

Queensland responsible gambling Code of Practice

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Code of Practice

Produced by the Department of Justice and Attorney-General
www.business.qld.gov.au/liquor-gaming

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Introduction

Rationale

The *Queensland responsible gambling Code of Practice* (Code of Practice) provides a proactive whole-of-industry approach to the promotion of responsible gambling practices. It also encourages the continuation of best practice for gambling environments that minimise harm to individuals and to the broader community.

The Code of Practice supports and progresses the State Government's *Queensland responsible gambling strategy*, which aims to balance the social and economic benefits and costs of gambling. The Code of Practice draws upon industry commitment to best practice in the provision of responsible gambling.

What is responsible gambling?

Responsible gambling is the provision of safe, socially responsible and supportive gambling environments where the potential for harm associated with gambling is minimised and people can make informed decisions about their participation in gambling.

It occurs as a result of the collective actions and shared ownership of individuals, communities, the gambling industry and government.

What is problem gambling?

Problem gambling is characterised by difficulties in limiting money and/or time spent on gambling which leads to adverse consequences for the gambler, others, or for the community.

Guiding principle

The Code of Practice is based on shared commitment by gambling industry providers to the guiding principle of ethical and responsible behaviour. This principle recognises the importance of customers' wellbeing with a focus on minimising the potential harm of gambling. In addition, customers' rights to privacy are respected.

Outcomes

The Code of Practice aims to achieve the following outcomes:

- Individuals, communities, the gambling industry and the Government have a shared understanding of responsible gambling practices.

Practices

- Individuals, communities, the gambling industry and the Government have an understanding of their rights and responsibilities in relation to responsible gambling practices.
- The gambling industry provides safe and supportive environments for the delivery of gambling products and services.
- Customers make informed decisions about their gambling practices.
- Harm from gambling to individuals and the broader community is minimised.
- People adversely affected by gambling have access to timely and appropriate assistance and information.
- The gambling industry considers, and applies, principles of responsible gambling to all new and emerging technologies.

Accountability and review

All gambling providers within Queensland are responsible for ensuring their commitment with the relevant practices contained in the Code of Practice. Each gambling provider will maintain appropriate records relating to the practices in the Code of Practice.

While commitment to the Code of Practice is voluntary, there are practices that are also a legislative requirement. These practices must be complied with according to relevant legislation.

The Code of Practice will be monitored and evaluated regularly for its effectiveness and commitment by industry. Where appropriate minimum standards may be recommended and codified into legislation. The Queensland Government will retain the right to legislate in any area of gambling at any time.

Cultural and geographic diversity

In recognition of the diversity in Queensland, gambling providers have a responsibility to respond to the needs of their local communities.

Where appropriate, consideration needs to be given to ensuring people from culturally and linguistically diverse backgrounds have access to relevant prevention and protection measures contained in the Code of Practice.

In addition, it is recognised that people living in different geographic areas may have particular needs that gambling providers will take into account in implementing the Code of Practice, where appropriate.

The Code of Practice commits the gambling industry to implement and adhere to responsible gambling practices, with a particular focus on prevention and customer protection measures.

These practices are organised into the following broad categories:

1. Provision of information
2. Interaction with customers and community
3. Exclusion provisions
4. Physical environment
5. Financial transactions
6. Advertising and promotions.

In recognition of the diversity within the gambling industry, the Code of Practice acknowledges that some practices apply to all sectors of the industry while others apply only to particular sectors. The Appendix (p. 10) contains details of how these practices apply to each industry sector.

The Code of Practice is a dynamic document. It is anticipated that new practices will be developed in response to innovative best practice within the industry. Research into issues related to problem gambling and responsible gambling will also inform further development.

Practice 1

Provision of information

1.1 Potential risks

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

1.2 Available on request

Information is displayed in a prominent location to alert customers that the following information is available on request:

- *the gambling provider's Responsible gambling policy document including policies for addressing problem gambling issues relevant to the local community*
- *the nature of games, game rules, odds or returns to players*
- *exclusion provisions*
- *gambling-related complaint handling procedures*
- *key elements of the gambling provider's financial transaction practices.*

1.3 Odds of winning major prizes

Meaningful and accurate information on the odds of winning major prizes is prominently displayed in all gambling areas and in proximity to relevant games.

1.4 Predominant cultural groups

Gambling providers are to provide information and materials suitable for predominant cultural groups in their local community.

Practice 2

Interaction with customers and community

2.1 Community liaison

To support early intervention and prevention strategies where opportunities arise, gambling providers are to establish effective mechanisms to link with:

- *local gambling-related support services*
- *community networks where responsible gambling-related issues could be raised.*

2.2 Customer liaison role

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

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

2.3 Customer complaints

Complaint handling procedures that can deal with gambling issues are established and promoted by gambling providers.

2.4 Training and skills development

Mechanisms are established to ensure that appropriate and ongoing responsible gambling training is provided to staff who provide gambling products to customers.

In addition, the relevant owners, boards and managers receive appropriate information to guide decision making in relation to responsible gambling.

Practice 3

Exclusion provisions

Self-exclusions and venue-initiated exclusions for problem gambling

3.1 Exclusion procedures

Gambling providers to provide exclusion procedures and supporting documentation.

3.2 Contact information for support services

Gambling providers offer customers who seek exclusion contact information for gambling-related support services.

3.3 Exclusion from other gambling providers

Excluded customers are to be given support in seeking consensual exclusions from other gambling providers, where practicable.

3.4 Correspondence to excluded customers

Gambling providers must not distribute promotional or advertising material to persons who are self-excluded, been issued with an exclusion direction for problem gambling or are known to have formally requested that this information not be sent.

Practice 4

Physical environment

4.1 Minors prohibited

Minors are prohibited from gambling.

4.2 Minors excluded

Minors are prohibited from designated gambling areas.

4.3 Hospitality services

Provision of hospitality services in areas where gambling is provided is managed in such a way as to encourage customers to take breaks in play.

4.4 Unduly intoxicated customers

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

4.5 Child care and play areas

Where child play areas are provided, best efforts should be made to minimise exposure to areas where gambling activities are conducted. Where gambling providers offer adjunct child care, these facilities must provide safe and suitable standards of care in accordance with relevant child care legislation.

4.6 Gratuities

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

4.7 Passage of time

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

4.8 Breaks in play

Gambling providers implement practices to ensure that customers are discouraged from participating in extended, intensive and repetitive play.

4.9 New gambling products and services

Prior to the introduction of relevant new gambling products and services, including those which make use of emerging technology, consideration should be given as to the potential impact of the technology on responsible gambling behaviours.

Practice 5

Financial transactions

5.1 ATM facilities

ATMs are not to be located in close proximity to designated gambling areas, or in the entry to gambling areas, where safe and practicable.

5.2 Cashing of cheques and payment of winnings

Gambling providers are to establish a limit above which all winnings are paid by cheque or electronic transfer.

Gambling winnings above the set limit are paid by cheque and are not cashed on the gambling provider's premises until the next trading day or within 24 hours of the win.

The following cheques can be cashed only by prior arrangement:

- *cheques not made payable to the venue*
- *cheques not made payable to the person presenting the cheque*
- *multiple cheques.*

5.3 Credit betting (lending of money)

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

Practice 6

Advertising and promotions

Gambling providers are to develop and implement strategies to ensure advertising and promotions are delivered in a responsible manner with consideration given to the potential impact on people adversely affected by gambling.

6.1 Code of Ethics

Strategies will ensure that any advertising or promotion complies with the Code of Ethics as adopted by the Australian Association of National Advertisers.

6.2 False, misleading or deceptive

Strategies will ensure that any advertising or promotion is not false, misleading or deceptive.

6.3 Misrepresentation of probabilities

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

6.4 Reasonable strategy (financial betterment)

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

6.5 Misleading statements

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

6.6 Community standards

Strategies will ensure that any advertising or promotion does not offend prevailing community standards.

6.7 Other activities to promote

Strategies will ensure that any advertising or promotion does not focus exclusively on gambling, where there are other activities to promote.

6.8 Minors or vulnerable or disadvantaged groups

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

6.9 External signs

Strategies will ensure that any advertising or promotion does not involve any external signs advising of winnings paid.

6.10 Irresponsible trading practices

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

6.11 Consumption of alcohol

Strategies will ensure that any advertising or promotion does not promote the consumption of alcohol while engaged in the activity of gambling.

6.12 Consent of the person

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

6.13 Responsible gambling messages

Strategies will ensure that any advertising or promotion incorporates responsible gambling messages (where applicable).

Common terms

Application for self-exclusion

A document executed by an individual by which the person prohibits themselves from specific gambling products, services or gambling areas of particular gambling providers.

Charitable and non-profit activities

Includes bingo, Calcutta sweeps, lucky envelopes, promotional games and art unions (such as silver circles, football doubles, sweeps, cent auctions and lucky door prizes).

Credit betting

The provision of credit or the lending of monies by a gambling provider for the purpose of gambling.

Exclusion

A prohibition against a person from specific gambling products, services or gambling areas of particular gambling providers. Under legislation, all gambling providers (with the exception of lotteries, bingo, and charitable and not-for-profit gambling providers) are responsible for actively enforcing exclusion procedures with customers.

Exclusion direction

Otherwise known as a venue-initiated exclusion, it is issued by a gambling provider and prohibits an individual from specific gambling products, services or gambling areas.

Gambling

Gambling involves staking money on uncertain events driven by chance or a combination of chance and skill. The major forms of gambling are wagering and gaming.

Gambling areas

Areas in which authorised gambling products or services are provided.

Gambling product/service

Any gambling activity or scheme authorised under a gaming or wagering Act.

Gambling providers

Gambling providers that conduct legal forms of gambling, including electronic gaming machines (pokies), casino table games, wagering, interactive gambling, lotteries, keno and minor gaming.

Gaming

All legal forms of gambling other than wagering. Gaming includes electronic gaming machines (pokies), casino table games, interactive gambling, lotteries, keno and minor gaming.

Gaming product

A gaming product is defined under s. 110 of the *Charitable and Non-Profit Gaming Act 1999*.

Irresponsible trading practice

The offering of an inappropriate enticement or inducement to customers, that is in conflict with the objective of maximising responsible gambling and minimising problem gambling.

Liquor

Liquor is defined under s. 4B of the *Liquor Act 1992*.

Minor gaming

Encompasses charitable and non-profit gaming, including art unions, bingo, lucky envelopes, raffles and the like.

Odds

The likelihood of a particular outcome or event occurring.

Problem gambling

Problem gambling is characterised by difficulties in limiting money and/or time spent on gambling which leads to adverse consequences for the gambler, others, or for the community.

Responsible gambling

Responsible gambling is the provision of safe, socially responsible and supportive gambling environments where the potential for harm associated with gambling is minimised and people can make informed decisions about their participation in gambling. It occurs as a result of the collective actions and shared ownership of individuals, communities, the gambling industry and government.

Return to player

Return to player (RTP) is the theoretical percentage obtained by dividing the sum of prizes from all possible game outcomes by the sum of all bets.

Safe and supportive gambling environment

An environment where the benefits to all participants are maximised and the potential harm of gambling is minimised.

Self-exclusion

A prohibition from specific gambling products, services or gambling areas of particular gambling providers sought by an individual against themselves.

Unduly intoxicated

The *Liquor Act 1992* s.9A provides that a person may be taken to be unduly intoxicated if—

- the person's speech, balance, coordination or behaviour is noticeably affected; and
- there are reasonable grounds for believing the affected speech, balance, coordination or behaviour is the result of the consumption of liquor, drugs or another intoxicating substance.

Wagering

Placing a bet on the outcome of racing, sport or other events covered by totalisators or licensed bookmakers.

Winnings

The amount of money won on a gambling product or service.

Supporting documents

The Code of Practice is supported by:

- the *Queensland responsible gambling resource manual* (Resource manual)
- training provided for each industry sector as applicable for the sector
- the gambling provider's Responsible gambling policy document.

Queensland responsible gambling resource manual

The Resource manual was developed in collaboration with gambling industry sectors as a tool to assist gambling providers to implement the requirements of the Code of Practice. Each industry sector will maintain their section of the Resource manual and provide changes to the Responsible Gambling Advisory Committee (RGAC) for noting. The Resource manual includes:

- guidance for gambling providers to develop and implement their Responsible gambling policy
- examples of practices that conform to industry best practice
- an outline of responsible gambling strategies specific to each sector of the industry, based upon the practices of the Code of Practice.

Responsible gambling policy

Each gambling provider will develop a Responsible gambling policy document. This document will be specific to their operations to:

- assist in creating a responsible gambling environment that meets the needs of customers, with a particular focus on customers and their families who are adversely affected by problem gambling behaviour
- provide a clear statement of responsibilities for gambling providers and their staff
- give consideration to the needs of their local communities with a particular focus on any geographic and cultural issues.

The Responsible gambling policy document will:

- consider the customers' rights to privacy
- support the continued maintenance of the Code of Practice.

Principal regulatory framework

The following is a list of each sector within the gambling industry and the relevant legislation to which it relates:

- **Casino**
Casino Control Act 1982
- **Charitable and non-profit** (includes Bingo)
Charitable and Non-Profit Gaming Act 1999
- **Clubs and hotels** (with gaming machines)
Gaming Machine Act 1991
- **Interactive**
Interactive Gambling (Player Protection) Act 1998
- **Keno**
Keno Act 1996
- **Lotteries**
Lotteries Act 1997
- **Wagering** (includes Racing and TAB)
Wagering Act 1998

Further information

For further information please visit
www.business.qld.gov.au/liquor-gaming

Acknowledgements

The RGAC comprises of representatives from the community, gambling industry and Queensland Government and provides advice on responsible and problem gambling-related issues to the Minister responsible for gambling in Queensland. The RGAC provides a forum to develop ethical and responsible approaches to gambling.

The committee is recognised in the Queensland responsible gambling strategy as playing a key role in the Government's approach to responsible gambling and is a significant source of advice to the State Government on emerging social concerns associated with gambling in Queensland.

The Code of Practice has been developed and updated by a working party comprising of representatives from the RGAC.

Appendix

The following tables outline which responsible gambling practices apply to the different types of gambling:

Charitable and non-profit (Category 3)—excludes Bingo	✓ required ✗ not required and/or not applicable
Bingo (Category 2)	gross proceeds more than \$50,000 gross proceeds more than \$2000 but not more than \$20,000

Responsible gambling practice	Industry sectors							
	Bingo	Casino	Charitable and non-profit (excluding Bingo)	Gaming machine areas in clubs and hotels	Interactive	Keno	Lotteries	Wagering
1 Provision of information								
1.1 Information about the potential risks associated with gambling and where to get help for problem gambling is prominently displayed in all gambling areas and near any cash out facilities which service gambling areas	✓	✓	✓ Category 3 only	✓	✓	✓	✓	✓
1.2 Information is displayed in a prominent location to alert customers that the following information is available on request:								
<ul style="list-style-type: none"> the gambling provider's Responsible gambling policy document including policies for addressing problem gambling issues relevant to the local community 	✓ Category 2 only	✓	✓ Category 3 only	✓	✓	✓	✓	✓
<ul style="list-style-type: none"> the nature of games, game rules, odds or returns to players 	✓ Category 2 only	✓	✓ Category 3 only	✓	✓	✓	✓	✓
<ul style="list-style-type: none"> exclusion provisions 	✗	✓	✗	✓	✓	✓	✓	✓
<ul style="list-style-type: none"> gambling-related complaint handling procedures 	✓	✓	✓	✓	✓	✓	✓	✓
<ul style="list-style-type: none"> key elements of the gambling provider's financial transaction practices 	✓ Category 2 only	✓	✓ Category 3 only	✓	✓	✓	✓	✓
1.3 Meaningful and accurate information on the odds of winning major prizes is prominently displayed in all gambling areas and in proximity to relevant games	✓ Category 2 only	✓	✓ Category 3 only	✓	✓	✓	✓	✓
1.4 Gambling providers are to provide information and materials suitable for predominant cultural groups in their local community	✓ Category 2 only	✓	✓ Category 3 only	✓	✓	✓	✓	✓

				✓ required					
				✗ not required and/or not applicable					
				Charitable and non-profit (Category 3)—excludes Bingo	gross proceeds more than \$50,000				
				Bingo (Category 2)	gross proceeds more than \$2000 but not more than \$20,000				
Responsible gambling practice		Industry sectors							
2 Interaction with customers and community		Bingo	Casino	Charitable and non-profit (excluding Bingo)	Gaming machine areas in clubs and hotels	Interactive	Keno	Lotteries	Wagering
2.1	To support early intervention and prevention strategies where opportunities arise, gambling providers are to establish effective mechanisms to link with: <ul style="list-style-type: none"> • local gambling-related support services • community networks where responsible gambling-related issues could be raised 	✓ Category 2 only	✓	✓ Category 3 only	✓	✗	✓	✓	✓
2.2	Gambling providers are to nominate a person/s to perform the customer liaison role and who is to: <ul style="list-style-type: none"> • be available during approved opening gaming hours • provide appropriate information to assist customers with gambling-related problems • support staff in providing assistance to those customers • provide assistance to staff with gambling-related problems • develop linkages with local community groups where opportunities arise 	✓ Category 2 only	✓	✓ Category 3 only	✓	✓	✓	✓	✓
2.3	Complaint handling procedures that can deal with gambling issues are established and promoted by gambling providers	✓ Category 2 only	✓	✓ Category 3 only	✓	✓	✓	✓	✓
2.4	Mechanisms are established to ensure that appropriate and ongoing responsible gambling training is provided to staff who provide gambling products to customers. In addition, the relevant owners, boards and managers receive appropriate information to guide decision making in relation to responsible gambling	✓ Category 2 only	✓	✓ Category 3 only	✓	✓	✓	✓	✓

✓	required
✗	not required and/or not applicable
Charitable and non-profit (Category 3)—excludes Bingo	gross proceeds more than \$50,000
Bingo (Category 2)	gross proceeds more than \$2000 but not more than \$20,000

<i>Responsible gambling practice</i>		<i>Industry sectors</i>							
3 Exclusion provisions (self-exclusions and venue-initiated exclusions for problem gambling)		Charitable and non-profit (excluding Bingo)			Gaming machine areas in clubs and hotels				
		Bingo	Casino	Charitable and non-profit (excluding Bingo)	Interactive	Keno	Lotteries	Wagering	
3.1	Gambling providers to provide exclusion procedures and supporting documentation	✓ Category 2 only	✓	✗	✓	✓	✓	✗	✓
3.2	Gambling providers offer customers who seek exclusion contact information for gambling-related support services	✓ Category 2 only	✓	✗	✓	✓	✓	✓	✓
3.3	Excluded customers are to be given support in seeking consensual exclusions from other gambling providers, where practicable	✗	✓	✗	✓	✓	✓	✗	✓
3.4	Gambling providers must not distribute promotional or advertising material to persons who are self-excluded, been issued with an exclusion direction for problem gambling or are known to have formally requested that this information not be sent	✓	✓	✓	✓	✓	✓	✓	✓

✓	required
✗	not required and/or not applicable
▲	if a prize includes liquor/gaming products, minors cannot be sold tickets
Charitable and non-profit (Category 3)—excludes Bingo	gross proceeds more than \$50,000
Bingo (Category 2)	gross proceeds more than \$2000 but not more than \$20,000

Responsible gambling practice	Industry sectors							
	Bingo	Casino	Charitable and non-profit (excluding Bingo)	Gaming machine areas in clubs and hotels	Interactive	Keno	Lotteries	Wagering
4 Physical environment								
4.1 Minors are prohibited from gambling	▲	✓	▲	✓	✓	✓	✓	✓
4.2 Minors are prohibited from designated gambling areas	✗	✓	✗	✓	✗	✗	✗	✗
4.3 Provision of hospitality services in areas where gambling is provided is managed in such a way as to encourage customers to take breaks in play	✗	✓	✗	✓	✗	✓	✗	✓
4.4 Customers who are unduly intoxicated are not permitted to continue gambling	✓	✓	✓	✓	✗	✓	✓	✓
4.5 Where child play areas are provided, best efforts should be made to minimise exposure to areas where gambling activities are conducted Where gambling providers offer adjunct child care, these facilities must provide safe and suitable standards of care in accordance with relevant child care legislation	✗	✓	✗	✓	✗	✓	✗	✓
4.6 Staff working in gambling areas are not to encourage gambling customers to give them gratuities	✓	✓	✓	✓	✓	✓	✓	✓
4.7 Gambling providers implement practices to ensure that customers are made aware of the passage of time	✗	✓	✗	✓	✓	✓	✗	✓
4.8 Gambling providers implement practices to ensure that customers are discouraged from participating in extended, intensive and repetitive play	✗	✓	✗	✓	✓	✓	✗	✓
4.9 Prior to the introduction of relevant new gambling products and services, including those which make use of emerging technology, consideration should be given as to the potential impact of the technology on responsible gambling behaviours	✓	✓	✓	✓	✓	✓	✓	✓

		✓ required ✗ not required and/or not applicable		Charitable and non-profit (Category 3)—excludes Bingo		Bingo (Category 2)			
				gross proceeds more than \$50,000		gross proceeds more than \$2000 but not more than \$20,000			
Responsible gambling practice		Industry sectors							
5 Financial transactions		Bingo	Casino	Charitable and non-profit (excluding Bingo)	Gaming machine areas in clubs and hotels	Interactive	Keno	Lotteries	Wagering
5.1	ATMs are not to be located in close proximity to designated gambling areas, or in the entry to gambling areas, where safe and practicable	✗	✓	✗	✓	✗	✓	✗	✓
5.2	Gambling providers are to establish a limit above which all winnings are paid by cheque or electronic transfer	✓	✓	✓	✓	✓	✓	✓	✓ except bookmakers
	Gambling winnings above the set limit are paid by cheque and are not cashed on the gambling provider's premises until the next trading day or within 24 hours of the win	✓	✓	✓	✓	✓	✓	✓	✓ except bookmakers
	The following cheques can be cashed only by prior arrangement: <ul style="list-style-type: none"> cheques not made payable to the venue cheques not made payable to the person presenting the cheque multiple cheques 	✓	✓	✓	✓	✗	✓	✓	✓
5.3	Gambling providers are not to provide credit or lend money to anyone for the purpose of gambling	✓	✓	✓	✓	✓	✓	✓	✓ except bookmakers

✓	required
✗	not required and/or not applicable
Charitable and non-profit (Category 3)—excludes Bingo	gross proceeds more than \$50,000
Bingo (Category 2)	gross proceeds more than \$2000 but not more than \$20,000

<i>Responsible gambling practice</i>		<i>Industry sectors</i>							
		Bingo	Casino	Charitable and non-profit (excluding Bingo)	Gaming machine areas in clubs and hotels	Interactive	Keno	Lotteries	Wagering
6 Advertising and promotions									
6.1	Complies with the Code of Ethics as adopted by the Australian Association of National Advertisers	✓	✓	✓	✓	✓	✓	✓	✓
6.2	Is not false, misleading or deceptive	✓	✓	✓	✓	✓	✓	✓	✓
6.3	Does not implicitly or explicitly misrepresent the probability of winning a prize	✓	✓	✓	✓	✓	✓	✓	✓
6.4	Does not give the impression that gambling is a reasonable strategy for financial betterment	✓	✓	✓	✓	✓	✓	✓	✓
6.5	Does not include misleading statements about odds, prizes or chances of winning	✓	✓	✓	✓	✓	✓	✓	✓
6.6	Does not offend prevailing community standards	✓	✓	✓	✓	✓	✓	✓	✓
6.7	Does not focus exclusively on gambling, where there are other activities to promote	✗	✓	✗	✓	✓	✓	✗	✓
6.8	Is not implicitly or explicitly directed at minors or vulnerable or disadvantaged groups	✓	✓	✓	✓	✓	✓	✓	✓
6.9	Does not involve any external signs advising of winnings paid	✗	✓	✗	✓	✓	✓	✗	✓
6.10	Does not involve any irresponsible trading practices by the gambling provider	✓	✓	✓	✓	✓	✓	✓	✓
6.11	Does not promote the consumption of alcohol while engaged in the activity of gambling	✓	✓	✓	✓	✓	✓	✓	✓
6.12	Has the consent of the person prior to publishing or causing to be published anything which identifies a person who has won a prize	✓	✓	✓	✓	✓	✓	✓	✓
6.13	Incorporates responsible gambling messages, where applicable	✓	✓	✓	✓	✓	✓	✓	✓