on the reverse side.
- ▶ Jupiters Gold Coast received the QHA Award for Excellence in 2011 Responsible Serving – Gaming and Treasury Brisbane received the same award in 2010.
- ▶ Tabcorp (the holding company prior to Echo Entertainment Group) was again recognised as the global leader in the gambling industry and a world leader in responsible gambling, according to the respected Dow Jones Sustainability Index for 2010/11. The company was recognised as a world leader in responsible gambling, gaining a 100% score for the promotion of responsible gambling for the fifth year in a row.
- ▶ Assessment of staff for problem gambling has been conducted by Southern Cross University for the Echo Entertainment Group at Jupiters Gold Coast and Treasury Brisbane Casinos in 2010, 2011 and 2012 as a criteria mandated by the Dow Jones Sustainability Index to achieve world leader in RG status. This research is also used to inform our RG best practice initiatives.
- ▶ Echo has developed a list of possible problem gambling risk indicators to identify problem gamblers in the casino using observable signs, reported signs and a combination of observed and/or reported signs as a training tool for staff. The document was based upon the research conducted by Delfabbro (2007) *Identifying Problem Gamblers in Gaming Venues* for GRA. Prior to completion of the document Dr Delfabbro was consulted to peer review the list and he provided positive confirmation that our indicators were appropriate for the casino environment.

Reef Hotel and Casino Cairns

Since 2008:

- ▶ Reef has appointed a Responsible Gambling Manager and RG Liaison Officers.
- ▶ A Responsible Gambling Incident Register has been developed – this is an electronic database that records all responsible gambling incidents that occur in the casino.
- ▶ Chances of winning are displayed in player information guides. These guides contain the odds of winning for each game type.

AUGUST 2012