

Queensland responsible gambling Resource manual

Section G • V3.1 • 2015

Lotteries

Developed by Golden Casket Lottery Corporation Limited and the Department of Justice and Attorney-General

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Background

Lotteries were first introduced to Australia in the early 1900s to raise funds for worthwhile community causes. Since that time, lottery games have been progressively introduced and conducted in a socially responsible and sustainable manner by the State Government-licensed operators that today comprise the Australian lotteries industry.

Golden Casket's foundations date back to 1916 when the first Golden Casket lottery was conceived to raise funds to help World War One veterans and their families. Over the years, Golden Casket has created millions of prize winners and provided an important source of funding for the Queensland community through its range of lottery games.

Today, Golden Casket is a Tatts Group company and is part of the Tatts Lotteries Strategic Business Unit of the Tatts Group. Tatts Lotteries comprises of Tattersalls Sweeps Pty Ltd, Tatts NT Lotteries, Golden Casket Lottery Corporation Limited (Golden Casket), New South Wales Lotteries Corporation Pty Ltd and Tatts Lotteries SA Pty Ltd and operates lotteries in various jurisdictions in Australia including Victoria, Queensland, Tasmania, New South Wales, Northern Territory, the Australian Capital Territory and South Australia.

Golden Casket operates and markets the games of Gold Lotto, Oz Lotto, Powerball, Super 66, and Instant Scratch-Its which are sold across Queensland through over 1000 retail outlets.

The *Queensland responsible gambling resource manual (Lotteries)* (Resource manual) has been designed as a resource for Tatts Lotteries to implement the principles and practices from the *Queensland responsible gambling Code of Practice* (Code of Practice) as they apply to Golden Casket in Queensland.

Tatts Lotteries has developed its Responsible play program to help ensure uniformity of Responsible play practices across its network of over 3000 outlets and in particular over 1000 Golden Casket outlets in Queensland. As such, individual retailers are not required to develop their own responsible gambling policies in addition to those outlined by Tatts Lotteries in its Responsible play program.

Tatts Lotteries' Responsible play program is all-encompassing, covering internal staff at the company's state offices as well as owners, managers and staff at the retail outlet level.

While the Code of Practice is a voluntary Code, Tatts Lotteries has chosen to make compliance to its Responsible play program mandatory for its retailers. As such, in Queensland, the Responsible play program forms part of the Golden Casket operational procedures, which in turn forms part of the Golden Casket agency agreement.

Practice 1

Provision of information

Introduction

Tatts Lotteries' Responsible play program aims to create an environment where relevant information is available for people to make informed decisions when considering buying lottery entries.

Core elements include:

- providing signage directing players to information on the gambling product, game rules and odds of winning
- providing problem gambling information
- providing player information brochures and guides.

1.1 Potential risks

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

Actions of the gambling provider

Retailers and the outlet staff who operate the lottery terminal, are to make readily available the *Have Fun and Play Responsibly—Responsible play* brochure (Responsible play brochure) which reminds players to have fun and play responsibly and details the 'signs to look out for' when playing is no longer fun. This brochure also reminds customers to set themselves a gambling limit according to their personal circumstances.

Retailers will ensure the *Have Fun and Play Responsibly—Responsible play* sign (Responsible play sign) is erected in the designated retail area. This sign includes the details of the Gambling Helpline phone number (1800 858 858), the Gambling Help Online website (www.gamblinghelponline.org.au) and directs customers to the Responsible play brochure.

The Responsible play brochure will be kept in the brochure holders in the Golden Casket writing bench or in the designated area of Instant Scratch-Its only Golden Casket outlets. Retailers are responsible for maintaining adequate stocks. Stock can be re-ordered through the terminal.

Retailers and outlet staff who operate the lottery terminal will familiarise themselves with the information contained in the brochure and give copies to customers who request this information.

Agents will also keep a copy of, and be familiar with, the *Tatts Lotteries Responsible Gambling Code of Conduct—Queensland* (Code of Conduct) for customer reference. Players can order this Code of Conduct through Golden Casket's Contact Centre (131 868) or from a Tatts Lotteries Responsible play liaison officer (RPLO) on 1300 138 132 or download it from the Golden Casket website. Retailers have a copy of the Code of Conduct in their Responsible play folder in the outlet. Retailers can order additional copies via the terminal.

The latest Responsible play brochure and Code of Conduct are available to be downloaded from Golden Casket's website <https://tatts.com/goldencasket>

Best practice

Retailers will maintain adequate supplies of the English Responsible play brochure and they can direct customers to download the brochure in English or one of six foreign languages from the Golden Casket website.

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

The Responsible play sign encourages customers to:

- take a copy of the Responsible play brochure
- refer to the Code of Conduct
- ask their retailer about the Responsible play program
- ask their retailer about the lottery rules or go to <https://tatts.com/goldencasket> for further information.

The Responsible gambling policy specific to Golden Casket is the Code of Conduct.

This Code of Conduct acts as a guide for the responsible service delivery and unfaltering commitment that the Queensland community can expect from Golden Casket and its agency network. This Code of Conduct covers among other things:

- Golden Casket's commitment to information provision, confidentiality and game availability
- key elements of its practices relating to cashing cheques, prize payments and credit
- the avenues and support available to those with gambling problems
- the Complaint handling charter
- the responsible advertising and promoting of lottery products.

This Code of Conduct will be stored in the Responsible play folder in the outlet and agents will allow customers to view this Code of Conduct upon request. If customers wish to obtain their own copy of the Code of Conduct, they will be advised that they can order one by calling Golden Casket's Contact Centre on **131 868** or from a Tatts Lotteries RPLO on **1300 138 132** or that they can download it from the Golden Casket website.

This Code of Conduct is supported by:

- Responsible play sign—will be displayed in the designated Golden Casket retail area.
- Responsible play brochure—will be displayed in the brochure holders in the Golden Casket writing bench or in the designated area of Instant Scratch-Its only Golden Casket outlets.
- Responsible play guide—will be stored in the Responsible play folder. The guide is the retailers self-paced training document for the Tatts Lotteries Responsible play program and is available for retailers to download from the Responsible play section of the Golden Casket retailers' website.

Retailers and their staff should be familiar with information contained in these documents and give copies of the brochure to customers who request this information.

Golden Casket's retail territory managers will, during their call cycle visits, monitor retailer's compliance that brochures and the sign are displayed in the correct area and that the Responsible play guide and the Code of Conduct is stored in the Responsible play folder and available for staff training. Repeated non-compliance will be reported and may eventually result in a breach of the Agency Agreement.

Best practice

Golden Casket's website

<https://tatts.com/goldencasket> includes a Responsible play page where players can download the Responsible play brochure in seven languages. They can also download the Responsible play sign and the Code of Conduct.

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

Retailers will prominently display the Responsible play brochure which details meaningful and accurate information on odds. The Responsible play brochure displays the odds of winning the major prize and 'a prize' on all Golden Casket games. Retailers and their staff should be familiar with the information contained in the brochure and give copies to customers who request this information.

Best practice

The odds of winning a prize plus other information about odds, can also be found in the how to play game information brochures for Golden Casket games which are displayed in Golden Casket outlets and on the Golden Casket website <https://tatts.com/goldencasket>

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

Retailers will prominently display the Responsible play brochure which details information on the Responsible play program, including information about the signs to look out for when playing is no longer fun, odds information and where to get help.

The brochure includes a high level summary of the Code of Conduct in English, Chinese, Vietnamese and Greek. Full translations of the brochure in six foreign languages are available on the Responsible play page of the Golden Casket website.

Retailers and their staff should be familiar with the information contained in the brochure and give copies to customers who request this information.

Tatts Lotteries provide a translation service for retailers to assist non-English speaking customers with problem gambling issues via a Tatts Lotteries RPLO on **1300 138 132**.

Golden Casket provides a translation of the Responsible play guide (retailer self-paced training) in three major Asian languages for the benefit of retailers and their staff who are from an Asian background. These translations are available on the Golden Casket Agent's website.

Best practice

Golden Casket's website <https://tatts.com/goldencasket> includes a Responsible play page where players can download the Responsible play brochure in seven languages. They can also download the Responsible play sign and the Code of Conduct.

Examples of acceptable/unacceptable actions

Acceptable

Explaining the odds of Golden Casket games from the Responsible play brochure to customers who seek this information.

Referring customers to the Responsible play brochure, the how to play game information brochures or <https://tatts.com/goldencasket> for information on odds and how to play the Golden Casket games.

Directing players to the lottery rules to gain further information, game rules, or returns to player.

Providing information via an electronic display or an emerging technical format (in addition to, not in place of existing signage requirements).

Unacceptable

Not keeping stocks of Responsible play brochures or covering the Responsible play sign with other material.

Refusing to supply odds of games to customers or not offering the Responsible play brochure to customers who request it.

Supplying incorrect odds or misrepresenting the chances of winning lottery prizes to customers.

Refusing to provide information to customers about where to gain a copy of the lottery rules.

Interaction with customers and community

Introduction

Golden Casket aims to ensure the highest possible level of customer satisfaction and believes interaction with customers and the community (where appropriate) is key. It is, however, inevitable that from time to time a customer may raise an issue or complaint. Sometimes these complaints are beyond Golden Casket's control and the company has a Complaint handling charter to encourage a smooth resolution process.

Core elements include:

- establishing links with local relevant community networks and support services
- maintaining a customer liaison role
- maintaining a customer complaints handling mechanism
- ongoing and appropriate responsible play training for relevant staff.

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

Golden Casket will maintain a list of Queensland Gambling Help support services (provided and updated periodically by the Office of Liquor and Gaming Regulation (OLGR)) so players or retailers who ring head office requesting local gambling support assistance can be provided with the contact details of their relevant local support service provider.

Golden Casket will endeavour to have a representative join relevant local community consultative networks and will liaise with local support service providers on a needs basis.

Best practice

The contact details of Gambling Help support services in Queensland are highlighted on the Responsible play page of the Golden Casket website <https://tatts.com/goldencasket>

Local Golden Casket retail territory managers attend local community consultative networks where possible.

2.2 Customer liaison role

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

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

Actions of the gambling provider

The RPLOs are consultants, team managers or administration consultants in the Golden Casket contact centre. These employees are based at head office and manage customer and retailer queries including those concerning responsible play. The RPLOs are available for player support from 8 am–5 pm Monday to Saturday and on Sundays from 8 am–2.30 pm. Online player support is available 8 am–7.30 pm Monday to Saturday and on Sundays from 8 am–2.30 pm. Retail Support is available from 5 am–7.30 pm Monday to Saturday and on Sundays from 5 am–5 pm.

Retailers and their outlet staff will refer responsible play customer issues that they are unable to assist with, to RPLOs (phone **1300 138 132**).

The RPLOs will provide the following forms of assistance if approached by individuals, including outlet and Tatts Lotteries staff, who indicate that they may have a gambling problem:

- Provide telephone contact details of the national Gambling Helpline (1800 858 858) or Gambling Help Online website www.gamblinghelponline.org.au
- Offer to send the person a Responsible play brochure which details responsible gambling information and how Tatts Lotteries can assist.
- At the customer's request, cancel their Golden Casket Winners Circle membership, so the customer cannot use the card unless they reapply for a new card, and stop them from being sent any Winners Circle promotional letters or offers in the mail or by email. (After deactivating their Winners Circle membership, no correspondence or promotional material is to be personally mailed to self-excluded players).

The RPOs maintain a problem gambling incident register of any telephone calls received from customers experiencing a gambling problem. After each call, the details are filled in the register by the RPO.

Best practice

The RPOs can also assist the customer through self-exclusion from the player's online Golden Casket account at the customer's request. The self-exclusion will suspend a player for a period of 180 days. The player has to write to or email Tatts Lotteries after the period of self-exclusion is complete to have their account re-instated.

In addition to the Gambling Helpline, the RPOs will also offer to provide the contact numbers for the local Queensland Gambling Help services to Queensland customers. These numbers can be obtained via the Responsible play page of the Golden Casket website at <https://tatts.com/goldencasket>

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

Golden Casket aims to ensure the highest possible level of customer satisfaction. It is, however, inevitable that from time to time a customer may raise an issue or complaint regarding products or services.

Golden Casket has a Complaint handling charter which outlines Golden Casket's role in the complaint handling process and advises people who wish to lodge a complaint of their rights and responsibilities.

The process for resolving responsible play complaints is as follows:

- 1. Golden Casket outlet**—attempt to resolve the customer complaint at the agency, as many concerns can be resolved by dealing with them straight away while customers are still in the agency. If the complaint is unable to be resolved at the agency, customers will be encouraged to telephone or write to Golden Casket.
- 2. Golden Casket head office**—Tatts Lotteries' Contact Centre staff will attempt to resolve the customer complaint. If a Contact Centre staff member is unable to resolve the complaint, Golden Casket has an internal escalation procedure.
- 3. OLGR**—if the responsible play complaint remains unresolved following step two, customers can elect to make a complaint to Golden Casket's regulator, OLGR who may investigate the matter.

Best practice

Copies of Golden Casket's Complaint handling charter can be obtained by calling Golden Casket on 131 868 or via the website (<https://tatts.com/goldencasket>). A copy is also displayed on Golden Casket's retailer website.

Golden Casket has an Incident and Complaints Unit that manages incidents and escalates complaints in a timely manner.

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

When Tatts Lotteries launched its national Responsible play program in 2010/11, all retailers, outlet staff and key internal Tatts Lotteries staff completed training on the new Tatts Lotteries Responsible play program.

Tatts Lotteries new retailer and outlet staff training programs have responsible play training incorporated into them for all outlets including Golden Casket outlets. This training includes information on how to identify the signs of problem gambling. Refer to *Signs to watch out for (Example 2.4A)* and *Retailer's role (Example 2.4B)* for information on how staff should respond.

Responsible play refresher training is coordinated periodically for the retail network and key Tatts Lotteries and Golden Casket staff.

Updates on Responsible play matters/issues will be included as needed in the retailer newsletters (regular newsletter for the agency network).

Best practice

Tatts Lotteries can monitor, periodically review, and evaluate the program.

Targeted communication to the Golden Casket retail network can be coordinated on a needs basis. Tatts Lotteries can regularly communicate responsible play updates to Tatts Lotteries staff through its staff newsletter.

Tatts Lotteries staff induction program includes training on the Responsible play program.

Example 2.4A Signs to watch out for

If retailers think customers may have a gambling problem, here are some behavioural signs or potential risks to look for:

- When gambling becomes the most important and interesting thing in their life
- Amount of time and money spent on gambling is escalating
- Not knowing when to stop gambling
- Trying to cut down without success
- Becoming irritable when trying to cut down on gambling
- Telling lies about how much they gamble
- Stealing and committing other unlawful activities to pay for their gambling habit
- Doing things that risk a relationship, job, home life or good opportunity for the sake of gambling
- Spending more money on gambling than they can afford
- When they feel guilty about their gambling
- When someone close to them complains about their gambling
- Relying on others for money to get out of financial trouble caused by gambling.

Example 2.4B Retailer's role

To protect the privacy of the customers, use discretion when the outlet is busy. Also, retailers are just providing information about Tatts Lotteries' program. Ultimately, it is up to customers to act.

Retailers have the responsibility of ensuring that the outlet is operated in a socially responsible manner and that all the relevant responsible play material is on display.

If retailers suspect one of their customers may have a problem, it is best not to approach them.

It is best to offer assistance in the form of information when customers volunteer that they have a problem and specifically request:

- information on Tatts Lotteries' Responsible play program
- contact information for counselling services (Gambling Helpline **1800 858 858** or Gambling Help Online www.gamblinghelponline.org.au)
- to be removed from the Winners Circle program
- to be suspended from their Golden Casket online account for 180 days.

The following are suggestions on how to handle the situation if a customer approaches the retailer directly:

- Move away from the counter and take customers to a quiet part of the outlet. This will help maintain privacy.
- Listen, be sensitive, but don't attempt to counsel them.
- Provide customers with a copy of the Responsible play brochure and alert them to call the Gambling Helpline on **1800 858 858** or visit the Gambling Help Online website www.gamblinghelponline.org.au
- Advise them that they can cancel their Winners Circle card membership or suspend their online Golden Casket account and the procedure for completing this exercise is through Golden Casket's contact centre.

Advise them that they can contact Tatts Lotteries Responsible play liaison officers on **1300 138 132** and/or offer to call Golden Casket's contact centre for them from the outlet.

Examples of acceptable/unacceptable actions

Acceptable

Maintaining the confidentiality of lottery customers, unless they have consented otherwise.

Circulating terminal messages and the retailer newsletters to provide agency staff with information about prize wins.

Telling other customers about prize wins in general terms as provided by Tatts Lotteries.

Attempting to resolve customers' complaints at the agency.

Encouraging customers, whose complaints the retailer cannot resolve, to contact Golden Casket in writing or phone **131 868**.

Unacceptable

Disclosing the identity of prize-winning customers without their consent.

Asking customers who have won a major prize something about their win in front of others without their permission.

Telling others that customers may or do have a gambling problem (whether they have disclosed that or not).

Dismissing a customer's request for assistance with a gambling problem.

Being unhelpful or dismissive of customers' complaints or queries.

Practice 3

Exclusion provisions

Self-exclusions and venue-initiated exclusions for problem gambling

Introduction

While lotteries are rarely the cause of problem gambling, Tatts Lotteries does not want to benefit at the expense of people's problems. Tatts Lotteries supports programs that help protect people most at risk and can offer assistance in the form of information and Winners Circle membership cancellation to Queensland players.

Core elements include:

- providing contact information for gambling support services
- cancelling Winners Circle membership and/or associated personalised promotional material normally sent to Winners Circle cardholders
- suspending Golden Casket online accounts.

3.1 Exclusion procedures

Gambling providers to provide exclusion procedures and supporting documentation.

Actions of the gambling provider

Lotteries are exempt from this practice.

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

If customers approach a retailer to cancel their Winners Circle card, suspend their Golden Casket online account or request that they not be sent any Winners Circle promotional mailings or emails because they have a gambling problem, they will be directed to call Golden Casket on **1300 138 132** to speak to a RPLO.

In some cases it may be better if retailers/staff offer to call Golden Casket for players from their outlet.

The RPLOs are contact centre personnel who have been trained in responsible play and manage customer and retailer queries concerning responsible play. The RPLOs are available for player support during normal business hours Monday to Saturday and for a period on Sundays. Online player support is available for extended business hours Monday to Saturday and for a period on Sundays. Retailer support is available for extended business hours Monday to Saturday and all day on Sundays.

The RPLOs can provide the following forms of assistance if approached by individuals, including outlet and Golden Casket staff, who indicate that they may have a gambling problem:

- Provide telephone contact details of the Gambling Helpline (**1800 858 858**) and the Gambling Help Online website (www.gamblinghelponline.org.au).
- Offer to send the player a Responsible play brochure which details responsible gambling information and how Tatts Lotteries can assist.
- At the customer's request, stop them from being sent any Winners Circle promotional letters or offers in the mail or by email.
- At the customer's request, cancel their Golden Casket Winners Circle membership, so the customer cannot use the card unless they reapply for a new card; and stop them from being sent any Winners Circle promotional letters or offers in the mail or by email.
- The RPLOs maintain a problem gambling incident register of any telephone calls received by customers experiencing a gambling problem. After each call, the details of the call are filled in the register by the RPLO as an incident report.

Best practice

The RPLOs maintain a list of Queensland gambling support service providers for customers who disclose they have a gambling problem and request help. They also provide the Gambling Helpline phone number **1800 858 858** and the Gambling Help Online website www.gamblinghelponline.org.au

The contact details of Queensland Gambling Help support services is displayed on the Responsible play program page of <https://tatts.com/goldencasket>

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

Lotteries are exempt from this practice.

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

Golden Casket can assist individuals by either deactivating their Winners Circle card, suspending their Golden Casket online account or stopping Golden Casket promotional letters or offers from being personally mailed or emailed to customers who formally request this. The RPLOs deal with these requests and record this information in the problem gambling incident register.

For customers who have requested that their Golden Casket Winners Circle membership be cancelled or their Golden Casket online account be suspended; no correspondence or promotional material is to be personally mailed to these self-excluded players.

The RPLOs ensure that self-excluded players and players who have formally requested that they not be sent correspondence or promotional material even if they have not self-excluded, are removed from the email and mail databases as part of the procedures of handling these requests from players.

Best practice

The RPLOs may offer to send a Responsible play brochure to self-excluded customers.

Examples of acceptable/unacceptable actions

Acceptable

Offering assistance if customers volunteer that they have a gambling problem by providing information on Tatts Lotteries' Responsible play program, the Gambling Helpline phone number (1800 858 858) and the phone number to call RPLOs (1300 138 132).

Training outlet staff so they can refer customers who volunteer that they have a gambling problem to their retailer.

Unacceptable

Refusing to sell a lottery entry to customers who look scruffy because you don't think they can afford it.

Discussing customers' gambling problems at the counter in front of other customers and staff.

Dismissing customers' requests for assistance with a gambling problem by telling them you can't help them.

Banning customers from the outlet because they have a gambling problem.

Physical environment

Introduction

All efforts are made to provide a safe, friendly and responsible play environment for customers in outlets and at Tatts Lotteries' head office.

Core elements include:

- lottery outlets should endeavour to offer a safe gambling environment to customers
- minors prohibited from all forms of gambling.

4.1 Minors prohibited

Minors are prohibited from gambling.

Actions of the gambling provider

Tatts Lotteries and retailers are prohibited from selling lottery entries to minors (people under 18 years of age) under s. 149, *Lotteries Act 1997*. Further under Tatts Lotteries' Responsible play program, minors are also not permitted to collect prizes from lottery games. The Responsible play sign and Responsible play brochure available from <https://tatts.com/goldencasket> clearly promote this prohibition for minors.

Best practice

Retailers and outlet staff are trained to ask for photo identification where age is in doubt.

Golden Casket online players are required to undergo an identification process to confirm their identity and that they are over 18 years of age. Online players only have 90 days from the date of registration to verify their account or it will be closed. Any funds in the player's account will then be sent to OLGR.

Additionally, before an online player's first withdrawal can be processed, Golden Casket requires that the player verifies the information they provided during registration if this has not already been done.

4.2 Minors excluded

Minors are prohibited from designated gambling areas.

Actions of the gambling provider

Lotteries 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

Lotteries are exempt from this practice.

4.4 Unduly intoxicated customers

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

Actions of the gambling provider

The Code of Practice states that 'customers who are unduly intoxicated are not permitted to continue gambling'. While alcohol is not served in Golden Casket outlets, retailers can still abide by this practice by not allowing intoxicated customers to buy lottery entries.

Retailers and staff will refuse to sell lottery entries to intoxicated customers. If customers are clearly displaying noticeably intoxicated signs outlined below, they will explain to customers that unfortunately they are unable to sell them an entry at that point in time as per the Responsible play guidelines because they believe they may be intoxicated. Intoxicated customers may be discreetly handed a Responsible play brochure or discreetly shown the Responsible play sign.

Signs of being noticeably intoxicated

There are several behavioural signs which, in combination, may indicate that a person is noticeably intoxicated. These signs include:

- smelling of alcohol
- slurring or mistakes in speech
- loss of balance or coordination
- swaying or staggering or difficulty walking straight, clumsiness, fumbling with change
- confusion, not hearing or responding to what is said/mood changes.

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

Lotteries are exempt from this practice.

4.6 Gratuities

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

Actions of the gambling provider

Retailers and outlet staff will not encourage lottery players to provide them with gratuities or gifts. Common sense will be used on matters of this nature. For example, retailers and outlet staff may find it appropriate to accept small tokens from lottery players if players wish to give such a token.

Tatts Lotteries, however, advises retailers and staff not to encourage it and to avoid making statements such as ‘If you win, I want a cut of the winnings’ even if they are meant in jest.

4.7 Passage of time

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

Actions of the gambling provider

Lotteries are exempt from this practice.

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

Lotteries are exempt from this practice.

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

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

Best practice

As part of the Tatts Lotteries new business development process, all new products or services are to be put through a responsible gambling filter and consideration given to the impact on player behaviour of the new product or service and what problem gambling risks to the player may arise as a result of the new product or service.

Examples of acceptable/ unacceptable actions

Acceptable

Selling lottery entries and paying prizes to adults.

Referring minors to the Responsible play sign if they attempt to buy an entry or claim a prize.

Asking for identification if unsure of someone's age.

Accepting a small token of thanks such as a box of chocolates or bottle of champagne for selling a prize-winning entry to a customer.

Refusing to sell lottery entries to a customer who is showing noticeably intoxicated signs.

Consideration is given as to the potential impact of the emerging technology on responsible gambling behaviours prior to the introduction of relevant new gambling products and services.

Unacceptable

Selling lottery entries to minors (under 18 years of age).

Paying prizes to children or allowing them to collect prizes on behalf of their parents or guardians.

Encouraging customers to pay you a share of their winnings or making statements such as 'if you win, I want a cut of the winnings' even if they are meant in jest.

Selling a lottery entry to customers suspected of being intoxicated.

Allowing or encouraging a customer, who is showing signs of being noticeably intoxicated, to make several large purchases one after the other in a short period of time.

Consideration is not given as to the potential impact of the emerging technology on responsible gambling behaviours prior to the introduction of relevant new gambling products and services.

Financial transactions

Introduction

Responsible play practices relating to financial transactions form an integral part of Tatts Lotteries' Responsible play program. They relate to buying entries and collecting prizes.

Core elements include:

- cashing of cheques and payment of winnings
- credit betting (lending of money).

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

Lotteries are exempt from this practice.

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

Details of related financial transaction practices are outlined in the Code of Conduct.

Prize payments should be undertaken in a consistent and socially responsible manner. While the Operational Procedure's Manual outlines the various prize payment procedures, the following specifically relate to responsible payment of these prizes:

- Pay any prize winnings of \$4000 and over by an approved method other than cash. This provides winners of larger amounts security in relation to their winnings. It also provides time for them to think about how to spend their winnings rather than act at an emotional time when they are excited about their win.
- Any winnings of \$4000 and over must be paid by an approved method other than cash. (Approved methods include: cheque, reverse EFTPOS and internet transfer. For example, if a customer presents a winning ticket with a value of \$4500, then \$3999.99 of that win can be paid in cash, but the remaining \$500.01 must be paid by another method, such as cheque).
- Tatts Lotteries retailers may also offer to pay the total amount of any prize \$4000 or greater (up to the maximum amount authorised in the prize payment procedure) by an approved method other than cash. For example, if a customer presents a winning ticket with a value of \$5250, the retail outlet may offer to pay the total amount of \$5250 by cheque.

Tatts Lotteries does not authorise the cashing of cheques by retailers. Although the decision to accept or decline the cashing of cheques is a business decision for retailers, if they choose to, it is not in their capacity as a Golden Casket retailer.

If retailers do choose to cash customer cheques, the Code of Practice states that the cashing of multiple cheques or those not made payable to the outlet or the person presenting the cheque should only be done if prior arrangement has been made between the outlet and the customer or other party. Furthermore, it indicates that large prizes paid by cheque should not be cashed within 24 hours of the win.

Best practice

Tatts Lotteries does not authorise the cashing of cheques by retailers.

5.3 Credit betting (lending of money)

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

Actions of the gambling provider

Payment for lottery entries must be received from customers at the time of processing and purchase of the entry or syndicate share. Retailers cannot provide credit or lend money to anyone for the purpose of purchasing a lottery entry. This includes adding lottery purchases to newspaper and stationery accounts.

The responsible purchase of lottery entries via credit cards or EFTPOS facilities is an acceptable business practice. This is because the funds arrangement is between customers and their own financial institutions. Ultimately though, the decision to accept or deny the purchase of goods via credit card and EFTPOS facilities is up to the outlet's own payment policy.

Examples of acceptable/unacceptable actions

Acceptable

Paying out Golden Casket prizes in cash for customers up to \$3999.99 whether they have bought the entry from your outlet or another.

Paying any winnings of \$4000 and over by an approved method other than cash (approved methods include: cheque, reverse EFTPOS and internet transfer).

Offering to pay the total amount of any prize \$4000 or greater (up to the maximum amount authorised in the prize payment procedure) by an approved method other than cash.

Accepting payment for lottery entries at the time of processing the entry (and in the case of store syndicates at the time of purchase and issuance of the share) via cash, credit card or EFTPOS.

Unacceptable

Setting a different outlet prize payment limit without approval from Golden Casket.

Issuing a customer with a lottery entry or store syndicate share without receiving full payment for it.

Selling a store syndicate share or other lottery entry after the draw has closed or occurred.

Charging lottery entries to a customer's personal or company account held with the outlet.

Irresponsibly promoting credit card purchases for bigger entry prices. For example, 'If you don't have the cash, put it on credit'.

Practice 6

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:

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

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

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

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

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

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

Acceptable practices

Any advertising or promotional activities, including advertising relating to a player loyalty/rewards program, are developed and delivered to comply with the *Code of Ethics* as adopted by the AANA.

Unacceptable practices

Development and delivery of any advertising or promotional activities, including advertising relating to a player loyalty/rewards program that do 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

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

Acceptable practices

For games such as Saturday Gold Lotto, where the first division prize pool is likely to be shared by a large number of winners, using words which indicate that people will win a share in \$22 million rather than win the entire \$22 million first division prize pool.

Where information about frequently drawn numbers is issued by Golden Casket, providing a plain English clause which explains the randomness and unpredictability of a gaming event.

Displaying a permanent plaque or poster in an outlet that indicates that a first division prize was sold by the outlet if specifically dated.

Information on Golden Casket's player loyalty/rewards program, its benefits, associated prizes and fees are included on the application form and at <https://tatts.com/goldencasket>

Unacceptable practices

Advertising that implies that one person will win the entire Saturday Gold Lotto first division prize pool, e.g. 'Play Gold Lotto and win \$22 million', as it is unlikely that one person will win the entire amount.

Note: *this does not apply to other lotto games which have a different prize structure.*

Golden Casket issuing information about frequently drawn numbers without a plain English explanation as to the randomness of a gaming event.

Golden Casket using phrases, such as 'These numbers have come up before so play them to win again' or 'These numbers have never come up so play them to win' as this may imply these numbers are an automatic chance to win.

Implying that an outlet has a major prize on sale, e.g. a lottery outlet stating 'Top Instant Scratch-Its prize not sold, last of tickets on sale here'.

An outlet intentionally leaving out-of-date promotional material displayed that shows prize amounts or offers that are no longer available, e.g. posters, flyers and pre-marked coupons.

Agency posters or plaques that are not dated which promote a major win.

Omitting major details about the mechanics etc of Golden Casket's player loyalty/rewards program, so customers are unable to determine how the program works prior to joining. For example, not offering, or making it difficult to, opt out of the player loyalty/rewards program.

6.3 Misrepresentation of probabilities

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

Actions of the gambling provider

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

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

Acceptable practices

Using words that communicate the randomness or 'chance element' of a lottery activity rather than words that imply an easy and automatic win, e.g. 'Play this game for your chance to win' or 'Play this game for your chance to win \$1 million'.

Golden Casket including a section within its website which explains the randomness and independence of gaming activities.

Featuring superstitious themes (e.g. 'Luck of the Irish' or 'Black Friday') or the word 'lucky' on Instant Scratch-Its tickets and in advertising and promotions in a responsible manner, e.g. not implying a probable or likely win.

Running promotions on unusual ways that people pick their lotto numbers or scratch their Instant Scratch-Its run in a light-hearted manner, without implying that one method of picking numbers is 'luckier' than another.

Using the word 'lucky' to describe a winner who has won a Golden Casket prize (given it is factually true that they have been fortunate to win).

Describing an outlet as having a lucky run or a run of luck if they have sold a number of Division 1 winning tickets.

Golden Casket issuing an explanation regarding the randomness of winning when providing information about frequently drawn lotto numbers.

Changing the 'Lucky numbers' generator on the Golden Casket website to read 'Favourite numbers'.

Unacceptable practices

Using luck in advertising and promotions in a manner that implies that winning is a probable or likely outcome.

Using words that imply that it is automatic to win, such as 'Play this game and win', 'Winning is easy' or 'You will win'.

Using luck to imply that some entries or games are luckier than others, e.g. ‘Quickpicks are luckier than recorded numbers’ or ‘This is your lucky entry’.

Using superstitious themes (such as ‘Luck of the Irish’ or ‘Black Friday’) or the word ‘lucky’ on Instant Scratch-Its tickets and in advertising and promotions, in a manner that implies that winning is a probable or likely outcome.

Using the words ‘as a result’ to describe a direct link between the intrinsic luck of a person or Golden Casket outlet and ‘the result’ of winning. For example, a winner rubbed a Buddha statue and ‘as a result’, won on an Instant Scratch-Its ticket.

Stating as a fact or implying that certain lotto numbers are ‘luckier’ than other lotto numbers.

Using superstition or the element of ‘luck’ to scare or coerce people into buying a product. For example, ‘If you don’t buy a ticket on Black Friday, you may never have the chance to be lucky again’.

Producing advertisements that imply that players can win after losing many times, such as ‘Your time to win is coming up’, ‘Hang in there and you’ll win sooner or later’ or ‘Chances are...you’ll win sometime’.

Stating as a fact or implying that people have a better chance of winning by buying entries at one outlet rather than another.

Stating as a fact or implying that certain entry types have a greater chance of winning compared to other entry types (unless the odds for the entry types in question are actually more favourable).

Golden Casket advertising and promotional campaigns showing only winning images. For example, all Instant Scratch-Its campaign advertisements only featuring winning images and no advertisements focusing on the dreaming or enjoyment of play aspects.

Stating as fact or implying that certain Golden Casket outlets or particular areas are ‘luckier’ than another.

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

6.4 Reasonable strategy (financial betterment)

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

Actions of the gambling provider

Golden Casket will avoid any type of advertising or promotional activity which gives the customer the impression that gambling is a reasonable strategy for financial betterment. The odds of winning will be available in various brochures in the retail lottery outlets and on the Golden Casket website <https://tatts.com/goldencasket>

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

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

Acceptable practices

Depicting a lottery win being used in various ways including mortgage payments and paying other bills in a manner that depicts an everyday acceptable situation rather than in a desperate and rescue-like manner.

Unacceptable practices

Suggesting that lottery entries are an alternative to investment, (e.g. ‘Would you like to invest your money in buying a lottery entry’) or suggesting that someone should channel their money into lottery entries instead of investing in superannuation or the like.

Promoting gambling as an easy and automatic way to pay off bills or using imagery and words, such as:

- ‘Play this lottery game as another way to pay off bills’
- ‘Play today and chase those bills away’.

Using imagery and text in advertisements which imply that customers can relieve their personal, physical and financial pain and anguish by buying lotto entries. For example, ‘Buy a lotto entry and chase all your pains away’ or ‘Relieve all your personal problems by buying a lotto entry’.

Advertising and promotions of lottery entries are portrayed in a desperate and rescue-type manner. For example, ‘Buy a lotto entry and save your life’.

Using images and words, such as ‘Play the lottery game and you can give up your job’.

Saying to a customer who is collecting a substantial prize, ‘Imagine what you would win if you invested all your winnings in more entries’.

Advertisements and promotions which encourage customers to spend their last dollar.

Presenting gambling as a guaranteed way to get rich. For example, ‘Put a lottery entry in and you’ll get rich’ or ‘Play the lottery and you’ll never have to worry at all’.

6.5 Misleading statements

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

Actions of the gambling provider

Responsible advertising and promotions will not make false promises/statements about the odds, prizes or chances of winning. This includes not suggesting that skill can influence games that are really games of chance. Luck should not be used in any advertising or promotion in a manner that implies winning is a probable or likely outcome. It is not appropriate to promote a venue or an individual as possessing intrinsic luck. It is not possible to predict the outcome of the next draw.

Acceptable practices

Having the odds of winning a lottery game easily accessible to customers. For example, making the odds of winning on any lottery game accessible from the Responsible play page or Product information page of Golden Casket's website or having information about the odds of winning available at the place of purchase.

Offering information on the odds in languages other than English on the website.

Unacceptable practices

Supplying incorrect odds or supplying information in difficult to understand language.

Refusing to supply odds of games to customers or making them unreasonably inaccessible.

Using images or text in advertisements, such as 'Remember the first time you had a big win, why not make it happen again and buy a lottery entry'.

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

Using imagery and/or language that is in step with prevailing community standards and that maintains a high industry standard.

Unacceptable practices

Using images (e.g. people who are dressed in a particular manner) that is inappropriate to the context of the advertisement or promotion and does not conform to prevailing community standards. For example, an advertisement or promotion that features a lottery winner hiring a stripper as a result of winning Lotto.

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

Using imagery or text in advertisements which aims to encourage or incite violence.

Using racist or sexist language/imagery in advertisements or promotions.

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

Lotteries are exempt from this practice.

6.8 Minors or vulnerable or disadvantaged groups

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

Actions of the gambling provider

Minors

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

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

Vulnerable or disadvantaged groups

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

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

Acceptable practices

Focusing on a family as a whole, and the parent figures in particular, in an advertisement, promotion or player loyalty/rewards program campaign rather than focusing solely on children.

Avoiding the promotion of 'desperate' winners such as 'A woman used her last \$2 to buy an entry and won \$1 million'.

Conducting player loyalty/rewards program campaigns that target customers based on their purchase history in a responsible manner.

Unacceptable practices

Focusing solely on children and people that are clearly underage in a lottery advertisement.

Featuring children and people who are clearly underage participating in lottery activities.

Using images of children picking numbers for games.

Advertising and promotions relating 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).

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

Advertising of lottery products at child-focused venues, e.g. putting a poster up at a school or school sporting event.

Advertising directly to unemployed people, e.g. advertising at a Centrelink office.

Conducting an advertising or direct mail campaign that specifically targets extremely disadvantaged groups or areas. For example, people who:

- have a mental disability or illness
- are unemployed
- are known to be having high levels of financial difficulties, e.g. bankrupt people.

Placing advertising in 'C' (children) or 'P' (preschool) rated TV programming or children's pages of a newspaper and child-skewed shows if they appear in 'G' classification programs, e.g. 'Willy Wonka & the Chocolate Factory' movie.

Using child-related celebrities to promote lottery products, e.g. 'a popular children's entertainment group to promote a new game'.

Showing lottery play as a way of dealing with grief or depression.

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

Lotteries are exempt from this practice.

6.10 Irresponsible trading practices

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

Actions of the gambling provider

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

Irresponsible trading practices are actions designed to persuade an individual to gamble in an excessive and irresponsible manner by offering inappropriate inducements. Such inducements may involve individuals who are persuaded to gamble who, in the absence of an inappropriate inducement, would not have otherwise. This may result in individuals being persuaded to gamble for longer periods of time and in a more excessive and irresponsible manner than they otherwise would have done. Inappropriate inducements therefore have the potential to impact on people who are at risk of, or have, a gambling problem.

Acceptable practices

Promoting and selling lottery entries in a friendly and informed manner, e.g. ‘Did you know that we have a new Instant Scratch-Its game?’ or ‘Would you like another entry?’ if a customer is collecting a prize.

Rewarding customers for their loyalty or encouraging them to modify their play in a responsible manner. For example:

- upon customer’s requests notifying them of upcoming events/jackpots or offering responsible rewards
- randomly drawn surprise entries.

Any advertising or promotions align with the Association for Data-Driven Marketing & Advertising (ADMA) *Direct Marketing Code of Practice*. For example, using a clearly visible opt-out option for the player loyalty/rewards program.

Unacceptable practices

Aiming promotions specifically at disadvantaged groups or minors.

Encouraging people to purchase unreasonably high levels of lottery products in order to win a promotion.

An outlet staff member aggressively pushing a customer to participate in gambling activities.

Using offers of free alcohol to promote lottery play.

Running a promotion which encourages people to spend their last dollar on lottery entries.

Advertising an offer of free money or a loan for the purposes of gambling.

Trade practices or inducements which intentionally aim to encourage people to gamble in an excessive or irresponsible manner.

Any rewards system that encourages irresponsible play in order to receive a reward or entry into an additional prize draw. For example, spend \$300 to receive one entry into a promotional draw.

Encouraging people to spend their last dollar on lottery entries.

Advertising or promotions that contradict the ADMA *Direct Marketing Code of Practice*. For example, not offering, or making it difficult to, opt out of the player loyalty/rewards program.

Note: ‘inducements’ are things that are offered to persuade a person to gamble. For example, prizes or gifts directly linked to winning a particular game, promotions conditional to a person gambling or offers of free credit to customers or potential customers.

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

Golden Casket 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

Showing images of alcohol in the context of celebration and entertainment and not during the act of purchasing lottery entries. For example, someone offers a toast of champagne to celebrate a win.

Unacceptable practices

Showing people drinking alcohol or taking drugs while participating in lottery activities, e.g. drinking a beer while playing a lottery game.

Featuring images of people who are showing signs of being unduly intoxicated, e.g. staggering, slurring of words.

Sponsorships or partnering of brands to specific alcohol-related products, such as joint Instant Scratch-Its and beer promotions.

6.12 Consent of the person

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

Actions of the gambling provider

A gambling provider 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 written guidelines in place to protect the privacy of major lottery winners.

All staff who have contact with major winners are trained on privacy requirements for major winners.

Obtaining express permission from a winner regarding releasing details about their story.

Advising the winner that they have the right to full anonymity if they wish.

Taking particular care to ensure that elderly winners and those with English as their second language understand their rights to privacy when winning a major prize.

Taking special care about publishing details of a win where the winner lives in a small country town, to help ensure a winner is not identified, without their express permission.

Unacceptable practices

Releasing information about a winner's story without express permission of the winner.

Aggressively persuading a winner to agree to participate in publicity activities.

Not explaining to the winner that they have the right to full anonymity.

Not ensuring that a winner who is elderly or whose first language is not English 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

Golden Casket 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' or 'Have fun and play responsibly'.

Acceptable practices

As part of every advertising campaign, placing of the message: 'Have fun and play responsibly' on a prominent in-store point of sale advertising piece, which would usually comprise an A2 poster (if produced).

Prominently displaying 'Have fun and play responsibly' as a scrolling message on the Customer display screens in Golden Casket outlets from time to time.

Schedule the displaying of the 'Have fun and play responsibly' message in a dynamic digital and prominent electronic point of sale display system.

Placement of the 'Have fun and play responsibly' message on all Golden Casket promotional flyers.

Preparing a style guide to ensure that responsible play messages are consistent and at an appropriate scale, to ensure readability.

Having dedicated responsible play brochures, which feature the responsible play message in a prominent location in each Golden Casket outlet.

Prominently displaying a responsible play sign featuring 'Have fun and play responsibly' in each outlet.

The responsible play message and dedicated responsible play information communicated via the how to play game information brochure for all Golden Casket products with the brochure being located in the crucial 'entry point' piece of communication at each Golden Casket outlet, which is the primary gateway for information on all Golden Casket products.

Including the 'Have fun & play responsibly' message on the home page of the Golden Casket website <https://tatts.com/goldencasket> at an appropriate size.

Including the 'Have fun & play responsibly' message on the online purchasing portal with a link to the Responsible Play page of the Golden Casket website.

Including the 'Have fun & play responsibly' message on the player loyalty/rewards program application form and Winners Circle pages of the Golden Casket website and on any promotional content or on any promotional direct mail and or email pieces of Winner's Circle or any player loyalty/rewards program.

Unacceptable practices

Not ensuring that responsible play messages are used consistently in advertising and promotional activities and are an appropriate scale, to ensure readability.

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
- Lives Lived Well
- UnitingCare Community
- Relationships Australia Queensland
- Lifeline Darling Downs and South West Qld
- Moonyah Rehabilitation Service (residential facility operated by Salvation Army).

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

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

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

Online

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

Other services (available 24 hours)

Gamblers Anonymous **1800 002 210**

Lifeline **13 11 14**

Frequently asked questions

What are the effects of problem gambling?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

For a comprehensive list of indicators refer to the *Signs to watch out for* in **Practice 2** of this Resource manual (p. 9).

Examples of risk indicators

1. Loss of control

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

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

2. Loss of control

Aggressive behaviour towards gaming machines or other customers or staff.

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

3. Personal remorse

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

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

4. Depression, or thoughts about suicide

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

5. Negative impacts of gambling

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

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

6. Loss of control/personal remorse

Long periods of play or frequent repeated periods of play.

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

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

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

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

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

What should I do if I have a customer that:

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