

Worksheet—2011 Codes of Practice Review—Issues to address

SA TAB Pty Ltd submission

<i>Reference</i>	<i>Description</i>	<i>Comments</i>
3.2.1	Approved Intervention Agency initiative	
3.2.2	Casino host responsibility	
3.2.3	Inducements to gamble	<ul style="list-style-type: none"> • SA TAB supports the status quo where inducements to open accounts banned.
3.2.4	Differential regulatory treatment	
3.2.5	Training	<ul style="list-style-type: none"> • SA TAB’s current training mechanisms are able to provide sufficient understanding of the responsibilities of SATAB Agents in relation to the RG Codes. • The logistics of providing face-to face training for country sites is difficult and potentially costly, particularly when the majority of staff employed in this area has had training previously. • The awareness of Agents obligations under the RG Code is high and is constantly monitored by SATAB’s regional managers as a part of their day to day role. • Responsible Gambling Code “enforcement” would take up approximately 30% of their role currently, whereas prior to the introduction of the Codes this aspect was significantly less a part of their role. • It should be noted that Queensland only requires mandatory Responsible Service of Gaming training for gaming machine staff, not wagering staff.

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<i>Reference</i>	<i>Description</i>	<i>Comments</i>
3.2.6	Mandatory warning messages	<ul style="list-style-type: none"> • SA TAB encourages the IGA to consult with its counterpart regulators in other jurisdictions to develop a nationally consistent approach to warning messages as the current regime of different requirements in every jurisdiction is unworkable in the modern reality of a national market for wagering advertisement. • The current system and rotation is functioning as it was intended. • The existing Code is well understood by SATAB and is able to be effectively managed. • A distinction should be clarified between ‘advertising’ which requires the warning message and ‘signage’ or ‘sponsorship’ which does not. For example, attaching a logo to football player’s guernsey should constitute signage and no warning message should be required (it would likely be illegible anyway!). There is a public benefit to sponsors supporting sporting teams, venues and the like – potential sponsors should not be discouraged with a requirement to affix warning messages where a mere logo is to be displayed. On the other hand, a newspaper advertisement (for example) promoting an operator’s products or odds is clearly advertising to which the warning should be affixed.
3.2.7	In-venue reporting of problem gamblers	

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<i>Reference</i>	<i>Description</i>	<i>Comments</i>
3.2.8	Perimeter control	<ul style="list-style-type: none"> • SA TAB does not support the imposition of perimeter control on TAB facilities. • SATAB has fewer than 40 barred customers across the whole State (356 venues), hence any control that would require a registration type entry would place an unnecessary burden and invasion of privacy on all other customers. • Perimeter control of the kind proposed in the IGA’s discussion paper is simply unmanageable in the TAB environment and is not considered necessary as the face to face nature of a wagering transaction presents a lower risk to problem gambling than, say, gaming machines.
3.2.9	Mandatory breaks in play (pop-up messaging)	
3.2.10	Sportsbetting advertising	<ul style="list-style-type: none"> • SA TAB supports complete banning the promotion of live odds during sports broadcasts utilising editorial commentary or on-screen displays while play is in action. Not only does the promotion of live odds heighten awareness of wagering products to many minors who take a keen interest in sport and watch live broadcasts, but it also disenfranchises many of the adult viewers who are not otherwise prone to having a bet. • SA TAB also supports the ban of ‘live odds’ displays on sporting venue scoreboards. We believe the ban should be in place sooner rather than later. Obviously, traditional forms of gambling advertising should be permissible during scheduled breaks in play. • SA TAB assumes that any such ban this would not extend to the regular price displays in TABs and licensed venues which do not form part of telecasts or commentaries.
3.2.11	Consolidating the wagering codes	<ul style="list-style-type: none"> • SA TAB supports consolidation of the codes in principle, together with any steps that hold Authorised Interstate Betting Operators to the same standards as those which SA TAB complies. • Careful drafting would be required to separate the retail and electronic aspects of the code.

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<i>Reference</i>	<i>Description</i>	<i>Comments</i>
3.2.12	Children's play areas	
3.2.13	Cheques for winnings	<p>Cheque Limits – SATAB requires more information about any change in this aspect of the Code. Our concerns are:</p> <ul style="list-style-type: none"> • Customers pay in cash, they want cash in return. • SA TAB's Responsible Gambling Policy already provides that we do not pay amounts more than \$10,000 in cash. We would support a the proposed rule if \$10,000 was set as the threshold amount. • SATAB does not hold large amounts of cash in its outlets and generally large payments are made in part cash and part cheque. • The use of EFTPOS for deposit to customer's bank account should be considered as an option instead of cheques. • Payouts are relevant investments and a customer who bets a large sum would be denied his initial investment returned to him as the dividend and initial investment may be too large. • Internet providers would not be subject to this restriction as they do not pay in cash rather they credit an account with funds that are then available for immediate reinvestment. • The <i>Anti- Money Laundering and Counter Terrorism Financing Act</i> already restricts large cash payments. • Any change would impose a large administrative burden to address a relatively low risk: The frequency of large payouts on bets of average size is low.
3.2.14	Obligations for staff welfare	

**Worksheet—2011 Codes of Practice Review—Advertising Code
SA TAB Pty Ltd submission**

<i>Clause No</i>	<i>Clause Description</i>	<i>Position</i>	<i>Comments</i>
1	Purpose	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
2(a)	Must ensure all gambling related advertising is socially responsible	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
2(b)	Must ensure all gambling related advertising does not mislead or deceive customer	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
2A(1)	Intervention initiatives – clauses that do not apply if party to a responsible gambling agreement	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
2A(2)	Responsible gambling agreement	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
3(1)	Abide by applicable laws and advertising industry code of practice	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
3(1A)¹ 3(2)²	Must ensure advertising includes relevant expanded warning message, if not reasonable or practicable, the condensed message	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	

¹ Gaming Machine, Casino and State Lotteries codes

² Wagering codes

Worksheet—2011 Codes of Practice Review—Advertising Code – SA TAB Pty Ltd submission

Clause No	Clause Description	Position	Comments
3(1B)	Gaming machine licensees must ensure there is no advertising of its product on the exterior of the premises	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
3(1C)	Gaming machine licensees must ensure there is not advertising of its product within the premises except material in gambling area and directional signage	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
3(2)(a) 3(3)(a) ³	Must ensure when it advertises its product, that the advertising is not directed at minors	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
3(2)(b) 3(3)(b) ⁴	Must ensure when it advertises its product it does not portray minors participating in gambling	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
3(2)(c) 3(3)(c) ⁵	Must ensure when it advertises its product it is not explicitly or exclusively directed at vulnerable or disadvantaged groups	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
3(2)(d) 3(3)(d) ⁶	Must ensure when it advertises its product does not promote gambling as a means of funding routine household purchases	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	

³ 3(2)(a) Gaming Machines, Casino, State Lotteries codes, 3(3)(a) Wagering codes

⁴ 3(2)(b) Gaming Machines, Casino, State Lotteries codes, 3(3)(b) Wagering codes

⁵ 3(2)(c) Gaming Machines, Casino, State Lotteries codes, 3(3)(c) Wagering codes

⁶ 3(2)(d) Gaming Machines, Casino, State Lotteries codes, 3(3)(d) Wagering codes

Worksheet—2011 Codes of Practice Review—Advertising Code – SA TAB Pty Ltd submission

Clause No	Clause Description	Position	Comments
3(2)(e) 3(3)(e) ⁷	Must ensure when it advertises its product does not promote gambling as a means of enhancing social standing or prospects	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input type="checkbox"/> Modify (<i>see comment</i>)	
3(3)(f) 3(2)(g) ⁸	Does not make claims related to winning or the prizes that can be won— (i) that are not based on fact; or (ii) that are unable to be proven; or (iii) that are exaggerated	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input type="checkbox"/> Modify (<i>see comment</i>)	
3(3)(g) 3(2)(h) ⁹	Must ensure when it advertises its product does not state or imply that a player's skill can influence the outcome of a gambling activity	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input type="checkbox"/> Modify (<i>see comment</i>)	
3(3)(h) 3(2)(i) ¹⁰	Must ensure when it advertises its product does not associate gambling with excessive alcohol consumption	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input type="checkbox"/> Modify (<i>see comment</i>)	

⁷ 3(2)(e) Gaming Machines, Casino, State Lotteries codes, 3(3)(e) Wagering codes

⁸ 3(3)(f) Wagering codes only, 3(2)(g) Gaming Machines, Casino, State Lotteries codes

⁹ 3(3)(g) Wagering codes, 3(2)(h) Gaming Machines, Casino, State Lotteries codes

¹⁰ 3(3)(h) Wagering codes, 3(2)(i) Gaming Machines, Casino, State Lotteries codes

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<i>Clause No</i>	<i>Clause Description</i>	<i>Position</i>	<i>Comments</i>
3(3)(i) 3(2)(j) ¹¹	Must ensure when it advertises its product not to exaggerate the connection between gambling activity and the use to which the gambling provider's profits may be put	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
3(3)(j) ¹²	Must ensure when it advertises its product that it does not draw attention to any inducement to gamble.	<input checked="" type="checkbox"/> Retain	See comments above re 3.2.3 Inducements to gamble
3(2)(k) ¹³	Must ensure when it advertises its product does not refer to factors that may induce a person to engage in gambling, including prizes or benefits	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
3(3) ¹⁴	Provider must ensure when it advertises on radio or television that the advertising does not include sounds normally associated with the playing of gaming machines	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
4(a)	Refrain from advertising on radio between 6.00am and 8.30am Monday to Friday	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	

¹¹ 3(3)(i) Wagering codes, 3(2)(j) Gaming Machines, Casino, State Lotteries codes

¹² 3(3)(j) Wagering codes only

¹³ 3(2)(k) Gaming Machines code only

¹⁴ 3(3) gaming Machines and Casino codes only

Worksheet—2011 Codes of Practice Review—Advertising Code – SA TAB Pty Ltd submission

Clause No	Clause Description	Position	Comments
4(b)	Refrain from advertising on television between 4.00pm and 7.30pm Monday to Friday	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
5(1)(a)	Relying on the value or nature of the prize which is available, must include sufficient information to allow a reasonably informed person to understand the overall return	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
5(1)(b)	If advertising intends people to gamble during a particular period, must provide sufficient information to allow a reasonably informed person to appreciate how likely it is that the prize will be won	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
5(2)	If in seeking to comply with this clause, a gambling provider calculates the theoretical number, value and frequency of prizes to be won,	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
5(3)	Sub-clause (1)(a) does not apply to advertising a trade promotion lottery	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
6(1)	Definition and interpretations	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
	Condensed warning message	<input checked="" type="checkbox"/> Retain	See comments above re 3.2.6 <i>Mandatory warning messages</i>
	Expanded warning message	<input checked="" type="checkbox"/> Retain	See comments above re 3.2.6 <i>Mandatory warning messages</i>

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Clause No	Clause Description	Position	Comments
	Gambling area	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
	Gambling website	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
	Inducement to gamble	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
	Permitted external sign	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
	Plug	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
	Radio or television s	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
	Relevant expanded warning message	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
	Trade promotion lottery	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
6(2)	<p>A gambling provider will be regarded as advertising if the provider of radio or television runs a plug in exchange for a payment or some form of valuable consideration or</p> <p>If the radio or television provider includes content in exchange for a payment or for some other form of valuable consideration</p>	<input checked="" type="checkbox"/> Modify (<i>see comment</i>)	See comments above re 3.2.10 - sportsbetting advertising

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Clause No	Clause Description	Position	Comments
6(3)	Advertising will offend if it contains “win”, “\$” and that expression is not used in relation to a particular prize which has been determined or is payable or is a reasonable approximation or estimate of a prize.	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
6(4)	A message listed as an expanded warning message in the table in Schedule 1 is relevant for the period of 6 months listed	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
6(5)	Expiation designation	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
7	Operative dates and transitional provisions	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
8 ¹⁵	Application to agents	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	

¹⁵ SA TAB code only

**Worksheet—2011 Codes of Practice Review—Responsible Gambling Code
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<i>Clause No</i>	<i>Clause Description</i>	<i>Position</i>	<i>Comments</i>
1	Purpose	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
2(a)(i)	Message that are operations governed by a code	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
2(a)(ii)	Code must be available	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
2(b)(i)	Document detailing staff training and measures for intervention	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
2(b)(ii)	Roles of staff in implementing code	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
2A(1)	Intervention initiatives – clauses that do not apply if party to a responsible gambling agreement	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
2A(2)	Responsible gambling agreement	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
2A(3)	Compliance required as part of structured program of visitation	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
3	Abide by applicable laws and cooperate with regulatory bodies	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
4(1)(a)	Display on gaming machine of condensed warning	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	

Worksheet—2011 Codes of Practice Review—Responsible Gambling Code – SA TAB Pty Ltd submission

<i>Clause No</i>	<i>Clause Description</i>	<i>Position</i>	<i>Comments</i>
4(1)(b)	Display message in screen if capable	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
4(2)	Time of day is prominently displayed	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
4(3)	Ensure person plays no more than one machine at a time	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
4A(1)	Ensure it is not possible to see into gambling area	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
4A(2)	Ensure sounds associated with gambling are not audible in other areas	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
5(1)(a)	Display responsible gambling materials	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
5(1)(b)	Make responsible gambling material available in 5 languages	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
5(2)	Prominent display of condensed warning message and helpline sticker on or near ATM	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
5(3)	Take all reasonable steps to ensure that a patron who demonstrates difficulty has attention drawn to gambling referral services	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
5(3A)(a)	Gambling provider must identify a gambling rehabilitation agency	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	

Worksheet—2011 Codes of Practice Review—Responsible Gambling Code – SA TAB Pty Ltd submission

<i>Clause No</i>	<i>Clause Description</i>	<i>Position</i>	<i>Comments</i>
5(3A)(b)	Ensure staff are sufficiently informed about the gambling rehabilitation agency	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
5(3A)(c)	Ensure management level contact is established and maintained with gambling rehabilitation agency	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
5(4)	File with Authority and publish on website its responsible gambling materials	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
5(5)	Reinforce the responsible gambling policy in newsletters and other communications	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
5(6)	If member of peak body, must comply with subclause (4) to (5)	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
5A(1)	Coin only to be obtained from cashier or an automated coin dispensing machine where activity can be monitored	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
5A(2)	Ensure patron activity in automated coin dispensing machines is routinely monitored	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
6(1)(a)	Take all practicable steps to prevent a person from gambling if intoxicated or if the person's speech, balance, coordination or behaviour are impaired	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	

Worksheet—2011 Codes of Practice Review—Responsible Gambling Code – SA TAB Pty Ltd submission

Clause No	Clause Description	Position	Comments
6(1)(b)	Prevent entry to gambling area of intoxicated persons or if the person's speech, balance, coordination or behaviour are impaired	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
6(1)(c)	Ensure liquor is not supplied to reward, promote or encourage continued gambling	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
6(2)	Ensure the person is not served liquor while seated or standing at a gaming machine	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
6A(1)(a)	Must not offer any inducement (other than participation in an acceptable loyalty program) directed at encouraging patrons to gamble	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
6A(1)(b)	Must not offer participation in a loyalty program (other than an acceptable loyalty program which includes a pre-commitment program approved by the Authority)	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
6A(2)	This does not apply to offering an inducement in respect of a pre-commitment trial approved in writing by the Authority	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
7 gaming machines only	Establish and maintain a written procedure about children under 10yrs who are left unattended on premises or in the car park.	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	

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Clause No	Clause Description	Position	Comments
7 casino only	Recommendation to establish and maintain a written procedure about children under 10 years who are left unattended on premises or in the car park.	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
7 wagering (other than licensed racings clubs)	Offer pre-commitment in form of weekly (Sunday–Saturday) betting limit on account betting with denial of service when limit reached	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
	Requirement to provide activity statements, with periodicity (annual, quarterly or weekly) dependent on level of betting activity	<input checked="" type="checkbox"/> Modify (<i>see comment</i>)	<ul style="list-style-type: none"> the current requirement that a customer who has more than one transaction in each period of consecutive months (up to 3 calendar months) be sent an activity statement, would seem to be excessive given that the intent of the statements is to create an awareness of losses for account customers. SATAB considers that such a small number of bets over the period concerned (three in three months) hardly indicates a person at risk.
8(1)	Not able to cash a cheque in gambling area, unless the Authority gives an exemption	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
8(2)	Must, if requested, provide a cheque for undisputed prize, winnings or redemption of credits within 30 minutes	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	See comments above re 3.2.13 Cheques for winnings
8(3)	The Authority must fix a minimum period longer than 30 minutes for a cheque under sub-clause (2)	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	

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<i>Clause No</i>	<i>Clause Description</i>	<i>Position</i>	<i>Comments</i>
8A(1)	Must establish a reporting process in respect of the identification of suspected problem gamblers	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
8A(2)	Must ensure the gaming manager reviews records of suspected problem gamblers and documents steps taken	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
9(1)	Gambling provider must facilitate the indefinite voluntary exclusion of persons	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
9(2)	Must ensure that every approach by a person about self-exclusion is responded to whilst the person is on the premises	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
9(3)	Self exclusion to include translation service, immediate referral, review of self exclusion and removal of self excluded persons from loyalty database	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
9(4)	Must ensure that self-excluded persons are not allowed to enter or remain in gambling areas.	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
10(1)(a)	Ensure all approved employees receive problem gambling training which identifies problem gambling and advance training for intervention	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
10(1)(b)	Maintain staff competency	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	

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<i>Clause No</i>	<i>Clause Description</i>	<i>Position</i>	<i>Comments</i>
10(1)(c)	Include responsible gambling information in employee newsletters	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
10(1)(d)	Display responsible gambling material in back of house	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
10(2)	If use an external provider for training, must be appropriately accredited	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
10(3)	Problem gambling training program designed to provide information about potential effect, information on recognition and identification and ensure that the processes are clear and well understood	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
10(4)	Must ensure the training programs are regularly reviewed	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
10(5)	Must make arrangements for training program to be audited and provide a report to the Authority	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
10(6)	Must take reasonable steps to ensure that staff with a potential or actual gambling problem are identified and referred for treatment	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
10(7)	If provide training through an external provider, must comply with sub-clause (3), (4) and (5)	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	

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<i>Clause No</i>	<i>Clause Description</i>	<i>Position</i>	<i>Comments</i>
10(8)	If member of a peak body may comply with sub-clauses (3), (4) and (5) through activities of peak body	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
11	Definition and interpretations	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
	Acceptable loyalty program	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
	ATM	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
	Condensed warning message	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
	Expanded warning message	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
	Gambling area	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
	Gambling rules	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
	Gambling telephone line	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
	Gambling website	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
	Helpline card	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	

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<i>Clause No</i>	<i>Clause Description</i>	<i>Position</i>	<i>Comments</i>
	Helpline message	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
	Helpline sticker	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
	Inducement to gamble	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
	Peak body	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
	Relevant expanded warning message	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
	Trade promotion Lottery	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	
	Transition day	<input checked="" type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	