



# Casino codes of practice

Public consultation

## *Information Document*

*with respect to the approval of  
codes of practice  
under sections 41A and 41B of the  
Casino Act 1997*

**Independent Gambling Authority**  
64 Hindmarsh Square, Adelaide  
Post Office Box 67, Rundle Mall, South Australia 5000  
+ 61 8 8226 7233 (voice) + 61 8 8226 7247 (fax)  
[codesofpractice@iga.sa.gov.au](mailto:codesofpractice@iga.sa.gov.au)  
[www.iga.sa.gov.au](http://www.iga.sa.gov.au)



# CASINO CODES OF PRACTICE—PUBLIC CONSULTATION

## Introduction

The Independent Gambling Authority is conducting public consultation, by way of an “inquiry” under the *Independent Gambling Authority Act 1995*, as part of its decision process for the approval of advertising and responsible gambling codes of practice for the Adelaide Casino.

## Terms of reference

The purpose of the inquiry is—

- To receive, in public, draft advertising and responsible gambling codes of practice from SkyCity Adelaide Pty Ltd, as licensee of the casino, along with a public explanation of their perceived role and purpose, and the basis on which they were prepared;
- To receive, in public, submissions from members of the public, including groups with a special interest in the minimisation of harm associated with gaming or responsible gambling, concerning what should constitute a code of practice in general and in relation to the draft before the Authority, within the constraints of the legislation;
- To allow SkyCity an opportunity to respond, in public, to the public submissions;
- To test the claims made in public explanations or public submissions—

with a view to subsequently approving the codes of practice for the purposes of sections 41A and 41B of the *Casino Act 1997*.

## How to have your say

### *Getting started on a “submission”*

The first thing to do is to read the draft codes of practice ([Attachment 1](#)). Then you can make a written submission (by mail, by email or by fax) or leave a voice message.

You will need to get your submission to the Authority by 4.00pm on Tuesday, 20 November 2001. (That timing has been chosen to allow submissions to be circulated to the members and read before the hearing on 28 November.)

However you do it, it will help greatly if you start your submission using the standard consultation form. The form—which is explained further on—is attached. The form can also be downloaded in rich-text format from [www.iga.sa.gov.au](http://www.iga.sa.gov.au).

If you are going to make your submission by voice message, you obviously cannot use the standard consultation form. For voice messages there is a standard message script which you are asked to start with (see the heading [standard message script](#) below).

Before you make your submission, it is worth checking [www.iga.sa.gov.au](http://www.iga.sa.gov.au) to see if there are any **registered submissions** on the site. If you agree with one or more registered submissions, you can just quote the number of the submission on your standard consultation form or in your standard message script and your support for the submission will be recorded.

### *Registered submissions*

If a person or group has produced a comprehensive submission, the Authority may decide to register the submission to allow other people to “adopt” it (instead of writing a similar submission or sending in an identical one). Registered submissions will be posted at [www.iga.sa.gov.au](http://www.iga.sa.gov.au) once they are registered.

A submission will be registered—

- if it relates to the terms of reference and is confined to the legislative mandate for the codes of practice;
- if it is available in rich-text format (most word processor formats will do this); and
- so long as it is not defamatory.

For more information about registering submissions, call the Office of the Authority on **(08) 8226 7233**.

### *Legislation*

The Authority’s ability to approve codes of practice is limited to what the relevant sections of the Casino Act allow for. For example, the codes cannot require the removal of gaming machines from venues.

Submissions should therefore only address the issues which the Authority is able to act on.

The relevant sections of the Casino Act say:

#### **41A. Advertising code of practice**

It is a condition of the casino licence—

- (a) that the licensee must adopt a code of practice on advertising approved by the Authority; and
- (b) that the licensee must ensure that advertising by the licensee conforms with the code of practice approved under this section.

#### **41B. Responsible gambling code of practice**

It is a condition of the casino licence—

- (a) that the licensee must adopt a code of practice approved by the Authority dealing with—
  - (i) the display of signs, and the provision of information, at the casino relating to responsible gambling and the availability of services to address problems associated with gambling; and
  - (ii) the provision of training to staff relating to responsible gambling and the services available to address problems associated with gambling; and
  - (iii) any other matters designed to reduce the incidence of problem gambling determined by the Authority; and
- (b) that the licensee must ensure that operations under the licence conform with the code of practice approved under this section.

### *Etiquette*

Even if you want your submission to be anonymous, you have to tell the Authority who you are—the Authority cannot accept unsigned or unattributed submissions.

If you are quoting other people you should respect their rights—you should get the person's permission (unless the comment has already been published elsewhere) and, if you are quoting from a written publication, you should provide the details—for example, with a book, the title and date of publication, the name of the publisher, the name of the writer and a page reference.

If the submissions are going to be of any use, the Authority needs to be able to quote from them—even if your name is suppressed. The Authority accepts submissions on the basis that you agree to publication.

Finally, if you are making a submission or giving evidence at a public hearing, you will need to abide by the rules of the hearing, including obeying any direction made by the Presiding Member.

### **Public hearing**

The Authority has decided to supplement the consultation process with a day of public hearings. The reasons for having a public hearing are many:

- a public hearing allows people making complex submissions to present evidence in support of them;
- a public hearing affords access to the process for those who are uncomfortable with more formal methods, such as written submissions;
- a public hearing allows the licensee affected by the proposal to comment on the proposal in an open and transparent way;
- a public hearing allows the public to participate as observers.

In order to make the most of the time available for a public hearing, there needs to be a high level of planning and preparation, both by the Authority's staff and on behalf of those making submissions.

For that reason, if you want to make a presentation to or give evidence before the public hearing on 28 November 2001, you will need to notify your interest and arrange to discuss your presentation or evidence so that an appropriate length of time can be allowed.

You should give that notification to the Director of the Office of the Authority on **(08) 8226 7233** as soon as possible and, in any event, no later than 4.00pm on **Tuesday, 20 November 2001**.

Once all of the participants' proposals have been assessed, indicative times will be advised.

The proceedings of the public hearing will be tape-recorded and may be transcribed for the purposes of the Authority's deliberations. The Authority may also decide to take people's evidence on oath or affirmation.

SkyCity Adelaide, as the licensee affected by the proposed codes of conduct, will be given the opportunity to make submissions about people's presentations and to ask questions of people giving evidence at the hearing—and the members of the Authority will also ask questions.

### Standard consultation form

When you use the standard consultation form, it helps the Authority by collecting the same basic information about you and your submission.

The standard consultation form is [Attachment 2](#).

### Standard message script

Starting your voice message with the standard message script helps the Authority, especially if something in your submission needs to be clarified before it is shown to the Authority.

“Hello. I am calling about the **advertising code** of practice for the casino/**responsible gambling** code of practice for the casino *[choose one or the other]*. My name is *[your name, including Mr/Ms/Mrs/Dr]* which is spelt *[spell name slowly]*. My address is *[the Authority needs to have a mailing address for you]* and you can telephone me on *[contact number]*. What I would like to say is....”

You should practise and time your whole message one or two times before calling. Try to keep your message between 3 and 4 minutes.

### Summary of key information

If you have a query, call the Office of the Authority on **(08) 8226 7233**.

The **deadline** for **submissions**, and to show interest in participating in the public hearing, is **4.00pm** on Tuesday, **20 November 2001**.

Presentation, or giving evidence, at the public hearing will be by prior arrangement at time notified on the Monday or Tuesday before.

Submissions can be made in writing—

- **by mail** to Post Office Box 67, Rundle Mall, South Australia 5000;
- **by hand delivery** to the Office of the Authority, Ground Floor, Wolf Blass House, 64 Hindmarsh Square, Adelaide;
- **by fax** to (08) 8226 7247;
- **by email** to [codesofpractice@iga.sa.gov.au](mailto:codesofpractice@iga.sa.gov.au).

You can also comment by **voice message**—on (08) 8226 7389.

14 September 2001

## Draft SkyCity Adelaide Advertising Code of Practice

### Introduction

This advertising code of practice is submitted to the Independent Gambling Authority, for their consideration to fulfill SkyCity Adelaide's obligations under section 41A(a) of the Casino Act 1997.

The code provides a framework through which SkyCity Adelaide can ensure that its advertising activities are consistent with the broader objective of operating the business in a responsible manner.

### Principles of the responsible advertising of gaming

The following principles of responsible advertising are designed to ensure that all gaming related advertising is undertaken by SkyCity Adelaide in a manner that is socially responsible and does not mislead or deceive the customer.

Specifically, gaming advertising should:

- comply with applicable (Commonwealth and State) laws and with the Advertiser Code of Ethics as adopted by the Australian Association of National Advertisers;
- not be directed at minors;
- not portray minors participating in activities in which they are under the legal age;
- not screen or air at times when minors are likely to be the predominant recipients (i.e. not to be in G broadcast time except for news, current affairs and sport);
- not be explicitly or exclusively directed at vulnerable or disadvantaged groups;
- not promote gaming as a means of relieving financial or personal difficulties;
- not state or imply that gaming is a means to pay for household staples, education, rent, or to meet mortgage commitments;
- not make claims related to winning, or prizes that can be won, that are not based on fact, are unable to be proven, or are exaggerated;
- not state or imply that a player's skill can influence the outcome of a game where this is not the case;
- not associate gaming with excessive alcohol consumption; and
- not exaggerate the connection between the gaming activity and the use to which the profits may be put.

14 September 2001

## Draft SkyCity Adelaide Responsible Gambling Code of Practice

### Introduction

This responsible gambling code of practice is submitted to the Independent Gambling Authority to fulfill SkyCity Adelaide's obligations under section 41B(a) of the Casino Act 1997.

### Legislation and regulation

SkyCity Adelaide will:

- conduct its business in accordance with all applicable laws and legal requirements and at all times comply with casino licence requirements; and
- co-operate with regulatory bodies and government agencies in all matters, including their investigations of our compliance with legal obligations.

### Customer information and signage

SkyCity Adelaide will:

- prominently display responsible gaming materials (posters, pamphlets, wallet cards, and stickers) in public areas throughout the SkyCity Adelaide complex. Pamphlets will be translated and available in six languages, including English;
- display helpline stickers on each gaming machine;
- display helpline stickers on ATMs;
- reinforce its responsible gaming policy in appropriate customer newsletters and other communications;
- display clocks prominently throughout gaming areas; and
- ensure general information pertaining to the conduct of games, including the rules, is available to customers within the casino.

### Staff training and information

SkyCity Adelaide will:

- ensure that all staff receive problem gambling training. Training is provided at four distinct levels:
  1. at induction where all staff must participate in training which identifies problem gambling (1 hour);

2. increased levels of training are provided to staff employed in positions associated with Gaming, Food and Beverage, Security, Surveillance, and Action Hosts (2 hours);
  3. all supervisors within the above departments are required to undertake training identifying initial procedures for ‘first level’ identification of and referral of customers requiring assistance (4 hours);
  4. advanced training is provided to appropriate senior employees on the identification of and intervention techniques for problem gambling, including administration of the self-bar process (8 hours).
- provide annual refresher courses for all staff;
  - include responsible gaming information in employee newsletters and magazines; and
  - display responsible gaming material ‘back of house’ to remind staff of policies and their responsibilities.

Training programmes will be designed to:

- provide information about the potential effect of gaming on customers;
- include information on the recognition and identification of problem gambling traits;
- ensure that the processes for approach, intervention, referral and follow-up are clear and well understood; and
- be regularly reviewed and revised.

### **Self-exclusion process**

SkyCity Adelaide operates a facility for indefinite voluntary exclusion of customers from the property. SkyCity Adelaide staff ensure that every approach by a customer or family member about this facility is responded to while the customer or family member is on the premises/on the telephone. The self exclusion facility:

- provides a translation service during the process if requested;
- involves third party involvement as a mentor who can be contacted on the progress of the self excluded person;
- provides for immediate referral to or liaison with a counseling agency;
- provides for the review of self exclusion notices with customers and their mentors before they are rescinded;
- ensures that self barred persons are removed from loyalty mailing databases.

Through the security and surveillance systems operated in the SkyCity Adelaide complex, SkyCity Adelaide will ensure, to the extent reasonably possible, that self barred customers are excluded from the complex.

### **Minors and unattended children**

SkyCity Adelaide will:

- take whatever steps are reasonably appropriate to exclude minors from the casino complex;
- train security and gaming staff to be vigilant for the presence of underage persons; and
- authorise and encourage all staff to report suspected underage persons in order to seek identification for proof of age.

SkyCity Adelaide will also take active steps to prevent parents leaving their children without adult supervision. Specifically, SkyCity Adelaide will:

- require employees to report to security any incident where it is suspected that a child has been left unattended by their guardian or care giver. In such situations security officers will intervene and take all practicable steps to locate an adult responsible for the child. Should this not be successful the Police will be contacted; and
- security officers will patrol surrounding environs to detect any unattended children in vehicles.

### **Service of alcohol**

Notwithstanding the importance of the responsible service of alcohol to broader host responsibility objectives, it is also an important component of responsible gaming policy. SkyCity Adelaide will:

- take all practicable steps to ensure that no person who appears to be intoxicated is served or sold alcohol, or allowed to game;
- provide education about the effect of alcohol on patrons;
- include guidelines to recognise excessive alcohol consumption in staff training programmes;
- take all practicable steps to ensure the exclusion of intoxicated patrons from entering the premises, and the eviction of those who are found to be intoxicated; and
- ensure alcohol is not supplied to reward continued play.

### **Financial transactions**

SkyCity Adelaide will:

- comply with the provisions of the Casino Act 1997 relating to the provision of credit or the lending of money to anyone for the purpose of gaming; and

- fulfill its obligation to report large or suspicious transactions.

### **Advertising**

SkyCity Adelaide will:

- ensure that all advertising activity complies with the SkyCity Adelaide Advertising Code of Practice as approved by the IGA.

### **Miscellaneous**

All SkyCity Adelaide employees will be:

- prohibited from participating in gaming at or with any business that is part of the Sky City Ltd group; and
- prohibited from soliciting any tip, gratuity, gift, consideration, or other benefit from any player or customer of the casino.

**Attachment 2—Standard consultation form**  
*(see following page)*



# Independent Gambling Authority Standard Consultation Form Casino Codes of Practice

*(Please read the notes overleaf before completing)*

### Which code?

*Strike out one*      ADVERTISING/RESPONSIBLE GAMBLING

### Personal details

Name *(please include titles and qualifications)*

Residential address *(include postcode)*

Home phone

Work phone

Mobile phone

Email address

Do you wish to remain anonymous? (YES/NO—a blank is a “NO”)

### Organisation details

*If you are making this submission on behalf of a body (such as a recognised charity), on behalf of a group of people (such as an informal association of people with a specific interest in gambling) or in some other capacity (for example, as a university lecturer) please provide the details of the body and indicate whether your submission is the body’s OFFICIAL position or simply your own UNOFFICIAL view.*

Name of body, association or organisation

Your title, designation or position

Is the submission OFFICIAL or UNOFFICIAL

### Submission details

*If you are writing to support or oppose a registered submission, please write the registration name of the submission here (otherwise write “N/A”): and then strike out one of these responses:*

I support this registered submission/I oppose this registered submission

Number of pages in this submission

This submission comprises 2 pages of standard consultation form plus ..... extra pages, making ..... pages in total.

*This submission is made by (circle/strike out as appropriate)*

HARD COPY

EMAIL

HARD COPY AND DISK

BOTH HARD COPY AND EMAIL

## Acknowledgment and consent

1. I have read the casino codes of practice public consultation information document and make this submission on the basis set out in that document.
2. I take responsibility for the correctness and accuracy of statements made in this submission.
3. Unless specifically attributed to others, the opinions, comments and observations in this submission are my own.
4. I consent to the whole or any part of this submission being published by the Independent Gambling Authority.

<i>Date</i>
<i>Signature</i>

### NOTES FOR COMPLETION OF SUBMISSIONS

#### 1. Which code?

The Authority is approving two separate codes of practice. Even though the codes are related to each other, each one deals with different issues. If you are making a submission to share your experiences with the Authority and those experiences are common to the two codes, you can make two separate submissions with the same attachment.

#### 2. Personal details

If you want to be **anonymous**, the Standard Consultation Form will be separated from the attached submission and only the attachment will be shown to the participants or otherwise published. However, you will need to be careful with your attachment to make sure that you do not inadvertently identify yourself. Please note that your details may be disclosed to certain members of the board and staff of the Authority.

#### 3. Organisation details

- (1) This section has two purposes: while it allows a person to make an official submission on behalf of an organisation, it also allows people whose role in an organisation makes them experts or opinion leaders (or both) to credential their submissions appropriately.
- (2) If the submission is made as the official submission of a group, please expect the Office of the Authority to seek independent verification of the status of the submission.

#### 4. Submission details

- (1) If you are supplying your submission on disk or making it by email, please—
  - (a) make the submission as a Word for Windows 97 (\*.doc) or rich-text format (\*.rtf) document—in the case of email, supplied as an attachment; and
  - (b) incorporate the Standard Consultation Form by pasting it in at the front (the form is downloadable in rich-text format from [www.iga.sa.gov.au](http://www.iga.sa.gov.au)).
- (2) If it is possible, please supply both a hard copy (paper) and an email or disk version of the submission.

#### 5. Acknowledgment

The acknowledgment is important. It makes sure that you understand some of the issues involved in making comments which might be published. Please read it carefully. In the case of emailed submissions, the Office of the Authority will seek a signed acknowledgment from you before the public hearing starts.