

Queensland responsible gambling Resource manual

Section E • V3.3 • 2022

Keno

Developed by Keno (Qld) Pty Ltd and the Department of Justice and Attorney-General

Contents

Practice 1 Provision of information	3	Practice 5 Financial transactions	11
1.1 Potential risks	3	5.1 ATM facilities	11
1.2 Available on request	3	5.2 Cashing of cheques and payment of winnings	11
1.3 Odds of winning major prizes	4	Example 5.2A Financial transactions policy	11
1.4 Predominant cultural groups	4	5.3 Credit betting (extending of credit)	12
Examples of acceptable/unacceptable actions	4	Examples of acceptable/unacceptable actions	12
Practice 2 Interaction with customers and community	5	Practice 6 Advertising and promotions	13
2.1 Community liaison	5	6.1 Code of Ethics	13
2.2 Customer liaison role	5	6.2 False, misleading or deceptive	13
2.3 Customer complaints	5	6.3 Misrepresentation of probabilities	14
2.4 Training and skills development	5	6.4 Reasonable strategy (financial betterment)	15
Examples of acceptable/unacceptable actions	6	6.5 Misleading statements	15
Practice 3 Exclusion provisions	7	6.6 Community standards	16
3.1 Exclusion procedures	7	6.7 Other activities to promote	16
3.2 Contact information for support services	7	6.8 Minors or vulnerable or disadvantaged groups	16
3.3 Exclusion from other gambling providers	7	6.9 External signs	17
3.4 Correspondence to excluded customers	7	6.10 Irresponsible trading practices	18
Examples of acceptable/unacceptable actions	8	6.11 Consumption of alcohol	18
Practice 4 Physical environment	9	6.12 Consent of the person	18
4.1 Minors prohibited	9	6.13 Responsible gambling messages	19
4.2 Minors excluded	9	Gambling help information	20
4.3 Hospitality services	9		
4.4 Unduly intoxicated customers	9		
4.5 Child care and play areas	9		
4.6 Gratuities	9		
4.7 Passage of time	9		
4.8 Breaks in play	10		
4.9 New gambling products and services	10		
Examples of acceptable/unacceptable actions	10		

Practice 1

Provision of information

Introduction

A fundamental component of the *Queensland responsible gambling Code of Practice* (Code of Practice) is to create an environment where information about responsible gambling is made available to customers where Keno is offered (clubs, hotels, and casinos) so customers can make informed decisions.

To assist customers in making informed decisions the information will be readily available and will include details of Keno products available including the odds of winning major jackpot prizes. In addition, the Keno Rule 2010 will be available for viewing by customers if requested. Furthermore customers can visit www.playkeno.com.au for all information and responsible gambling materials related to Keno.

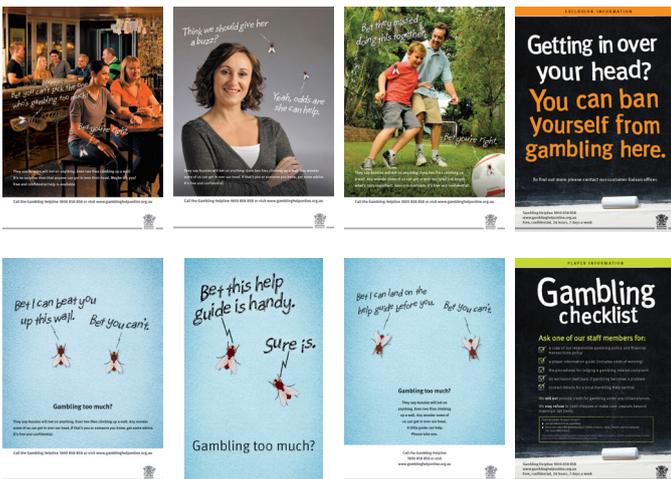
Note: Keno (Qld) Pty Ltd (Keno Queensland) does not have direct contact with customers who play Keno.

1.1 Potential risks

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

Actions of the gambling provider

Keno Queensland supports Keno venues in ensuring that information about the potential risks associated with problem gambling is on display to customers. Current in-venue signage includes:



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

Best practice

Keno Queensland provides responsible gambling statements in between Keno games on the Keno Display System.

1.2 Available on request

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

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

Actions of the gambling provider

Keno Queensland encourages accredited agents and outlets and their staff to engage with customers and provide information to customers upon request.

Keno Queensland's *Game Guide*, which is available under 'Learn to play' on the Keno website (www.playkeno.com.au) informs customers on how to play, the odds/win rates of major jackpot prizes and where to access support services.

In addition Keno Queensland will support Keno venues to ensure that information on responsible gambling is available to customers by displaying it on the Keno website (www.playkeno.com.au).

It is recommended that clubs, hotels, and casinos develop the above-mentioned items and incorporate Keno information into existing venue information which is available on request.

1.3 Odds of winning major prizes

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

Actions of the gambling provider

Keno Queensland encourages accredited agents, and outlets and their staff to engage with customers and provide information to customers upon request.

Keno Queensland's *Game Guide* includes information on the nature of the various Keno games, and the odds of winning major jackpot prizes.

Keno Queensland also has the Keno Rule 2010, available under 'Responsible gaming' on the Keno website. The Keno Rule must be made available at all Keno venues for customers to view at their request.

Best practice

Keno Queensland recommends and encourages that all Keno venues assist customers by making available copies of the *Game Guide* upon request.

1.4 Predominant cultural groups

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

Actions of the gambling provider

Keno Queensland encourages accredited agents and outlets and their staff to provide information and materials suitable for predominant cultural groups in their community.

Examples of acceptable/unacceptable actions

Keno Queensland finds the following behaviours deemed to be acceptable or unacceptable within the environment of a Keno venue.

Acceptable

Referring members and customers to the venue's *Responsible gambling policy* which demonstrates the venue's commitment to the provision of responsible gambling products and services.

Where appropriate, informing members and customers that responsible gambling information and brochures are available.

Directing a person who approaches a staff member for information about/assistance with, a gambling problem or who/may be displaying indicators that may be related to problem gambling to the venue's customer liaison officer (CLO)/gaming duty manager for help.

Unacceptable

Not positioning responsible gambling information in a visible/accessible location or covering responsible gambling signage with other notices.

Asking a customer who requests responsible gambling information to come back later to collect it.

Interaction with customers and community

Introduction

Keno is a game that is played in a variety of different venues. An essential element of responsible gambling is to create an environment where information about responsible gambling is made available to Keno customers, enabling customers to make informed decisions. This is achieved by supporting early intervention and prevention strategies by communicating and cooperating with the local community.

All Keno operators should liaise with local communities on a regular basis to effectively communicate responsible gambling initiatives and receive any feedback relating to responsible gambling.

Note: *Keno Queensland does not have direct contact with customers who play Keno.*

2.1 Community liaison

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

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

Actions of the gambling provider

Keno Queensland encourages accredited agents and outlets and their staff to familiarise themselves with the support services that exist in their area and to utilise local community consultative networks.

2.2 Customer liaison role

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

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

Actions of the gambling provider

Keno Queensland encourages and supports policies and procedures regarding customer liaison roles developed by clubs, hotels, and casinos.

2.3 Customer complaints

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

Actions of the gambling provider

Keno Queensland will support processes and forms developed for clubs, hotels, and casinos for addressing complaints.

In the first instance Keno-related gambling complaints will be addressed, in the club, hotel, or casinos. If the complaint is not resolved at the venue level then the complaint should be escalated to Keno operations for resolution.

2.4 Training and skills development

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

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

Actions of the gambling provider

Keno Queensland supports clubs, hotels, and casinos ongoing responsible gambling training programs in venues where Keno is available. Training on products and information is conducted when a new Keno venue commences.

Best practice

Keno Queensland recommends and supports ongoing responsible gambling training on Keno products and harm minimisation initiatives annually to ensure relevancy and currency of information.

Examples of acceptable/ unacceptable actions

Keno Queensland finds the following behaviours deemed to be acceptable or unacceptable within the environment of a Keno venue.

Acceptable

Referring a customer who has a complaint to the person responsible for customer liaison.

When requested, providing the complaint handling procedures and information to customers.

Unacceptable

Discussing a customer's gambling behaviour in front of other customers.

Advising a customer who indicates they may have a problem with gambling that the venue is unable to assist them.

Practice 3

Exclusion provisions

Self-exclusions and venue-initiated exclusions for problem gambling

Introduction

Keno customers who believe they have problems managing their gambling behaviour should be given information about self-exclusion provisions and gambling support services.

Note: Keno Queensland does not have direct contact with customers who play Keno or have direct involvement in the exclusion process.

3.1 Exclusion procedures

Gambling providers to provide exclusion procedures and supporting documentation.

Actions of the gambling provider

Keno Queensland strongly recommends accredited Keno agents, clubs, hotels and casinos, and outlets and their staff to engage with customers and provide information to customers on self-exclusion and gambling help services on request.

Best practice

Clubs, hotels, and casinos, CLOs or nominated staff members, should be nominated as the contact point for information on exclusion provisions or general problem gambling issues relating to Keno.

3.2 Contact information for support services

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

Actions of the gambling provider

Keno Queensland strongly recommends accredited Keno agents, outlets, clubs, hotels, and casinos have readily available and provide local Gambling Help service provider's information.

This can be achieved by displaying or making available Gambling Help services business cards and brochures.

3.3 Exclusion from other gambling providers

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

Actions of the gambling provider

Keno Queensland strongly recommends accredited Keno agents, outlets, clubs, hotels, and casinos have readily available and provide local Gambling Help service provider's information.

This can be achieved by displaying or making available Gambling Help services business cards and brochures.

3.4 Correspondence to excluded customers

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

Actions of the gambling provider

Keno Queensland supports and strongly recommends accredited Keno agents, outlets, clubs, hotels, and casinos ensure that self-excluded customers do not receive correspondence or promotional material.

Examples of acceptable/unacceptable actions

Keno Queensland finds the following behaviours deemed to be acceptable or unacceptable within the environment of a Keno venue.

Acceptable

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

Encouraging customers who request self-exclusion to seek independent legal advice before signing a *Self-exclusion notice*.

Providing customers who request self-exclusion with a list of local community support agencies in the area and the Gambling Helpline phone number **(1800 858 858)**.

Requesting all customers who approach the venue with gambling-related problems to sign the *Gambling-related incident report* where possible.

No longer sending excluded customers correspondence or promotional materials that mentions gambling.

Unacceptable

Dismissing a customer's request for self-exclusion or delaying the signing of the *Self-exclusion notice*.

Providing counselling to members and customers that request self-exclusion, instead of referring them to appropriate local support agencies.

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

Allowing self-excluded members and customers to enter gambling areas and to partake in gambling activities.

Physical environment

Introduction

Whilst Keno Queensland has no direct control of the physical environment in venues where Keno is available to customers, Keno Queensland strongly recommends Keno venues ensure that the physical environment at venues where Keno is conducted is pleasant and safe for customers.

4.1 Minors prohibited

Minors are prohibited from gambling.

Actions of the gambling provider

Keno Queensland supports Keno venues to prohibit minors from gambling on Keno in accordance with the *Keno Act 1996* s. 165, (Keno gaming by minors) and s. 166, (Allowing minors to take part in Keno gaming). The prohibition of minors gambling is provided in Keno product training.

4.2 Minors excluded

Minors are prohibited from designated gambling areas.

Actions of the gambling provider

Keno operators/venues are exempt from this practice.

4.3 Hospitality services

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

Actions of the gambling provider

Keno Queensland supports Keno venues' responsible gambling initiatives in the provision of hospitality services.

4.4 Unduly intoxicated customers

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

Actions of the gambling provider

Keno Queensland encourages Keno venues to prohibit unduly intoxicated customers to participate in Keno gaming.

4.5 Child care and play areas

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

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

Actions of the gambling provider

Keno Queensland supports Keno venues' policies and processes on child care and play areas.

4.6 Gratuities

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

Actions of the gambling provider

Keno Queensland supports Keno venues' policies and procedures.

4.7 Passage of time

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

Actions of the gambling provider

Keno Queensland supports Keno venues' policies and procedures in ensuring that customers are aware of the passage of time.

4.8 Breaks in play

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

Actions of the gambling provider

Keno Queensland encourages breaks in play by making available a Keno game to be played approximately every three minutes (the game is approximately one minute), with an approximate two-minute break in between each game.

4.9 New gambling products and services

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

Actions of the gambling provider

Keno Queensland, prior to the introduction of relevant new Keno products or services, including those which make use of emerging technology, will consider and assess their potential impact on gambling behaviours before implementation in accordance with our commitment to responsible gambling.

Best practice

All new Keno products and services, all marketing and all advertising will be assessed for responsible gambling impact, prior to release to the market. Where practicable, the Gambling Helpline phone number **1800 858 858**, Gambling Help Queensland website (www.gamblinghelpqld.org.au) and a responsible gambling message should be included in all new products and services.

Examples of acceptable/unacceptable actions

Keno Queensland finds the following behaviours deemed to be acceptable or unacceptable within the environment where Keno is played.

Acceptable

Where appropriate, advising the prohibition of minors in gaming areas.

Referring minors to the responsible gambling signage if they attempt to enter gaming areas.

Informing parents/guardians that minors are not allowed in gaming areas or to take part in any form of gambling.

Encouraging breaks in play by informing gambling persons about the availability of other hospitality services.

Ensuring that there is a clock displaying the correct time in all gambling areas.

Unacceptable

Selling Keno products to minors.

Allowing minors in gambling areas to collect prizes on behalf of parents/guardians.

Offering free meals and discounted drinks to promote gambling.

Serving alcohol to customers who show signs of undue intoxication.

Accepting gratuities/gifts from customers, e.g. a share of their winnings as a personal gift.

Financial transactions

Introduction

All Keno venues must ensure customers are provided with an environment where they can make an independent decision in relation to their money and spending habits.

Note: Keno Queensland has no direct control of the physical environment in venues where Keno is available for customers to play.

5.1 ATM facilities

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

Actions of the gambling provider

Keno Queensland supports Keno venues to ensure ATM's are not located in close proximity to designated gambling areas, or in the entry to gaming areas, where safe and practicable.

5.2 Cashing of cheques and payment of winnings

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

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

The following cheques can be cashed only by prior arrangement:

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

Actions of the gambling provider

Keno Queensland provides each Keno venue with a limit above which all Keno winnings will be paid by cheque. Keno venues must comply with s. 26(2) of the Keno Rule 2010 and display the cash payment limit for Keno wins at the point of purchase.

Keno Queensland has developed a *Financial transactions policy (Example 5.2A)* which prescribes how winning are paid. For example, Keno Queensland pays all Keno winnings beyond a venue's cash limit by a non-negotiable cheque.

Example 5.2A Financial transactions policy

Credit

- Keno venues will not under any circumstances extend or permit credit betting. Credit betting or extending credit for the purpose of gambling is illegal (*Keno Act 1996 s. 148*).
- All breaches under the *Keno Act 1996* and Keno agency agreements incur penalties such as fines, imprisonment and termination of employment and agency agreements. These penalties apply to all personnel of an authorised Keno operator (employed or engaged by the operator (whether or not for fee or reward) in functions relating to the conduct of Keno gaming).

Cashing of cheques

- Keno winner details are provided to Keno (Qld) Pty Ltd (Keno Queensland) daily. Winning cheques are mailed to the winner within three working days.
- If Keno Queensland or the Office of Liquor and Gaming Regulation (OLGR) suspects an agents' inability to pay their daily settlement or there is suspicion of credit betting, any cheques for winnings at that agency will be retained until the matter has been resolved.
- OLGR will be notified immediately if any winners' cheques are being withheld for more than three working days.

Payment of prize winnings

- Keno Queensland will provide a limit at each Keno venue above which all Keno winnings are paid by cheques. Further, Keno Queensland will pay Keno winnings beyond a venue's cash limit by a non-negotiable cheque.
- Keno venues must display the cash payment limit for Keno wins at the point of purchase.

5.3 Credit betting (extending of credit)

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

Actions of the gambling provider

Keno Queensland and all Keno venues and their employees will not provide/extend credit or lend money to anyone for the purpose of gambling.

Keno Queensland will report all breaches of the *Keno Act 1996* within three working days to the Office of Liquor and Gaming Regulation.

Best practice

Keno Queensland provides specifically targeted training and online communications about the consequences of breaches and implications of credit betting.

Examples of acceptable/unacceptable actions

Keno Queensland finds the following behaviours deemed to be acceptable or unacceptable within the environment of a Keno venue.

Acceptable

Informing customers who have winnings that they have a choice of payouts and the venue can pay the winnings by cheque or partly in cash to the maximum limit approved for the venue by the Office of Liquor and Gaming Regulation (OLGR) and the balance by cheque.

Unacceptable

Permitting credit betting or extending credit for gambling purposes.

Cashing winning cheques within a few hours of the win.

Cashing third party cheques without proper verification or arrangement.

Exceeding the maximum payout limit set for the venue by OLGR.

Advertising and promotions

Introduction

Practice 6 applies to the advertising and promotion of all gambling activities in all Queensland gambling industry sectors. This Practice requires gambling providers to develop and implement strategies to ensure advertising and promotions are delivered in a responsible manner with consideration given to the potential impact on people adversely affected by gambling. This Practice covers communication activities including (but not limited to):

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

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

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

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

In addition to the voluntary practices, there are practices which have a legislative requirement. These practices must be complied with or action may be taken under the relevant legislation. **Practice 6** is to be used in conjunction with all other regulatory requirements for the conduct of gambling in Queensland.

6.1 Code of Ethics

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

Actions of the gambling provider

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

Acceptable practices

All advertising and promotional activities will comply with the *Code of Ethics* as adopted by the AANA.

Unacceptable practices

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

6.2 False, misleading or deceptive

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

Actions of the gambling provider

Keno Queensland will ensure advertising and promotional materials for Keno agents, outlets, clubs, hotels, and casinos provide a balanced perspective and are not false, misleading or deceptive.

Acceptable practices

Advertising jackpots and providing information about the actual dollar prize that can be won in the venue.

Advertising current available jackpot prizes on the internet.

Having a balance of winning and non-winning play imagery in gambling advertisements and promotions.

Unacceptable practices

Advertising a maximum jackpot possibility when the amount advertised is not a true projection of the expected jackpot amount.

Using false or misleading language in relation to jackpots or a new product that may encourage visitation, e.g. 'get in now to win the current jackpot' or for new products, advertising potential 'maximum possible jackpots'.

Any advertising or promotion that encourages the false belief, either explicitly or implicitly, that the outcome of certain games can be predicted or controlled using written or visual images such as:

- 'plan your play'
- 'beat the odds'
- 'work your system'
- the use of superstitious behaviour, e.g. rubbing a Buddha statue.

Gambling advertisements and promotions that suggest there is some relationship between past, present and future events, when there is not. For example 'Jackpot has not gone off for the last 8 weeks, it must go off soon...'

Gambling advertisements and promotions which depict someone selecting their Keno numbers on the basis of astrology/horoscopes or some lucky intuition or similar means, and suggesting that this method of selection improved their chances of winning.

Gambling advertisements that imply that players can win after losing many times. For example:

- 'Your time to win is coming up'
- 'Hang in there and you'll win sooner or later'
- 'Chances are...you'll win sometime'.

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

6.3 Misrepresentation of probabilities

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

Actions of the gambling provider

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

Advertising and promotions will not encourage the public to gamble by presenting winning as a probable or likely outcome (i.e. misrepresenting the probability of winning a prize). Advertising and promotional campaigns which show winning should be shown with a balance of winning and non-winning play images.

Acceptable practices

The focus of advertisements relating to gambling is on the 'fun' and 'entertainment' value of visiting the venue rather than upon winning, e.g. depicting people laughing and enjoying themselves while playing Keno.

Unacceptable practices

Keno using language or imagery that suggests that winning Keno is easy or implies that the odds of winning a prize are greater than they actually are. For example:

- 'Have a bet and win'
- 'Today is your lucky day'
- 'Win \$\$\$ Win \$\$\$ Win \$\$\$'
- showing large wads of \$100 notes in gambling advertisements and promotions
- depicting large amounts of money which can be won and which dominate advertisements or promotions
- people winning in all, or the majority of, images depicting actual gambling behaviour
- advertising 'More jackpots, more often'. Whilst this might be true, it could imply the chances of winning a prize are greater than they actually are.

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

6.4 Reasonable strategy (financial betterment)

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

Actions of the gambling provider

Keno Queensland will avoid any type of advertising or promotional activity which gives the customer the impression that gambling is a reasonable strategy for financial betterment. Odds of winning will form an integral part of any advertising or promotional material.

Acceptable practices

Responsible advertising and promotion will not promote gambling as an easy and automatic way to obtain money.

Keno marketing strategy focusing on the fun and entertainment aspects of playing.

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

Unacceptable practices

Using language or imagery in advertising and promotions that would imply that winning on Keno is another way to earn an income or that winning on Keno may alter your living standards. For example:

- portraying someone giving up their job as a result of a big win on Keno
- depicting someone as wealthy and successful and suggesting that this wealth and success is a result of, or is linked to, winning on Keno
- portraying Keno as a financial investment or a way of achieving financial security
- depicting someone paying off bills, school fees or loans with their gambling winnings from Keno
- depicting a person or a family moving from a situation of relative poverty to privileged circumstances as a result of their winning Keno
- portraying that winning Keno is an alternative to employment or earning an income.

6.5 Misleading statements

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

Actions of the gambling provider

Responsible advertising and promotions will not make false promises/statements about the odds, prizes or chances of winning. This includes not suggesting that skill can influence games that are really games of chance. It is not appropriate to promote a venue or an individual as possessing intrinsic luck.

Acceptable practices

The Keno licensee has a *Player information guide*, detailing the odds of winning Keno, on their website.

Advertisements or promotions which use 'luck' in a humorous way (e.g. people gambling and enjoying themselves), provided that there is no suggestion that the individual or the venue has 'intrinsic luck'.

Unacceptable practices

Advertising in a way that misleads or misrepresents the actual chance or odds of winning. Examples of misleading statements include:

- 'You can be lucky too'
- 'Our jackpot is due to go off'.

Displaying out-of-date advertising material (point of sale) that shows prize amounts that are no longer available.

Supplying incorrect odds or information in difficult to understand terminology.

Advertisements or promotions which suggest that a venue has intrinsic luck. For example:

- using a venue 'mascot' who is claimed to be unnaturally 'lucky' and 'never loses at games of chance'
- statements, graphics or images which may imply that winning is more likely on Keno than on another game or form of gambling.

Gambling advertisements and promotions which suggest, through imagery, written or verbal information, that 'feeling lucky' is some sort of intuition which skilled people can use to determine their chances of winning. For example:

- an advertisement which depicts a person selecting Keno numbers on the basis of a 'lucky' hunch
- an advertisement which depicts a person utilising a 'lucky charm' when gambling and winning as a result

- any advertisement or promotion that suggests that ‘luck’, ‘feeling lucky’ or having a ‘hunch’ is accurately indicative of an imminent future win.

Explicitly stating or implying through imagery or written/verbal information that there are strategies that people can adopt or employ in order to modify their ‘luck’ so as to improve their chances of winning. For example:

- suggesting superstitious practices (e.g. rubbing a Buddha statue, etc.) are reliable strategies that can be employed by people if they wish to improve their chances of winning on Keno)
- suggesting through imagery or written/verbal information that Keno numbers chosen in a certain manner (e.g. astrology/horoscopes, ‘lucky’ numbers) are any luckier than any other numbers
- depicting someone on a winning streak with another customer saying ‘He can’t stop/leave now, he’s on a roll’
- depicting someone on a winning streak with the question ‘Would you leave now?’.

Stating as fact or implying that certain Keno agents, outlets, clubs, hotels, and casinos or particular areas are ‘luckier’ than another.

6.6 Community standards

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

Actions of the gambling provider

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

Acceptable practices

Undertaking not to use images that may offend prevailing community standards.

Advertising complying with prevailing community standards.

Unacceptable practices

Using images of minors gambling or picking numbers.

Exceeding the relevant regulatory and advertising codes/guidelines.

Suggesting that enhancement of one’s social, financial or sexual success and general abilities can be attributable to gambling.

6.7 Other activities to promote

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

Actions of the gambling provider

Keno Queensland supports and encourages Keno agents, outlets, clubs, hotels, and casinos to ensure there is a balance between messages about gambling and other activities offered by the gambling provider. If the advertisement is part of a series of advertisements that make up a campaign, this balance must be reflected across the campaign.

Acceptable practices

Responsible gambling advertising and promotions promoting other activities as well as Keno.

Unacceptable practices

Focussing advertising and promotions exclusively on gambling.

Only promoting Keno products when there are other activities to promote.

6.8 Minors or vulnerable or disadvantaged groups

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

Actions of the gambling provider

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

Persons depicted as gamblers in advertising and promotions should not be, or appear to be, minors. Advertising and promotions should not contain symbols or language that is primarily intended to appeal to minors. The use of animation should be monitored to ensure characters are not associated with animated characters on children’s programs. Celebrities or other testimonials that would primarily appeal to minors, should not be used.

Advertising and promotions should not be targeting vulnerable or disadvantaged groups by linking social and financial betterment issues to gambling. Disadvantaged persons may include persons lacking social or economic access, due largely to inadequate income, an inadequate standard of living in terms of housing, food, clothing and health care and lacking opportunities to fully participate in society through education, employment and social pursuits.

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

Acceptable practices

Marketing products to adult audiences via electronic and print media.

Not intentionally advertising or promoting services to minors or vulnerable or disadvantaged groups.

Not using images of minors gambling.

Being part of entertainment opportunities or promotions for a particular group (e.g. seniors) that offer cheap entertainment that is not conditional upon gambling, e.g. 'Treasure Day'.

Unacceptable practices

Intentionally placing media where it targets minors, vulnerable or disadvantaged groups. For example, gambling advertisements and promotions which:

- relate to gambling appearing in media directed primarily at minors (media selection and placement of all advertising and promotions that are not in accordance with the relevant legislative and Code of Practice/guideline requirements for all forms of advertising and promotions in Australia)
- appear in close proximity to schools or events involving minors, e.g. children's concert, children's sporting event, billboards outside of venues or within 200 metres of a school, etc.

Gambling advertisements and promotions which contain symbols or language, cartoon characters, celebrities or other testimonials that would primarily appeal to minors.

Gambling advertisements and promotions which depict minors gambling.

Sending correspondence or promotional material to gambling customers who are excluded or known to have formally requested that this information not be sent.

Running promotions on specific days with the express purpose of attracting low income groups/seniors to come when they have money, e.g. cheap lunches, or cheap entertainment that is conditional upon them gambling, on the day they receive payments.

Gambling advertisements or promotions, which appeal to the vulnerabilities of those from low socio-economic areas or those financially disadvantaged, by linking social and financial betterment to gambling or which suggest that gambling is a reasonable strategy for financial betterment.

Gambling advertisements or promotions, which appeal primarily to culturally and linguistically diverse communities. For example:

- misleading written/verbal information and/or imagery about the chances of winning major prizes which are published in magazines and newspapers primarily read by these communities
- suggesting that the Keno area/s have been designed according to Feng Shui principles and are therefore 'luckier' than other venues
- suggesting culturally specific superstitious practices (e.g. reading tea leaves, consulting an oracle or opening a fortune cookie) are strategies that can be used by people if they wish to improve their chances of winning on Keno.

6.9 External signs

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

Actions of the gambling provider

Winnings paid will not be advertised on external signs on the premises, or displayed in internal areas on the premises which can be viewed from outside. This also includes signage not on the premises, such as highway billboards, newspaper advertisements, television advertisements, radio advertisements, mail-out material, brochures, and any web-based information. Passive web pages should be considered as internal promotion and **Practice 6.9** does not apply.

Acceptable practices

Not externally advertising 'turnover' as winnings paid.

Advertising actual winnings paid in the venue, such as posters inside the venue promoting a recent jackpot win on Keno.

Unacceptable practices

Externally advertising 'turnover' as winnings paid. For example, information on or in any media such as:

- 'Major jackpots so far this year: \$26,000, \$28,000, \$32,000, \$52,000 and \$29,000...'
- 'Two huge jackpot winners at [venue name]'.

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

6.10 Irresponsible trading practices

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

Actions of the gambling provider

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

Irresponsible trading practices are practices intended to encourage an individual to gamble in an excessive and irresponsible manner by offering inappropriate inducements. These practices may cause individuals to gamble in an excessive and irresponsible manner. Inappropriate inducements have the potential to impact on people who are at risk of, or have, a gambling problem.

Acceptable practices

Conducting responsible promotional activities for specific products and not specifically directing these promotions at disadvantaged, vulnerable or culturally and linguistically diverse groups or encouraging irresponsible gambling behaviour.

Being committed to best practice in the provision of responsible gambling, with the aim of minimising the potential harm to individuals in the community through responsible gambling practices.

Unacceptable practices

Providing customers with credit or lending money to gamble.

Offering customers improper inducements to gamble. Examples of irresponsible trading practices include:

- offering free money or prizes conditional on increased or more intensive play
- targeting promotions at disadvantaged, vulnerable or culturally and linguistically diverse groups or regions
- using known problem gambling trigger points to encourage irresponsible play
- inducements that would result in a substantial increase to the person’s normal betting stake or gambling activity.

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

6.11 Consumption of alcohol

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

Actions of the gambling provider

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

Acceptable practices

Keno will not advertise or promote players consuming alcohol while playing Keno.

Unacceptable practices

Using images of individuals drinking and gambling.

Running a joint promotion with an alcohol supplier to promote gaming activities.

6.12 Consent of the person

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

Actions of the gambling provider

Keno Queensland, Keno agents, outlets, clubs, hotels, and casinos will not publish or cause to be published anything which identifies any person who has won a prize, unless that person has given prior consent.

Acceptable practices

Having strict privacy guidelines in keeping with privacy laws which are implemented across all advertising and promotional activities.

Advising customers through posters and/or terms and conditions of Keno’s intentions in relation to promotional activities.

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

Ensuring that any winner fully understands their rights to privacy when winning a major prize.

Ensuring that any winner agreeing to publicity signs a Release form agreeing to have their details and/or photo released.

Unacceptable practices

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

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

Not ensuring that any winner fully understands their rights to privacy when winning a major prize.

6.13 Responsible gambling messages

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

Actions of the gambling provider

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

Responsible gambling messages will be sized appropriately in respect of relative ratio to the advertising or promotional material.

Acceptable practices

Displaying responsible gambling messages/tag lines that are incorporated in gambling advertising and promotions e.g. 'Bet with your head, not over it'.

Advertising and promotions that display the Gambling Helpline phone number (**1800 858 858**) and Gambling Help Queensland website (www.gamblinghelpqld.org.au) and the words 'Gamble responsibly'.

Unacceptable practices

Advertising or promotional materials that do not display responsible gambling messages or gambling help information.

Gambling help information

Phone

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

Face-to-face

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

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

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

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

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

Online

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

Other services (available 24 hours)

Gamblers Anonymous **0467 655 799**
Lifeline **13 11 14**

Further information

For more information, visit www.gamblinghelpqld.org.au