

7 October 2011
Independent Gambling Authority
Level 4, 45 Grenfell Street
Adelaide SA 5000

**South Australia Independent Gambling Authority's 2011
Code of Practice Review**

Attached is Sportsbet's Worksheet for the South Australia Independent Gambling Authority's (SAIGA) 2011 Codes of Practice Review.

Sportsbet is Australia's largest corporate bookmaker holding an estimated 20% of the online market in Australia and employing over 260 people. It is licensed by the Northern Territory Racing Commission and operates from the Northern Territory.

Sportsbet is also an Authorised Interstate Betting Operator under the SA Authorised Betting Operations Act 2000.

Sportsbet is pleased to contribute to the review of those parts of the SA Codes of Practice relevant to an Authorised Interstate Betting Operator from the perspective of a participant in what is a global online gambling market.

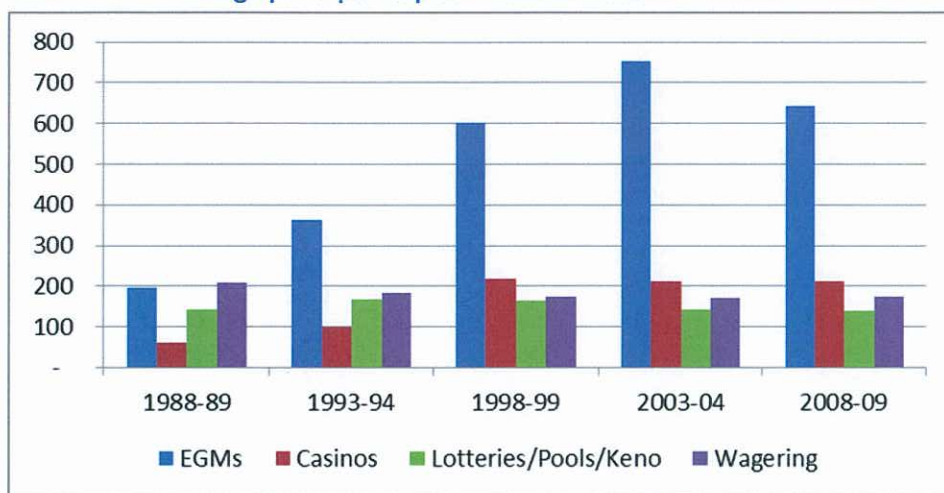
Sportsbet believes that a national framework is required to ensure a consistent regulatory approach across all Australian Territories and States. It seeks to encourage the IGA to work with its counterparts in other jurisdictions to move towards consistency of regulation. The attached Worksheet identifies some challenges which State-based regulation creates for participants in a global market.

Examples of different standards of regulation which national businesses such as Sportsbet face include the banning in some States of inducements to open a betting account, in others a ban on offering inducements to "participate" in gambling while other jurisdictions do not prohibit the offering of inducements of any kind. These differing standards of regulation complicate advertising, lead to higher advertising cost and create business and consumer uncertainty.

One of the concerns with such inducements and advertising is its impact on consumers and, more specifically, whether it has resulted in an increase in the prevalence of problem gambling.

While there has been an increase in marketing and advertising by corporate bookmakers in recent times, the real dollar per capita spend on wagering declined in the period 1989 to 2004 and showed only minimal growth between 2004 and 2009 (real spend per capital grew 1% but 2009 spend levels remain below those in 1999 before corporate bookmakers gained material market share). During the same period, the real dollar per capita spend on electronic gaming machines increased over 280 percent to its peak in 2004, before declining in 2009 as a result of the introduction of smoking bans in venues around Australia (Figure 12).

Figure 12 – Real Gambling Spend per Capita – 1989 to 2009¹



According to Frontier Economics:

“Consequently, while it is true that operators such as Sportsbet have increased their share of the market, it would be incorrect to infer that they have driven an increase in wagering overall. Rather, the flat per capita expenditure on wagering suggests that the growth of corporate bookmakers has been driven by substitution away from traditional wagering service providers.”²

This switching is the result of corporate bookmakers offering more favourable pricing, a greater variety of product and more innovation and ultimately results in consumers being better off. Sportsbet notes the Productivity Commission’s Finding 16.5:

“Productivity Commission: Finding 16.5

Offering inducements to wager through discounted prices to new customers is not necessarily harmful, it may primarily serve to reduce switching costs between incumbent wagering operators and new entrants, enhancing competition. The risks for problem gamblers should be assessed and, regardless of whether prohibition or

¹ Frontier Economics (2011), “Sportsbet submission to the Joint Select Committee on Gambling Reform, Economic Overview of Selected Issues”. Included in Appendix 2 of this submission

² Frontier Economics (2011), “Sportsbet submission to the Joint Select Committee on Gambling Reform, Economic Overview of Selected Issues”

*managed liberalisation is the appropriate action, a nationally consistent approach would be warranted*³

Sportsbet believes that when consideration is given to the lack of increase in real wagering spend per capita since the introduction of corporate bookmakers and the lifting of advertising prohibitions, it is clear that consumers are better off as a result of these events. As noted by Frontier Economics:

*“Promotional activities by new entrants will be pro-competitive, if undertaken on a sufficient scale. The Productivity Commission found that inducements may serve primarily to reduce the cost to consumers of switching from incumbents to new entrants, and could therefore be pro-competitive”.*⁴

Other examples of differing regulatory requirements addressed in the attached Worksheet include mandatory warning messages for advertisements published in South Australia despite Sportsbet's use of appropriate responsible gambling message approved by the Northern Territory Racing Commission in all of Sportsbet's advertising. Sportsbet urges mutual recognition of warning messages in advertising between States and Territories. Mutual recognition of responsible gambling staff training standards is also urged.

In relation to the IGA's review of sportsbetting advertising, Sportsbet has already made a submission to the Federal inquiry undertaken by the Minister for Broadband, Communications and Digital Economy in relation to the promotion of live betting odds during sporting broadcasts. The Company is keen to work in conjunction with State and Federal governments in determining new measures to strike the right balance between appropriately controlling the promotion of live odds while allowing adults to access betting odds information and participate in wagering with Australian licensed operators.

A balanced approach is critical when reviewing the promotion of live odds during broadcasts of sporting events for a number of reasons:

- Similar to horse racing, there is a long tradition of Australian adult's enjoying wagering on sports which needs to be protected. Sportsbet concurs with the Productivity Commission conclusion that *“Gambling is an enjoyable pursuit for many Australians. As much as possible, policy should aim to preserve the benefits, while targeting measures at gamblers facing significant risks or harm”* (Productivity Commission Inquiry Report, Gambling, Overview)
- Wagering on Sports (all bet types) represents less than 2% of the total gambling expenditure in Australia and live betting is an insignificant proportion of sportsbetting (Productivity Commission Inquiry report Gambling, pp2.5, Australian Fact book, 2004 to 2010 editions and Sportsbet estimates)

³ Inquiry Report *Gambling* (Productivity Commission, 2010) Recommendation 16.59

⁴ Frontier Economics (2011), “Sportsbet submission to the Joint Select Committee on Gambling Reform, Economic Overview of Selected Issues”. Included in Appendix 2 of this submission

- Wagering contributes significant economic benefits to Australia including considerable employment and tax revenues; and
- Wagering contributes significant revenues to the funding of racing and sporting organizations

In order to strike the right balance between concerns about the promotion of live odds, the ability of Australian's to access betting information and wagering operators' ability to operate their businesses, Sportsbet's policy position is:

- The advertising of live odds during "active play" should be prohibited during broadcasts of the match and within the match commentary of sporting events, regardless of the form the broadcast takes. This would include television and radio broadcasts, along with official streams of broadcasts via the internet or mobile devices.
- Sportsbet defines "active play" as the period where play is occurring. It does not include broadcast content prior to the start of the game or at scheduled breaks in play such as quarter time/half time/three-quarter time;
- Sportsbet believes that the integration of odds in pre-match coverage and coverage during scheduled breaks in play such as half-time provides valuable information to the viewer about the prospects of success and performance of match participants. Any restriction on the promotion of pre-match odds or updates during scheduled breaks in play would severely limit the ability of licensed wagering operators to promote their products and disrupt the long tradition of many Australians of analysing and discussing the match odds prior to play commencing;
- Allowing the promotion of betting odds pre-match and during scheduled breaks in play does not impact the ability of vulnerable people or children under the age of 18 to view the sporting event without exposure to betting odds information;
- Sportsbet believes that brand and product advertising should be allowed in advertising breaks during live play in line with current regulations and industry practice.

Sportsbet's view is that excessive prohibition of live odds display will negatively impact the industry in a number of significant ways including limiting the ability of wagering operators to grow their business which will in turn impact employment, reduce state and federal taxes and reduce product fees contributed to sporting bodies. There will also be a devaluing of broadcast rights of sporting bodies as media companies derive significant revenue from

licensed wagering operators for the rights to undertake the promotional activities. There will also be a limiting of competition in the market to the detriment of consumers.

Other than as noted above, Sportsbet contends that there should be no restriction on advertising, including advertising of live betting odds on any other websites, with the exception of websites targeting children less than 18 years of age. The consumption of this type of online content is elective and there is no "forced" viewing of live betting odds related to watching the matches or events online. It believes measures such as these would create considerable overhead in monitoring compliance and would likely be ineffective due to the vast number of websites which consumers can access. It is also noted that any attempt to prohibit the promotion of live odds information on the websites of licensed wagering operators or other information websites hosted in Australia will likely drive adult consumers to overseas media outlets which are not compliant with any Codes of Conduct relevant to the Australian market.

Sportsbet is happy to expand on any of the matters raised above or in the attached Worksheet.

Yours Sincerely



Ben Sleep
Chief Financial Officer
Sportsbet

Worksheets—2011 Codes of Practice Review

Instructions for Worksheets

The Authority has developed a set of worksheets covering the issues that the Authority wishes to see addressed and setting out the provisions of the Responsible Gambling and Advertising Codes of Practice.

These worksheets are provided to assist stakeholders in drawing together their comments and issues on the various matters and to allow the Authority to have a document that is an easy reference guide of stakeholders' positions. It is intended that stakeholders will submit the worksheet with their outlines of presentation.

The first two columns of the worksheets—*Reference and description*—set out the series of code issues from the guide or the clauses from the codes and provides a brief description of the issue or clause.

The third and fourth columns—*Position and Comments*—are for stakeholders to indicate their position in relation to whether they believe that the code clause should be retained as it currently is, be deleted from the code or be modified in some way. If you indicate that the clause should be modified please provide comment in relation to how you believe the clause should be changed.

The final column—*Notes*—is available for stakeholders to make their own notes in relation to the provisions under the codes. It is intended that when stakeholders submit the worksheet to the Authority, that they will remove the notes column. The worksheet will aid the Authority in collating information for stakeholders in relation to all aspects of the code.

Worksheet—2011 Codes of Practice Review—Issues to address

<i>Reference</i>	<i>Description</i>	<i>Comments</i>	<i>Notes</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"> Sportsbet contends that the current regulation in the Advertising (Authorised Interstate Betting Operators) Code of Practice with its focus on inducements to establish a betting account is an unnecessary advertising restriction however it also recognises that it is in line with existing laws in Vic, NSW and WA. Other States and Territories do not have such restrictions. No further regulation of inducements is warranted in the on-line gambling area given the sector accounts for only x% of the total gambling spend in Australia. To further regulate advertising is not warranted in the on-line gambling area and is not in the interests of competition and benefit to consumers. 	
3.2.4	Differential regulatory treatment		
3.2.5	Training	<ul style="list-style-type: none"> A nationally consistent approach is required so that interstate wagering operators authorised under SA legislation are not required to comply with differing requirements under different State and Territory Codes of conduct including in the area of staff training for responsible gambling. 	

Worksheet—2011 Codes of Practice Review—Issues to address

<i>Reference</i>	<i>Description</i>	<i>Comments</i>	<i>Notes</i>
3.2.6	Mandatory warning messages	<ul style="list-style-type: none"> • A nationally consistent approach to mandatory warning messages or alternatively recognition of warning messages endorsed by interstate gambling regulators is overdue. Many advertisements are broadcast nationally and cannot comply with every State or Territory regulator’s warning message requirements. Recognition that a variety of responsible gambling messages can be effective is preferable instead of requiring interstate wagering operator to seek a dispensation on a case-by-case basis. • Sportsbet recognises the importance of appropriate responsible gambling warnings in advertising and supports the requirement that they be appropriately placed and communicated in radio and print advertising. 	
3.2.7	In-venue reporting of problem gamblers		
3.2.8	Perimeter control		
3.2.9	Mandatory breaks in play (pop-up messaging)		

Worksheet—2011 Codes of Practice Review—Issues to address

Reference	Description	Comments	Notes
3.2.10	Sportsbetting advertising	<ul style="list-style-type: none"> • Sportsbet contends that there is a sensible balance to be struck between controlling the promotion of live-odds while allowing adults to access betting odds information. • Sportsbet believes that the right balance can be struck by banning of live-odds promotion <i>during</i> broadcasting of match ‘active play’ and within-match commentary of sporting events (including television, radio and official streams of broadcasts via the internet or mobile devices). A discrete restriction on advertising betting odds during live-play would enable the public including those under 18 to watch the actual sporting event without exposure to betting odds. • Live-odds should however be permitted prior to the start of a game and during scheduled breaks in play such as quarter time/half time etc. Restrictions on pre-match odds or updates during scheduled breaks in play would be a severe limitation on a wagering operator’s ability to promote its products as well as an unwarranted limitation on adults’ enjoyable pursuit of wagering activities. • Sportsbet contends that brand and product advertising (not live odds) should be allowed at any time in line with current regulations and industry practice. This includes at sporting venues such as on boundary signs. • It is not feasible to require an interstate operator complying with the licensing requirements of its State or Territory to attempt to tailor its website content to a myriad of other jurisdictions which may seek to also prescribe specific online content. Such an approach is not practical and is not a realistic response to the challenges of a national online wagering market. A national approach by State and Territory regulators as to advertising and responsible gambling guidelines is a sensible and appropriate response to the emergence of the online wagering operators. • Member-only pages of Sportsbet’s website should not be characterised as “advertising” for the purposes of the SA code. Members (by definition 18+) chose when they access the site. 	

Worksheet—2011 Codes of Practice Review—Issues to address

<i>Reference</i>	<i>Description</i>	<i>Comments</i>	<i>Notes</i>
3.2.11	Consolidating the wagering codes	Sportsbet supports the consolidation of the 3 wagering codes as an obvious and sensible step to simplify the identification of regulatory requirements within SA.	
3.2.12	Children's play areas		
3.2.13	Cheques for winnings		
3.2.14	Obligations for staff welfare		

Worksheet—2011 Codes of Practice Review—Advertising Code

<i>Clause No</i>	<i>Clause Description</i>	<i>Position</i>	<i>Comments</i>	<i>Notes</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 type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	National approach necessary. Refer comments in 3.2.3, 3.2.5, 3.2.6 and 3.2 10 above	
3(1A)¹ 3(2)²	Must ensure advertising includes relevant expanded warning message, if not reasonable or practicable, the condensed message	<input type="checkbox"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	National approach necessary. Refer comments in 3.2.3, 3.2.5, 3.2.6 and 3.2 10 above	

¹ Gaming Machine, Casino and State Lotteries codes

² Wagering codes

Worksheet—2011 Codes of Practice Review—Advertising Code

Clause No	Clause Description	Position	Comments	Notes
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

Clause No	Clause Description	Position	Comments	Notes
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	✓ Retain ✓ Delete ✓ 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	✓ Retain ✓ Delete ✓ 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	✓ Retain ✓ Delete ✓ 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	✓ Retain ✓ Delete ✓ 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

Worksheet—2011 Codes of Practice Review—Advertising Code

Clause No	Clause Description	Position	Comments	Notes
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 type="checkbox"/> Retain <input type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)	See comment in 3.2.3 above National approach preferred.	
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

<i>Clause No</i>	<i>Clause Description</i>	<i>Position</i>	<i>Comments</i>	<i>Notes</i>
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 <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>)		

Worksheet—2011 Codes of Practice Review—Advertising Code

<i>Clause No</i>	<i>Clause Description</i>	<i>Position</i>	<i>Comments</i>	<i>Notes</i>
	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)	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 If the radio or television provider includes content in exchange for a payment or for some other form of valuable consideration	<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—Advertising Code

<i>Clause No</i>	<i>Clause Description</i>	<i>Position</i>	<i>Comments</i>	<i>Notes</i>
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>)		
8¹⁵	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

<i>Clause No</i>	<i>Clause Description</i>	<i>Position</i>	<i>Comments</i>	<i>Notes</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

<i>Clause No</i>	<i>Clause Description</i>	<i>Position</i>	<i>Comments</i>	<i>Notes</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>)		

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<i>Clause No</i>	<i>Clause Description</i>	<i>Position</i>	<i>Comments</i>	<i>Notes</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>)		

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Clause No	Clause Description	Position	Comments	Notes
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 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 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 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 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 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 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 type="checkbox"/> Modify (<i>see comment</i>)		

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Clause No	Clause Description	Position	Comments	Notes
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"/> Retain <input checked="" type="checkbox"/> Delete <input checked="" type="checkbox"/> Modify (<i>see comment</i>)		
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>)		
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>)		
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>)		

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<i>Clause No</i>	<i>Clause Description</i>	<i>Position</i>	<i>Comments</i>	<i>Notes</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>)		
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>)		

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<i>Clause No</i>	<i>Clause Description</i>	<i>Position</i>	<i>Comments</i>	<i>Notes</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>)		
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>)		

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<i>Clause No</i>	<i>Clause Description</i>	<i>Position</i>	<i>Comments</i>	<i>Notes</i>
11	Definition and interpretations	✓ Retain ✓ Delete ✓ Modify (<i>see comment</i>)		
	Acceptable loyalty program	✓ Retain ✓ Delete ✓ Modify (<i>see comment</i>)		
	ATM	✓ Retain ✓ Delete ✓ Modify (<i>see comment</i>)		
	Condensed warning message	✓ Retain ✓ Delete ✓ Modify (<i>see comment</i>)		
	Expanded warning message	✓ Retain ✓ Delete ✓ Modify (<i>see comment</i>)		
	Gambling area	✓ Retain ✓ Delete ✓ Modify (<i>see comment</i>)		
	Gambling rules	✓ Retain ✓ Delete ✓ Modify (<i>see comment</i>)		
	Gambling telephone line	✓ Retain ✓ Delete ✓ Modify (<i>see comment</i>)		
	Gambling website	✓ Retain ✓ Delete ✓ Modify (<i>see comment</i>)		
	Helpline card	✓ Retain ✓ Delete ✓ Modify (<i>see comment</i>)		
	Helpline message	✓ Retain ✓ Delete ✓ Modify (<i>see comment</i>)		
	Helpline sticker	✓ Retain ✓ Delete ✓ Modify (<i>see comment</i>)		

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<i>Clause No</i>	<i>Clause Description</i>	<i>Position</i>	<i>Comments</i>	<i>Notes</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>)		