

## SCHEDULE / SUMMARY OF PROPOSED CHANGES TO LICENSED RACE CLUB RESPONSIBLE GAMBLING CODE OF PRACTICE

### 1. Purpose

No change.

### 2. Venue Responsible Gambling Charter

It is proposed that this clause be deleted as it has no practical application. However, if it is to remain we recommend the following:

- (a) That wherever the phrase "gambling area" appears, the phrase "Secretary's Office" is substituted.
- (b) TAB is providing intervention training for its staff. The oncourse totalizator is operated under contract by the TAB. The Race Club itself does not run the race meeting. In almost all situations the meeting is run under the control of the appropriate Code controlling body, eg TRSA. We submit that under the circumstances the clause should be deleted because the sanctions appear in the TAB Responsible Code of Practice and in relation to bookmakers are governed by the IGA in any event. Alternatively we submit that the relevant document/material should be kept in the Secretary's Office and that such document would comprise the training manual of the TAB and the name of the compliance officer of the applicable Code.

### 3. Legislation and Regulation

The Racing Industry would expect that this clause would remain in place.

### 4. Gambling Areas

- (1) The Industry is agreeable to this condition remaining in place.
- (2) Delete as it provides no effective application in a racing environment. This is particularly noticeable due to the very nature of horse racing being a time based sport, the natural timeframe between events and the fact that most totalizator monitors display the time of day in any case. Wagering ceases at each race meeting after the last race. Wagering on any one race ceases when the race starts. Each race and wagering thereon is based on commencing at a particular set time.
- (3) Racing does not believe that this clause is required in its current form and would be better being reworded that a copy of the Gambling Rules be available from the Secretary's Office upon request.

~~The IGA would take into account that the rules relating to gambling on the oncourse totalizator are registered with the Liquor and Gaming Commissioner under the *Authorised Betting Operations Act* in any event. Bookmakers rules and bookmakers themselves are subject to direction from the IGA.~~

## 5. Customer Information and Signage

- (1)(a) Racing supports this clause in particular applying to the main gambling area, however, believe that it should not apply to remote one-off totalizator situations which occur periodically and are generally to service patrons in a marquee situation which are usually not open to the general public. The fixed totalizator areas are more appropriate for prominent display materials.
- (1)(b) Racing supports this being retained.
- (2) Racing has no problem with continued compliance of Clauses (a) and (b). However, Racing submits that this should be the responsibility of the oncourse totalizator operator, namely the TAB and the bookmakers because they have the interface with the client. There are real practical difficulties for an individual Racing Club discharging this responsibility.
- (3) Racing has no issue with this clause however does question how a race club could absolutely identify someone demonstrating difficulty in controlling his or her personal expenditure and then how that approach could be made without breaching *Privacy Act*.
- (4) In our submission this clause should be deleted. The IGA will be aware that some racing clubs do not have websites. If the clause is to be retained then we suggest that it be amended to read that each code has responsible gambling materials published on its websites as opposed to each club (the gambling provider).
- (5) Racing has no issue with this clause being retained.

## 6. Alcohol and Gambling

The Racing Industry will use best endeavours to ensure continued compliance with this clause. It is common knowledge that identification of persons for each of the points in this clause is difficult to assess.

## 8. Cheques

Racing supports retention.

## 9. Self-exclusion Facility

Due to the periodic nature of racing activities by race clubs throughout the State, it is believed that this clause should not be applicable to licensed race clubs, perhaps with the exception of the major metropolitan club that has regular racing throughout the year, ie every Saturday.

## 10. Staff and Training

Racing has no problem with this clause and will continue to work with its contractor (SA TAB) to support the clause's objectives.