



ALH: Responsible Gambling Review

Final Report

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Submitted to:



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EXECUTIVE SUMMARY

INTRODUCTION

The Australian Leisure and Hospitality Group (ALH) offers a diverse hospitality experience and is the largest owner and operator of electronic gaming machines (EGMs) in Australia, with 285 pubs that provide access to 12,000 EGMs. ALH is committed to ensuring players are able to make informed decisions about their gambling, and receive timely and appropriate assistance and information. Overall, ALH strives to be the most responsible operator in Australia.

RG+ was contracted to conduct an independent assessment of ALH's RG policies and initiatives. The objectives of this review were to evaluate ALH's RG program against the Responsible Gambling Council's (RGC) best practice standards, review the RG programs of similar gaming environments worldwide, and assess against the state-specific regulatory requirements across Australia. Program strengths and recommendations for improvement were identified based on this analysis.

EVALUATION PLAN

A literature review was conducted to increase our understanding of the factors that may affect VLT play and to inform how gambling harms may be mitigated. Relevant published and grey literature on VLT venue location and features, machine factors, and RG practices in hospitality environments were also reviewed.

A jurisdictional scan was conducted to identify leading RG practices around the world. Several jurisdictions were identified as having unique and/or strong RG policies or initiatives in place in relation to VLT gambling. Specifically, five Canadian jurisdictions, seven states in the USA, Norway, and United Kingdom were reviewed in detail.

The review of the ALH program against RGC best practice standards involved several data collection steps and focused on five jurisdictions in particular: South Australia, Queensland, New South Wales, Victoria, and Northern Territory.

1. **Document Review:** All available RG policy and program documents were reviewed against an evaluation framework based on RGC's venue-based best practice standards and VLT research.
2. **Site Visits:** 37 venues participated in site visits: 10 in South Australia, 10 in Queensland, eight in New South Wales, six in Victoria, and three in Northern Territory.
3. **Staff Survey:** Staff in the five jurisdictions under review were asked to complete an online survey, which ran from May 1 to June 1, 2018. A total of 465 staff completed the survey (86 respondents from South Australia, 149 from Queensland, 98 from New South Wales, 118 from Victoria, and 14 from Northern Territory).
4. **Player Survey:** Players in the five jurisdictions under review were asked to complete a survey to gauge awareness and availability of RG-related tools and information in the venues. The survey ran from May 4 to June 3, 2018 and was completed by 1,441 players (168 completions in South Australia, 779 in Queensland, 95 in New South Wales, 390 in Victoria, and 9 in Northern Territory).
5. **Interviews:** Interviews were conducted to supplement the information obtained via the document and site visits. Interviewees included the CEO, Head of Regulatory and Corporate Affairs, National Compliance and Loss Prevention Manager, National Gaming Manager, Responsible Gambling Ambassador, and Senior Marketing Coordinator, as well as State Managers and State Gaming Managers.

RG+ reviewed all RG-related regulations pertaining to the five jurisdictions that were under review. The regulations are summarized in Appendix A, along with an assessment based on the RG+ review of the ALH program.

LITERATURE REVIEW

Despite being a popular form of entertainment, VLTs are often linked to problem gambling and, in some jurisdictions, are considered to be a serious social problem. Prevalence studies show that 27% of Australians engage in VLT gambling every year, and regular VLT players are 10.7 times more likely to develop an issue with their gambling (Sproston, Hing, & Palankay, 2012).

Machine features and environmental characteristics of the venues are important elements to consider when implementing RG initiatives for VLTs in hospitality settings. Research shows that certain features of VLTs, such as rapid speed, engaging lights and sounds, near-win combinations, and losses disguised as wins, can mislead players and may be associated with an increased risk for developing a gambling problem. The accessibility of VLTs in venues where food and alcohol are served, as well as their proximity to ATMs, could further increase the risk of problems with gambling.

VLT venues are generally more accessible than casinos, as they are typically hospitality environments such as bars and clubs. Specifically, increased exposure and access to gambling opportunities may be associated with heightened risks of problem gambling (Pearce, Mason, Hiscock, & Day, 2008; Shaffer, LaBrie, & LaPlante, 2004; Vasiliadis, Jackson, Christensen, & Francis, 2013). Moreover, venue proximity and density of VLTs are closely linked to gaming participation and increased expenditure on gambling (Vasiliadis et al., 2013). Accessibility and convenience of VLT venues are also factors that influence the choice of gambling venue for many Australians (Hare, 2009).

To minimize risks associated with EGMs (Dowling, Smith, & Thomas, 2005), RG strategies, including self-exclusion, have been designed and implemented in VLT venues in Australia and around the world. These programs have been found to be effective in reducing problem gambling symptoms, increasing peoples control over their gambling activities, and improving their overall wellbeing (Hayer & Meyer, 2011; Nelson, Kleschinsky, LaBrie, Kaplan, & Shaffer, 2010; McCormick, Cohen, & Davies, 2018).

Pre-commitment strategies allowing players to set monetary and time limits at the beginning of gambling sessions have also led to reductions in excessive gambling (Auer & Griffiths, 2013; Hoffmann, 2014). Auer and Griffiths (2013) found that setting financial limits on one's gambling led to a greater reduction in problem gambling behaviour, compared to time limits. Although most research favours voluntary pre-commitment strategies, evidence from Norway suggests that mandatory pre-commitment can be just as effective at reducing problem gambling rates (Norsk Tipping, 2016).

The provision of information is especially important for players experiencing problems with their gambling, and incorporates responding to their requests for information, identifying and responding to the signs of distress, and initiating interactions about problem gambling (Hing & Nuske, 2011). Helping players in times of crisis is another important component in providing help to people with gambling problems and reducing gambling-associated harms (Ibid.).

RG staff training, limited advertisement of gambling activities, and provision of information on available help resources and problem gambling supports are also common RG initiatives applied in VLT venues.

JURISDICTIONAL SCAN

Canadian provinces and American states that offer VLT gambling were reviewed to identify RG policies and programs in place. Norway and the United Kingdom were also reviewed to identify other leading practices.

Overall, most of the reviewed jurisdictions had developed an RG policy that detailed key aspects of their respective programs. Age restrictions were in place and operators were not permitted to offer gaming 24 hours per day. Gaming machines were placed in a separate area and efforts were made to ensure the machines were not visible from outside the venue or from the other areas within the venue. Intoxicated customers are not permitted to play.

ATMs were placed outside of the gaming areas and operators did not provide credit or cash cheques.

Generally, RG policies and help information must be placed throughout the venues. This often includes policies pertaining to age restrictions, RG commitments, financial transactions, and information relating to available help services for players.

VLTs displayed the time of day, had RG messaging, and the local helpline number on-screen. In some jurisdictions, players were required to set a time limit before initiating play. Pop-ups may appear before reaching one's time limit, and then once the limit was reached. If a limit is reached, the player may be offered the option to cash out or to set another limit and continue play. Some jurisdictions required a mandatory cash out after a particular amount of time had elapsed. Maximum bets and maximum cash-ins were also imposed in particular jurisdictions.

Mandatory staff training is requirement in several jurisdictions, as are regular refreshers. Restrictions pertaining to advertising and marketing of VLT games and venues is also a common element of RG programs in a number of jurisdictions.

Norway implemented a mandatory player card system across several lines of gaming, which allowed for the enforcement of time and loss limits. VLTs feature the PlayScan system, which monitors individual play and sends notifications when behaviours indicate increased risk, such as playing for more money and/or taking greater risk. PlayScan provides players with tips on how to limit risk and offers them the option to pause their play for a set number of hours or days, or to permanently self-exclude.

REVIEW AGAINST RGC BEST PRACTICE STANDARDS

Based on the Responsible Gambling Council's RG standards for casinos and VLT research, RG+ developed an evaluation framework against which ALH RG policies and programs were reviewed. The RG program was evaluated based on documents submitted to RG+, a sampling of site visits across the five jurisdictions under review, staff surveys, player surveys, and interviews with corporate staff, state managers, and state gaming managers.

Key Strengths

Responsible Gambling Policies: ALH demonstrates a strong RG commitment to RG and the senior staff commitment is evident.

Training: ALH's RSG online training provides examples of how ALH operationalizes its commitment to RG, and provides staff with a detailed list of "red flag behaviours" to be aware of. The Know Your Code pocket guide provides staff with information on signs, escalation, the self-exclusion program, and voluntary pre-commitment.

Self-Exclusion: All jurisdictions have in place a policy statement that requires players be provided with resources for help services when registering for the self-exclusion program. The Know Your Code pocket guide provides staff with information about the self-exclusion program applicable in their respective jurisdictions.

Assisting Players: The Know Your Code pocket guide provides staff with general information about self-exclusion, assisting players, and contact information for help services. Staff actively respond to a customer in distress by speaking with them, and many would offer the customer resources and/or escalate to a more senior staff person.

Informed Decision making: Responsible gambling and help information is available in a number of different formats and locations throughout venues, including on all machines. ALH offers all players access to pre-commitment tools in all ALH venues, though pre-commitment is only mandated in the state of Victoria.

Advertising and Promotion: No gambling related advertising is permitted in the jurisdictions of South Australia, New South Wales, Victoria, and Northern Territory. Queensland has RG related advertising restrictions in place. Gambling-related comps are not provided to members of the rewards program. If self-excluded, the customer's loyalty card will be disabled from use in gaming areas across all venues.

Access to Money: ATMs are not permitted in gaming rooms across all ALH properties. Players cannot obtain credit or loans from ALH venues, and cashing of personal cheques is not permitted.

Venue and Game Features: All gaming machines display the time and credits in their cash value, and are required to have an RG message, the helpline number, and voluntary pre-commitment features. Gaming areas are not open 24 hours a day. Children are restricted from entering gaming areas.

Key Recommendations

Responsible Gambling Policies: Develop a corporate RG strategy document to support continuous program growth. Develop an RG Code of Conduct that is applicable to all jurisdictions, similar to the one available in the state of Victoria.

Training: The online training program could be strengthened by incorporating adult learning principles, and the addition of critical concepts such as the risks and impacts of problem gambling, underage gambling, information on how the games work, self-exclusion, and response procedures and expectations.

Self-Exclusion: Train all staff on the self-exclusion program to ensure that all have a strong understanding of the self-exclusion program.

Assisting Players: Develop a comprehensive, corporate-wide policy that outlines expectations of staff with regard to assisting players. Response procedures should be clearly laid out to ensure all staff understand their responsibilities and there is consistency across all properties. Support escalation staff with robust advanced training to ensure they are equipped with the skills, techniques, and information required to respond to players displaying signs of problem gambling behaviour.

Informed Decision making: Consider conducting a comprehensive evaluation of the RG Ambassador program to determine if it needs a refresh to increase both staff and customer awareness and utility of the program. Considering increasing promotional efforts and incentivizing players for the VPC to increase understanding and usage of the available tools and features.

Advertising and Promotion: Develop a formal RG screening process for advertising and promotional materials in Queensland.

Venue and Game Features: Ensure clocks are visible from all areas of the gaming rooms, and restrict complimentary alcohol in gaming areas.

REGULATORY REVIEW

The RG-related regulations in the five participating jurisdictions were reviewed and summarized. ALH's program was evaluated against the regulations at a high level and found to meet all regulations that were reviewed.

FINAL SUMMARY

Overall, ALH demonstrates a strong commitment to RG and has made this commitment publicly available. The strong corporate commitment to RG is evident through the involvement of senior staff, and through regular communication that occurs across all levels of the organization. ALH also demonstrates its commitment to RG by implementing a voluntary pre-commitment system across all jurisdictions under review, though it is mandated only in the state of Victoria. Additionally, providing staff with key RG information via the Know Your Code pocket guide, and requiring that all staff have it on hand at all times, demonstrates the emphasis ALH places on having staff be a key resource for player support.

While ALH demonstrates a strong commitment to RG and has implemented various policies and programs across all jurisdictions under review, there are a few areas that RG+ would recommend improvement, such as taking key initiatives in place in particular jurisdictions and implementing them across all ALH's properties. For example, developing a comprehensive RG Code of Conduct (as in Victoria) that is applicable to all ALH venues would support a cohesive program across the country. Other recommendations include strengthening the usage of the pre-commitment program by increasing promotional efforts throughout all ALH properties and incentivizing players to utilize the tools.

While the online staff training module describes ALH's commitment to RG and provides some problem gambling information (e.g., signs to be aware), a refresh of this program is recommended. A comprehensive program should address several critical concepts (e.g., game information, underage gambling, response procedures, etc.) and should incorporate key adult learning principles.

Lastly, the RG Ambassador program demonstrates a unique initiative implemented by ALH; however, an evaluation of its current appeal and utility would help inform a program refresh that would improve engagement by both staff and customers.

1. INTRODUCTION

The Australian Leisure and Hospitality Group (ALH) offers a diverse hospitality experience that includes accommodation, restaurants, cafes, retail liquor, electronic gaming, sports bars, bistros, nightclubs and wagering. ALH facilities are located in capital cities and urban and regional centres across Australia. The ALH Group is also the largest owner and operator of electronic gaming machines (EGMs) in Australia, with 285 pubs that provide access to 12,000 EGMs (approximately 6% of the total EGMs in operation across Australia). Three thousand staff work in these gaming areas.

The ALH Group is committed to providing responsible gambling in their venues. Its goal is to ensure players are able to make informed decisions about their gambling, and are able to receive timely and appropriate assistance and information when needed. The ALH Group seeks to comply with, and exceed, the responsible gambling legislative requirements in each state in which it operates. ALH strives to be the most responsible operator in Australia.

The ALH Group contacted the Responsible Gambling Council's (RGC) consulting service, RG+, for an independent review of its RG policies and initiatives. The objectives of the review are to evaluate ALH's RG program against the Responsible Gambling Council's (RGC) best practice standards, review the RG programs of similar gaming environments worldwide, and evaluate against the state-specific regulatory requirements across Australia. Following the review and analyses, recommendations for improvement are provided.

Five jurisdictions were selected to participate in this review: Victoria, South Australia, Queensland, New South Wales, and Northern Territory. An overview of the availability of ALH venues and EGMs in these jurisdictions are provided in Table 1.

Table 1. Number of ALH Venues and EGM Maximums

State/Territory	# of ALH Gaming Venues	Hotel/CLUB EGM Venue Cap	Hotel/Club EGM State Cap
Victoria	79	105 EGMs per hotel 105 EGMs per club	27,372
South Australia	29	40 EGMs per hotel 40 EGMs per club	12,086
Queensland	113	45 EGMs per hotel 300 EGMs per club	44,705
New South Wales	56	30 EGMs per hotel 450 EGMs per club	97,500
Northern Territory	3	20 EGMs per hotel 55 EGMs per club	1,852

2. EVALUATION PLAN

The evaluation plan for the review of ALH's Responsible Gambling Program involved several steps, including conducting research of the VLT gambling landscape in Australia, as well as collecting data from a number of sources to obtain a comprehensive view of ALH's program. The evaluation consisted of a literature review, jurisdictional scan, review of state regulations, and the evaluation against best practice standards, which involved a document review, site visits, a staff survey, a player survey, and interviews with key corporate and management staff.

2.1. LITERATURE REVIEW

A review of available literature was conducted to provide a deeper understanding of factors that may affect VLT play and to inform how gambling harms may be mitigated. Searches were performed to locate relevant published and grey literature on VLT venue locations and features, as well as machine factors, to understand the complexities of this unique gaming environment and how it differs from casino-based play. Literature pertaining to RG tools and practices with regard to hospitality environments (i.e., pre-commitment, self-exclusion, staff training, information and assistance, and advertising and marketing) were also reviewed to provide context for this evaluation. Where relevant, findings for casino environments are discussed and attempts are made to draw parallels with VLT environments in order to identify approaches that may be applicable in this context.

2.2. JURISDICTIONAL SCAN

A jurisdictional scan was conducted to identify leading RG practices around the world. Several jurisdictions were identified, based on research and RG+ expertise, as having unique and/or strong RG policies or initiatives in place in relation to VLT gambling, and were researched using all publicly available information regarding their RG policies and programs. Specifically, five Canadian jurisdictions that offer VLTs were identified, seven states in the USA, Norway, and the United Kingdom were reviewed in detail.

2.3. REVIEW AGAINST RGC BEST PRACTICE STANDARDS

The review of the ALH program against RGC best practice standards involved numerous data collection steps to provide a full understanding of available policies, utility of particular program aspects, staff and player awareness of RG tools and information, and availability of RG resources within venues. Five jurisdictions in particular were the focus of this review: South Australia, Queensland, New South Wales, Victoria, and Northern Territory.

Document Review: ALH was asked to provide all available RG policy and program documents, including samples of RG resources, staff training materials, staff communications, and data demonstrating usage of particular program elements. All documents were reviewed against an evaluation framework based on RGC's venue-based best practice standards and VLT research.

Site Visits: In collaboration with ALH, several venues from each of the five jurisdictions under review were selected to participate in the site review. The sample of venues from each state were selected based on their location (urban versus rural) and size (large, medium, small) in order to include a range of venues in the sample. A total of 37 venues were reviewed: 10 in South Australia, 10 in Queensland, eight in New South Wales, six in Victoria, and three in Northern Territory.

Staff Survey: Staff in the five jurisdictions under review were asked to complete an online survey, which ran from May 1 to June 1, 2018. The 24-question survey focused on staff knowledge of policies and programs (e.g., self-exclusion), the availability of RG information and tools, staff communications, and response procedures. A total of 465 staff completed the survey across the country, with 86 respondents from South Australia, 149 from Queensland, 98 from New South Wales, 118 from Victoria, and 14 from Northern Territory.

Player Survey: Players in the five jurisdictions under review were asked to complete a survey to gauge awareness and availability of RG-related tools and information in the venues. The seven-question survey ran from May 3 to June 3, 2018, and was completed by a total of 1,441 players across the country. Specifically, there were 168 completions in South Australia, 779 in Queensland, 95 in New South Wales, 390 in Victoria, and 9 in Northern Territory.

Interviews: In collaboration with ALH, key staff were identified to participate in interviews. The purpose of these interviews was to supplement the information obtained via the document and site visits, and to provide a deeper understanding of the overall RG program and its goals. Interviews with ALH corporate staff included: the CEO, Head of Regulatory and Corporate Affairs, National Compliance and Loss Prevention Manager, National Gaming Manager, Responsible Gambling Ambassador, and Senior Marketing Coordinator.

Interviews with State Managers and State Gaming Managers were also conducted to provide context to how corporate policies and programs are applied within each of the jurisdictions under review, and to obtain further information regarding communications and involvement of staff at all levels in the development and delivery of RG initiatives.

2.4. REGULATORY REVIEW

RG+ reviewed all RG-related regulations pertaining to the five jurisdictions that were under review:

- South Australia
- Queensland
- New South Wales
- Victoria
- Northern Territory

The regulations are summarized in Appendix A, along with an assessment based on the RG+ review of the ALH program.

3. LITERATURE REVIEW

3.1. INTRODUCTION

Video lottery terminals (VLTs) located in non-casino environments such as clubs and pubs are very similar to the electronic gaming machines (EGMs) that are typically found in casinos. A substantial difference between the two is that VLTs are operated through a central computer system that is shared among multiple machines, while each casino EGM has its own random number generator and operates independently from other machines on the gaming floor. Differences in gaming environments are also an important consideration when considering differences in player gambling experience. Despite being a popular form of entertainment, VLTs are often linked to problem gambling and, in some jurisdictions, are considered to be a serious social problem. Prevalence studies show that 27% of Australians engage in VLT gambling every year, and regular VLT players are 10.7 times more likely to develop an issue with their gambling (Sproston, Hing, & Palankay, 2012). As such, responsible gambling (RG) practices designed specifically for VLTs have been developed over the past decade in all Australian states and territories where this type of gambling is permitted.

Machine features and environmental characteristics of the venues are important elements to consider when implementing RG initiatives for VLTs in hospitality settings. Research shows that certain features of VLTs, such as rapid speed, engaging lights and sounds, near-win combinations, and losses disguised as wins, can mislead players and may be associated with an increased risk for developing a gambling problem. The accessibility of VLTs in venues where food and alcohol are served, as well as their proximity to ATMs, could further increase the risk of problems with gambling. These areas demonstrate key considerations with developing a robust RG program in hospitality environments in order to minimize gambling-related harms.

To minimize risks associated with EGMs (Dowling, Smith, & Thomas, 2005), RG strategies, including self-exclusion, have been designed and implemented in VLT venues in Australia and around the world. Self-exclusion programs provide people with the option to ban themselves from gambling venues. These programs have been found to be effective in reducing problem gambling symptoms, increasing individuals' control over their gambling activities, and improving their overall wellbeing (Hayer & Meyer, 2011; Nelson, Kleschinsky, LaBrie, Kaplan, & Shaffer, 2010; McCormick, Cohen, & Davies, 2018). Pre-commitment strategies allowing players to set monetary and time limits at the beginning of gambling sessions have also led to reductions in excessive gambling (Auer & Griffiths, 2013; Hoffmann, 2014). RG staff training, limited advertisement of gambling activities, and provision of information on available help resources and problem gambling supports are also common RG initiatives applied in VLT venues.

This review summarizes the available literature on RG best practices for VLT gambling, exploring the empirical evidence regarding VLT venue and machine characteristics that are important areas for consideration, and identifying RG strategies for non-casino environments, such as the provision of information, promoting pre-commitment and self-exclusion programs, limiting gambling advertisements, and supporting staff through the delivery of comprehensive RG training.

3.2. VLT VENUE LOCATION AND FEATURES

The location, layout, and specific features of gaming venues play an important role in the rates of gambling-related problems. Specifically, the geographical location of the venue (e.g., rural vs. urban areas, low-income vs. high-income neighborhoods), its accessibility, the ability to notice the passage of time, the availability of alcohol and food in the venue, and access to cash are all factors that may contribute to problems with gambling and are considerations for the implementation of RG initiatives.

VLT venues are generally more accessible than casinos, as they are typically hospitality environments such as bars and clubs. Specifically, increased exposure and access to gambling opportunities may be associated with heightened risks of problem gambling (Pearce, Mason, Hiscock, & Day, 2008; Shaffer, LaBrie, & LaPlante, 2004; Vasiliadis, Jackson, Christensen, & Francis, 2013). Moreover, venue proximity and density of VLTs are closely linked to gaming participation and increased expenditure on gambling (Vasiliadis et al., 2013). Accessibility and convenience of VLT venues are also factors that influence the choice of gambling venue for many Australians (Hare, 2009).

Research suggests that particular groups may be at higher risk of gambling-related harms. In particular, people with psychological disorders, youth, those of low socio-economic status, and Indigenous people have an increased risk of developing an issue with their gambling (Breen & Gainsbury, 2013; Gupta & Derevensky, 2000; Petry, Stinson, & Grant, 2005; van der Maas, 2016). Therefore, there is a need to ensure that vulnerable populations are not overly exposed to risks and the negative effects of gambling. Consideration should be given to VLT location in relation to its proximity to schools, hospitals, and college campuses, and should not be disproportionately concentrated in low-income neighborhoods and Indigenous settlement areas.

The design and features of venues may also influence how much one gambles and therefore may increase risk of gambling-related harms. Losing track of time is part of dissociative play and is linked with high risk gambling (Ladouceur & Sevigny, 2006; Dowling, Smith, & Thomas, 2005). Players tend to spend more money gambling and are more likely to experience a dissociative state in which they are unaware of their surroundings when they cannot keep track of time they spend in the venue. The presence of clocks and windows within the venue, as well as established closing hours, are features that can help players keep better track of time and interrupt the dissociative state associated with high risk gambling (Hing, 2004; Schellinck & Schrans, 2006).

Another important venue feature is direct access to cash. Studies investigating gamblers' behaviour report that the availability of automated teller machines (ATMs) in gambling venues can trigger impulsive decision-making and is associated with higher probability of excessive gambling for people with gambling problems (Thomas et al., 2013). Therefore, it is recommended that access to cash and credit is limited or restricted in VLT venues. Some studies suggest restricting the visibility of ATMs from gaming areas, as well as restricting credit and access to direct deposit, and prohibiting cheque cashing as preventative measures that can be used to reduce the risks of excessive gambling.

Drinking alcohol while gambling can lead to impaired decision-making while facilitating impulsive risk-taking, ultimately leading to more negative gambling outcomes and greater financial losses (Cronce, Bittinger, Di Lodovico, & Liu, 2017; George, Rogers, & Duka, 2005). Additionally, some research suggests that recreational and low-risk gamblers who play in VLT venues that serve alcohol tend to lose more money than those who gamble in venues that do not serve alcohol (Leino et al., 2017). Therefore, limiting access to alcohol, where possible, is another consideration when developing RG policies in hospitality environments. An option for controlling access to alcohol for gamblers in VLT venues could include only

serving alcoholic beverages at the bar, outside of the gaming room. This approach would decrease the amount of alcohol consumed by VLT players and encourage players to make interruptions in their gameplay.

In summary, the location of VLT venues and their environmental features, such as access to ATMs and alcoholic beverages, significantly impact the application of RG strategies. Implementing RG initiatives at VLT venues requires ensuring that high-risk populations are not disproportionately exposed to gambling-related harms. Moreover, venue features that promote excessive gambling should be addressed (i.e., having clocks to mitigate losing track of time) or closely controlled (e.g., ATMs, alcohol).

3.3. GAME FEATURES AND DESIGN

The structure and speed of games, as well as their visual and sound features, can affect players' behaviour and contribute to risky play (Ladouceur & Sevigny, 2006; Wood, Griffiths, Chappell, & Davies, 2004). Research suggests that VLT gambling is related to increased problem gambling outcomes as compared to other forms of gambling such as casino games, bingo, or scratch and lottery tickets (Dowling, Smith, & Thomas, 2005; Holtgraves, 2009; Sproston, Hing, & Palankay, 2012). One of the main reasons for this difference may be that VLT games are generally very fast, involve engaging lights and sounds that contribute to dissociative states, and often feature multiline betting options, and near-win combinations, all of which can mislead players and promote excessive gambling (Braverman & Shaffer, 2010; Cote, Caron, Aubert, Desrochers, & Ladouceur, 2003; Ladouceur & Sevigny, 2006). Therefore, ensuring games are properly screened with these features in mind is an important consideration for VLT operators.

As discussed above, some game design features may encourage excessive play. For instance, rapid gameplay providing immediate outcomes frequently leads to increased player engagement, which in turn could cause players to underestimate their gambling frequency and lose track of their spending (Ladouceur & Sevigny, 2006). VLT games tend to have exceptionally high speeds; hence, pace-limiting RG features such as mandatory breaks is another consideration when screening new potential games for the venue.

Some VLTs incorporate multiline betting options as a part of their design, thereby allowing players to make multiple bets on the outcomes of the draw. This feature can be easily misinterpreted by players, who assume that placing multiple bets increases the odds of winning, while in reality the odds always remain the same (Braverman & Shaffer, 2010). Such misinterpretation can lead players to place higher bets and incur greater financial losses (Ibid.). Thus, the provision of RG information about the chances and odds of winning is important for players to understand how the games work and to make informed decisions.

Near-miss combinations are another game design feature that can be associated with gambling problems among VLT players. Near-misses are outcomes that include a loss of wager but are still perceived as very close to a major payout (Parke & Griffiths, 2004). One example of a near-miss is an XXO combination on a classic three-reel machine. Near-misses create an illusion of being close to big win, and research shows that near-misses increase players' motivation to continue gambling, and could lead to chasing behaviours and greater financial losses (Sharman, Aitken, & Clark, 2015). Therefore, a special caution should be taken to ensure that near-miss combinations are not appearing more frequently than they would if the combinations were generated in a purely random fashion.

Finally, the presence of RG features plays a very important role in the design of VLT games. Pop-up messages, personalized time and cash displays, and breaks in play, are some features that have a promise in promoting responsible gambling (RGC, 2006; Wynne & Stinchfield, 2004). Pop-up messages can include information on the risks of gambling, as well as advice on how to play responsibly. When displayed during

the game, pop-up messages can be useful for capturing players' attention and interrupting the state of dissociation (McCrickard, Catrambone, Chewar, & Stasko, 2003). The evidence also suggests that when pop-up messages contain personalized feedback, especially regarding time and money spent, they have a greater effect on reducing problem gambling behaviours (Auer & Griffiths, 2015; Blaszczynski, Gainsbury, & Karlov, 2014).

Breaks in play are another example of how RG strategies can be incorporated in game design. Breaks in play provide a time out, during which players can "cool off" and make better calculated decisions about whether they should continue to gamble or not (Stewart & Wohl, 2012). However, breaks in play can also backfire and make players experience an increased urge to gamble (Blaszczynski, Cowley, Anthony, & Hinsley, 2016). Therefore, it is recommended to combine breaks in play with other RG strategies, such as warning messages or personalized feedback (Gainsbury & Blaszczynski, 2016).

To summarize, game design and structural characteristics can contribute to problem gambling behaviours and cause gambling-related harms. VLT games are often characterized by high speed of play, engaging lights and sounds, and other unsafe gambling features, including near-misses. As these features may impact decision-making regarding a player's gambling, game screening to minimize these features and evaluation to ensure compliance with the recommended RG safeguards is an important part of an RG program.

3.4. PRE-COMMITMENT

Pre-commitment involves setting time and money limits before one gambles. This RG safeguard is commonly used to reduce gambling-related risk among VLT players and can be mandatory or voluntary. Research generally supports the use of pre-commitment tools and their ability to facilitate players' control of their gambling (Auer & Griffiths, 2013; Blaszczynski, Parke, Parke, & Rigbye, 2014; Wood, Shorter, & Griffiths, 2014).

Studies show that using pre-commitment tools is also associated with positive play (i.e., exhibiting no problems or concerns with their gambling [Wood & Griffiths, 2014]) for recreational gamblers. However, some studies show that people with gambling problems have difficulty sticking to their pre-set limits (Wood & Griffiths, 2014; Hing et al., 2015). An Australian study expanded these findings and showed that gamblers who play on EGMs are also more likely to exceed the cash and time limits they set for themselves (McDonnell-Phillips Pty Ltd, 2005). Additionally, a large proportion of players frequently predetermine the amount of money and time they wish to spend during a gambling session, but often experience difficulty making accurate and reasonable self-assessments of affordable limits (Blaszczynski et al., 2014). Other research suggests that people with gambling problems regard pre-commitment tools more favorably than recreational players and are more willing to use pre-commitment (Ladouceur, Blaszczynski, & Lalonde, 2012). Therefore, the evidence suggests that those who experience problems with their gambling are more willing to use limit-setting tools, yet experience greater difficulty adhering to these limits. As such, providing players with access to pre-commitment tools in VLT venues is recommended. Supporting adhering to one's pre-set limits should also be a key consideration, such as preventing further play, or providing an incentive to cease play, once a limit is reached.

Some research suggests that different forms of pre-commitment may also have differential effects on gambling outcomes. Auer and Griffiths (2013) found that setting financial limits on one's gambling led to a greater reduction in problem gambling behaviour, compared to setting time limits. Although most research favours voluntary pre-commitment strategies, evidence from Norway suggests that mandatory pre-

commitment can be just as effective at reducing problem gambling rates (Norsk Tipping, 2016). Thus, it is important to consider relative effectiveness of different types of pre-commitment strategies.

Overall, pre-commitment tools are considered effective and reliable RG strategies. Specific consideration should be given to the types of pre-commitment tools available the promotion of these tools to players, and the extent to which they are useful to people at risk of developing a gambling problem.

3.5. SELF-EXCLUSION

Self-exclusion (SE) programs are a common RG strategy for limiting gambling behaviour by those who may have a problem with gambling (Ladouceur, Sylvain, & Gosselin, 2007). By registering in the program, players voluntarily ban themselves from gambling venues or from a particular form of gambling (e.g., roulette, slot machines, poker, etc.). The research shows that self-exclusion programs are associated with a reduction in the rates of problem gambling, improvements in players' well-being, enhanced control over gambling, and better social and familial functioning (McCormick, Cohen, & Davies, 2018; Hayer & Meyer, 2011; Ladouceur, Sylvain, & Gosselin, 2007; Tremblay, Boutin, & Ladouceur, 2008).

To successfully establish a SE program, venues need to have a comprehensive written policy in place that outlines all aspects of the program including the registration process, conditions of the ban, and program enforcement. The specifics of the program should also be available to players, both as promotional materials in the venue and in the program registration materials, to ensure they have all relevant information and can make informed decisions about program participation.

Ban length options often vary in SE programs. Recently, multi-operator SE schemes (MOSES) that allow people with gambling concerns to ban themselves from multiple venues, have been developed (Parke & Rigby, 2014). MOSES have the potential to reduce gambling-related harms in VLT venues by banning a person's access to several venues at once. The length of the SE period and the availability of the information on terms, conditions, and breach consequences, are important factors in VLT venues SE programs.

Despite the benefits of SE programs for those who choose to enroll, their implementation process can often face multiple challenges. The convenience and accessibility of enrollment services is often a criticism of SE programs (Gainsbury, Blankers, Wilkinson, Schelleman-Offermans, & Counsijn, 2013; Nowatzki & Williams, 2002; RGC, 2008; Parke & Rigby, 2014). Hence, it is important that providers do not require people who want to SE to visit a venue to complete this process (Hing, Tolchard, Nuske, Holdsworth, & Tiyce, 2014). It is also essential that self-excluded players do not receive promotional materials about gambling products during their ban (RGC, 2008). To promote adherence to the program and to maximize its beneficial effects, it is also important to provide self-excluded players with information on local problem gambling resources and supports. Venues need strong enforcement policies to identify and remove self-excluded players should they breach their self-exclusion agreement. Finally, guidelines related to reinstatement and renewal processes need to be clearly stated in SE information and agreements. In particular, the conditions of one's reinstatement should be discussed, and the convenience of the renewal procedure should be given major consideration (Ibid).

In sum, SE programs are an important RG strategy. Components of the self-exclusion program, including flexibility of the ban, its length, the accessibility of enrollment and renewal processes, and clear enforcement and reinstatement guidelines should be at the forefront of SE program assessments.

3.6. EMPLOYEE TRAINING

Employees of VLT venues are often the first point of contact for people who are concerned about their gambling. Therefore, it is crucial that employees are knowledgeable about RG strategies and problem gambling help resources in the community. A number of research studies testify to the effectiveness of RG training programs in increasing VLT staff's RG knowledge and capacity to help people experiencing gambling-related harms (Nunweiler, Tomei, & Zumwald, 2014; Dufour, Ladouceur, & Giroux, 2010; Ladouceur et al., 2004).

Frontline staff should be provided with mandatory training that equips them with basic gambling-related knowledge (e.g., concepts of chance and randomness), as well as procedures that are specific to identifying and assisting people demonstrating signs of possible problems with their gambling. When employees understand RG concepts and problem gambling, it supports staff buy-in to corporate RG policies and initiatives, and they are less likely to reinforce misleading or false beliefs about gambling (Lee, Song, Lee, Lee, & Bernhard, 2013; Wong & Poon, 2011). Further, providing employees with the skills necessary to identify, approach, and assist players displaying 'red flag' behaviours enhances their confidence in their ability to provide help, and increases the frequency with which employees seek to assist players (Dufour et al., 2010; Ladouceur et al., 2004).

When implementing an employee training program, instruction must be provided in such a way that incorporates adult learning principles and current research findings in the area of RG. Since employees may have different levels of knowledge regarding RG and problem gambling, training should be accessible to all staff. (Gray, Tom, LaPlante, & Shaffer, 2015). Some research indicates that role ambiguity and role conflict are particularly challenging when implementing RG training for VLT staff (Hing & Nuske, 2012). Therefore, it is essential that staff members understand that RG procedures are a part of the company's policies and that adherence to RG standards is an important component of their jobs.

In summary, RG training provided to VLT venue staff should include information on gambling concepts, RG strategies, and problem gambling. It should also teach skills and procedures that are useful to helping players who have experienced, or might experience, problems with their gambling. The potential challenges in designing and providing RG training should be identified and addressed through stressing the importance of educational standards, empirical research, and the corporate culture regarding RG.

3.7. PROVIDING INFORMATION TO PEOPLE WHO ARE CONCERNED ABOUT THEIR GAMBLING

Informed decision making is one of the key tenets of responsible gambling, and incorporates the importance of operators providing players with information on chances of winning, randomness, the availability of RG tools and resources, gambling-related risks. The provision of information is especially important for players experiencing problems with their gambling, and incorporates responding to their requests for information, identifying and responding to the signs of distress, and initiating interactions about problem gambling (Hing & Nuske, 2011). Compared to large gambling venues, smaller facilities such as bars and clubs tend to have more regular players and are characterized by a greater number of personal interactions between players and venue staff. Such interactions provide opportunities for staff to identify and address gambling concerns or red flag behaviours.

Helping players in times of crisis is another important component in providing help to people with gambling problems and reducing gambling-associated harms (Ibid.). There is debate regarding the extent of

intervention that is appropriate for venue staff to provide to distressed gamblers, but there is general consensus that frontline staff should interact with distraught players. Visibly emotional reactions, unusual social behaviours, and very intense gambling behaviour can be used to identify those who may be experiencing a problem with gambling (Delfabbro, Thomas, & Armstrong, 2016). Once identified, it is important to provide distressed players with information on available help resources and supports for problem gambling, therefore it is critical for venue staff to be knowledgeable about available help lines, self-exclusion programs, and local gambling support services.

Initiating conversations about RG and problem gambling is another way of providing assistance to people with who may be experiencing gambling-related harms (Hing & Nuske, 2011). These types of exchanges are, again, opportunities to promote RG tools and information. Staff training programs discussed in the previous section are useful tools to educate staff and develop the skills necessary to initiate RG conversations with players (Dufour et al., 2010; Hing, Nuske, & Holdsworth, 2013).

In brief, assisting those with gambling problems is an important objective for VLT RG programs. In particular, important aspects of this objective include providing information about problem gambling to players, assisting gamblers in distress, and initiating conversations about RG.

3.8. ADVERTISING AND MARKETING

Advertisements promoting VLT venues are highly regulated in Australia. Some states completely prohibit any type of advertising, while others set strong restrictions on the types of information that can be portrayed in advertising and marketing materials. In most jurisdictions, there are regulations in place to prevent misinformation about the odds of winning and/or expected outcomes from gambling. It is also a common requirement that gambling advertisements and marketing strategies do not target vulnerable populations, such as minors, people with gambling problems, and disadvantaged groups.

One of the fundamental steps in promoting safe advertising practices is to develop a corporate and/or venue marketing and advertising policy. This policy should incorporate fundamental RG principles, including informed decision making, use of empirical research, and stakeholder collaboration. To ensure advertising and marketing materials are in adherence with the applicable policies, a screening process is recommended.

Since informed decision making is one of the critical components of an RG program, advertising gambling in a misleading way is especially problematic. It can affect a player's understanding of rules, odds, and skills that affect the outcome of a specific gambling activity. Additionally, some advertising materials augment positive attributes of gambling and downplay the harms and risks associated with it, thereby creating a distorted image of gambling activities in general (Parke, Parke, Harris, Rigbye, & Blaszczynski, 2014). Misleading advertising can also overestimate the odds of winning in a particular game or imply that skill can affect the outcome in a game of chance.

Particular groups, such as underage players and people with gambling problems, can be particularly susceptible to the effects of gambling advertising (Griffiths, 2016; Hanss, Mentzoni, Griffiths, & Pallesen, 2015; Binde, 2009). Therefore, screening of advertising and marketing materials should ensure that advertising does not target vulnerable populations by portraying children and youth in advertising, using specific cultural images, or propagating the idea of gambling as a way to make money, among other things.

3.9. SUMMARY

Factors such as venue features, environmental factors, and game design play could be a defining role in players' gambling behaviour. Pre-commitment and self-exclusion are valuable RG strategies that can be useful for facilitating players' control over their gambling behaviour and reducing the harms associated with problem gambling. One of the primary goals of an effective RG program focuses on the promotion of informed decision making, which means that the availability of gambling-related information to VLT players should also be considered. Lastly, staff training, RG messaging, and gambling marketing and advertising are all essential ingredients in a robust RG program for VLT venues.

4. JURISDICTIONAL SCAN

4.1. RATIONALE

A jurisdictional scan was conducted to identify leading RG practices around the world. Several jurisdictions were identified as having unique and/or strong RG policies or initiatives in place in relation to VLT gambling. Several Canadian provinces, states in the United States of America, Norway, and the United Kingdom are detailed below.

4.2. CANADA

Gambling in Canada is regulated by the provinces. As such, the availability of particular types of gambling and the corresponding RG regulations differ across the country. Of note, two of Canada's most populated provinces, British Columbia and Ontario, have chosen to not permit VLTs in their jurisdictions. Those that do offer VLT gambling have a number of regulations and requirements to ensure responsible service.

4.2.1. MANITOBA

The Liquor and Gaming Authority of Manitoba (LGA) licenses all VLT venues in the province of Manitoba. Only establishments that hold a liquor service license are eligible to offer VLTs gambling. In 2017, there were 6,489 VLTs located in 480 venues (e.g., bars, lounges, and racetracks) (Canadian Partnership for Responsible Gambling [CPRG], 2018). All VLTs are owned and managed by Manitoba Liquor & Lotteries (MLL).

Operators of VLTs prepare, adopt, and implement a responsible gaming policy. The policy must be made available to the public and be reviewed at least once every five years. The responsible gaming policy must identify (The Legislative Assembly of Manitoba, 2013):

- a) measures that will be taken to educate the public about responsible gaming;
- b) the responsible gaming training to be completed by employees and others who are directly involved in operating or providing a lottery scheme; and,
- c) the information that will be provided to players to support informed decision-making, and the manner in which that information will be distributed.

Players must be 18 years of age or older to gamble in Manitoba. The licensee must prohibit those who appear to be intoxicated from entering the gaming areas. The licensee shall not provide credit, advances on credit cards, or cash cheques to enable a person to play a VLT. The licensee must also ensure that the VLTs are not placed in a way that would make them visible to minors. ATMs must be placed off the floor of the designated gaming area. 24 hour operation is prohibited.

VLTs in Manitoba display an on-screen clock, provide players with the option to set time limits, display credits as cash, have bill acceptor limits, and display RG information and the provincial problem gambling helpline number on screen. The stop reel function has been disabled on all machines. Players are forced to cash out at \$1,250. On the welcome screen, a disclaimer is displayed informing players of the house advantage.

After selecting a game, the player needs to select a session time limit of 15, 30, 45 or 60 minutes. Those who have selected a 45 or 60 minute first session, will have a pop up at 30 minutes asking “Do you know how long you have been playing for?”. When the selected time limit is reached, another pop up will appear and the player can select whether they would like to cash out or choose a second time limit; the helpline number is also displayed on this pop up. During a second session, if the player has selected a 45 or 60 minute session, the message “Do you need a break?” will appear after 30 minutes of play. Players can also print helpline information at the machine.

The MLL website provides an RG section for VLTs and provides information on myths, randomness, skill versus chance, where to go for help, tools to track spending, links to other websites, and tips for safer gambling. The website also provides players with a “cost of play” brochure for VLTs that provides players with information on the average cost per hour of playing these machines.

All staff working in the gaming area of a VLT venue must complete the *Smart Choices* training program. The program educates staff on current laws, safety requirements, and responsible strategies when serving or selling liquor, as well information on responsible and problem gambling such as how to identify customers who may be experiencing problems with their gambling. Training and recertification is required every five years.

4.2.2. ALBERTA

VLTs in the province of Alberta are managed by the Alberta Gaming & Liquor Commission (AGLC) under the province’s Gaming and Liquor Act, and are generally located in bars, lounges, and similar venues. In 2017, there were 5,992 VLTs located in 854 sites across the province (CPRG, 2018).

VLT play is restricted to those 18 years of age or older. Staff members who are on duty and anyone who appears to be intoxicated are restricted from VLT play (Alberta Gaming & Liquor Commission [AGLC], 2015). Hours of operation for VLTs are restricted to 10am to 3am (a maximum of 17 hours a day) and only during the hours that the venue is open to the public. Retail locations must be at least 25km from each other (Ibid.)

A destination gaming facility, or Gaming Entertainment Centre (GEC), carries 15 to 30 VLTs and is subject to enhanced facility standards. A GEC must have a designated VLT gaming area and at least three other types of entertainment for customers, such as billiards, television, amusement games, etc. VLTs cannot be visible from outside the GEC, and there must be no direct access to a GEC from an adjacent licensed premise. ATMs must be located at least 15 feet from the nearest VLT.

The VLT will automatically produce a cash-out ticket of \$1,250 when a series of individual prize awards of \$1,250 or less result in a terminal balance of \$1,250 or more. If an individual prize is over \$1,250, the VLT automatically produces a cash-out ticket for that specified prize amount. New VLTs with RG features were installed across the province in 2013. These machines require players to set a time limit of either 15, 30, 45 or 60 minutes. Once the time limit has been reached, the player will have the option to cash out or select a new time limit. If a new limit is selected, the player will be required to cash out once that time limit is reached.

VLTs in Alberta accept a maximum of \$100 at a time and the machines provide an RG message reminding players that help is available if gambling is affecting their life. Game instructions and payout tables are available on each terminal. Retailers are not permitted to grant credit to players or provide cash advances on a credit card.

VLT retailer advertising is limited to the message “VLTs are available for play” at the venue. Advertising and promotions that appear to encourage VLT play, refer to VLTs as slot machines, or the VLT site as a casino, are prohibited. Proposed advertising or promotional materials must be approved in advance by the AGLC; no VLT promotion or giveaway may be offered to a player without the written consent of the AGLC (AGLC, 2015).

At all entrances and exits of GEC retailers, a “Minors Prohibited” sign must be posted. The AGLC also provides retailers with the following signs and information that must be posted in clear view at the VLT venue: “*Your games. Your choice.*” Which is a VLT Rules of Play and Gaming Irregularities poster, and the RG poster: “*If you gamble, use your GameSense*”. The GameSense website offers VLT section which provides information about VLTs such as how they differ from slot machines, available RG features, explanations of randomness and house advantage, and how to play.

Reel Facts is a social responsibility training program designed for VLT retailers and their staff to teach them how to recognize the differences between responsible and problem gambling behaviours, and appropriately respond to someone who may have a problem with their gambling.

Reel Facts certification is mandatory for retailer owners, managers, supervisors, and all staff working at a liquor licensed premise having any involvement with patrons using VLTs. This training program is not required for kitchen staff, bus persons, entertainers, and cleaning staff in licensed premises.

Those required to complete *Reel Facts* training must do so within 30 days of hire, and a minimum score of 80% on an AGLC administered test is required for the training certification. Certification is valid for five years from the date of completion and is maintained by successfully repeating the *Reel Facts* program and passing the test before the certification expiration date. It is the responsibility of the VLT retailer to ensure that all required staff have completed the certification and that at least one *Reel Facts* certified staff member is on shift at all times. VLT retailers must keep a log of employees who are *Reel Facts* certified.

4.2.3. SASKATCHEWAN

The Saskatchewan Liquor and Gaming Authority (SLGA) owns and manages 4,000 VLTs in the province of Saskatchewan. These VLTs are located in licensed taverns and lounges. The Western Canada Lottery Corporation (WCLC) is contracted by SLGA to operate the VLT program and provides services that include training, installation, maintenance of the central operating system, and operating a helpline for assistance. VLT play is restricted to those 19 years of age or older. The placement of ABMs in the venues must be pre-approved by SLGA

Stop buttons have been eliminated to remove the illusion that players have control over the outcome of the VLT. All machines provide a permanent on-screen clock and credits are displayed in cash value. VLT players are limited to a one-time bill insertion of \$100, and a forced cash-out will occur once the balance reaches \$1,750.

VLT players are able to register for a voluntary Player Services Account. This can be done anonymously and directly on the machine via the creation of a player ID and password. The player can also display real-time values to track money and time spent during game play, and can set spend and time limits for a particular session, game day (9:30am to 2:00am), week, or month. A pop-up message will notify the player if they are approaching their spending limit. Once the limit is reached, they can log out and continue game play. VLT players are also able to set time limits of up to 60 minutes per gambling session. This time limit can be extended only once before an automatic cash-out occurs.

Additional responsible gambling messaging on VLTs aims to educate gamblers on concepts such as randomness, the cost of play, and the importance of setting time and money limits. There is also an information tab available that explains how VLTs work, provides gambling myths and facts, and information regarding the provincial problem gambling helpline.

The SLGA responsible gambling course must be completed by at least one senior management staff person (e.g., owner or manager) for each VLT site. The course covers how VLTs work and educates staff on identifying and dispelling common gambling myths. It also provides information on concepts such as randomness, odds, random number generators, and identifying signs of problem gambling and how to address it. The training certification is valid for five years.

RG training is mandatory for at least one VLT site owner or manager, and expires after five years. The training helps VLT site contractors identify and dispel myths and misconceptions regarding gambling; understand concepts such as randomness and odds; understand random number generators and how VLTs operate; and identify signs and methods of addressing problem gambling behaviour.

4.2.4. QUEBEC

Société des établissements de jeux du Québec (SEJQ), a subsidiary of Loto-Quebec, manages the network of VLTs in the province of Quebec. In 2017, there were approximately 11,000 VLTs in 1,737 venues (e.g., bars, restaurants and gaming halls) across the province (CPRG, 2018).

In 2017, Loto-Québec began removing VLTs from particular venues as a way to reorganize the machine distribution and decrease the number of VLTs in operation. VLTs were removed from areas with a high concentration of VLTs, which tended to be in low-income neighbourhoods. By 2019, the plan is to have fewer than 10,000 VLTs in operation across the province (down from 12,000 in about 2,000 establishments). To determine how many VLTs will be permitted in a given region, Loto-Québec will limit the number of sites to two per 5,000 inhabitants and have a maximum of two machines per 1,000 inhabitants. Loto-Quebec also aims to shift the distribution of VLTs away from bars; relocating them to venues that "promote socialization and group entertainment," (e.g., bowling alleys, pool halls, etc.).

VLT play is restricted to those 18 years of age or older. Retailers are restricted from allowing those who appear to be impaired (e.g., by drugs, medication, other substances) to play the VLTs. Staff are also restricted from playing VLTs.

Within the venue, VLTs may not be placed in a room in a bar if the room holds fewer than 15 people. VLTs may not be installed in the following areas of an establishment: (1) the areas for the preparation of alcoholic beverages; (2) on the service counters; (3) in bathrooms; (4) in cloak rooms; (5) in areas reserved for the use of employees of the establishment. The area where VLTs are to be located must be arranged so as to avoid isolating players. ATMs cannot be located near VLTs. Retailers cannot provide information on prior, or anticipated, results of the VLTs (e.g., "this terminal is about to pay a jackpot") (Société des établissements de jeux du Québec [SEJQ], 2015).

VLT retailers cannot provide credit or advances to customers, or allow loans made by third parties in the venue to allow customers to play. Retailers cannot cash cheques. No person may, in a VLT venue, make a loan, provide credit, or advance money in any form to a person in order to permit them to play a VLT.

The Code of Responsible Commercialization establishes the requirements and commitment of the retailer for the responsible management of VLTs, and is a key part of the retailer agreement. Retailers must ensure that venue staff are aware of, and comply with, the Code. The Code must also be displayed next to VLTs so that it is visible at all times.

VLT retailers are not permitted to display commercial advertising or posters about VLTs that are visible from outside the venue, unless specifically authorized by SEJQ. As well, retailers cannot offer promotions that encourage customers to play (SEJQ, 2015)

VLTs cannot be connected to each other to create a progressive jackpot. Customers are not permitted to play more than one VLT at a time, and retailers cannot encourage customers to continue playing.

All VLTs display the provincial problem gambling helpline, a responsible gambling message, and the time on-screen. Players can select a session time limit of 15, 30, 45 or 60 minutes. A wager cannot exceed \$2.50 and the prize offered by a VLT cannot exceed \$1,000. Therefore, VLTs must automatically provide a reimbursement coupon when the cumulated credits reach or exceed a value of \$1,000. The cost of one credit cannot exceed \$0.25.

VLT retailers must ensure that RG information is always available (i.e., the Stick to Your Limits brochure), and must also display game rules, payment charts, and instructions concerning the working of the VLT.

All retailers and gaming employees are required to complete the *Taking Risks Is No Game* training. This training provides information on recognizing warning signs and knowing how and when to provide help information. The retailer must ensure that an RG trained employee is always present at the venue. Additionally, all new employees must attend an awareness workshop on problem gambling that provides information on Quebecers' participation in games of chance, problem gambling, and available support services.

4.2.5. ATLANTIC CANADA

The Atlantic Lottery Corporation (ALC) operates lotteries and VLTs in Atlantic Canada on behalf of its shareholders, the *New Brunswick Lotteries and Gaming Corporation*; the *Nova Scotia Provincial Lotteries & Casino Corporation*; the *Prince Edward Island Lotteries Commission*. In 2017, there were 6,870 VLTs in 968 liquor-licensed establishments across Atlantic Canada (e.g., restaurants, bars, legions) (CPRG, 2018) with a maximum of 27 VLTs per site.

Players must be at least 19 years of age to play VLTs in Atlantic Canada. In 2008, PEI released its RG strategy, *Leadership, Integrity and Responsibility: A Responsible Gaming Strategy for Prince Edward Island*. As part of the strategy, a commitment was made to reduce the number of VLTs (by 20%) and VLT sites (by 50%) across the province.

In Nova Scotia, government made changes to the accessibility of VLTs, reducing the hours of operation (machines are shut off at midnight) and removing 1,000 VLTs from operation.

In New Brunswick, registered VLT venues do not permit VLT play between the hours of 2:30 a.m. and 10:00 a.m. In 2007, government released its new responsible gaming policy, *Responsible Management, Responsible Play in a Responsible Environment: A Responsible Approach to Gaming in New Brunswick*.

As a result of this reform, VLTs are now only allowed in age-controlled environments (e.g., they are not permitted in restaurants) and the number of VLT venues was reduced across the province by more than 50 per cent. The total number of sites at any given time is now capped at a maximum of 300 and the maximum number of VLTs allowed is 2,000.

Nova Scotia's 2011 responsible gaming strategy included the following key principles: due consideration should be given to vulnerable populations at greater risk of developing VLT-related gambling problems and proactive efforts should be made to reduce the intense stigmatization of VLTs and VLT players. Government also stated that it would explore all strategic directions using a balanced approach that considers the impacts on both public health and revenue generation.

According to Nova Scotia's Video Lottery Regulations, amended in January 2018, a licensee shall not grant credit, cash cheques of any kind, provide loans, or allow credit card advances to enable a person to play VLTs. In New Brunswick, a registered video lottery site holder shall not grant credit or cash cheques to enable a person to play a video gaming device.

External view of VLTs at all venues is prohibited and venues cannot operate for 24 hours per day. ATMs must be away from designated gaming areas.

VLTs in Atlantic Canada provide a fixed on-screen clock, 'time played' reminders, mandatory cash-outs at 150 minutes, display credits as cash, impose a maximum bet of \$2.50, and a maximum cash-in of \$60. Players can also set money limits and track historical time/money expenditures, use self-assessment tools, and access responsible gambling tutorials. VLTs display RG information, as well as warning labels that provide information about the odds of winning and the randomized nature of wins.

In Nova Scotia, VLTs offer pop-up reminders letting players know how long they have been playing and providing the option of continuing to play or not. The reminder first appears after 60 minutes and then at 30 minute intervals. ALC VLTs also have mandatory cash-outs which require players to cash out after 150 minutes. The largest prize that can be won on a single VLT spin is \$500. In addition, software changes were made in Nova Scotia in 2005 to slow game speed by 30%, and stop buttons were disabled. As part of Nova Scotia's 2011 responsible gaming strategy, the government made a commitment to slow VLT game speed further, and announced that it would implement changes to VLT host venues to reduce the potential for excessive play.

As part of its Code of Conduct, ALC is committed to ensuring that its advertising reflects the highest of standards and complies with Canada's Code of Advertising Standard. Advertising must be factual and must not oversell the winning experience, encourage over-consumption, or depict gambling as an investment. Advertising must not include messages to, or be placed in media intended for, those under 19 years of age.

In Nova Scotia, no licensee shall engage in advertising or permit anyone with whom the operator contracts to engage in advertising that:

- a) implies VLTs promote or are required for social acceptance, personal or financial success or the resolution of any economic, social or personal problems;
- b) contains endorsements by well-known personalities that suggest playing VLTs contributed to their success;
- c) is specifically directed at encouraging individuals under 19 years of age to play VLTs; or
- d) compares playing VLTs to other forms of gaming in Nova Scotia.

All advertising and promotion of a VLT or VLT venue is limited to the interior of the approved premises.

Through its training program, ALC provides retailers with tools and information to better prepare them to recognize the warning signs of problem gambling and to provide customers with information on how to access community resources. Training is mandatory for retail applicants and voluntary for retail staff. Training refreshers are provided every two years.

ALC conducts an annual collateral study with VLT retailers to gauge awareness and the perceived effectiveness of their “PlayWise” RG-branded materials.

4.3. UNITED STATES

In the United States, VLTs are permitted in retail or convenience locations including bars, truck stops, restaurants, and members’ clubs in seven states: Illinois, Louisiana, Montana, Nevada, Oregon, South Dakota, and West Virginia. Of note, only Oregon and South Dakota use random number generators in their machines.

4.3.1. ILLINOIS

Since 2012, almost 24,000 VLTs have been installed in more than 5,000 non-casino environments across Illinois (American Gaming Association [AGA], 2016a). This recent proliferation includes venues such as restaurants and bars, alongside floral shops and laundromats (Voyles Decatur, 2017). This represents more than double the number of machines available on the states riverboat casinos (AGA, 2016a).

Illinois is required to deliver a program for public education, research, training, and treatment for problem gambling. This program must include a helpline for individuals and family members, public awareness campaigns focused on problem gambling awareness and prevention, support for problem gambling resources through training and other means, and conducting research to identify youth in the state who are at risk (AGA, 2016b).

Various signage is required in VLT venues in Illinois. VLT owners are required to display messaging on where to obtain support for problem gambling at each entrance and exit, and near each source of cash (AGA, 2016b). The state regulator, the Illinois Gambling Board, displays RG messaging on VLT terminals. There are no advertising restrictions for VLTs in the state (AGA, 2018).

Multi-game VLTs are permitted in Illinois, as long as the featured games are tested and approved (Illinois Gaming Board, 2018). VLT manufacturers require secondary approval for their machines and all VLTs must be certified by Gaming Laboratories International and approved by the Illinois Gaming Board (Illinois Gaming Board, 2018).

Loyalty or pre-commitment systems that track players for repeated play are not permitted in Illinois (Illinois Gaming Board, 2018). Locations are permitted to collect voluntary contact information for promotional purposes and giveaways (Ibid). The minimum game payout on VLTs in Illinois is 80% (Voyles Decatur, 2017). The maximum bet is \$2, with a maximum payout of \$500 per bet. Five machines are permitted at truck stops and licensed establishments (Ibid).

VLT locations in Illinois are not permitted to offer players complimentary alcoholic drinks (AGA, 2018). Hours of operation must be the same as the legal hours for the consumption of alcohol on the premises (Illinois Gaming Board, 2018). However, for truck stops that do not hold a liquor licence, VLTs may operate 24 hours (Ibid).

Individuals must be 21 years of age or over to gamble (AGA, 2018). In locations accessible to people under the age of 21, a physical barrier must surround the gaming floor (Illinois Gaming Board, 2018). The gaming floor exit must be monitored by at least one employee over the age of 21 (Ibid). Employee monitoring of the exit may be supplemented by closed circuit television monitoring (Ibid).

Credit is offered to VLT patrons in Illinois. However, credit may only be offered in a responsible manner and considering the patron's assets, liabilities, prior payment history, and income (AGA, 2018). A voluntary self-exclusion program is available to VLT players, with a minimum length of five years.

As part of their VLT licence, VLT owners and staff must complete an online RG course that defines RG and outlines how to have a conversation with a patron whose behaviour suggests they may have a gambling problem (White, 2018). When owners and employees encounter players exhibiting such behaviours, they have a right (but not an obligation) to have a conversation with the patron.

The Illinois Gambling Board maintains a voluntary, confidential problem gambling registry for VLT gamblers (White, 2018). Those who enroll in the registry are sent regular emails with links to resources on problem gambling prevention and treatment. The registry is available to both Illinois and out-of-state residents.

Illinois has been discussing scanning driver's licences of players in order to monitor problem gambling in VLT establishments. There has been a notable increase in the number of calls to the local helpline in relation to VLT play.

4.3.2. LOUISIANA

VLT licensees and operators are required to establish comprehensive problem gambling programs that outline policies and procedures regarding:

- Addressing underage gambling and unattended minors,
- Displaying information to increase public awareness of problem gambling and support resources,
- Allowing players to opt out of venue functions and amenities, such as access to credit, check-cashing, or direct mail marketing,
- Preventing employees from allowing self-excluded players to use the VLTs,
- Providing employees with responsible gambling materials, and
- Providing employees with a confidential problem gambling assessment and treatment referrals for themselves and their dependents (AGA, 2016b).

VLTs are not to be operated by intoxicated persons, and alcohol should not be served to intoxicated players (AGA, 2016b). No credit or financial assistance may be extended to VLT players. Advertisements for VLTs cannot be displayed outside of licensed establishments. Internal advertisements must include the toll free number, with specifications for font and size (Ibid). The local helpline number must be displayed at all entry points to gambling areas. The helpline number and information on problem gambling must be displayed where cash or credit is made available to players (Ibid).

VLT staff who interact with players are to complete training on how to report patrons who may have a gambling problem to their supervisors (AGA, 2016b). This training must cover, at a minimum, information on the signs of problem gambling, available support resources, and how to assist players in obtaining the relevant information (Ibid). Training must be completed upon hire and refreshed annually (Ibid).

To register for self-exclusion, players must submit an in-person request to the state police, present valid identification, and have their picture taken (AGA, 2016b). The minimum self-exclusion term is five years

(Ibid). Louisiana has a multi-operator self-exclusion list. Information on self-excluded players is shared with all VLT locations and employees are to be made aware any additions or deletions to the list (Ibid). Those on the self-exclusion list are not to receive any advertisements, promotions, or other targeted mail, starting 90 days from their placement on the list (AGA, 2016b). Self-excluded players are not to have access to credit, complimentary services, cheque cashing, or other club benefits in the VLT venue (Ibid).

When self-excluded players are found on the premises, there must be procedures in place for removing them, which may include the assistance of law enforcement (AGA, 2016b). Self-excluded players are disentitled to their winnings and cannot recover losses (Ibid). Losses by identified self-excluded players are to be forfeited by operators and deposited into a problem gambling fund (Ibid). In order to be removed from the self-exclusion list after the five year term, the player must submit a written request that includes the reason for the request and a recommendation from a qualified health professional (Ibid). An additional assessment may be sought from an independent health professional by the self-exclusion hearing officer. The player will be removed from the self-exclusion list if the officer determines that s/he can gamble without adverse consequences (Ibid).

4.3.3. MONTANA

For VLTs in Montana, the maximum bet is \$2, with a maximum payout of \$800 per bet (Montana Department of Justice, 2018). Operators may not award free games to players.

VLT operating hours are restricted to 8 am to 2 am (State of Montana, 2017). However, local governments can pass ordinances to allow play during this time (Ibid).

4.3.4. NEVADA

VLT operators in Nevada must place information on the nature and signs of problem gambling, as well as the local helpline number, in gambling areas and near cash dispensing machines (AGA, 2016b).

VLT operators are able to issue credit, provide check-cashing services, and send direct mail marketing to their players. If operators choose to do so, they can establish a program that allows players to limit access to or opt-out of these services (AGA, 2016b).

VLT operators are to develop procedures and provide training for employees who interact with players in gaming areas. Training should provide information on the nature and signs of problem gambling, along with guidance on how to direct players to information about problem gambling programs (AGA, 2016b). Each licensed operator is to designate personnel to be responsible for maintaining the training program and ensuring training is up to date (Ibid).

4.3.5. OREGON

Oregon State Lottery manages 12,000 VLTs across 2,400 sites, with a maximum of six VLTs per site. In 2014, Oregon State Lottery established its Responsible Gambling Code of Practice, which sets forth the state's approach to RG.

Players must be at least 18 years of age to play VLTs in Oregon. Minors are prohibited from designated gambling areas (Oregon State Lottery, 2014). Customers who are clearly intoxicated are not permitted to continue gambling. External views of VLTs are prohibited and venues cannot be open for 24 hours. ATMs must be located off the designated gaming area.

Oregon State Lottery requires retailers to prominently display problem gambling resource materials, including posters, pamphlets, and stickers; retailers are audited for compliance. Retailers are also required to provide materials supplied Oregon State Lottery to customers requesting information on the games, their rules, and the odds of return to players. (Oregon State Lottery, 2014).

Key staff are required to complete the RG training as part of their retailer onboarding. These key persons are then encouraged to share the training with frontline staff and provide resources and materials to assist with the training (Oregon State Lottery, 2014). Oregon Lottery uses a 30 minute online interactive course to train their VLT retailers entitled, '*Responsible Gambling and You*'. Periodic refreshers are also provided.

Oregon State Lottery employees are expected to be engaged in responsible gambling. They are educated about the importance of RG within the Oregon State Lottery culture, about problem gambling issues and available resources for assistance, and how to promote RG (Oregon State Lottery, 2014).

Retailers are encouraged to provide hospitality services and make players aware of the passage of time to encourage breaks in play. (Ibid.).

Retailers are prohibited from providing credit or lending money for the purpose of gambling (Ibid). Cheque cashing is not permitted.

VLTs are to display visible clocks on the game screen, prominently display helpline information, and should offer the ability to display credits as dollars. (Ibid). The maximum bet is \$2.50 and maximum cash in is \$60.

4.3.6. SOUTH DAKOTA

VLTs are only permitted in bars or lounges in South Dakota, with a limit of 10 machines per venue (South Dakota Legislature, 2018). Physical barriers are required between the gaming floor and the rest of the venue, and the gaming floor must be limited to those aged 21 years or older (Ibid). VLT operating hours must coincide with the legal hours for alcohol sales (Ibid). The maximum bet is \$2 and the maximum payout is \$1,000 per bet (Ibid). Machines cannot award free games and their payback value must be at least 80% (Ibid).Odds of winning should be displayed on the machines (Ibid). VLT operators are not permitted to extend credit to players (AGA, 2016b).

When awarding additional VLT licences, localities may consider:

- The number of venues already offering VLTs,
- The proximity of other VLT locations,
- The type of business and how it will be operated,
- The location of the business relative to other businesses, residential areas, or activities,
- The extent that minors visit the location, and
- The proposed economic impact of the VLT location (South Dakota Legislature, 2018).

4.3.7. WEST VIRGINIA

The maximum bet for VLTs in West Virginia is \$2 (West Virginia Legislature, 2018). VLT operators cannot have ATMs in VLT venues, accept credit card or debit cards for play, or extend credit to players (AGA, 2016b).

New VLT locations cannot be placed within 150 feet of another location offering VLTs (West Virginia Legislature, 2018). Operators must install at least one security camera (Ibid). VLT operators are responsible for displaying the helpline number and a warning message about gambling-related harms on each machine (Ibid). VLT operators in West Virginia are not permitted to advertise or conduct promotional activities (Ibid).

4.4. NORWAY

Norway introduced state-of-the-art cashless VLTs in 2008 (Helge Hoffmann, 2014). A mandatory player card has been in place since 2009. The card allows for the enforcement of mandatory time limits, mandatory loss limits (maximum of € 75 per day and € 300 per month), and maximums for optional deposit limits (maximum of €500 per day and € 1200 per month; Ibid). In order to play games associated with more risk, players must set a daily and monthly loss limit (Norsk Tipping, 2018). In addition to game-specific limits, players can also set global limits across all online and land-based games offered by Norsk Tipping, which have maximums of € 1200 per day and month (Norsk Tipping, 2018).

Players can access their online account to view a summary of the net amount of money spent gambling – amounts wagered minus any winnings – for the day, week, or month (Norsk Tipping, 2018). Players can view a graph of their spending over the previous eight weeks and request that a more detailed report be emailed, showing their stakes, winnings, net spend over the past year, and how much they have wagered on individual games (Ibid). When players have bet more than they have won, negative numbers will appear on these summaries.

VLTs in Norway do not offer new player bonuses or spins, automatic play, loyalty programs, or direct marketing to players at risk (Helge Hoffmann, 2014). All VLTs feature the PlayScan program. This system monitors player behaviour and sends notifications when behaviours indicate increased risk, such as playing for more money and/or taking greater risk (Norsk Tipping, 2018). PlayScan provides players with tips on how to limit risk and offers them the option to pause their play for 24 hours, 1 day, 7 days, 30 days, or 180 days, or to permanently self-exclude (Ibid). Pauses can be increased during the pause period. Players can take a break or self-exclude from all games, groups of games, or a specific game (Ibid).

4.5. UNITED KINGDOM

The Association of British Bookmakers (ABB) represents of 80% of the high street betting industry and includes members such as William Hill, Ladbrokes, Coral, and Paddy Power, as well as almost 100 small independent operators. This includes approximately 9,000 betting shops, with 84% of all betting shops located in commercial centres. RG requirements are enforced by the ABB's Code of Conduct (Association of British Bookmakers [ABB], 2015). Complaints of non-compliance are subject to review by an independently chaired RG committee.

In 2014, limit setting was introduced. In January 2015, an evaluation of limit-setting features showed that over 75% of those who set a limit, stuck to it. The ABB then made it mandatory for players to have the option to set a limit (time and money) before they start to play. The ability to set limits on gaming machines and this mandatory requirement are unique to high street betting shops. Players must be able to set a custom voluntary limit at any stage during play, if they had not chosen one prior to play (ABB, 2015).

Major operators must conduct regular third-party age verification testing to check the implementation of the Think 21 policy in their shops, which requires that all customer who appear to be under 21 are approached and have their age verified. Members are required to ensure that staff receive specific training to prevent

under-age access to machines and encourage the use of the behind-the-counter functionality to disable machines where required. All machines must be situated where they can be adequately supervised from the counter. All staff must be encouraged to 'walk the shop floor' and implement the Think 21 policy with players (ABB, 2015).

Players reaching their limit must be presented with the option to stop or to set a new limit and continue playing. Staff must be alerted behind the counter for every mandatory alert triggered or voluntary limit set, in order to provide them with an overview of the player's behaviour and to encourage interaction where appropriate. Staff must be trained on how and when to interact with customers who have triggered a behind-the-counter alert. On reaching a voluntary limit, there must be a 30 second break in play before the player can resume playing (ABB, 2015).

All players receive mandatory reminders every 30 minutes played, or when £250 is added to the machine. Players must be able to request a statement (if participating in account based play) showing a detailed history of their time and money spent (ABB, 2015).

Players must be allowed to voluntarily ban themselves from betting shops. Since December 2014, the ABB has trialled an enhanced self-exclusion (SE) process that allows players to exclude from multiple shops across different operators (ABB, 2015).

ABB members must maintain a central SE register, monitor the number of SEs in each of their shops, have processes in place to ensure shop staff are properly implementing SE, and conduct regular audits to ensure effectiveness. Members must also encourage customers to self-exclude from other gambling premises, such as arcades, bingo halls and casinos in the immediate local area, where appropriate. Customers that have been excluded must be removed from the operator's marketing databases. At the time of SE, customers must be provided information on support services, such as the National Gambling Helpline. (ABB, 2015).

Operators must adhere to the Advertising Standards Authority administered Codes of Practice, and ABB members must adhere to the cross-industry Gambling Industry Code on Socially Responsible Advertising. There can be no gaming machine advertising in shop windows, and 20 per cent of all shop windows are to be dedicated to responsible gambling messaging. Members cannot advertise free bets as a sign up incentive on TV before 9 pm (ABB, 2015).

ABB members must proactively promote RG messages, such as the gambleaware.co.uk website and the National Gambling Helpline, in all shops. Operators with corporate websites are to provide a click through to the Gamble Aware website. Leaflets with RG information must be available in gaming machine areas. The top screen of all gaming machines must display RG information at least 25% of the time. Customer help pages on gaming machines that contain information explaining concepts such as 'Return to Player', must be maintained and up-to-date (ABB, 2015).

Staff must be trained to recognize a range of PG indicators to help identify and interact with customers who may be at risk of developing a gambling problem. All staff are encouraged to walk the shop floor and to initiate interactions in response to specific customer behaviour.

In accordance with the Gambling Commission's Licensing Conditions and Codes of Practice (LCCP) operators must ensure induction and annual refresher training in all areas of social responsibility, including RG interactions (ABB, 2015). Members who do not have their own social responsibility training program must ensure staff have completed the ABB online social responsibility induction training course.

5. REVIEW AGAINST RGC BEST PRACTICE STANDARDS

Based on the Responsible Gambling Council's RG standards for casinos, along with research conducted on VLT environments, RG+ developed an evaluation framework against which ALH RG policies and programs were reviewed.

The following presents the findings of the review based on the above-mentioned evaluation framework. ALH corporate policies and initiatives that are applicable across all of its properties are outlined first, followed by additional information that is specific to a particular state(s) or territory. The RG program was evaluated based on documents submitted to RG+ (e.g., policies, training materials, sample communications, etc.), a sampling of site visits across the five jurisdictions under review (Victoria, Queensland, South Australia, New South Wales, and Northern Territory), staff surveys, player surveys, and interviews with corporate staff, state managers, and state gaming managers.

5.1. RESPONSIBLE GAMBLING POLICIES

The corporation demonstrates awareness of problem gambling and creates integrated corporate policies and strategies to actively address it.

Policy Commitment to RG

Well-articulated policies outline a clear commitment to action that addresses responsible gambling and problem gambling prevention. This commitment is readily available to players and to the general public.

ALH is committed to being a responsible operator and to minimizing problem gambling (PG) harm by implementing socially responsible best practices through its Responsible Service of Gaming (RSG) program. In particular, the ALH Group's commitment statement articulates that ALH strives to ensure their venues "provide a safe and supportive environment", support players to "make informed decisions about their gambling", and have developed measures to support the provision of "timely, appropriate assistance and information."

This commitment statement is publicly available on the ALH website and includes descriptions of program initiatives (e.g., self-exclusion, pre-commitment, the RG Ambassador program) that are in place to support this commitment. A cornerstone of this is a corporate "three point plan" that focuses on setting limits, staff education and training, and community partnerships. ALH is clear that it strives to be Australia's most responsible operator of gaming machines.

ALH's RG Code of Conduct that specifically applies to the state of **Victoria** (dated December 2017) provides a clear commitment to RG, describes ALH's key RG program initiatives such as the RG Ambassador program, RG information available to players, financial transaction policies, the self-exclusion program, the availability of support services, loyalty program information, the pre-commitment program, as well as other policies that pertain to assisting players, underage gambling, and advertising and promotion. This Code of Conduct represents a comprehensive policy document that summarizes all the key aspects of the RG program as it applies in the state of Victoria, and provides clear examples of how ALH strives to execute its commitment to RG in the state of Victoria.

It would be beneficial to have a uniform Code of Conduct, similar to the one in Victoria, across all ALH properties in Australia. This would further support the implementation of ALH RG initiatives across the country and demonstrate to its retailers and the general public that ALH's commitment remains strong and consistent across state and territorial lines.

To gauge awareness of ALH's RG policies, a survey of staff took place between May 1 and June 1, 2018. Staff were first asked if they were aware of ALH's RG policy. Those that indicated they were aware were then asked to describe it.

In **Victoria**, 82% of respondents said they were aware of ALH's RG policy. Of those, 27% provided a strong description of its key points and 32% demonstrated some knowledge of the policy.

In **New South Wales**, 86% of respondents said they were aware of ALH's RG policy. Of those, 17% provided a strong description of its key points and 66% demonstrated some knowledge of the policy.

In **Queensland**, 81% of respondents said they were aware of ALH's RG policy. Of those, 7% provided a strong description of its key points and 67% demonstrated some knowledge of the policy.

In **South Australia**, 79% of respondents said they were aware of ALH's RG policy. Of those, 26% provided a strong description of its key points and 40% demonstrated some knowledge of the policy.

In **Northern Territory**, 86% of respondents said they were aware of ALH's RG policy. Of those, 67% provided a strong description of its key points and 34% demonstrated some knowledge of the policy.

Strategy for RG

The corporation has a responsible gambling strategy with defined goals and a clear plan of action. The strategy is periodically reviewed and updated.

No evidence was provided that a detailed corporate RG strategy is in place that identifies defined goals and outlines a clear plan of action. It is recommended that a strategic plan be developed in order to grow and improve the existing RG program.

Senior Staff Focused on RG

One or more executive staff are accountable for responsible gambling policies and programs. Senior executives are actively engaged in responsible gambling, as evidenced by performance evaluations, training, and internal communications with staff.

The documentation provided demonstrated a strong commitment to RG by ALH senior management. In particular, ALH's CEO, the Head of Regulatory and Corporate Affairs, and the National Gaming Manager are actively involved in the development and implementation of ALH's RG program.

Members of this senior management team participate in a range of state and local government gambling working groups to assist in identifying and developing RG initiatives. ALH is represented on the RG Foundation Venue Support Program Reference Group, the Ministerial Pre-Commitment Industry Advisory Group, the Ministerial Community Concerns About Gaming Machines Working Group, the Ministerial Advisory Council on RG (RGMAC), and an RG Awareness Week Working Group. Senior staff also visit other jurisdictions to learn about their RG programming, and report to the Board on RG-related matters.

The CEO presents at manager meetings, and provides weekly updates to state and operations managers. These regular communications to state-level staff were supported by information collected via interviews with State Managers and State Gaming Managers. Senior level management attend RG conferences regularly. The Head of Regulatory and Corporate Affairs also receives daily summaries from each state that include RG issues, but are not exclusive to RG.

State and venue level management also demonstrate a commitment to RG and communicate on a regular basis with their staff and with ALH head office. Interviews indicated that RG-related communications from ALH head office are provided via email, training sessions, conferences with senior staff that include an RG component, and quarterly face-to-face meetings. Additionally, the National Gaming Manager speaks about RG at weekly State Manager meetings.

Venues in **Victoria** are committed to maintaining relationships with local problem gambling support services. Venue management meet regularly with service providers in their areas and participate in their training programs. It is mandatory in Victoria to have a designated RG Officer at each venue. This is normally assigned to whomever is on management duty (e.g., supervisors and above).

The **Queensland** State Gaming Manager participates in the Responsible Gambling Network Committee. Interviews with state level management suggest regular communication with ALH head office staff and with operations managers, including weekly updates to all Queensland management staff and supervisors. The State Manager speaks with both the Gaming and Compliance Managers regularly about RG. The State Gaming Manager has regular one-on-one meetings with the National Gaming Manager, participates in regular updates and internal audits and receives monthly communications from ALH head office. Additionally, the State Gaming Manager regularly communicates with other jurisdictions to receive RG updates and share information.

Interviews with state level management in **New South Wales** confirmed regular communication and meetings with head office and between State Managers and State Gaming Managers. RG is discussed at all meetings taking place with operations management and venue management.

Interviews with the State Manager and the State Gaming Manager in **South Australia** reiterated the regular contact between head office staff (particularly the Head of Regulatory and Corporate Affairs and the CEO) and state level management. The State Gaming Manager indicated that they participate in weekly gaming meetings each Monday, at which RG is a regular agenda item. The State Gaming Manager is also part of a Responsible Gambling Working Party. Venue managers meet regularly and RG is an agenda item at these meetings.

All state managers, operations managers and hotel managers have completed the basic RSG training. Other than the attendance at conferences by ALH head office staff and participation in government working groups by both head office staff and state level management, there is no evidence of additional RG training for senior staff.

ALH actively monitors RG compliance through the day-to-day management structure of the organisation and through annual audits at each venue that review RSG and RSA compliance. Venue and operations managers are not advised as to when these audits will occur and the results are included as part of the key performance indicators set for each venue manager. Beyond meeting the compliance requirements, RG is not part of performance evaluations for senior staff.

RG Integration and Staff Information

Responsible gambling is embedded across the organization and is discussed at all levels of the organization. There are regular reminders to retail staff about responsible gambling initiatives.

Retailers and Other Third Parties

Retailers ensure the public is aware of responsible gambling policies by posting them at their VLT establishment, as well as on their website (if the retailer has a website).

Regular RG communications were evident among all levels of corporate and state management, demonstrating a strong top-down commitment to RG. Involvement in external RG-related working groups and the inclusion of RG as part of regular venue audits demonstrated a corporate culture in which RG is embedded.

Surveyed staff were asked whether they receive RG updates and reminders, and if yes, how they receive these updates.

In **Victoria**, 77% of respondents said they received RG updates and reminders. When asked how they receive these communications: 50% indicated staff email, 13% said staff meetings, and 13% said back of house messaging.

In **Queensland**, 67% of respondents said they received RG updates and reminders. When asked how they receive these communications: 21% indicated staff email, 17% said staff meetings, and 28% said “other” with most of these noting weekly updates.

In **South Australia**, 90% of respondents said they received RG updates and reminders. When asked how they receive these communications: 41% indicated staff email, 16% said staff newsletters, and 22% said “other” with most indicating “all of the above” (meetings, intranet, email, back of house messaging, and newsletters).

In **New South Wales**, of respondents said they received RG updates and reminders. When asked how they receive these communications: 31% indicated staff email, 26% said staff meetings, and 25% said “other” with most indicating “all of the above” (meetings, intranet, email, back of house messaging, and newsletters).

In **Northern Territory**, of respondents said they received RG updates and reminders. When asked how they receive these communications: 44% indicated staff email, 22% said staff meetings, and 22% said staff newsletters.

The sample of venues that participated in the site visits suggests that in particular jurisdictions the ALH’s commitment to RG is displayed at the venue level. In particular, all the sampled venues in **Victoria** and **Northern Territory** had the ALH mission statement posted in the gaming room. In **Queensland**, **South Australia**, and **New South Wales**, a small number of venues made the ALH policy statement available to players in the gaming room, but most did not. Making ALH’s RG commitment easily visible across all ALH properties should be considered for future program enhancement.

SUMMARY – Responsible Gambling Policies

Areas of Strength:

- ALH has a strong RG commitment that is publicly available online and includes specific examples of program initiatives.
- ALH venues in Victoria adhere to a comprehensive RG Code of Conduct
- Victoria and Northern Territory have the ALH RG commitment statement publicly available in the gaming rooms of all sampled venues.
- ALH corporate senior staff commitment to RG is evident.
- Regular RG communications take place between various levels of management and with venue staff.

Recommendations for Improvement:

- Develop a corporate RG strategy document outlining RG goals and a detailed plan of action to support continuous program growth.
- Ensure ALH's RG commitment statement is available across all ALH properties in Australia.
- Develop an RG Code of Conduct that is applicable to all jurisdictions, similar to the one available in the state of Victoria.
- Include RG as a KPI for both head office senior staff that lead RG initiatives, as well at state level management (State Managers, State Gaming Managers)

5.2. EMPLOYEE TRAINING

Retail staff understand the importance of responsible gambling and are knowledgeable about their role and the corporation's expectations of their actions.

Reflecting Corporate Policies

Staff are trained on corporate responsible gambling policies and procedures, and are made aware of relevant codes of practice in areas such as assisting players, informed decision making and self-exclusion.

The Responsible Service of Gambling (RSG) training, required to be completed by all employees, provides an introduction to ALH's commitment to responsible gambling, which specifically states as its intention "to provide a safe and supportive environment where our players make informed decisions about gambling". There is a further commitment to provide timely and appropriate assistance and information.

The RSG training program includes an introduction to ALH's RG Ambassador Program and the availability of responsible gambling information at the venue level, such as posters, self-exclusion information, and the RG code of practice.

RSG training provides trainees with information on the ALH Responsible Hotel and Gaming Charter which discusses:

- Having a shared responsibility, with individuals, families, communities, and governments, to ensure responsible behaviour;
- Restrictions on promotions that encourage irresponsible drinking;
- Restricting gaming room access to adults only and ensuring gaming rooms are screened or separated from other areas of the hotel, so as not to attract children;
- Supporting voluntary pre-commitment;
- Training staff to be aware of behaviour that may indicate a gambling problem and to provide appropriate patron support;
- Partnering with external groups/organizations to help staff and players deal with PG, including Gambler's Help (a counselling service) and the Salvation Army; and,
- Restrictions on ATM placement.

Understanding Problem Gambling and Key RG Concepts

Staff training provides a description of problem gambling, which includes information on the risks, impacts and signs of a gambling problem. Training includes key responsible gambling concepts, such as tips for safer play, common gambling myths, and the realistic chances of winning.

Understanding Job Skills and Procedures

Retail staff are taught skills and procedures required of them to respond to players who may have problems with gambling. Frontline staff are able to handle situations where players are in distress or request information. They are aware of escalation procedures and learn when to refer a player to a more senior staff person or to external support services.

Avoiding Misleading Information

Retail staff are trained to avoid messaging that reinforces misleading or false beliefs and are provided with information to correct common gaming myths.

The focus of the RSG e-learning module is to provide staff with the skills to approach and interact with players who may be demonstrating signs of problematic gambling and to provide information on the self-exclusion program.

The training module acknowledges that problem gambling is a serious issue and provides information on the various types of warning signs that staff should be aware of.

The training module does not provide information on the risks and impact of PG or safer gambling tips. Nor does it provide detailed information regarding underage gambling or game mechanics, such as randomness, the chances of winning and losing, etc.

Although this training provides detailed information on signs to be aware of, it does not include specific information on how staff are expected to respond. Staff are instructed to refer to the Responsible Gambling Pocket Guide; however, describing expectations and response procedures within the training program itself would help staff better understand their specific role and how they are to interact with players. For example, information that can be provided within the training includes escalation procedures, when to provide information to players, what type of information is available, and what information should be provided in specific circumstances.

While the RG Pocket Guide includes detailed self-exclusion information specific to each state, the training program does not provide a description of the program to staff. It is important for all staff to

have a basic understanding of the program so they are able to respond to questions when necessary, and to understand when it may be appropriate to propose the program to a customer.

The training program should also provide staff with basic information on how the games work and the chances of winning so they are equipped to debunk myths and false beliefs when interacting with players.

The RG Code of Conduct available for venues in **Victoria** states that the rules for each game, including the chances of winning, are available via the Player Information Display on the machines, and venue staff should be able to assist customer to view this display if requested.

All Staff Receive Mandatory Training

Retail staff are trained upon hiring and are retrained on a regular basis.

In Victoria, New South Wales, Queensland, and South Australia, all staff that work in the gaming room are required to complete the RSG training. Those who do not possess a valid RSG certificate are not able to work in the gaming room. No information specific to Northern Territory was provided.

Documents provided and information from interviews indicate that all venue management are required to take an additional advanced face-to-face training within six months of commencing work. As the advanced training is developed and administered externally at the state level, these programs were not reviewed in detail. However, ALH might consider developing its own robust advance training in order to ensure all staff are equipped with the necessary skills and knowledge to respond to players, when needed. Alternatively, ALH might also consider collaborating with the external agencies in each state to inform advanced training content and delivery to ensure its staff are receiving adequate training.

Surveyed staff were asked what training they have received on responsible gambling:

- In **Queensland**, 91% of respondents indicated they had received the online training and 48% said they had received advanced face-to-face training.
- In **Victoria**, 83% of respondents indicated they had received the online training and 67% said they had received advanced face-to-face training.
- In **Northern Territory**, 93% of respondents indicated they had received the online training and 64% said they had received advanced face-to-face training.
- In **New South Wales**, 79% of respondents indicated they had received the online training and 63% said they had received advanced face-to-face training.
- In **South Australia**, 65% of respondents indicated they had received the online training and 90% said they had received advanced face-to-face training.

When asked about regular refresher training, RG+ received a variety of responses. While some corporate staff indicated there was no policy in place for refresher training, others stated that a refresher was required every three years.

Interviewees from **Queensland** said that a training refresh was required every three years, while interviewees from **South Australia** indicated that operations managers are required to receive RSG refreshers each year, and that advanced gaming refresher training is required every two years. Interviewees that represented **Victoria**, **Northern Territory**, and **New South Wales** stated that staff are required to refresh their training every two years. One interviewee said that a refresher program is in development for their state, and will be available by 2020. No supporting evidence was provided to indicate that regular refresher training is in place for any of the jurisdictions under review or for corporate staff.

Staff Training is based on Key Learning Principles

The corporation is responsible for developing a training package for retailers that accommodates difference learning styles, contains objectives that are clear and accessible to learners, and provides a self-assessment quiz.

Training is Evaluated

A formal evaluation process is in place that includes feedback from participants.

Training is based on Current Research and Expertise

The training program and/or evaluation is informed by the best available evidence and is based on advice from specialists in responsible gambling and adult education.

The training program could be strengthened by stating clear training objectives, increasing interactivity and audio/visual components, and incorporating opportunities for self-assessment to ensure comprehension.

Training does reference the RG pocket guide, “Know Your Code”. This guide is provided to every gaming staff person and they are required to have it on-hand while working their shift. This is a useful tool that provides an on-the-job reminder of RG information and procedures. The pocket guide includes information on signs of distress, suggests encouraging breaks in play, describes voluntary pre-commitment, recommends escalating if a customer is showing signs of distress, provides self-exclusion information, and has contact information for other help services in the state.

One of the sampled venues in **South Australia** provided an example of their monthly “SA Gamers Newsletter”, which included information on voluntary pre-commitment, provided help information, described the internal reporting system and how to use it, and gave details on response procedures (including suggestions on how to approach a customer and what to say/not say). Feedback from site visits indicated that venues require staff to read and sign off on each newsletter. Of the 10 venues that participated in the site visits, four had the RG policy posted for staff back of house, six had an RG board with posters (e.g., helpline, pre-commitment, etc.), and seven provided information on RG procedures.

One of the sampled venues in **Queensland** indicated that they provide their staff with weekly “one-pager” RG updates. Of the 10 venues sampled in Queensland, two provided information on RG procedures for staff back of house.

Of the six sampled venues in **Victoria**, five provided staff with RG policy and procedural information back of house.

Of the eight sampled venues in **New South Wales**, seven had RG posters back of house, but none provided RG procedural information for staff.

Of the three venues in the **Northern Territory** that participated in site visits, two provided information on RG procedures back of house (e.g., regulator information, incident logs) and one provided information on RG training.

The training program was developed in conjunction with Gambler’s Help, gambling research experts, and regulators.

No evidence of obtaining training feedback from staff or of conducting evaluations of the training program were provided for this review.

SUMMARY – Employee Training

Areas of Strength:

- The RSG online training provides examples of how ALH operationalizes its commitment to RG.
- The RSG online training provides a detailed list of signs to be aware of (red flags).
- The RG Pocket guide provides staff with information on signs, escalation, the self-exclusion program and voluntary pre-commitment.
- The newsletter distributed to ALH properties in South Australia provides comprehensive RG information for staff and covers a range of subtopics, such as how to document incidents, pre-commitment, and monitoring and approaching players displaying problem play behaviour.

Recommendations for Improvement:

- The training program could be strengthened by stating clear training objectives, increasing interactivity and audio/visual components, and incorporating opportunities for self-assessment to ensure comprehension.
- Include information in the training program on the risks and impact of problem gambling, as well as safer gambling tips.
- Include information in the training program regarding underage gambling.
- Include information in the training program on how the games work (e.g., randomness, chances of winning, etc.) to provide staff with the knowledge and comfort to appropriate debunk gambling myths.
- Include response procedures and expectations within the training program itself to help staff to develop a clear understanding of their role and expected procedures.
- Consider including basic self-exclusion information within the training program.
- Advanced training should be provided for venue management and/or any staff to whom frontline staff escalate RG interactions. ALH might consider developing their own robust advance training in order to ensure their staff are equipped with the necessary skills and knowledge to respond to players, when needed. Or, ALH might also consider collaborating with the external agencies in each state to inform advanced training content and delivery.
- Require staff to complete a training refresher at least every two years.
- Use participant feedback and third party evaluations to better understand the effectiveness of the training module and to inform future iterations of training programs and materials.
- Encourage use of back of house RG materials for staff (e.g., RG board, staff newsletter) across all jurisdictions as a way to provide regular reminders and to reinforce RG expectations and procedures.

5.3. SELF-EXCLUSION

A well-managed and communicated self-exclusion program is in place that facilitates access to counselling and other supports.

Self-Exclusion Policy

A publicly available self-exclusion policy is in place that is comprehensive and support-oriented.

Self-exclusion (SE) programs in Australia are state-based, and are therefore implemented in ALH venues by a number of different organizations across the country. The common features of self-exclusion programs across jurisdictions is the agreement by the SE participant to the following:

- To refrain from entering the venue at all, or at minimum, to refrain from entering the gaming area and from playing gaming machines at the nominated venue(s);
- Authorizing staff to prevent them from entering or remaining in a gaming area of a venue they are excluded from;
- Authorizing photographs and personal details to be taken and disseminated to relevant venues and for the venues to display these photographs; and,
- Acknowledging that nominated venues or their staff have no legal duty implied by the SE deed.

In **Victoria**, if gaming staff receive a request for self-exclusion information from a customer, they are required to direct the enquiry to the Australian Hotels Association (AHA). The AHA self-exclusion office oversees an annual review of the administration of the self-exclusion program at gaming venues.

In **South Australia**, the self-exclusion program is administered by the Independent Gambling Authority (IGA). Individuals may also be barred via “Family Protection Orders” if the person’s gambling is affecting family members who are dependent on them. The barring order can: 1) ban someone from particular gambling activities in particular venues; 2) compel someone to attend counselling; 3) have wages paid directly to a family member or into a specific account. Gambling providers can bar someone from gambling for three months. They must provide their decision to the IGA who will review it and interview the individual. IGA barring orders last up to three years and can be extended.

In **Queensland**, all gambling providers are required to offer self-exclusion. Operators can also initiate exclusion for players from gambling activities and may accept a third-party request for venue initiated exclusions. All gambling providers are responsible for actively enforcing exclusion procedures with players. Venue initiated exclusions remain in place for five years, unless the patron makes a written application to the venue and the venue agrees to revoke it. Self-exclusion must be administered through the venue.

Self-exclusions in ALH venues in **New South Wales** are operated by Game Care of AHA. A person who has self-excluded cannot play the gaming machines at the venue(s) from which they have excluded. They are not permitted to enter the restricted gaming area for any reason. However, the customer is permitted to go to the venue for the purpose of having a meal or a drink, as long as it is outside of the gaming area. The exclusion form states that the person agrees to be excluded for a minimum of six months. They can select if they prefer to be excluded from “any area where gaming machines are located”, “any area where gaming machines, or any other gambling facilities, are located,” or “the whole venue”.

Under the **Northern Territory** Responsible Gambling Code of Conduct, application forms for self-exclusion must be available at the gaming venue and/or on the gambling provider's website. Currently, it is up to the customer to initiate a self-exclusion at each venue they wish to be excluded from.

Promotion of the Program

The self-exclusion program is well promoted to players through a variety of methods.

ALH staff are expected to be knowledgeable about the state's self-exclusion program and able to talk with players about the SE process. They are equipped with the "Know Your Code" pocket guide, which provides details of the program and the steps required to enroll.

Surveyed staff were asked what they know about the self-exclusion program:

- In **New South Wales**, 6% of respondents demonstrated a strong understanding of the SE program, 49% demonstrated a basic understanding, and the remainder either did not know or provided an incorrect response.
- In **Victoria**, 39% of respondents demonstrated a strong understanding of the SE program, 37% demonstrated a basic understanding, and the remainder either did not know or provided an incorrect response.
- In **Queensland**, 8% of respondents demonstrated a strong understanding of the SE program, 47% demonstrated a basic understanding, and the remainder either did not know or provided an incorrect response.
- In **South Australia**, 16% of respondents demonstrated a strong understanding of the SE program, 42% demonstrated a basic understanding, and the remainder either did not know or provided an incorrect response.
- In **Northern Territory**, 36% of respondents demonstrated a strong understanding of the SE program, 7% demonstrated a basic understanding, and the remainder either did not know or provided an incorrect response.

The SE program is promoted throughout venues via David Schwarz posters, point-of-sale brochures, posters in washrooms and through the ALH website.

Players were surveyed in each of the jurisdictions under review, and were asked if they had heard of the SE program, and if yes, how they heard about it. The results of the patron survey are as follows:

- In **Queensland**, 65% of survey respondents said they knew about the program. Of those, 58% said they had seen an advertisement at an ALH venue, 19% said that a friend or family member told them about it, 18% said they heard about it from the radio/television/newspaper, and 8% said that they heard about it from a staff person.
- In **Victoria**, 73% of survey respondents said they knew about the program. Of those, 63% said they had seen an advertisement at an ALH venue, 30% said they heard about it from the radio/television/newspaper, 12% said that a friend or family member told them about it, and 5% said that they heard about it from a staff person.
- In **South Australia**, 63% of survey respondents said they knew about the program. Of those, 61% said they had seen an advertisement at an ALH venue, 26% said they heard about it from the radio/television/newspaper, 16% said that a friend or family member told them about it, and 9% said that they heard about it from a staff person.

- In **New South Wales**, 78% of survey respondents said they knew about the program. Of those, 63% said they had seen an advertisement at an ALH venue, 30% said they heard about it from the radio/television/newspaper, 12% said that a friend or family member told them about it, and 5% said that they heard about it from a staff person.
- In **Northern Territory**, 78% of survey respondents said they knew about the program. Of those, 66% said they had seen an advertisement at an ALH venue, 20% said they heard about it from the radio/television/newspaper, 8% said that a friend or family member told them about it, and 7% said that they heard about it from a staff person.

Surveyed staff were also asked to name a location in the venue where a customer could obtain a self-exclusion brochure. Their responses were as follows:

- In **New South Wales**, 68% of respondents referred to the gaming room, 17% said the cashier, 8% said bar or hotel, and 2% said a staff person.
- In **Victoria**, 66% of respondents referred to the cashier, 24% said the gaming room, 4% said bar or desk, 3% said in the toilets, and 2% said a staff person.
- In **Queensland**, 46% of respondents referred to the gaming room and 33% said the cashier.
- In **South Australia**, 64% of respondents referred to the gaming room, 22% said the cashier, 8% said a staff person, and 3% said bar or hotel.
- In **Northern Territory**, 57% of respondents referred to the gaming room, and 14% said the cashier.

In **Victoria**, each gaming venue is required to nominate a RG Officer who will ensure that a staff member is available (whenever gaming is available) to provide players with information about the SE program. AHA policy states that gaming venues will obtain relevant training information from AHA, which provides staff with the knowledge to help players who are seeking information about self-exclusion, identify self-excluded players and to appropriately manage those who have self-excluded.

All staff employed in gaming areas are required to undertake a Victorian Commission for Gambling and Liquor Regulation approved training course in responsible services, which provide staff with knowledge on monitoring and detecting those who may breach their self-exclusion. Emphasis is placed on maintaining discretion, privacy, and sensitivity when managing issues relating to breaching and the administration of self-exclusion.

In **Queensland**, the exclusion brochure includes information about self-exclusions and venue-initiated exclusions, duration and cooling off periods, breaching, confidentiality, revocation, and information on support services.

In **New South Wales**, staff must be aware of their obligations pertaining to the self-exclusion program, including respecting the confidentiality of the customer and not disclosing any related information to another person, unless it is in the course of their duties.

Registration Process

The process is managed in a timely and respectful way by specially designated and trained personnel. Terms are fully explained and players are given the opportunity to be connected with support services.

ALH staff are expected to carry the Know Your Code pocket guide, which details the self-exclusion program and the registration process in their respective jurisdictions.

In **Victoria**, the venue RSG Officer/Host or Manager advises the patron to contact Australian Hotels Association (AHA) and provides them with a self-exclusion information pack. The RSG Officer/Host or Manager is not required to attend the implementation meeting. AHA will conduct the interview, and the deed is issued by the AHA. The commitment period is from six to 24 months. Only the AHA can revoke the deed.

Surveyed staff were asked how they would respond if a customer said s/he would like to self-exclude. In Victoria, 22% of respondents indicated they would speak with the customer, 82% would offer resources, 14% would escalate to a manager, and 3% either did not know or did not provide a response.

In **South Australia**, gaming staff can use the Barring and Online Employee Notification (BOEN) system to manage exclusions electronically. Staff must notify the IGA within seven days of barring someone or from refusing a third-party request to bar someone. Following the individual's meeting with the IGA, a three-day cooling off period will commence. After this period, a notice is sent to the relevant venues. The order is legally binding for at least six months.

The Know Your Code pocket guide for South Australian staff indicates that the RSG Host or Manager determines the length of the self-exclusion/barring process. If it is patron initiated, it must be indefinite. Forms are completed by the patron and a photo (though not compulsory) is submitted. Venue staff then complete the SE/Barring Checklist. This checklist includes items such as ensuring the appropriate reports are filled out; patron and third party requests are responded to expeditiously; the patron either understood English or an interpreter was accessed; the patron appeared to understand the terms; a referral to Gambling Help Service was made; photo requested; barring notice completed; patron informed of consequences of breaching; the barring pack (which includes help information) was provided to the customer; all forms completed; loyalty points were redeemed; patron was removed from mailing lists; and information was entered into BOEN.

Surveyed staff were asked how they would respond if a customer said they would like to self-exclude. In South Australia, 66% of respondents said they would speak with the customer, 34% would offer resources, 28% would complete the SE form with the customer, 23% would escalate to a manager, and 9% either did not know or did not provide a response.

To register for self-exclusion in **Queensland**, the patron must complete the Self-Exclusion Notice (Form 3A) and return it to the venue, along with a photo. The patron must be informed that the self-exclusion is for a five-year period and cannot be revoked, except within the 24 hour cooling-off period after they received the Self-Exclusion Order (Form 3B) or at least 12 months after the person received the Form 3B. The exclusion is then recorded in the Register of Excluded Persons. Under no circumstances are exclusion details forwarded to another venue.

It was noted that as part of the site visit reviews in Queensland, three of the ten sampled venues did not have self-exclusion information packages readily available for players.

Surveyed staff were asked how they would respond if a customer said they wanted to self-exclude. In Queensland, 26% of respondents said they would explain the program to the customer, 8% would offer resources, 36% would complete the SE form with the customer, 27% would escalate to a manager, and 3% either did not know or did not provide a response.

In **New South Wales**, if a patron wants to self-exclude they are referred to the Game Care hotline or AHA to determine an interview time to register. The interview takes approximately 40 minutes. Once the

paperwork is complete, the customer's details and photograph will be distributed to all the venues from which they have excluded.

Surveyed staff were asked how they would respond if a customer said they wanted to self-exclude. In New South Wales, 32% of respondents would complete the SE form with the customer, 26% would offer resources, 19% would escalate to a manager, 17% of respondents indicated that they would explain the program, and 4% either did not know or did not provide a response.

In the **Northern Territory**, a patron can select the areas from which they wish to be excluded (e.g., the entire venue, the gaming area, keno, table games, gaming machines, TAB, and/or other). There is a three-day cooling off period following the completion of the agreement. Exclusions are available for a minimum of three months.

Surveyed staff were asked how they would respond if a customer wanted to self-exclude. In the Northern Territory, 43% of respondents said they would explain the program, 29% would offer resources, 21% would escalate to a manager, and 7% would complete the SE form with the customer.

Promotional Materials Discontinued

A system is in place to ensure banned players do not receive marketing or promotional materials.

In **Victoria**, the venue is required to review the listing of the self-excluded players to ensure that any loyalty database does not include those who are self-excluded.

In **South Australia**, as part of the checklist that must be completed, staff redeem the customer's loyalty points and remove the person from all mailing lists.

In **Queensland**, the customer is removed from any loyalty database or mailing list once the registration process is complete.

In **New South Wales**, as part of the signed agreement, the customer selects whether they wish to continue to receive club promotional material that refers to gaming machines. Players do not have the option to stop receiving other types of promotional materials from the venue.

In **Northern Territory**, the self-exclusion agreement states that the Licensee must remove the self-excluded person from player loyalty mailing lists that promote gaming activities for the duration of the self-exclusion period.

Access to Community Resources

Players receive information on problem gambling and are directed to help resources, such as clinical and financial counselling services.

On behalf of gaming venues in **Victoria**, the AHA self-exclusion officer maintains regular contact with problem gambling support services and works with gaming venues to refer players to appropriate help services.

The self-exclusion pack contains an SE brochure that describes the program and provides a number to call if a customer is interested in registering for the program. It provides an overview of the process and restrictions that are in place during the self-exclusion period. It also informs players as to how their photo will be used and provides contact information for various help services.

In **South Australia**, as part of the checklist that must be completed, staff are required to offer a referral to Gambling Help Services and provide the patron with a barring pack, which includes RG pamphlets and the helpline number.

In **Queensland**, when a customer requests to self-exclusion s/he is to be provided with information on the self-exclusion program and problem gambling support services.

The self-exclusion agreement form for **New South Wales** includes an option for players to have the venue forward their personal information to a problem gambling counsellor.

In **Northern Territory**, the self-exclusion agreement provides information for the helpline, Amity community services, and Anglicare.

Enforcement

A strong enforcement process is in place to identify and remove self-excluded players. Staff have sufficient tools to enforce the program.

In **Victoria**, the venue receives the self-excluded individual's photo and personal information for the purpose of updating venue records. The gaming venue supervisor/manager is required to maintain a full listing of self-excluded players from that particular venue and must ensure the person's photo, information and exclusion dates are displayed back of house to assist venue staff to monitor self-excluded players. The information should be stored in an area that is private and secure from the public. Venues in Victoria are able to access an AHA self-exclusion database, which allows them to view only those individuals who are excluded from their venue.

Venue staff are required to maintain working knowledge of self-excluded people. In the case of a suspected breach, staff are required to check the person's appearance against the available photographs of self-excluded persons. Where possible, the staff person will seek input from other staff members when making the determination that a particular person is breaching their self-exclusion agreement.

If positively identified, a discreet intervention will take place by either venue management or a designated staff person who will take reasonable steps to remove the person from the gaming area. The staff person will invite the individual to a private area and inform them that they are currently self-excluded. Help information may be provided to the customer. All breaches are recorded in the venue's RG register.

As part of the ALH audit, venues in Victoria are required to display photos of all current self-excluded persons back of house. The venue is to ensure that all details are up to date and that expired records are properly destroyed. During the site visits, the sampled venues had photos and information of self-excluded players displayed on a wall accessible only to staff for review.

In **South Australia**, if a self-excluded person is detected breaching their agreement, venue staff are required to complete a patron intervention form. No further details about response procedures were provided.

All sampled venues reviewed as part of site visits had photos of self-excluded players available to frontline staff, usually located in the cashier station. Photos and information were also available online via the BOEN system.

In **Queensland**, if a self-excluded customer enters the gaming room or plays gaming machines at the nominated venue, they are to be reminded of their exclusion and asked to leave the gaming room. Staff should offer the person a non-alcoholic refreshment away from the gaming room. If the patron refuses to leave, reasonable force may be used to remove the person. Staff are expected to encourage the customer to contact all relevant gambling help service providers listed in the Know Your Code pocket guide. The customer is also provided with a Notice of Contravention of Exclusion Order/Direction (Form 3H). Completed forms are sent to Gaming Operations Manager/Compliance for submission to the Office of Liquor, Gaming and Racing (OLGR).

Of the venues that participated in the site visits, all had a binder with photos of self-excluded individuals. It was generally located at the cashier's station and was available to frontline staff.

In **New South Wales**, once the deed is executed, passport-sized photographs of the patron will be taken and distributed, along with a copy of the signed deed, to each of the venues that the patron has excluded from. The photos ensure that staff are familiar with the appearance of the patron and all steps are taken to protect the patron's confidentiality. The deed and photographs are displayed back of house and in the self-exclusion folder at the cashier station. If the customer enters the gaming room, or uses gaming machines at a nominated venue, they will be approached by a staff person who will remind them of their exclusion and ask them to leave the restricted area and/or the venue. If the patron refuses to leave, reasonable force may be used to remove them. If the customer has breached multiple times, they are encouraged to contact GameCare or the AHA.

As part of ALH's audit process, venues in New South Wales are required to maintain a display of all currently self-excluded persons back of house. The venue is to ensure that all details are up to date and expired records are properly destroyed. All venues that participated in the site visits in New South Wales had photos of self-excluded players available to frontline staff.

During site visits in **Northern Territory**, one venue had photos available to trusted staff, and the remaining two venues had photos available to all frontline staff.

Reinstatement

There is an active reinstatement process in place for self-excluded players.

Renewal

Ban renewal is straightforward and offered both off and on site.

In **Victoria**, if a patron requests to have their self-exclusion revoked, they are again connected with the AHA. The person must attend an interview with a problem gambling counsellor and obtain written acknowledgement of revocation counselling. The person then meets with the SE officer. Once the agreement has been revoked, the SE Officer notifies the particular gaming venues.

In **South Australia**, if the individual wants to cancel a voluntary barring after the minimum amount of time specified in the order (usually six months), they can contact the IGA to make the request.

In **Queensland**, a self-exclusion cannot be revoked except within the 24 hour cooling-off period after they have received the Self-Exclusion Order (Form 3B), or at least 12 months after the person received Form 3B.

The self-exclusion agreement form for **New South Wales** provides the customer with the following options: 1) to automatically have the exclusion end after the minimum six-month period, 2) to automatically end after a duration selected by the customer (but not longer than three years), or 3) when the person completes an “End of Self Exclusion Form” at the end of the six-month period, but not longer than three years from the date of the agreement.

SUMMARY – Self-Exclusion

Areas of Strength:

- Staff are required to carry the Know Your Code pocket guide, which provides them with information about the self-exclusion program applicable in their respective jurisdictions.
- Players who self-exclude are, or can choose to be, removed from all loyalty mailing lists.
- All jurisdictions have in place a policy statement that requires players be provided with resources for help services when registering for the self-exclusion program.
- All but one of the venues reviewed as part of the site visits provided photos and information of self-excluded players to frontline staff to assist with detecting breaches.

Recommendations for Improvement:

- Train all staff on the self-exclusion program to ensure that all have a strong understanding of the self-exclusion program.

5.4. ASSISTING PLAYERS

Assistance to players who may have problems with gambling is readily available, systematically provided and documented.

Policies and Procedures

Clear written policies and procedures are in place for assessing and handling situations where players may have a gambling problem. Escalation guidelines are outlined and senior staff have procedures to follow when a player has been referred to them.

All staff must be aware of, and able to explain, all aspects of ALH’s RG program. In particular, the training program and the pocket guide instruct staff to be aware of signs of distress and provide examples of some of the warning signs. The pocket guide also suggests that staff encourage a break in play and escalate to an RSG Host or Manager. In the pocket guide provided to staff in **South Australia**, frontline staff are also instructed to record the incident in the Patron Internal Reporting System.

The **Victoria** RG Code of Conduct provides a clear policy of staff responsibilities with regard to assisting players, stating that “all gaming staff will be aware of their responsibility to assist players both in response to direct requests for assistance and where players are displaying signs that their gambling is becoming a problem.” Staff are instructed to approach the customer and offer assistance. The signs of problem gambling are explicitly stated in the document and suggestions provided as to how a staff person can respond.

The other jurisdictions under review, **South Australia, Queensland, New South Wales**, and **Northern Territory**, did not provide similar policy documents. However the sample newsletter provided by a **South Australia** venue did provide a detailed description of response procedures.

Responding to Information Requests

Staff are able to provide information about the helpline, self-exclusion/timeout, responsible gambling and problem gambling resources, and local treatment options.

Responding to Distress

Clear protocols are in place and designated staff respond appropriately to a player in crisis/distress.

Staff in each of the jurisdictions under review are provided with the RG pocket guide, which describes resources such as the self-exclusion program and provides contact information for help services in the respective jurisdictions.

To gauge staff awareness of available resources, surveyed staff were asked to name one resource available to players who may be looking for help, and to name one location in the venue where a customer can find the helpline number.

- In **South Australia**, when asked to name one resource: 26% of respondents said the helpline; 19% said limit setting tools; 15% said Gaming Care; 15% said self-exclusion, 14% mentioned David Schwarz, 5% said staff, and 3% said Relationships Australia. When staff were asked to name a location where the helpline number could be obtained: 49% of respondents said on the gaming machines; 27% said the gaming area; 28% said the cashier or tiny teller, and 22% said the ATM area.
- In **Queensland**, when asked to name one resource: 24% of respondents said self-exclusion; 23% mentioned brochures or pamphlets, 21% said the helpline or Gambler's Anonymous; 4% mentioned pre-commitment; 5% mentioned David Schwarz, and 3% said Relationships Australia. When staff were asked to name a location where the helpline number could be obtained: 46% of respondents said the gaming area; 16% said the ATM area; 17% said the cashier; 10% said the toilet, and 3% said the bar.
- In **New South Wales**, when asked to name one resource: 28% of respondents said self-exclusion; 23% mentioned David Schwarz; 21% said the helpline; 15% mentioned brochures or posters; and 7% said Chaplain or counsellor. When staff were asked to name a location where the helpline number could be obtained: 81% of respondents said the gaming area and/or the machines; 8% said the ATM area; 7% said the cashier; 5% said the bar.
- In **Victoria**, when asked to name one resource: 47% of respondents said Gambler's Help; 30% said self-exclusion; 19% mentioned David Schwarz; 7% mentioned YourPlay; and 6% either were not sure or did not provide a response. When staff were asked to name a location where the helpline number could be obtained: 58% of respondents said the cashier; 26% said the gaming area and/or the machines; 15% said the toilets; 4% said staff, and 3% either did not know or did not provide a response.
- In **Northern Territory**, when asked to name one resource: 36% of respondents named Amity; 2% said self-exclusion, 14% mentioned David Schwarz, and 7% mentioned the ALH website. When staff were asked to name a location where the helpline number could be obtained: 79% of respondents mentioned the gaming area, with some specific mentions of the teller (14%), toilets (14%), bar (14%), and ATM area (7%).

The pocket guide also instructs staff to be aware of warning signs and to respond to the player by suggesting a break and then escalating to a RSG host or Manager. Staff are required to log the interactions in the RG Register. To gauge awareness and use of the pocket guide, surveyed staff were asked if they were aware of the pocket guide, and those that answered yes were then asked how often they refer to it. Responses from each of the jurisdictions under review are as follows:

- In **Victoria**, 90% of respondents said they were aware of the RG pocket guide. Of those, 28% said they refer to it a few times a year, 15% said they refer to it about once a year, 14% said once every few months, 12% said about once every month, and 8% said more than once a month. 22% said they never refer to it.
- In **New South Wales**, 90% of respondents said they were aware of the guide. Of those, 23% said they refer to once every few months; 22% said more than once a month; 19% said a few times a year; 11% said about once a month, and 7% said about once a year. 18% never refer to it.
- In **Queensland**, 91% of respondents said they were aware of the guide. Of those, 20% said they refer to once every few months; 16% said about once a month; 14% said more than once a month; 13% said a few times a year and 10% said about once a year. 27% said they never use it.
- In **South Australia**, 94% of respondents said they were aware of the guide. Of those, 25% said a few times a year; 17% said they refer to once every few months; 14% said about once a month; 12% said about once a year; and 8% said more than once a month. 23% said never.
- In **Northern Territory**, 57% of respondents said they were aware of the guide. Of those, 38% said they refer to it about once a month, and 13% said they refer to it either once every few months, a few times a year, or about once a year, respectively. 25% said they never refer to it.

The majority of staff across the jurisdictions under review are well aware of the RG pocket guide. In Northern Territory, however, close to half of staff respondents said they were not aware of it. Across all jurisdictions, many staff said they refer to it infrequently, and about 25% in several jurisdictions said they never use it.

In **Victoria**, all ALH venues must have a nominated RG officer available when the venue is open. While all staff should be able to provide assistance to players, the RG Officer is the person responsible for ensuring that any customer requiring information or assistance regarding problem gambling or self-exclusion is provided with it.

In **New South Wales**, interactions may be escalated to the onsite Chaplain. Over the past two years, the Salvation Army has provided a chaplaincy program whereby the chaplain pays a monthly visit to provide help, support and lend a “listening ear”. The Chaplain is available to both staff and players.

To gauge how staff might respond to a customer in distress, surveyed staff were asked how they would respond if they encountered someone who was crying in the gaming room. Responses were as follows:

- In **New South Wales**, 90% of respondents said they would speak with the customer, 34% would offer information or resources, and 11% would escalate.
- In **South Australia**, 93% of respondents said they would talk to the patron, 23% said they would offer resources, and 9% would escalate.
- In **Queensland**, 91% of respondents said they would talk to the patron, 24% said they would offer resources, and 10% would escalate.

- In **Victoria**, 91% of respondents said they would talk to the patron, 34% said they would offer resources, and 12% would escalate.
- In **Northern Territory**, 86% of respondents offered to speak with the customer, 21% said they would escalate, and 21% said they would offer them resources.

These survey responses indicate that staff actively respond to players in distress by opening a conversation with them. Many respondents also mentioned bringing the person to a private area off the gaming floor and offering them a non-alcoholic drink, such as coffee or water.

Staff at all ALH venues are required to document RG-related incidents in the RG Register. This began as a paper-based system but is now moving to an online platform. Venues in **South Australia** have starting using “Service Now”, which is web-based. It is designed to record all RG interactions, including a description of the issue and its outcome. Staff are trained on the tool, and its use is encouraged at venue manager meetings and in emails and newsletters.

Surveyed staff in South Australia were asked how often they record RG related interactions. 72% of respondents said more than once a month, while 12% said never.

In **Victoria**, the RG Code of Conduct dictates that all venues are to maintain an RG Register. Gaming staff may enter information into the register or refer the RG matter to an appropriate person to be recorded. The venue manager is required to routinely check the register to ensure it is kept up to date and that any issues have been addressed. The Code of Conduct identifies the types of interactions that are to be recorded, such as incidents related to self-exclusion, players displaying warning signs, customer requests for information, players being asked to leave the gaming machine area, the provision of help information, and any other matter pertaining to the code. Interviewees stated they had begun to use the Service Now system.

Surveyed staff in Victoria were asked how often they record RG related interactions: 36% of respondents said never; 16% said once every few months; 15% said a few times year; 14% said more than once a month; and 14% said about once a month.

In **Queensland**, gambling related incident reports record information such as the incident details, the action taken, follow-up actions necessary, and staff member details. Regulations state that staff must enter RG related incidents into the paper-based system. The venues would then use the incident reports to determine an approach to a customer when needed.

Surveyed staff in Queensland were asked how often they record RG related interactions: 46% of respondents said never; 19% said a few times year; and 11% said about once a year. Fewer than 10% selected each of “more than once a month,” “about once a month”, and “once every few months”.

In **New South Wales**, interviewees indicated that staff use Service Now to log RG interactions and that notifications are sent to the State Manager and the State Gaming Manager. The State Gaming Manager then provides feedback to the Venue Manger and/or frontline staff regarding the action to be taken.

Surveyed staff in New South Wales were asked how often they record RG related interactions: 42% of respondents said never; 17% said a few times year; 12% said about once a year; 11% said once every few months; and 10% or less selected each of “more than once a month,” or “about once a month”.

Surveyed staff in **Northern Territory** were asked how often they record RG related interactions: 36% of respondents said never; 15% said about once a month, once every few months, a few times a year, and about once a year, respectively. 7% said more than once a month.

With the exception of South Australia, one third to one half of respondents from the surveyed jurisdictions said they had never logged an RG related interaction, which suggests possible low utility of the logging system. Gambling register data provided for the review also demonstrate a striking difference in the number of incidents logged in South Australia as compared to the other jurisdictions under review. Though the specific time period of the data collected was not provided, South Australia had logged 5,558 gambling incidents, while Victoria, New South Wales, Queensland reported 242, 177, and 98 interactions, respectively. Data for Northern Territory was not provided.

Recording interactions is an important part of responding to players, for both training and staff support purposes, but primarily to better support players who may be having frequent or regular RG-related interactions with staff.

It is possible that some of these staff who reported not having logged an incident may not have been involved in any gambling related incident. However, the surveyed staff were also asked if, while working at ALH, they had ever: suggested/provided RG-related information to a player, talked to a player about the voluntary pre-commitment system, talked to a player about the SE program, corrected myths or other incorrect beliefs about how gambling works, or none of the above. Very few survey respondents indicated none of the above (South Australia: 7%; Queensland: 15%; New South Wales: 14%; Victoria: 20%; Northern Territory: 14%), suggesting that many survey respondents had in fact engaged in a gambling related incident, though they had not recorded any incidents.

Initiating Interactions

Staff initiate discussions with players exhibiting signs of problematic gambling, and know when to escalate to designated staff.

Staff in all five jurisdictions under review are expected to observe warning signs displayed by players and escalate to an RSG Host or Manager. The RSG Host or Manager must record the nature and details of the complaint before referring to ALH head office for further advice. During interviews and in response to staff survey questions, several staff indicated that venue managers are required to complete advanced RG training. However, no evidence of the advanced training was provided for this review.

In **South Australia**, the Automated Risk Monitoring System (ARMS) is a tool used by staff to monitor the behaviour of players who exceed three hours of playing time, or turn over more than \$20,000 on a particular machine. The tool is still being refined and issues with false alerts are being considered.

Staff in **South Australia**, **New South Wales**, and **Victoria** indicated that a recent directive from head office required there be an RG host at each venue, who would be at the supervisor or manager level. No evidence of additional training for these staff was provided for the review.

SUMMARY –Assisting Players

Areas of Strength:

- ALH staff are required to carry the Know Your Code pocket guide at all times. This guide provides staff with general information about self-exclusion, assisting players, and contact information for help services.
- Staff actively respond to a customer in distress by speaking with them. Many also indicated they would offer the customer resources and/or escalate to a more senior staff person.

Recommendations for Improvement:

- Develop a comprehensive, corporate-wide policy that outlines expectations of staff with regard to assisting players. Response procedures should be clearly laid out to ensure all staff understand their responsibilities and there is consistency across all properties.
- Consider ways to better encourage and/or support the use of the RG interaction tracking system.
- Analysing logged RG interactions could facilitate a greater understanding of the types of interactions taking place and highlight areas for improvements to the RG program.
- Support escalation staff with robust advanced training to ensure they are equipped with the skills, techniques, and information required to respond to players displaying signs of problem gambling behaviour.

5.5. INFORMED DECISION MAKING

Site provides substantial and readily available information to enable players to make informed decisions.

Information about Gambling

Responsible and problem gambling information is provided in a variety of formats and locations throughout the venue.

Responsible gambling and help information is available in a number of different formats and locations throughout the venue reviewed on site visits. Through posters, brochures, information cards, stickers, information on the machines, and via staff, players can access RG information in a variety of ways.

Placement of RG information is determined by both regulators and ALH. Venue management is responsible for ensuring materials are well stocked and in the correct locations. Regular audits check that information is available and placed appropriately. Common locations for RG information across venues include: on the machines, at the cashier area, in restrooms, at venue entrances, on ATMs, and food and beverage areas.

The range of information provided includes:

- State-based helpline information
- Voluntary pre-commitment, Your Play
- Self-exclusion
- Chaplaincy program (**New South Wales**)

- Playing the pokies
- Other support services
- ALH mission statement, Code of Practice
- The prohibition of credit and cheque-cashing policies

The venues in **Victoria** that participated in the site visits provided players with information in a number of locations. Most of the sampled venues displayed RG posters at venue entrances, while two of the six sampled venues also provided RG brochures. All six displayed the ALH policy statement, as well as posters and signage that provided included information on Your Play, the state-wide voluntary pre-commitment system. All machines displayed an RG message. Cashier stations at the six participating venues provided a range of information, such as the helpline, the ALH RG policy statement, brochures, posters, payment of winnings policies, and financial policies. All toilets displayed the helpline number and RG posters, and most provided RG brochures.

Players surveyed in Victoria were asked which of the following types of information they had seen in the venue. Responses were as follows:

- How pokies work: 22%
- The odds of winning and losing: 33%
- Information on how to set limits: 34%
- Self-exclusion information: 52%
- Information about the Responsible Gambling Ambassador, David Schwarz: 20%
- Have not seen any information: 17%
- Not sure: 20%

Players were also asked to name one location where they might find help information in the venue, with the following responses:

- Toilets: 23%
- Cashier: 22%
- Gaming room: 7%
- Machines: 5%
- Reception: 3%
- Bar: 2%
- Entrance: 2%
- Staff: 1%

All venues in **New South Wales** that participated in the site visits provided helpline information and RG posters at the venue entrance; two of the eight venues also provided RG brochures in this location. With regard to the gaming rooms, three venues provided the ALH RG policy information, six displayed RG posters and signs, and three provided RG brochures in a variety of languages. Only two of these gaming rooms provided information about the voluntary pre-commitment system.

All venues had RG information and the helpline number available on the machines. In some venues, the cards with the helpline information were placed on the side of each machine, however, they were not easily visible. Helpline and RG information, such as brochures and posters, were also available at the cashier area of most of the sampled venues. The ALH RG policy statement was visible from the cashier area in nearly all of the venues visited.

One venue provided payment of winnings policies and financial policies in the vicinity of the cashier's area; the remaining venues did not have this information available in this location. All venues provided the helpline number on ATMs. No information was available in the restrooms. Nearly all of the sampled venues with food and beverage areas provided RG information in the form of posters and brochures.

Players surveyed in New South Wales were asked which of the following types of information they had seen in the venue. Responses were as follows:

- How pokies work: 24%
- The odds of winning and losing: 50%
- Information on how to set limits: 29%
- Self-exclusion information: 44%
- Information about the Responsible Gambling Ambassador, David Schwarz: 15%
- Have not seen any information: 20%
- Not sure: 17%

Players were also asked to name one location where they might find help information in the venue, with the following responses:

- Machines: 32%
- Gaming room: 23%
- Bar: 9%
- Cashier: 4%
- Entrance: 3%
- Staff: 3%
- Toilets: 1%

Most of the venues in **Queensland** that participated in the site visits (seven of ten) provided their players with the helpline number and RG posters/signs at the venue entrance. Two venues had RG brochures available near the venue entrance. Half of the sampled venues provided ALH policy statements in the gaming room (e.g., mission statement, advertising policy, Responsible Service of Gambling, financial transactions). Most of the sampled venues (nine of ten) displayed RG posters/signage throughout the gaming room.

All gaming machines had a card with the helpline number. All cashier stations provided players with the helpline number, as well as RG brochures and posters. Two of the ten sampled venues displayed the payment of winnings policy and credit and cheque cashing policy. All ATMs provided the helpline number and displayed RG posters, and most (eight of ten venues) also provided RG-related brochures near ATMs. All venue toilets had RG posters and four of the ten also provided players with RG brochures. Half of the sampled venues provided the helpline number, RG posters and/or RG brochures in the food and beverage areas.

Players surveyed in Queensland were asked which of the following types of information they had seen in the venue. Responses were as follows:

- How pokies work: 20%
- The odds of winning and losing: 31%
- Information on how to set limits: 28%
- Self-exclusion information: 38%

- Information about the Responsible Gambling Ambassador, David Schwarz: 14%
- Have not seen any information: 25%
- Not sure: 25%

Players were also asked to name one location where they might find help information in the venue, with the following responses:

- Toilets: 20%
- Gaming room: 19%
- Bar: 8%
- Cashier: 8%
- Posters: 7%
- Entrance: 4%
- Machines: 4%
- Staff: 2%
- Reception: 2%
- Keno: 2%
- ATM: 2%

Nearly all of the venues in **South Australia** that participated in the site visits (nine of ten) displayed helpline information and RG posters at the venue entrance; three of the ten had RG brochures available at the venue entrance. All gaming rooms displayed RG posters (e.g., pre-commitment, helpline, etc.), and three had the ALH RG policy statement posted.

All EGMS provided helpline information, but the visibility of this information was poor in some of the sampled venues. All cashier stations provided the helpline number, and nearly all (9 of 10) also provided RG information in the form of posters and/or brochures. All sampled venues that had ATMs provided the helpline number and RG information on screen; about half of these displayed RG posters and/or brochures nearby. Nearly all toilets had the helpline number posted (eight of 10 venues) and/or had RG posters (nine of ten venues); one venue provided RG brochures in the restrooms. Most venues with a food and beverage area provide the helpline number (seven of nine), RG posters (six of nine) and/or RG brochures (five of nine).

Players surveyed in South Australia were asked which of the following types of information they had seen in the venue. Responses were as follows:

- How pokies work: 18%
- The odds of winning and losing: 23%
- Information on how to set limits: 35%
- Self-exclusion information: 37%
- Information about the Responsible Gambling Ambassador, David Schwarz: 18%
- Have not seen any information: 23%
- Not sure: 24%

Players were also asked to name one location where they might find help information in the venue, with the following responses:

- Toilets: 13%
- Gaming room: 14%

- Bar: 8%
- Cashier: 12%
- Entrance: 3%
- Machines: 17%
- Reception: 3%

Three venues in **Northern Territory** participated in the site visits. One of the three provided players with helpline and RG information at the venue entrance. All venues provided a copy of the ALH RG policy statement and RG posters/signage (e.g., pre-commitment, helpline) in the gaming area. All gaming machines had helpline information and RG strategies in the form of an easily accessible Amity card. All cashier areas provide the ALH RG policy statement, helpline information, and RG posters and brochures. Two of the three sampled venues also displayed the payment of winnings policies, and one displayed credit and cheque cashing policies. All ATMs provide the helpline number; two of the three sampled venues also displayed RG-related posters in the vicinity of the ATMs. All toilets displayed the helpline number, and one venue also provided RG brochures. Two of the three venues provided the helpline and RG posters or brochures in their food and beverage areas.

Players surveyed in Northern Territory were asked which of the following types of information they had seen in the venue. Responses were as follows:

- How pokies work: 22%
- The odds of winning and losing: 56%
- Information on how to set limits: 44%
- Self-exclusion information: 56%
- Information about the Responsible Gambling Ambassador, David Schwarz: 22%
- Have not seen any information: 11%
- Not sure: 11%

Players were also asked to name one location where they might find help information in the venue, with the following responses:

- Toilets: 38%
- Cashier: 25%
- Staff: 13%

In 2006, ALH established the RG Ambassador program. David Schwarz, a former footballer who had previously experienced problems with his own gambling, was appointed ALH's RG Ambassador. The purpose of this role was to assist with the delivery of workshops and training for ALH management and staff, providing them with insights and strategies to assist players who may be experiencing issues with their gambling.

Part of this role entails being available to staff directly if they would like to have a confidential discussion regarding gambling-related issues they or their family members may be experiencing. ALH staff can also contact David if they want to discuss concerns regarding a patron and to obtain advice on how they might respond. David is available to staff via email, written communication, telephone, or in person. David is also the face of the ALH RG program and appears on much of their corporate RG collateral, such as brochures and posters with RG messaging, information about voluntary pre-commitment, and self-exclusion.

David has taken RG training and other courses deemed necessary. He strives to keep abreast of regulatory changes or new research pertaining to problem or responsible gambling. He has met with local help groups and organizations to share resources. He visits ALH venues from time to time and engages with staff. He is not involved in the self-exclusion program.

In the early years of the Ambassador program, approximately 40 to 50 visits were made in a year; they are now much less frequent. David provides monthly reports to ALH's Head of Regulatory and Corporate Affairs. When usage stats of the program were requested, RG+ was informed that David averages approximately 20 contacts per year, and in 2017, he was in regular contact with six staff or related family members. A detailed monthly report of contacts was not provided, but it appears uptake is low.

ALH Corporate staff feel the RG Ambassador program is a strong asset and a centrepiece of ALH's RG commitment. It was described as a valuable resource to staff and it is believed that staff feel the same, given that David adds a personal touch to the corporate RG program. The confidentiality in speaking with David was emphasized during interviews with ALH corporate staff as another key strength of this program.

Interviews with other staff also indicated the value in having a relatable person to be the face of the RG program. However, a number felt that it was time to refresh the program, perhaps with another spokesperson who would be more recognizable to a new demographic. Most believe in the strength of sharing personal stories, and suggestions included having several "relatable" state ambassadors, or having a more average person as the primary face of the program.

Across all participating jurisdictions, when surveyed staff were asked whether they had heard of David Schwarz, 91% said they had. When asked what function the RG ambassador program served, 29% of respondents mentioned that it was a resource for staff, 29% said it helped promote awareness and education for players, and 23% stated that David was the face of the ALH program. 24% either did not provide an answer or provided an incorrect response.

Staff were also asked how often they reached out to the RG Ambassador for an RG related matter. Across all surveyed jurisdictions, 90% said never, 5% said about once a year, and 4% said a few times a year.

Players were asked whether they had seen information about the RG ambassador, David Schwarz. Across all customer respondents, 18% said they had seen information about David, with most mentioning either on a poster or brochure.

Specialized Information Provision

The venue has dedicated player information and/or support services.

Staff and RG resources across each state provide ALH players with access to information about help services. Helpline information is readily available throughout most venues, including on nearly all gaming machines. All staff carry a Know Your Code pocket guide, which contains contact information for help services in their respective jurisdictions. ALH also partners with agencies such as Gambler's Help, the Salvation Army, Gaming Care, AHA, and Amity, to provide information and services to its players.

In **South Australia**, Gaming Care officers will make contact with venue managers approximately every quarter. In **Victoria**, each venue is assigned a Venue Support Worker by Gambler's Help. The Support Worker meets with venues periodically and conducts face to face training with new staff.

Personalized Information Provision (Player Feedback)

Players can access information about their current play and their play history (e.g., time and money spent).

All ALH venues provide access to pre-commitment features and play account feedback. The system is voluntary and card-based. Voluntary pre-commitment (VPC) was mandated in Victoria in 2016 (“YourPlay”) and was optional in all other jurisdictions. ALH implemented VPC across all mainland hotels in 2017, and is the only national pub group to provide gaming players with the ability to set time and spend limits on their play.

Players can use their Monty’s Rewards card to access the VPC options, and can register for VPC in the gaming venues, at a kiosk, or online. Upon joining the loyalty program, ALH staff are to inform the customer that the card can be linked to a registered player account or can be used as a casual player card. Staff will ask the customer if they would like to use the player card to set a time limit or net loss limit, or track their gaming machine play under the pre-commitment system.

Players are able to set a daily or weekly limit for time or dollars spent on EGM’s in any 24 hour period. These limits continue indefinitely unless changed by the customer. Players can decrease their time or money limits at any time; increases to limits take effect after 24 hours.

Players who have used their Monty’s card to set daily limits will not be able to earn reward points from EGM play for the remainder of the day once those limits have been reached. EGMs display “picture in picture” VPC alerts on the main playing screen of EGMs to ensure that players know how much they are spending and when they are approaching their limit. Players who are self-excluded from an ALH gaming area will not be able to earn reward points from gaming machine play at any ALH venue.

Players who participate in the loyalty program will be provided with an annual written player activity statement that includes information on: total duration of play (in hours and minutes), total number of active days, and net amount won or lost. The statement also provides a breakdown of the number of active days each month, duration in hours and minutes, and net amount won or lost each month. The activity statement also includes information about available help services and the helpline number.

The program is required to be promoted in ALH venues, although across the sites visited, the availability and visibility of this information was found to be very uneven. There was some signage the gaming rooms and on EGMs that promoted the VPC system and recommend that players set a limit and keep to it. Information on how to use the VPC system to track and limit the amount of time and money spent while playing EGMS was included in brochures available at some venues. Staff also carry the Know Your Code pocket guide, which provides basic information about the VPC system.

Information provided for this review stated that 35,000 users had set time and/or spend limits in **Victoria** from December 2015 to November 2017. In other jurisdictions there were approximately 390 players using the VPC tools, which would indicate there is a high need for better promotion in those jurisdictions.

SUMMARY – Informed Decision Making

Areas of Strength:

- Responsible gambling and help information is available in a number of different formats and locations throughout venues.
- All machines have RG messaging.
- ALH offers all players access to pre-commitment tools, such as time and spend limits, in all jurisdictions though it is only mandated in the state of Victoria.
- Players have access to play history statements through their loyalty card membership.

Recommendations for Improvement:

- Consider conducting a comprehensive evaluation of the RG Ambassador program to determine whether it needs a refresh to increase both staff and customer awareness and the overall utility of the program.
- Considering increasing promotional efforts for the VPC to increase understanding and usage of the available tools and features.
- Ensure staff are promoting VPC limit-setting tools to customers.
- Incentivize players to register and use VPC tools by offering food and beverage vouchers.

5.6. ADVERTISING AND PROMOTION

Advertising and promotion does not mislead or misrepresent products, or target potentially vulnerable players.

Advertising and Promotions Policy

The company has a clearly articulated policy that prohibits advertising that is misleading or targets minors or people with gambling problems.

No gambling related advertising is permitted in the jurisdictions of **South Australia, New South Wales, Victoria, and Northern Territory.**

In **Queensland**, advertisements are restricted to one-third gaming and two-thirds non-gaming content. Television advertisements are not permitted. The Queensland Code of Practice outlines the restrictions that must be followed.

Screening Process

A responsible gambling screening process is in place to ensure all advertising complies with policy.

As gambling advertising is not permitted in **South Australia, New South Wales, Victoria, or Northern Territory**, there is no RG specific screen required for advertisements.

According to information obtained during interviews, there is no RG review process in place for Queensland; however the advertising agency will flag if it is in breach of the advertising restrictions. All creative must include an RG message.

Not Misleading

Advertising does not mislead about the outcomes of gambling, portray gambling as a way to recoup financial losses, or misrepresent the odds of winning and losing.

Not Targeting Problem Gamblers or Minors

Advertising does not target or depict people with gambling problems or underage persons.

In **Queensland** advertising and promotions must be delivered in a responsible manner with consideration given to the potential impact on people adversely affected by gambling, and should incorporate responsible gambling messages (where applicable). Advertising and promotions cannot:

- be false, misleading or deceptive;
- implicitly or explicitly misrepresent the probability of winning a prize;
- give the impression that gambling is a reasonable strategy for financial betterment;
- include misleading statements about odds, prizes or chances of winning;
- focus exclusively on gambling, where there are other activities to promote;
- implicitly or explicitly directed at minors or vulnerable or disadvantaged groups;
- involve any external signs advising of winnings paid; or
- promote the consumption of alcohol while engaged in the activity of gambling.

Retailer Marketing & Loyalty Program

Loyalty program limits promotions for players identified with a gambling problem. Promotions cannot misrepresent products or target potentially vulnerable players.

No advertising of gambling is permitted in most of the jurisdictions under review. No gambling comps are allowed. Monty's rewards members receive promotional offers, but they are not gambling-related.

When registering for a Monty's membership, players can elect to receive information and promotional offers. A member can also choose not receive such information.

If self-excluded and a member of Monty's rewards, the membership is suspended and the card is disabled for use in gaming areas across all ALH properties.

SUMMARY – Advertising and Promotion**Areas of Strength:**

- No gambling related advertising is permitted in the jurisdictions of South Australia, New South Wales, Victoria, and Northern Territory.
- Queensland has RG related advertising restrictions in place.
- Gambling-related comps are not provided to members of the rewards program.
- Players can opt out of receiving promotional offers.
- If self-excluded, the customer's loyalty card will be disabled from use in gaming areas across all venues.

Recommendations for Improvement:

- Develop a formal RG screening process for advertising and promotional materials in Queensland.

5.7. ACCESS TO MONEY

Money and money services are provided to players in a responsible manner that does not encourage excessive spending.

ATMs

The placement of ATMs in the venue does not encourage excessive spending.

ALH requires that ATMs be placed outside of gaming areas. Site visits to a number of venues in each of the five jurisdictions under review confirmed that all ATMs, where available, are placed outside the gaming room and out of sight from the gaming room.

In **Queensland**, all ATMs viewed as part of site visits displayed the helpline number and RG posters. All had a minimum withdrawal of \$10. Eight of ten venues also had RG brochures in the vicinity of the ATMs.

In **Northern Territory**, all three venues displayed the helpline near the venue ATMs, and two of the three also displayed RG posters. The minimum withdrawal at each of the ATMs was \$20. There is a \$200 withdrawal limit per transaction.

ATMs in the **South Australia** venues that participated in the site visits all displayed the helpline number, had RG information on the screen and had a minimum withdrawal of \$10. Half of these venues had RG brochures and/or RG posters in the vicinity of the ATMs. A \$250 withdrawal limit is in place, per card per day.

ATMs in **New South Wales** do not have a specific withdrawal limit, and are required to display a “Think about your choices” sticker. During the site visits, ATMs at all eight venues displayed the helpline number and had a minimum withdrawal amount of \$20. Six of the eight venues also had RG posters near the ATMs.

No ATMs are available in **Victoria** venues. However the venues do have an ecash system, whereby a customer can swipe a debit card at the food and beverage areas and receive a ticket. The ticket is then be inserted into the POS Connect machine which dispenses bills in \$20 or \$50 denominations. Withdrawals are limited to \$200 per transaction to a maximum of \$1,000 per day. These machines are not located in the gaming rooms.

Credit

Access to credit is prohibited or restricted.

Cheque Cashing

Cheque cashing is prohibited or restricted.

Accessing Money While Playing Games

Direct electronic access to money at games is prohibited.

Players cannot obtain credit or loans from ALH venues.

Cashing of personal cheques is not permitted at any ALH venue.

Players cannot access direct electronic fund transfers at machines.

SUMMARY – Access to Money

Areas of Strength:

- ATMs are not permitted in gaming rooms across all ALH properties.
- All venue ATMs display the helpline and/or other RG information.
- Venues that do have ATMs have a low minimum withdrawal amount.
- Players cannot obtain credit or loans from ALH venues.
- Cashing of personal cheques is not permitted.

Recommendations for Improvement:

- No suggestions for enhancements at this time.

5.8. VENUE & GAME FEATURES

Venue and game design promotes awareness of the passage of time, breaks in play, and the responsible use of alcohol.

Passage of Time

Players have ample opportunity to take note of the passage of time.

ALH requires that all venues display the time of day in all major areas of the venue, including the cashier's counter, in the gaming room, and on each gaming machine. Staff are also expected to mention the time when making any announcement about venue activities.

Of the ten venues in **Queensland** that participated in the site visits, the time was available on all EGMs. The gaming rooms of seven of these venues had clocks visible from all parts of the room. In two of these venues the time was visible from a fraction of the room. Half of the sampled venues also displayed a clock in the cashier's area, and two venues had a clock in the food and beverage area. Half the venues had windows that could be seen from all areas of the gaming floor, allowing players to approximate the time of day.

Of the three venues in **Northern Territory** that participated in the site visits, the time was available on all EGMs. Two venues displayed clocks in the gaming room, and all displayed clocks near the cashier's station and in the food and beverage areas. Two venues had windows that could be seen from all parts of the gaming floor, while the third venue had windows visible from approximately half of the gaming area.

Of the ten venues in **South Australia** that participated in the site visits, the time was available on all EGMs. All venues had clocks in their gaming rooms; though clocks in one of the sampled venues were not easily visible. Seven of the ten venues also had clocks in or near the cashier's station, and four had a clock in their food and beverage area. While all ten venues had windows, only half these venues had windows that could be seen from the majority of their respective gaming areas.

Of the eight venues in **New South Wales** that participated in the site visits, the time was available on all EGMs. All venues displayed clocks in their respective gaming rooms; three venues had clocks at the cashier station, and of those that had a food and beverage area, most also displayed the time. All the sampled venues had windows that could be seen from all parts of their gaming rooms.

Of the six venues in **Victoria** that participated in the site visits, the time was available on all EGMs, nearly all displayed the time in their gaming rooms, and all had a clock at the cashier station. All venues had windows visible from the gaming room.

During site visits across the five jurisdictions, no announcements were heard that included the current time.

Hours of Operation

The venue is not open 24 hours per day.

No venue is open for more than 20 hours at a time. In all jurisdictions other than Victoria, the gaming area is closed for a minimum of six hours a day. In **New South Wales** and **Queensland**, for example, venues must close between 4:00 am and 10:00 am, although some may close earlier than 4:00 am.

All ALH staff across the five jurisdictions are trained to encourage players to take a break from gaming machine play when they have been gambling for an extended period of time.

Alcohol Restrictions

Access to alcohol is well-controlled and rarely, or never, complimentary.

Staff are required to complete ALH's Responsible Service of Alcohol training, and cannot work in gaming areas until this is complete. In **South Australia** and **New South Wales**, no complimentary alcohol is permitted in gaming rooms. In **Victoria**, **Northern Territory**, and **Queensland**, there are no restrictions regarding complimentary alcohol.

In **Northern Territory**, players cannot be served alcohol while at a gaming machine.

If players appear to be intoxicated, staff are expected to cut them off from alcohol, offer coffee, and ensure they get home safely.

Display Credits as Cash

Machines are designed to display spending as cash.

Gaming Machine Features

Machines display RG messaging during play. Stop buttons are disabled.

New Game Screening

New games are screened to assess their potential problem gambling implications.

All gaming machines display credits in their cash value.

All new machines are approved by the National Gaming Manager, and are reviewed at the state level. Considerations when approving new gaming machines include volatility, return, average bids, and level of risk. However, there is no formal screening process.

All machines are required to have an RG message, the helpline number, and voluntary pre-commitment features.

In **New South Wales**, all machines must display a THINK! Sticker, which contains a prevention message and the helpline number.

Underage Gambling

To play electronic gaming machines, players will be verified for age.

Gaming rooms in venues are restricted to adults 18 years of age or older; minors are prohibited from entering the gaming areas. Gaming rooms are screened or separated from other areas of the venue, so as to not attract children. All venues are required to have signage indicating the age restriction for gaming rooms.

No Reinforcement of Myths and Misconceptions

Practices and procedures at the venue do not reinforce myths and misconceptions.

The staff survey asked how staff would respond to two myth-related scenarios.

When asked what they would say if a customer asked which pokies were lucky, staff responses were as follows:

- In **Northern Territory**: 43% of respondents provided an accurate response mentioning randomness and/or accurate information about chances, 14% provided an incorrect response and/or one that indirectly supported the myth, and 43% either did not know or did not respond.
- In **Queensland**: 50% of respondents provided an accurate response mentioning randomness and/or accurate information about chances, 20% provided an incorrect response and/or one that indirectly supported the myth, and 30% either did not know or did not respond.
- In **New South Wales**: 50% of respondents provided an accurate response mentioning randomness and/or accurate information about chances, 8% provided an incorrect response and/or one that indirectly supported the myth, and 38% either did not know or did not respond.
- In **South Australia**: 36% of respondents provided an accurate response mentioning randomness and/or accurate information about chances and 50% either provided an incorrect response or did not respond.
- In **Victoria**: 55% of respondents provided an accurate response mentioning randomness and/or accurate information about chances and 44% either provided an incorrect response or did not respond.

When asked how they would respond if a customer told them they were doubling their chances of winning by playing two machines at once, staff responses were as follows:

- In **Victoria**, 64% of respondents said they would explain the odds and chances of winning.
- In **Northern Territory**, 50% of respondents said they would explain the odds and chances of winning.
- In **South Australia**, 35% of respondents said they would explain the odds and chances of winning.
- In **New South Wales**, 74% of respondents said they would explain the odds and chances of winning.
- In **Queensland**, 66% of respondents said would explain the odds and chances of winning.

SUMMARY – Venue & Game Features

Areas of Strength:

- The time is available on all EGMs.
- Gaming areas are not open 24 hours a day.
- All gaming machines display credits in their cash value, and are required to have an RG message, the helpline number, and voluntary pre-commitment features.
- Children are restricted from entering gaming areas.
- All gaming staff are required to complete a responsible service of alcohol training.

Recommendations for Improvement:

- Ensure clocks are visible from all areas of the gaming rooms
- Restrict complimentary alcohol in gaming areas.

6. FINAL SUMMARY

The ALH Group is committed to providing a robust RG program in their venues across Australia. Goals of the ALH program focus on facilitating player informed decision making, and providing timely and appropriate assistance and information to players. ALH strives to be the most responsible operator in Australia by complying with, and exceeding, the responsible gambling legislative requirements in each state in which it operates.

The literature review provided an overview of key venue and game factors to consider when implementing a RG program. As hospitality environments and VLTs provide a unique gambling experience, as compared to casino-based gambling, it is critical to consider all possible factors that may impact gambling behaviour and/or gambling-related harms in this context.

The jurisdictional scan provides a summary of several RG initiatives and policies in place in jurisdictions across the globe. Reviewing practices in other jurisdictions provides operators with an opportunity to learn from their successes and challenges, and use these learnings to inform and strengthen their own programs.

The RG+ review of ALH's RG policies and initiatives involved a detailed analysis of several sources of data. The review incorporated corporate level policies and staff involvement, as well as the policies and programs in place in the five jurisdictions were selected to participate in this review: Victoria, South Australia, Queensland, New South Wales, and Northern Territory.

Based on this extensive review of the RG policies and initiatives, RG+ has identified program strengths and provided recommendations for improvements to strengthen ALH's RG program.

6.1. LIST OF STRENGTHS

Overall, ALH demonstrates a strong commitment to RG and has made this commitment publicly available. This corporate commitment is evident through the involvement of senior staff, and through regular communication that takes place across all levels of the organization.

ALH also demonstrates its commitment to RG by implementing a voluntary pre-commitment system across all jurisdictions under review, though it is only mandated in the state of Victoria. Additionally, providing staff with key RG information via the Know Your Code pocket guide, and requiring that all staff have it on-hand at all times, demonstrates the emphasis ALH places on having staff be a key resources for player support. Other strengths identified throughout the review are provided below.

Responsible Gambling Policies:

- ALH demonstrates a strong commitment to RG and makes this commitment statement publicly available online. This statement includes specific examples of program initiatives.
- The corporate commitment to RG is evident through the contributions and involvement of senior staff, as well as through regular communications that occur among the various levels of staff across the organization, from the CEO through to the venue level.
- ALH venues in Victoria adhere to a comprehensive RG Code of Conduct developed by ALH to satisfy regulations in the state of Victoria.

Training:

- ALH's RSG online training provides examples of how ALH operationalizes its commitment to RG, and provides staff with a detailed list of signs to be aware of (red flags).
- The Know Your Code pocket guide provides staff with information on signs, escalation, the self-exclusion program, and voluntary pre-commitment. All staff are required to have this on-hand while at work.
- The newsletter distributed to ALH properties in South Australia provides comprehensive RG information for staff and covers a range of subtopics, such as how to document incidents, pre-commitment, and monitoring and approaching players displaying problem play behaviour.

Self-Exclusion

- Staff are required to carry the Know Your Code pocket guide, which provides them with information about the self-exclusion program applicable in their respective jurisdictions.
- Players who self-exclude are, or can choose to be, removed from all loyalty mailing lists.
- All jurisdictions have in place a policy statement that requires players be provided with resources for help services when registering for the self-exclusion program.
- All but one of the venues reviewed as part of the site visits provided photos and information of self-excluded players to frontline staff to assist with detecting breaches.

Assisting Players:

- The Know Your Code pocket guide provides staff with general information about self-exclusion, assisting players, and contact information for help services.
- Staff actively respond to a customer in distress by speaking with them. Many also indicated they would offer the customer resources and/or escalate to a more senior staff person.

Informed Decision making

- Responsible gambling and help information is available in a number of different formats and locations throughout venues, including on all machines.
- ALH offers all players access to pre-commitment tools, such as time and spend limits and access to play history statements. This is offered in all ALH venues, though pre-commitment is only mandated in the state of Victoria.

Advertising and Promotion:

- No gambling related advertising is permitted in the jurisdictions of South Australia, New South Wales, Victoria, and Northern Territory.
- Queensland has RG related advertising restrictions in place.

- Gambling-related comps are not provided to members of the rewards program.
- Players can opt out of receiving promotional offers.
- If self-excluded, the customer's loyalty card will be disabled from use in gaming areas across all venues.

Access to Money

- ATMs are not permitted in gaming rooms across all ALH properties. Venue ATMs display the helpline and/or other RG information, and have a low minimum withdrawal amount.
- Players cannot obtain credit or loans from ALH venues, and cashing of personal cheques is not permitted.

Venue and Game Features

- The time is available on all EGMs.
- Gaming areas are not open 24 hours a day.
- All gaming machines display credits in their cash value, and are required to have an RG message, the helpline number, and voluntary pre-commitment features.
- Children are restricted from entering gaming areas.
- All gaming staff are required to complete a responsible service of alcohol training.

6.2. LIST OF RECOMMENDATIONS

While ALH demonstrates a strong commitment to RG and has developed and implemented various policies and programs across all jurisdictions under review, there are a few areas that RG+ would recommend considering for improvement.

It is clear that there are some initiatives in place in particular jurisdictions that could be implemented across all ALH's properties. For example, developing a comprehensive RG Code of Conduct (as in Victoria) that is applicable to all ALH venues would support a cohesive program across the country. Usage of the pre-commitment program should be strengthened by increasing promotional efforts throughout all ALH properties, and incentivizing players to utilize the tools.

While the online staff training module describes ALH's commitment to RG and provides some problem gambling information (e.g., signs to be aware), a refresh of this program is recommended. A comprehensive program should address several critical concepts (e.g., game information, underage gambling, response procedures, etc.) and should incorporate key adult learning principles.

Lastly, the RG Ambassador program demonstrates a unique initiative implemented by ALH, however, uptake is very low. An evaluation of its current appeal and utility would help inform a program refresh that would improve engagement by both staff and customers.

Additional recommendations that were identified throughout the review are detailed below.

Policies

- Develop a corporate RG strategy document outlining RG goals and a detailed plan of action to support continuous program growth.
- Ensure ALH's RG commitment statement is available across all ALH properties in Australia.
- Develop an RG Code of Conduct that is applicable to all jurisdictions, similar to the one available in the state of Victoria.
- Include RG as a KPI for both head office senior staff that lead RG initiatives, as well at state level management (State Managers, State Gaming Managers)

Training

- The training program could be strengthened by:
 - Stating clear training objectives, increasing interactivity and audio/visual components, and incorporating opportunities for self-assessment to ensure comprehension.
 - Including information on the risks and impact of problem gambling, and safer gambling tips.
 - Including information on regarding underage gambling.
 - Include information in the training program on how the games work (e.g., randomness, chances of winning, etc.) to facilitate debunking myths
 - Including response procedures and expectations within the training program to provide a clear understanding of staff role and expectations.
 - Including basic self-exclusion information.
- Advanced training should be provided for venue management and/or any staff to whom frontline staff escalate RG interactions. ALH might consider developing their own robust advance training in order to ensure their staff are equipped with the necessary skills and knowledge to respond to players, when needed. Or, ALH might also consider collaborating with the external agencies in each state to inform advanced training content and delivery.
- Require staff to complete a training refresher at least every two years.
- Use participant feedback and third party evaluations to better understand the effectiveness of the training module and to inform future iterations of training programs and materials.
- Provide regular RG reminders to staff across all jurisdictions to reinforce RG expectations and procedures.

Self-Exclusion

- Train all staff on the self-exclusion program to ensure that all have a strong understanding of the self-exclusion program.

Assisting Players:

- Develop a comprehensive, corporate-wide policy that outlines expectations of staff with regard to assisting players. Response procedures should be clearly laid out to ensure all staff understand their responsibilities and there is consistency across all properties.
- Consider ways to better encourage and/or support the use of the RG interaction tracking system.
- Analysing logged RG interactions could facilitate a greater understanding of the types of interactions taking place and highlight areas for improvements to the RG program.
- Support escalation staff with robust advanced training to ensure they are equipped with the skills, techniques, and information required to respond to players displaying signs of problem gambling behaviour.

Informed Decision making

- Consider conducting a comprehensive evaluation of the RG Ambassador program to determine if it needs a refresh to increase both staff and customer awareness and utility of the program.
- Considering increasing promotional efforts for the VPC to increase understanding and usage of the available tools and features.
- Incentivize players to register and use VPC limit-setting tools by offering food and beverage vouchers.

Advertising and Promotion:

- Develop a formal RG screening process for advertising and promotional materials in Queensland.

Access to Money

- No suggestions for enhancements at this time.

Venue and Game Features

- Ensure clocks are visible from all areas of the gaming rooms
- Restrict complimentary alcohol in gaming areas.

6.3. CONCLUSION

Resulting from this detailed review and analysis, RG+ notes that, overall, ALH demonstrates a strong commitment to RG. ALH has taken initiative in expanding parts of its program across all jurisdictions to provide tools and services that go beyond minimum regulatory requirements. By improving particular areas, such as the uptake of the voluntary pre-commitment, refreshing the RG Ambassador program, and improving the online RG training program, ALH can further strengthen its RG program going forward and be an industry leader in the delivery of RG programming in Australia.

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APPENDIX A: REVIEW AGAINST REGULATIONS

Broadly across all jurisdictions, as described in the Australasian Gaming Council's Guide to Australasia's Gambling Industries (Chapter 11 – Responsible Gambling).

Regulatory Requirement	
Education and Information Measures	Information products on price, odds, games
	Warnings and messaging
	Expenditure statements
	Consumer awareness initiatives
Environment, Venue and Product Controls	Advertising and marketing restrictions
	Access restrictions – including age restrictions, restrictions to the hours of operation of gambling venues and restrictions on the numbers of products/machines/tables/venues available
	Alcohol restrictions
	Requirements for lighting and customer awareness of the passage of time
	Restrictions on product parameters (e.g.: bet, win and spin limits on EGMs)
	Restrictions on loyalty program availability
Financial Controls	Restrictions on access to cash within venues (e.g.: ATM restrictions/withdrawal limits)
	Cheque pay-out requirements
	Prohibitions on credit
Consumer Assistance Measures	Requirements for responsible gambling policies and practices
	Requirements for responsible gambling staff training and management programs
	Requirements to provide support, counselling and assistance information
Consumer Control Measures	Requirement to provide self-exclusion programs
	Requirements for, or the voluntary offer of, precommitment mechanisms to limit the expenditure of time/money

6.1. VICTORIA

As of December 2008, the Gambling Regulation Act 2003 has required Victorian gambling industry licence holders to have a Responsible Gambling Code of Conduct. This legislation replaces previously voluntary industry codes applicable to this jurisdiction. Codes must be approved by the Victorian Commission for Gambling and Liquor Regulation (VCGLR) and Ministerial Directions specify the standards and requirements of the code as well as measures to be taken to further responsible gambling.

ALH's RG Code of Conduct for Victoria meets this requirement and outlines ALH's RG policy and programs applicable in their Victorian venues. As the Code of Conduct was reviewed and referred to extensively in the review against RGC's best practices, it will not be reiterated here.

6.2. SOUTH AUSTRALIA

In South Australia, a mandatory Responsible Gambling Code of Practice Notice 2013 (applicable since March 2014) applies to all gambling providers. For this review, RG+ focused mainly on Chapter 3 – Responsible Gambling Code of Practice.

Regulatory Requirement		Outcome
Responsible gambling documents	<p>A gambling provider must ensure the existence of a document or documents detailing (a) the manner in which staff training and measures for intervention with problem gamblers are implemented; and (b) the roles of staff (described by name or by job title) in the implementation of this code.</p> <p>The document must be readily available to, and made known to the staff to which it relates.</p>	Meets requirements
Internal reporting of problem gamblers	<p>A gambling provider must establish a reporting process in respect of the identification of suspected problem gamblers by staff and the recording of those gamblers' details.</p> <p>A gambling provider must ensure that a manager (a) reviews the record of suspected problem gamblers on a regular basis; and (b) documents, as part of the record (i) the fact of the review; and (ii) any steps taken to intervene in suspected problem gamblers' gambling behaviour.</p>	Meets requirements
Duty to offer barring	<p>A gambling provider must facilitate the operation of the barring orders scheme in Part 4 of the Independent Gambling Authority Act 1995 for the benefit of problem gamblers, their family members dependent upon them, and those with a genuine interest in the welfare of problem gamblers and their families.</p> <p>A gambling provider must (a) if a gambler requests voluntary exclusion, bar the person forthwith unless there is good reason not to; and (b) if a person requests the involuntary barring of a gambler, promptly make a considered decision.</p> <p>A gambling provider must document and implement procedures to ensure that it responds to enquiries about barring (regardless of who initiates them) and approaches for the making of barring orders in a manner which is (a) informative; (b) timely and (c) culturally appropriate.</p> <p>A gambling provider may respond to enquiries or approaches for barring under Part 4 of the Independent Gambling Authority Act 1995 with flexible informal arrangements to limit, manage or control a gambler's access to gambling if (a) the gambling provider has adequate resources; and (b) it is reasonable to expect that informal arrangements would be better for the gambler.</p> <p>A gambling provider must ensure that any loyalty program database and any like list does not include a person who is excluded (whether by formal barring order or otherwise).</p>	Meets requirements
Direct customer communications	<p>A gambling provider must include in or with a direct customer communication (a) in the case of a direct customer communication which is not a text message—information about how the customer could obtain help for a gambling problem; and (b) in the case of a text message—the condensed warning message or the national gambling helpline number 1800 858 8580</p>	Meets requirements
Gaming areas—regulatory signs	<p>A gaming provider must, at each entrance to a gaming area, display a statement that the gaming area is restricted to people aged 18 and more (18+ only)</p> <p>A gaming provider must place in a prominent position in each gaming area at least one A3 equivalent sign ("multi-lingual sign") (a) containing information about the availability of free, confidential and professional help with gambling problems and related issues; and (b) expressed in (i) English, Arabic, Chinese, Greek, Italian and Vietnamese (the "core languages"); and (ii) any other locally relevant language.</p> <p>A gaming provider must, taking account of the typical cultural and linguistic composition of the patrons of each gaming area, give consideration to whether any language other than the core languages is another locally relevant language, and must record that consideration in writing.</p>	Meets requirements

<p>Gaming areas—help and other information</p>	<p>A gaming provider must ensure that each ATM which is available for operation by patrons operates so that (a) when the ATM is idle the screen displays (i) a full screen responsible gambling message approved by the OPG official; or (ii) if there is no current approval under sub-paragraph (i), the condensed warning message and the national gambling helpline number 1800 858 858 at least 20% of the time; and (b) when the ATM prints a transaction slip (however described), the transaction record includes the condensed warning message and the national gambling helpline number 1800 858 858.</p> <p>A gaming provider must (a) ensure the prominent display of the condensed warning message and the national gambling helpline number 1800 858 858 on or near—</p> <ul style="list-style-type: none"> (i) each automated coin dispensing machine in or near a gaming area; and (ii) each customer service point at which money is exchanged for coins, for tickets or for credit on a recognised account based cashless gaming system; and <p>(b) ensure that a quantity of helpline cards is available at or near—</p> <ul style="list-style-type: none"> (i) each ATM; ii) each automated coin dispensing machine in or near a gaming area; (iii) each customer service point at which money is exchanged for coins, for tickets or for credit on a recognised account based cashless gaming system; and (iv) each gaming machine. <p>A gaming provider must ensure that the time of day is (a) prominently displayed; and (b) visible throughout gaming areas.</p> <p>A gaming provider must ensure that a copy of this code (or a summary document approved in writing by the Authority) is made available on request.</p>	<p>Meets requirements</p>
<p>In-venue messaging</p>	<p>A gaming provider must prominently display approved OPG campaign material on two classes of signs (a) primary responsible gambling signs—which must be displayed in gaming areas; and (b) additional responsible gambling signs—which the gaming provider may elect to display in gaming areas or to display in other parts of the gaming provider's premises accessible to the public as follows (c) for a gaming machine licensee operating 10 or fewer gaming machines: at least one A1 equivalent primary responsible gambling sign, ensuring that there is at least one sign in each gaming area; (d) for a gaming machine licensee operating more than 10 gaming machines (i) at least one A1 equivalent primary responsible gambling sign, ensuring that there is at least one sign in each gaming area; (ii) for each 10 (or part thereof) gaming machines in excess of 10, one A1 equivalent additional responsible gambling sign;</p>	<p>Meets requirements</p>
<p>Multiple gaming machine play</p>	<p>A gaming provider (a) must take all reasonable and practicable steps to ensure that a person plays no more than one gaming machine at a time; and (b) must (i) in respect of a patron offending for the first time on a given day, give a warning; and (ii) in respect of a patron who does not heed a warning, require the patron to leave the gaming area for 24 hours.</p>	<p>Meets requirements</p>
<p>Cashing cheques in gaming areas</p>	<p>(1) Subject to sub-clause (2), a gaming provider must not cash a cheque in a gaming area. (2) The Authority may, on the application of a gaming provider, give an exemption in respect of a gaming area by notice in writing stating (a) the reason for the exemption (such as the location of the premises containing the gaming area); and (b) any conditions attached to the exemption.</p>	<p>Meets requirements</p>
<p>Provision of cheques for winnings</p>	<p>(1) Subject to sub-clause (2), a gaming provider must, if requested to provide a cheque on premises in respect of an undisputed prize, winnings or redemption of credits in aggregate of \$1 000 or more, provide the cheque (a) as soon as practicable; and (b) in any event, within 30 minutes after the patron makes the request and completes any formalities required by law. (2) The Authority must, if satisfied on application by a gaming provider that exceptional circumstances exist, fix a period longer than 30 minutes for the purposes of sub-clause (1)(b).</p>	<p>Meets requirements</p>
<p>Young children in and around premises</p>	<p>A gaming provider must establish and keep current; and implement a written procedure addressing the issue of young children (being children aged 10 years or less) who might, but for the procedure, be left unattended on the gaming provider's premises or in a motor vehicle parked in a car park over which the gaming provider has direct power and control.</p>	<p>Meets requirements</p>
<p>Gaming machines and coin availability</p>	<p>A gaming provider must ensure that coin can only be obtained from (a) a cashier; or (b) an automated coin dispensing machine which is located so as to enable patron activity to be monitored.</p>	<p>Meets requirements</p>
<p>Customer information and interaction</p>	<p>A gambling provider must take all reasonable steps to ensure that a person who demonstrates difficulty in controlling his or her personal expenditure on gambling products has his or her attention drawn to the name and telephone number of a widely available gambling help service.</p>	<p>Meets requirements</p>
	<p>A gambling provider must (a) identify a gambling rehabilitation agency that gamblers and their family members can readily access (including the location of the agency and a key operational contact who can be asked for by name); (b) ensure that staff are sufficiently informed about</p>	<p>Meets requirements</p>

	<p>the identity and location of the gambling rehabilitation agency so as to be able to direct patrons to the agency; and (c) ensure that management level contact is established and maintained with the gambling rehabilitation agency about problem gambling matters.</p> <p>A gambling provider must reinforce its responsible gambling policy in appropriate customer newsletters and other communications.</p>	Meets requirements
Alcohol and gambling	<p>A gambling provider must take all practicable steps (a) to prevent a person from being allowed to gamble if the person's speech, balance, coordination or behaviour is noticeably impaired and it is reasonable to believe that the impairment is the result of the consumption of liquor or some other substance; (b) to prevent the entry of a person into a gambling area, or a person remaining in a gambling area, if the person's speech, balance, coordination or behaviour is noticeably impaired and it is reasonable to believe that the impairment is the result of the consumption of liquor or some other substance; and (c) to ensure that liquor is not supplied to reward, promote or encourage continued gambling.</p> <p>The casino licensee must ensure that a person is not served liquor while seated or standing at a gaming machine or at automated table game equipment, unless (a) the machine or equipment is in a premium gaming area¹⁰; or (b) the automated table game is conducted by a dealer.</p> <p>A gaming machine licensee must ensure that a person is not served liquor while seated or standing at a gaming machine.</p>	Meets requirements
Inducements	<p>(1) A gambling provider must not offer or provide any inducement (a) directed at encouraging patrons to gamble; (b) directed at encouraging people to open gambling accounts.</p> <p>(2) Sub-clause (1)(a) does not apply to (a) the offering or provision of participation in an acceptable loyalty program; (b) the offering or provision of participation in an acceptable trade promotion lottery or of a complimentary gambling product; (c) the offering or provision in a gambling area of an inducement in the form of complimentary non-alcoholic beverages and refreshments of nominal value; or (d) the offering or provision of an inducement in respect of a pre-commitment trial approved in writing by the Authority, within and subject to the terms of the instrument of approval.</p> <p>(3) This clause does not prevent the payment of commissions to, or in respect of, identified high value patrons.</p>	Meets requirements
Acceptable loyalty programs	<p>A loyalty program is an acceptable loyalty program if it is a structured program which—</p> <ul style="list-style-type: none"> (i) is conducted in accordance with published terms and conditions; (ii) is advertised in a manner consistent with the advertising requirements for the gambling provider's gambling products; (iii) offers rewards proportionate to gambling activity (including non-monetary privileges attached to tiers in a stepped rewards system); (iv) offers regular activity statements; and (v) offers "high value patron" status only to those who meet and, on periodic review, maintain numerical and narrative tests of high value play; or <p>In addition to the matters required by sub-clause (1)(a), an acceptable loyalty program must include a facility for predictive monitoring of the patterns of gamblers' gambling activity, with the purpose of intervening in cases where there is a risk of problem gambling.</p>	Meets requirements
Gambling accounts	<p>If a gambling provider has established a gambling account for a person (a) subject to clause 58B (i) the account may only be credited with funds deposited by the person or at the person's direction from a third party (not being a person in a close associate relationship with the gambling provider); and (ii) the account must not be allowed to have a negative balance;</p> <p>(b) the terms and conditions governing the account must not operate (i) to impose a waiting period on withdrawals from the account; (ii) to allow funds pending withdrawal to be used for gambling; or (iii) to require a particular level of gambling, or a particular use of funds in the account, as a condition of withdrawal; and</p> <p>(c) the gambling provider must ensure that its business systems (i) facilitate withdrawals from the account as soon as practicable; (ii) do not allow funds pending withdrawal to be applied to any purpose other than the withdrawal; and (iii) do not allow the establishment or extension of a credit facility while there are funds pending withdrawal.</p>	Meets requirements
	<p>Sub-clause (1) does not operate (a) to preclude the following routine transactions on a gambling account—</p> <ul style="list-style-type: none"> (i) the crediting of winnings or prizes, the making of refunds, the re-settling of bets on the outcome of a protest or like transaction; (ii) the redemption of rewards as part of the operation of an acceptable loyalty program; (iii) the redemption of prizes won in an acceptable trade promotion lottery; and (iv) the making of ex gratia payments resolving complaints or disputes; <p>(b) to preclude a gambling provider from implementing—</p>	Meets requirements

	<p>(i) procedures reasonably necessary to ensure compliance with laws relating to the handling of money or the reporting of financial transactions;</p> <p>(ii) procedures required by or under the licence or other authority authorising the gambling provider to conduct its gambling business;</p> <p>(iii) procedures for the holding of a major prize pending identification of those entitled to claim the prize; or</p>	
Credit gambling	<p>Subject to any regulatory provision prohibiting or regulating the extension of credit for gambling, a gambling provider may only establish or extend a credit facility for an account holder if (a) the account holder has requested the establishment or the extension in writing; (b) the gambling provider has disclosed all spotters' fees relating to the establishment or extension; and (c) an acceptable due diligence process has been completed.</p> <p>If a credit facility has been established for an account holder</p> <p>(a) the account holder must not be allowed access to the credit facility until the account holder has set a relevant pre-commitment limit;</p> <p>(b) if the credit facility is extended (i) the account holder must not be allowed access to the extension of the facility until a positive step has been taken by the account holder to review the relevant pre-commitment limit; and (ii) pending compliance with sub-paragraph (i), the relevant pre-commitment limit must be capped at \$500;</p> <p>(c) the terms and conditions of the facility, or the conduct of the gambling provider, must not operate to require a particular level of activity in order to maintain the facility;</p> <p>(d) the terms and conditions of the facility must operate to limit the gambling provider's credit recovery activities to the extent of the reasonable expectations identified in the acceptable due diligence process;</p> <p>(e) the gambling provider must not extend the credit facility at any time when the credit facility is not maintained in good standing in the manner identified in the acceptable due diligence process; and</p> <p>(f) the relevant pre-commitment limit must not exceed the prudential limit identified in the acceptable due diligence process.</p> <p>A gambling provider must not solicit a request for the establishment or extension of a credit facility, except (a) by inclusion in its advertising of a statement that the gambling provider offers credit gambling to account holders subject to completion of a due diligence process; and (b) by publication of the terms and conditions on which it offers credit gambling.</p> <p>For the purposes of this clause, an acceptable due diligence process is a documented process undertaken by a gambling provider directed to providing reasonable assurance in respect of an account holder as to (a) the extent to which the account holder can afford to gamble on credit before experiencing harm; (b) the routine payments the account holder can afford to make to maintain the credit facility in good standing; (c) the times in which it would be reasonable to expect the account holder to satisfy a demand for payment in respect of the whole or part of the facility (credit recovery activities); and</p> <p>(d) the account holder's maximum prudent weekly gambling expenditure (the "prudential limit") having regard, after reasonable enquiry, to the account holder's means and other circumstances.</p>	Meets requirements
	<p>(5) For the purposes of this clause (a) a relevant pre-commitment limit is a weekly limit under clause 61; and (b) if a relevant pre-commitment limit is assessed by reference to deposits made to the account during the relevant period [clause 61(2)(b)(ii)], the account holder will be deemed (for the purpose of determining whether the limit has been reached) to have made deposits to the same extent as he or she has accessed credit.</p>	Meets requirements
Gambling provider to offer weekly pre-commitment	<p>A gambling provider must, in respect of account based gambling, provide a pre-commitment scheme.</p> <p>A pre-commitment scheme referred to in sub-clause (1) must meet the following minimum requirements (a) an account holder must be able to set a pre-commitment limit for a fixed period of 7 days (the "relevant period"); (b) the pre-commitment limit set by the account holder may apply, at the election of the gambling provider, to (i) net betting losses by the account holder (regardless of the number of accounts held) during the relevant period; (ii) deposits made to the account during the relevant period; or (iii) a combination of both;</p>	Meets requirements
	<p>(c) a gambling account must not be able to be used until the account holder has set a pre-commitment limit or chosen not to set a pre-commitment limit;</p> <p>(d) the gambling provider, at intervals of no less than 2 years, must contact each account holder who has chosen not to set a pre-commitment limit to offer the choice to set a pre-commitment limit;</p>	Meets requirements
	<p>(e) a decision by an account holder to (i) increase or revoke a pre-commitment limit; or</p>	Meets requirements

	(ii) change the start day for the relevant period must not come into effect for a period of 7 days; (f) a decision by an account holder to decrease a pre-commitment limit must be given effect as soon as practicable. (3) A pre-commitment scheme referred to in sub-clause (1) may include additional limits and features so long as they do not conflict with the minimum requirements set out in sub-clause (2).	
Account balances	A gambling provider must provide an account holder with an account balance— (a) whenever money is withdrawn (other than for the purchase of a gambling product); and (b) whenever money is deposited into a gambling account via an online transaction; and (c) in the case of a bet placed by internet—whenever a bet is made from the account; and (d) upon request by the account holder.	Meets requirements
Pre-commitment to be promoted	A gambling provider must promote the availability of the pre-commitment scheme— (a) on any brochures, pamphlets or marketing information (other than advertising) that provides information on how a gambling account may be established; (b) as part of the welcome pack (however described) provided to an account holder upon account establishment; (c) on the gambling provider's website—both on the homepage and on any point of sale page; and (d) on account balances (when provided in writing) and activity statements.	Meets requirements
Gambling provider to send activity statements	A gambling provider must send an account holder a routine activity statement— (a) for each calendar month in which there are 50 or more transactions conducted on a gambling account; and (b) for each period of consecutive calendar months (up to three calendar months) in which more than 40 transactions are conducted on a gambling account (which statement may be combined with a statement required by paragraph (a)); and (c) at least once in each period of 12 months following the provision of an activity statement so as to provide a continuous record of gambling activity. A gambling provider must, in addition to activity statements required by sub-clause (1), send a special activity statement to an account holder upon request for the period nominated by the account holder. Despite sub-clause (1), a gambling provider may meet the requirements for routine activity statements by sending activity statements on a rolling monthly basis (whether or not the statement periods are calendar months).	Meets requirements
Statement to be in writing	An activity statement must be sent in writing.	Meets requirements
Contents of activity statement	An activity statement must include (a) details of each transaction in the statement period, including the amount, date, time and a description of the transaction; and (b) the amounts of spotters' fees relating to the account holder in the statement period. If (a) an account holder elects to receive activity statements by email; (b) on any one day during the relevant period, the statement would record 20 or more transactions; and (c) the gambling provider offers a facility by which the account holder may view individual transactions online the gambling provider may provide the statement in a form which aggregates on a daily basis the amounts deposited, withdrawn, bet and won.	Meets requirements
Training	A gaming machine licensee must ensure that (a) each gaming employee (i) within the 3 months before or after starting, completed basic training; and (ii) at intervals of no more than 2 years after first completing basic training, commences and completes basic training or advanced training; and (b) each gaming manager (i) within the 3 months before or after starting, completed basic training (if the gaming manager has not already completed basic training) and advanced training; and (ii) at intervals of no more than 2 years after first completing advanced training, commences and completes further advanced training.	Meets requirements
Staff welfare	A gaming machine licensee must take reasonable steps to ensure that staff with a potential or actual gambling problem (not limited to a gaming machine problem) are identified and referred for counselling, support or therapy.	Meets requirements
Intervention Initiatives	Unless a gaming machine licensee is party to a responsible gambling agreement (a) the licensee must ensure that it is not possible to see into a gambling area from within other parts of the premises or from outside the premises; (b) the licensee must ensure that, to the greatest extent practicable, sounds associated with gambling are not audible in parts of the premises other than gambling areas or in any area outside the premises; (c) the licensee must ensure that patron activity on automated coin dispensing machines is routinely and regularly monitored; and (d) the licensee must not allow participation in a loyalty program other than one which includes a pre-commitment program approved by the Authority.	Meets requirements

6.3. NEW SOUTH WALES

Gambling providers throughout New South Wales adhere to detailed regulatory requirements that emphasize several responsible gambling principles, including:

- Clear provision of product information;
- Provision of responsible gambling messages and warnings;
- Provision of information about self-exclusion/exclusion; and
- Provision of information about assistance and counselling services.

Providers in this jurisdiction subscribe to a number of voluntary codes, including The Australian Hotels Association (NSW) GameCare Hotel Gaming Code of Conduct.

Regulatory Requirement		Outcome
Counselling	This Hotel has an arrangement with GameCare for the provision of problem gambling counselling and treatment service for its patrons.	Meets requirements
Self-Exclusion	A self-exclusion scheme is available for the benefit of people who wish to be prevented from entering or remaining in any nominated area of the hotel to assist patrons to control their gambling.	Meets requirements
	GameCare provides a free service that is able to assist patrons to become participants in a self-exclusion scheme conducted on behalf of this Hotel. Hotel patrons can ban themselves from entering gaming areas of hotels near where they live, work and socialize.	Meets requirements
Hotel Gaming code of conduct	Assist Patrons who have (or are at risk of developing) a gambling problem by participating in, and actively promoting, the GameCare statewide Self-Exclusion Program.	Meets requirements
	Ensure that all staff are aware of their obligations relating to the GameCare Self-Exclusion program including respecting the confidentiality of self-exclusion participants and not disclosing any related information to another person unless in the exercise of their duties.	Meets requirements
	Display signage promoting the GameCare accredited counselling service as part of directing patrons-in-need to professional support services.	Meets requirements
	Conduct business in a manner that precludes persons who (a) may indicate signs of intoxication and/or (b) are known to be self-exclusion participants.	Meets requirements
	Prohibit any form of patron credit being available for gaming machine play.	Meets requirements
	Actively promote awareness among all hotel staff of the Gaming Machines Act requirement for payment of large collects (over and above the 1st \$2000 in cash) to be paid in cheque and when requested by patron, to provide the entire collect by cheque.	Meets requirements
	Ensure that all staff working in gaming rooms complete an accredited Responsible Conduct of Gambling course and Responsible Service of Alcohol course.	Meets requirements

Gaming Machines Regulation 2010

Regulatory Requirement		Outcome
Display of information concerning chances of winning prizes on gaming machines	A hotelier or registered club must display, in accordance with this clause, notices providing information about the chances of winning a major prize from the operation of any approved gaming machine in the hotel or on the premises of the club.	Meets requirements
	The notices must contain the following (a): Think! What are the odds of hitting the jackpot? Your chance of hitting the jackpot on a gaming machine is no better than a million to one, and (b): What are the odds of hitting the jackpot? No better than a million to one.	Meets requirements

	<p>The notices must be: (a) displayed in each part of the hotel, or each part of the premises of the registered club, where approved gaming machines are located in such manner and in such a place that it would be reasonable to expect that a person entering the part of the hotel, or part of the premises of the club, in which the notices are displayed would be alerted to their contents, and (b) displayed on each approved gaming machine kept in the hotel or on the premises of the club.</p>	Meets requirements
	<p>Any such notice that is required to be displayed on an approved gaming machine must be positioned so as to enable a person to clearly see the notice while playing the gaming machine.</p>	Meets requirements
Provision of player information brochures	<p>If a hotelier or registered club is authorised to keep approved gaming machines, the hotelier or club must make copies of at least one player information brochure approved by the Authority under clause 22 available to patrons of the hotel or club in accordance with this clause.</p>	Meets requirements
	<p>The brochures must be made available in each part of the hotel, or each part of the premises of the registered club, in which approved gaming machines are located.</p> <p>The brochures must be displayed in such a manner and in such a place that it would be reasonable to expect that a person entering the part of the hotel, or part of the premises of the club, in which the brochures are required to be available would be alerted to their presence.</p>	Meets requirements
Provision of player information brochures in community languages	<p>A patron of a hotel or registered club in which approved gaming machines are authorised to be kept may request the hotelier or club to supply to the patron a community language player information brochure approved under clause 22 (5) in one of the languages specified in that subclause.</p> <p>The hotelier or registered club must supply a brochure in accordance with a request made under subclause (1) as soon as practicable after being requested to do so.</p>	Meets requirements
Dangers of gambling—notice to be displayed on gaming machines	<p>A hotelier or registered club who or which is authorised to keep approved gaming machines must display in accordance with this clause: (a) a gambling warning notice, and (b) a problem gambling notice.</p> <p>The gambling warning notice and problem gambling notice must be displayed on each approved gaming machine kept in the hotel or on the premises of the club.</p> <p>Each such notice must be positioned so as to enable a person to clearly see the notice while playing the gaming machine.</p> <p>The wording required to appear in a gambling warning notice may appear (as a separate and distinct statement) in a problem gambling notice or with any other notice displayed on an approved gaming machine, provided that the requirements of this clause in relation to the gambling warning notice and the problem gambling notice are otherwise complied with.</p> <p>The notice referred to in the definition of <i>problem gambling notice</i> in subclause (1) must contain the following: Call Gambling Help 1800 858 858 www.gamblinghelp.nsw.gov.au</p> <p>The notices may be attached to an approved gaming machine or may consist of a permanently visible light emitting display that forms part of the gaming machine.</p>	Meets requirements
Counselling signage—notice to be displayed	<p>If a hotelier or registered club is authorised to keep approved gaming machines, the hotelier or club must: (a) display a notice that complies with this clause in the vicinity of the main entrance to the hotel or the premises of the club, and (b) display the notice in such a manner and in such a place that it would be reasonable to expect that a person using the main entrance to the hotel or the premises of the club in which the notice is displayed would be alerted to its contents.</p> <p>The notice must contain the following: Think! About your choices, Gambling More, enjoying it less? For free and confidential information and advice about problem gambling, please contact Gambling Help 1800 858 858 www.gamblinghelp.nsw.gov.au</p>	Meets requirements
Signage to be displayed on ATMs and cash-back terminals	<p>If a hotelier or registered club is authorised to keep approved gaming machines, the hotelier or club must display a notice in accordance with this clause on each automatic teller machine (ATM) or cash-back terminal installed in the hotel or on the premises of the club.</p> <p>The notice must be positioned so as to enable a person to clearly see the notice while using the ATM or cash-back terminal.</p>	Meets requirements

	<p>The notice must contain the following: Think! About your choices Call Gambling Help 1800 858 858 www.gamblinghelp.nsw.gov.au</p> <p>In the case of a cash-back terminal that can be operated by means of a player card, the notice must also contain the following: Your player activity statement is available from the cashier</p> <p>The notice may be attached to an ATM or cash-back terminal or may consist of a permanently visible light emitting display that forms part of the ATM or cash-back terminal.</p>	
Display of clocks	A hotelier or registered club must ensure: (a) that a clock in good working order and that is set to, or within 10 minutes of, the correct time is kept in each part of the hotel, or part of the premises of the club, where approved gaming machines are located, and (b) that the time shown on that clock can be readily viewed by any person operating an approved gaming machine in that part of the hotel or premises of the club.	Meets requirements
Prohibitions on dealings with cheques	If a hotelier or registered club is authorised to keep approved gaming machines, the hotelier or club must not: (a) exchange a cheque for cash unless the cheque is made out to: (i) the hotelier or the hotel owner, or (ii) to the club, or (b) exchange a cheque for more than \$400 in cash, or (c) exchange more than one cheque for the same person on a single day for cash, or (d) exchange a cheque for cash if a cheque previously exchanged for the person who tendered the cheque has not been met on presentation (unless the amount of the cheque not met was subsequently paid to the hotelier or club).	Meets requirements
Payment of prize money by cheque or electronic funds transfer	A hotelier or registered club must pay so much of the total prize money payable to a person as exceeds \$5,000: (a) by means of a crossed cheque payable to the person, or (b) if the person so requests, by means of electronic funds transfer (if those means are available to the hotelier or club) to an account nominated by the person. If the total prize money payable to a person exceeds \$5,000, a hotelier or registered club must, if the person so requests, pay the whole of the total prize money in the same manner as is required under subclause (1).	Meets requirements
Location of cash dispensing facilities away from gaming machines	A hotelier or registered club must not permit a facility for the withdrawal or transfer of money from a bank or authorised deposit-taking institution (such as an ATM or EFTPOS terminal) to be located in a part of the hotel, or a part of the premises of the club, in which approved gaming machines are located.	Meets requirements
Provision of player activity statements under player reward schemes	Player activity statements are required to be provided by a hotelier or registered club under section 45 (4) of the Act only if the player reward scheme being conducted by the hotelier or club is one in which a participant's activity in relation to playing gaming machines is recorded by electronic means.	Meets requirements
	Player activity statements relating to the playing of approved gaming machines by the participants in a player reward scheme conducted by the hotelier or club must: (a) be made available, on request by the participant to whom any such statement relates, on a monthly basis, and	
	The following information, provided in the form approved by the Authority, is the minimum information that must be included in a participant's player activity statement: (a) the total amount of turnover by the participant during the monthly period covered by the statement, (b) the total wins recorded during the monthly period, (c) the net expenditure (i.e. turnover less wins) during the monthly period, (d) the total points earned and redeemed during the monthly period as the result of playing gaming machines under the scheme, (e) the total length of time over each 24-hour period during the monthly period when the participant's player card was inserted in gaming machines under the scheme (<i>the daily record</i>), (f) the total length of time that the participant's player card was inserted in gaming machines under the scheme during the monthly period.	Meets requirements
	The daily record is required to be included in the player activity statement only in respect of those days that the participant's player card was used.	
	A player activity statement is to also include a note stating that the information detailed in the statement: (a) only relates to the occasions on which the participant used his or her player card under the player reward scheme to play a gaming machine, and (b) does not necessarily relate to all of the participant's gaming machine activity during the monthly period, and (c) may not include information about wins from playing gaming machines that are part of a linked gaming system within the meaning of Part 10 of the Act.	Meets requirements

	<p>Information to the effect that player activity statements are available on request must: (a) be given to each participant at the time the participant joins the player reward scheme conducted by the hotelier or registered club, and (b) be included in any promotional material relating to the player reward scheme.</p> <p>A player activity statement must include a problem gambling notice as referred to in clause 25.</p> <p>Player activity statements must be provided free of charge by the hotelier or registered club. However, if a participant requests a subsequent player activity statement to be provided in respect of a monthly period, the hotelier or club may charge for providing the subsequent statement in accordance with the scale of charges approved by the Authority.</p>	
<p>Provision of problem gambling counselling services</p>	<p>The persons who are to provide problem gambling counselling services as referred to in section 46 of the Act are persons who are employed or engaged by, or whose services are accessed through, any of the following bodies (referred to in this clause as service providers):</p> <p>(a) Australian Hotels Association (NSW), (b) Clubs NSW, (c) BetSafe, (d) any other body that receives funding from the Responsible Gambling Fund under the <i>Casino Control Act 1992</i> for the specific purpose of providing gambling-related counselling or treatment services.</p> <p>A hotelier or registered club is required to make available at all times to the patrons of the hotel or club information as to the name and contact details of a problem gambling counselling service made available by or through a service provider.</p> <p>The hotelier or registered club must also provide the information referred to in subclause (2): (a) to each person who is a participant in a self-exclusion scheme conducted by the hotelier or club under section 49 of the Act at the time the participant undertakes to be part of the scheme or as soon as practicable after that time, and (b) to any other person whenever requested to do so.</p> <p>A hotelier or registered club must display a notice that complies with subclause (5) in any part of the hotel, or part of the premises of the club, in which approved gaming machines are located. The notice must contain the following information: (a) the name and contact details of the problem gambling counselling service referred to in subclause (2), (b) a statement advising patrons that a self-exclusion scheme is available in the hotel or on the premises of the club for the benefit of patrons who wish to be prevented from entering or remaining in any nominated area of the hotel or premises of the club for the purposes of assisting patrons to control their gambling, (c) the name and contact details of a person or body who is able to assist patrons with becoming participants in a self-exclusion scheme conducted in the hotel or on the premises of the club.</p>	<p>Meets requirements</p>
<p>Self-exclusion schemes</p>	<p>For the purposes of section 49 of the Act, the prescribed requirements for the conduct of a self-exclusion scheme are that the scheme makes provision for the following:</p> <p>(a) preventing the hotelier or registered club, or an employee of the hotelier or club, from refusing a participant's request to participate in the scheme, (b) requiring the participant to give a written and signed undertaking that he or she will not gamble in the hotel or on the premises of the club for a period specified in the undertaking (such undertaking may be in a standard form as approved by the Secretary from time to time), (c) requiring the participant to be given an opportunity to seek independent legal or other professional advice at his or her own expense as to the meaning and effect of the undertaking before it is given, (d) requiring a participant who enters into an undertaking to be provided by the hotelier or club (or an employee of the hotelier or club) with written information outlining the name and contact details of the problem gambling counselling service referred to in clause 52 (2), (e) requiring the hotelier or club to ensure that responsible persons for the hotel or the club can readily identify the participant, whether by means of access to a recent photograph of the participant or otherwise, (f) requiring the hotelier or club to make available, on request by any patron of the hotel or club, the standard self-</p>	<p>Meets requirements</p>

	exclusion form (if any) referred to in paragraph (b), (g) preventing a participant from withdrawing from the scheme within 6 months after requesting participation in the scheme.	
Provision of gambling contact cards	A hotelier or registered club must display gambling contact cards in a card holder that is securely attached to each bank of approved gaming machines and that is positioned so as to enable a person to clearly see the gambling contact cards: (a) while playing a gaming machine that is part of the bank of gaming machines, or (b) when approaching the bank of gaming machines.	Meets requirements
Offering of inducements to gamble	A hotelier or registered club must not: (a) offer or supply, or cause or permit to be offered or supplied, any free or discounted liquor as an inducement to play, or to play frequently, approved gaming machines in the hotel or on the premises of the club, or (b) offer, or cause or permit to be offered, free credits to players, or as an inducement to persons to become players, of approved gaming machines in the hotel or on the premises of the club by means of letter box flyers, shopper dockets or any other similar means,	Meets requirements
Location of jackpot prize monitors for linked gaming systems under Part 10 of Act	A hotelier or registered club must not permit any monitor that is used to display the jackpot prize from a linked gaming system operating in the hotel or on the club premises to be located in any part of the hotel or club premises other than: (a) the bar area (within the meaning of the <i>Liquor Act 2007</i>) of the hotel or club premises, or (b) in the case of a hotel that is required.	Meets requirements
Issue and expiry of recognised competency card	For the purposes of the definition of <i>recognised competency card</i> in section 49A of the Act, a <i>recognised competency card</i> is a card (in hard copy or electronic form) issued by or on behalf of the Secretary to a person that: (a) certifies (based on an interim RCG certificate granted to the person within the period of 5 years before the card is issued) that the person has successfully completed an approved RCG training course, and (b) provides for its expiry on the 5th anniversary of: (i) if the card only certifies the completion of an approved RCG training course on the basis of an interim RCG certificate—the date on which the certificate was granted, or (ii) if the card certifies the completion of both an approved RCG training course and approved RSA training course on the basis of interim RCG and RSA certificates—the date on which the certificates were granted or, if the dates on which the certificates were granted differ, the earliest of the dates, and (c) contains such other information (including photographic or other information about the identity of the person) as the Secretary may require at the time the card is issued.	Meets requirements
	(2) Without limiting subclause (1) (c), a recognised competency card does not cease to be a recognised competency card only because it also certifies that the person to whom the card is issued has successfully completed an approved RSA training course. (3) The Secretary may, on payment of a fee of \$30, issue a replacement recognised competency card to a person if the Secretary is satisfied that the original card: (a) has been lost, stolen or damaged, and (b) is still current. A person is not liable to pay a fee of more than \$30 for the replacement of a recognized competency card even if the card also certifies the successful completion of an approved RSA training course.	Meets requirements
Expiry and renewal of recognised RCG certifications	A recognised competency card or interim RCG certificate expires at the end of the day specified in the card or certificate as its expiry date. A new recognised competency card or interim RCG certificate may be issued or granted to a person following the expiry of a recognised competency card or interim RCG certificate held by the person if the person: (a) successfully completes, within 28 days of the expiry, an approved RCG training course, and (b) if that course is provided by or on behalf of the Secretary—pays the Secretary a fee of \$35. A person is not liable to pay a fee of more than \$35 for a new recognised competency card even if the card also certifies the successful completion of an approved RSA training course (within the meaning of clause 58B). Despite clause 58B (1) (b), a new recognised competency card issued to a person following the expiry of a recognised competency card or interim RCG certificate held by the person is to provide for its expiry on the 5th anniversary of the date of expiry of the expired recognized competency card or interim RCG certificate.	Meets requirements

<p>Inspection of recognised RCG certification</p>	<p>A police officer or inspector may require any of the following persons to produce their recognised competency card or interim RCG certificate to the officer or inspector for inspection: (a) a hotelier who keeps gaming machines, (b) the secretary of a registered club that keeps gaming machines, (c) a person employed by a hotelier or registered club whose duties are concerned in the conduct of activities involving approved gaming machines in the hotel or on the premises of the club.</p> <p>A person must not, without reasonable excuse, fail to comply with a requirement of a police officer or inspector under subclause (1).</p>	<p>Meets requirements</p>
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6.4. QUEENSLAND

The voluntary Queensland Responsible Gambling Code of Practice commits the gambling industry to implement and adhere to responsible gambling practices, with a particular focus on customer protection measures. The voluntary Code was launched 29 May 2002 by Queensland Government and was developed by the Responsible Gambling Advisory Committee.

Regulatory Requirement	Outcome
<p>Provision of Information</p>	<p>Potential risks: Information about the potential risks associated with gambling and where to get help for problem gambling is prominently displayed in all gambling areas and near any cash out facilities which service gambling areas.</p> <p>Available on request: Information is displayed in a prominent location to alert customers that the following information is available on request: the gambling provider's Responsible gambling, policy document including policies for addressing problem gambling issues relevant to the local community, the nature of games, game rules, odds or returns to players, exclusion provisions, gambling-related complaint handling procedures, key elements of the gambling provider's financial transaction practices.</p> <p>Available on request: Information is displayed in a prominent location to alert customers that key RG information is available on request. Odds of winning major prizes Meaningful and accurate information on the odds of winning major prizes is prominently displayed in all gambling areas and in proximity to relevant games.</p> <p>Predominant cultural groups Gambling providers are to provide information and materials suitable for predominant cultural groups in their local community.</p>
<p>Interaction with customers and community</p>	<p>Community liaison: To support early intervention and prevention strategies where opportunities arise, gambling providers are to establish effective mechanisms to link with: local gambling-related support services community networks where responsible gambling related issues could be raised.</p> <p>Customer liaison role: Gambling providers are to nominate a person/s to perform the customer liaison role and who is to: be available during approved opening gaming hours, provide appropriate information to assist customers, with gambling-related problems, support staff in providing assistance to those customers, provide assistance to staff with gambling-related problems, develop linkages with local community groups where opportunities arise.</p> <p>Customer complaints: Complaint handling procedures that can deal with gambling issues are established and promoted by gambling providers.</p> <p>Training and skills development: Mechanisms are established to ensure that appropriate and ongoing responsible gambling training is provided to staff who provide gambling products to customers. In addition, the relevant owners, boards and managers receive appropriate information to guide decision making in relation to responsible gambling.</p>
<p>Exclusion provisions</p>	<p>Exclusion procedures: Gambling providers to provide exclusion procedures and supporting documentation.</p> <p>Contact information for support services: Gambling providers offer customers who seek exclusion contact information for gambling-related support services.</p> <p>Exclusion from other gambling providers: Excluded customers are to be given support in seeking consensual exclusions from other gambling providers, where practicable.</p>

	Correspondence to excluded customers: Gambling providers must not distribute promotional or advertising material to persons who are self-excluded, been issued with an exclusion direction for problem gambling or are known to have formally requested that this information not be sent.	Meets requirements
Physical environment	Minors prohibited: Minors are prohibited from gambling.	Meets requirements
	Minors excluded: Minors are prohibited from designated gambling areas.	Meets requirements
	Hospitality services: Provision of hospitality services in areas where gambling is provided is managed in such a way as to encourage customers to take breaks in play.	Meets requirements
	Unduly intoxicated customers: Customers who are unduly intoxicated are not permitted to continue gambling.	Meets requirements
	Child care and play areas: Where child play areas are provided, best efforts should be made to minimise exposure to areas where gambling activities are conducted. Where gambling providers offer adjunct child care, these facilities must provide safe and suitable standards of care in accordance with relevant child care legislation.	Meets requirements
	Gratuities: Staff working in gambling areas are not to encourage gambling customers to give them gratuities.	Meets requirements
	Passage of time: Gambling providers implement practices to ensure that customers are made aware of the passage of time.	Meets requirements
	Breaks in play: Gambling providers implement practices to ensure that customers are discouraged from participating in extended, intensive and repetitive play.	Meets requirements
	New gambling products and services: Prior to the introduction of relevant new gambling products and services, including those which make use of emerging technology, consideration should be given as to the potential impact of the technology on responsible gambling behaviours.	Meets requirements
Financial transactions	ATM facilities: ATMs are not to be located in close proximity to designated gambling areas, or in the entry to gambling areas, where safe and practicable.	Meets requirements
	Cashing of cheques and payment of winnings: Gambling providers are to establish a limit above which all winnings are paid by cheque or electronic transfer. Gambling winnings above the set limit are paid by cheque and are not cashed on the gambling provider's premises until the next trading day or within 24 hours of the win. The following cheques can be cashed only by prior arrangement: <ul style="list-style-type: none"> • cheques not made payable to the venue • cheques not made payable to the person presenting the cheque • multiple cheques. 	Meets requirements
	Credit betting (lending of money): Gambling providers are not to provide credit or lend money to anyone for the purpose of gambling.	Meets requirements

6.5. NORTHERN TERRITORY

The Northern Territory Code of Practice for Responsible Gambling was first implemented on a voluntary basis in 2003. The code was developed as a partnership between Northern Territory gambling providers, government, regulators and counselling services and represents a whole-of-industry commitment to best practice in the provision of responsible gambling. The Code became mandatory in 2006 and addresses various matters including:

- Provision of information;
- Interaction with customers and community;
- Staff training;
- Gaming environment;
- Financial transactions; and
- Advertising and promotions.

Regulatory Requirement		Outcomes
Provision of information	A Mission Statement that clearly demonstrates the venues commitment to responsible gambling must be displayed at the venue in a location easily accessible by patrons and for those providers with websites, clearly displayed on their home page. Providers of telephone betting services must have in place suitable initiatives to achieve the same outcomes.	Meets requirements
	Information relating to the potential risks associated with gambling must be displayed prominently as well as information about where patrons can seek assistance with any gambling issues they may have. The information is to be displayed in all gambling areas plus those locations where an ATM or EFTPOS machine is available.	Meets requirements
	Meaningful and accurate information regarding the odds or win rates of major prizes should be clearly displayed in all gambling areas and providers who utilise websites must ensure this information is easily accessible by patrons.	Meets requirements
	All gambling providers must make available, when requested, the following types of information for their patrons: Responsible Gambling Policy documentation including, where appropriate, policies for addressing problem gambling issues relevant to the local community the nature of games, game rules, odds or returns to players for all products offered all provisions relating to the Self-Exclusion process gambling-related complaint resolution mechanisms and appropriate documentation.	Meets requirements
Interaction with patrons and community	Community Liaison. To support early intervention and prevention strategies, gambling providers are to establish: appropriate links with gambling support services in the NT and, where applicable, nationally link with appropriate community networks where gambling related issues could be raised.	Meets requirements
	Community Liaison Officer Role - Commercial gambling providers must appoint a person to: be available during approved gaming opening hours provide appropriate information and assistance to patrons with gambling related problems support other staff in providing assistance to these affected patrons provide assistance to any staff that may themselves have gambling related issues.	Meets requirements
	Patron Complaints - Resolution mechanisms for recognising and addressing complaints are to be established and promoted by gambling providers. Any complaints concerning breaches of the Code will be directed to the individual provider. It is then the responsibility of that particular gambling provider to ensure that mechanisms are in place to address complaints in a manner that enables any legitimate issue to be dealt with effectively in order to ensure that this Code is upheld and that any breach is rectified as soon as possible.	Meets requirements
	Responsible Gambling Records - Gambling providers will ensure they record all actions taken by staff in assisting people in accordance with the Code through a Responsible Gambling Incident Register. The register will need to include the following minimum amount of information: a) Date, time, location and nature of any event where a patron reports a gambling related issue or complaint. b) Name and address (or description of person where this information is unavailable) of the person the incident relates to; and c) The name of the staff member involved and the action they took. The register should also list those patrons who have chosen to exclude themselves from the venue and include name, address, contact details and the date the exclusion commenced.	Meets requirements
Training and skills development	New Staff - All new staff, engaged in the provision of gambling services, must complete appropriate gambling training within three (3) months of commencing employment. This should include training that will allow all relevant staff to identify and respond to 'Red Flag' behaviours as well as general information in relation to gambling and gambling products offered by the venue.	Meets requirements
	On-going Training - Gambling providers operating electronic gaming machines are to ensure current gaming staff partake in refresher training (approved by the Director General of Licensing) annually regarding harm minimisation strategies to enable the ongoing provision of a responsible gambling environment. Gambling providers not operating electronic gaming machines must undertake the training biannually.	Meets requirements
	Licensees and Managers – are to participate in appropriate training at least once every five years to guide decision making in relation to responsible gambling practices and environment.	Meets requirements

	Record of Training - A Gambling Training Register is to be maintained and kept as a part of responsible gambling records. This register should include staff name, date of training and type of training. A copy of this register should be provided to the Director-General on request.	Meets requirements
Exclusion provisions	Gambling providers are to make available the option of patrons excluding themselves from the gambling venue or site to patrons who feel they are developing a problem with gambling.	Meets requirements
	Patron Responsibility - Gambling patrons will be encouraged to take responsibility for their gambling activity.	Meets requirements
	Self-Exclusion Procedures - All commercial gambling providers must use the generic form of self-exclusion which has been developed for use by Northern Territory gambling providers. This is available on the Department of the Attorney-General and Justice website (Note: casinos have specific provisions in place). Procedures with clear, supporting documentation are to be implemented and application forms for self-exclusion must be available at Reception, within the gambling area, adjacent to the gambling products or/and on the website.	Meets requirements
	Completed Self-Exclusion Forms - Management, Community Liaison Officer and/or security staff of the gambling provider are to be supplied with the completed self-exclusion forms together with a photo of the relevant person. These forms will include the stated wish of the patron to be reminded of their desire to be excluded from the specified gambling provider. Details will also be entered in the Responsible Gambling Incident Register.	Meets requirements
	Counselling Contact Information - gambling providers are to offer patrons who seek self-exclusion and/or express a concern that they have a gambling problem, contact information for appropriate counselling agencies.	Meets requirements
	Self-Exclusion from Other Gambling Providers. Self-exclusion gambling patrons are to be given support and encouragement in seeking self-exclusions from other gambling providers.	Meets requirements
	Correspondence or Promotional Material - all gambling providers are not to send correspondence or promotional material to gambling customers who are excluded from their services or who request that this information not be sent to them.	Meets requirements
	Licensee Exclusion - all gambling providers operating electronic gaming machines will have adequate procedures in place to exclude patrons in accordance with section 111 of the Gaming Machine Act.	Meets requirements
Physical environment	A gambling provider must maintain a safe environment to protect the interests of gamblers themselves, their friends and family, and a physical environment that is consistent with responsible gambling.	Meets requirements
	Passage of Time - Gambling providers will implement practices to ensure that customers are made aware of the passage of time - e.g.: clearly visible clocks in the vicinity of cash cages, automatic teller machines and coin dispensers, together with natural lighting where possible. Where gaming machines incorporate a clock, it must display the correct time.	Meets requirements
	Intoxicated Customers - Customers who are intoxicated are to be prevented from gambling and removed from the premises as per the requirements under the Liquor Act.	Meets requirements
	Child Care Facilities - Where gambling providers offer child care facilities, these facilities must recognise all child care legislation and staff overseeing the facility must be appropriately accredited. The facility should be set up so that children cannot see gambling activities taking place.	Meets requirements
	Procedures to Check Venues and Car Parks - Where Gambling providers, where offer patrons a car park, as opposed to a general public car park; practical, they will adopt procedures to check car parks under their control with the aim of reducing the risk of children being left unattended.	Meets requirements
Minors	All gambling providers are to adopt appropriate strategies to ensure minors are prohibited from gambling and not induced to gamble.	Meets requirements
	Prohibition of Minors - Minors are prohibited from gambling and gambling providers will check the identification of any person whom they have reason to believe might be less than 18 years of age.	Meets requirements
	Activities for Minors - Activities run by gambling providers for minors must not promote any aspect of gambling and should not be conducted in close proximity to gambling activities.	Meets requirements
	Minors as staff members - Where legislated minors are not permitted to work in gambling activities and where no legislation is applicable, gambling product providers are discouraged from allowing minors to sell NT Keno and lottery products.	Meets requirements

Financial transactions	Financial transactions associated with gambling are to be undertaken in a responsible manner, which includes such factors as the location and operation of Automatic Teller Machines (ATMs), the provision of credit or granting loans for the purpose of gambling, and the cashing of cheques.	Meets requirements
	Signage - ATMs will carry or have within close sight of them problem gambling warning signage and appropriate support service contact details in a manner clearly visible to customers.	Meets requirements
	Location - ATMs must not be located within designated gaming areas and where safe and practicable, not in the entry to gaming areas. They must not be located within sight of the gaming areas.	Meets requirements
	ATM and EFTPOS Facilities will have access only to debit accounts; access to credit accounts will not be permitted.	Meets requirements
	Credit and Money Lending - all gambling providers, with the exception of bookmakers, are not to provide credit or lend money to anyone for the purpose of gambling.	Meets requirements
	Cashing of Cheques, whether personal or third party, on the gambling provider's licensed premises for the sole purpose of gambling is forbidden.	Meets requirements
	Payment of winnings - all gambling providers are to pay by cheque winnings in excess of \$500 or where offered, electronic transfer. Cheques provided for gambling winnings should not be cashed within 24 hours of the win.	Meets requirements
Advertising and promotions	<p>Advertising and promotions are to be delivered in an honest and responsible manner with consideration given to the potential impact on people adversely affected by gambling.</p> <p>Compliance with the Advertising Code of Ethics - Advertisements must comply with the Advertising Code of Ethics as adopted by the Australian Association of National Advertisers or the Advertising Federation of Australia. Any television advertising and promotion must also comply with the Federation of Commercial Television Stations (FACTS) Code of Practice.</p> <p>Return to Player - Advertising, marketing and promotions must accurately detail prizes on offer and the game results available.</p> <p>Accurate Details - Advertising, marketing and promotions must accurately detail prizes on offer and the game results available.</p> <p>False Impressions - No advertising produced by any gambling provider is to give the impression that gambling is a reasonable strategy for financial betterment, i.e. advertisements should centre on entertainment purposes</p> <p>Minors - Advertising displays and point of sale material for gambling products must not be directed at minors, portray minors participating in gambling, or be set up in an area specifically to target minors.</p> <p>Problem Gambling Signage - Advertising displays at the point of sale are to have on or within sight of them appropriate problem gambling warning signage in a clearly visible manner.</p> <p>Notices of Winnings Paid - Advertising of individuals' winnings paid should only be displayed within the gambling provider's premises and not externally in public spaces. Personal particulars of winners are only to be published with their consent</p> <p>Urging to Buy - Gambling providers are not to verbally urge non-gambling customers to buy gambling products.</p> <p>Alcohol Consumption - The gambling provider will ensure no advertising depicts or promotes the consumption of alcohol while engaged in gambling activities.</p>	Meets requirements



411 Richmond Street East, Suite 205, Toronto, ON, Canada M5A 3S5
<http://www.rg-plus.com/>