

Queensland Responsible Gambling

Guidelines for Player Loyalty Programs



Addendum to
the Queensland
Responsible Gambling
Advertising and
Promotions Guideline
(March 2005)

Guidelines to support the implementation of the
*Queensland Responsible Gambling
Code of Practice*

August 2007

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Preamble

The *Queensland Responsible Gambling Advertising and Promotions Guideline*, March 2005 (the Advertising Guideline) was developed by a sub-committee of the Responsible Gambling Advisory Committee (RGAC) known as the Advertising and Promotions Working Party (the Advertising Working Party). The Advertising Guideline, released in March 2005, was developed to support the gambling industry in implementing Section 6 of the *Queensland Responsible Gambling Code of Practice* – ‘Advertising and Promotions’.

At that time, the various functions and features of Player Loyalty Programs (PLPs) were excluded from the Advertising Guideline. In March 2005, the RGAC agreed that specific guidelines should be developed by the Advertising Working Party relating to the functions and features of PLPs. It is likely that these PLP guidelines will be incorporated within the broader Advertising Guideline at some future point in time. The Guidelines for PLPs are intended to support the *Queensland Responsible Gambling Code of Practice* (Code of Practice) where the functions and features of PLPs are concerned.

Scope

The *Guidelines for Player Loyalty Programs* (the PLP Guidelines) are intended to apply to Player Loyalty Programs in all sectors of gambling in Queensland.

The *Guidelines for Player Loyalty Programs* are to be used in conjunction with all other regulatory requirements for the conduct of gambling in Queensland.

Accountability and Review

All gambling providers and Player Loyalty Program system providers (including, where applicable, Licensed Monitoring Operators or LMOs) are responsible for the application of the *Guidelines for Player Loyalty Programs*.

The Code of Practice (including the Advertising Guideline and the *Guidelines for Player Loyalty Programs*) will be independently monitored and evaluated regularly for its effectiveness. Following a review of voluntary commitment with the Code of Practice, minimum standards may be recommended and, where appropriate, codified into legislation.

Adherence to the specific guidelines for PLPs does not absolve a gambling provider from observing the broader Advertising Guideline. In other words, the Advertising Guideline document applies where a venue is advertising or promoting their venue’s PLP.

Practices

The practices in the Code of Practice’s “Advertising and promotions” section are aimed at ensuring advertising and promotions are delivered in a responsible manner with consideration given to the potential impact on people adversely affected by gambling. The practices in the Advertising Guideline commit the gambling industry to ensure that any advertising or promotion:

- 6.1 complies with the Advertising 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 depict or 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 where appropriate, positive responsible gambling messages are incorporated in advertising and promotion.

The actual advertising and promotion of a PLP should comply with the broader Advertising Guideline.

The actual components or functions of a PLP, itself, should comply with these PLP Guidelines.

Implementing the Guidelines for Player Loyalty Programs

The *Queensland Responsible Gambling Code of Practice* defines responsible gambling as follows:

Responsible gambling occurs in a regulated environment where the potential for harm associated with gambling is minimised and people make informed decisions about their participation in gambling. Responsible gambling occurs as a result of the collective actions and shared ownership by individuals, communities, the gambling industry and the Government to achieve outcomes that are socially responsible and responsive to community concerns.

PLPs should be advertised and promoted (like any other gambling product or service) in such a way as to encourage gambling as a form of leisure and entertainment which a person must be prepared to pay for, with money spent on gambling being an ‘entertainment cost’ – ie. as fun and enjoyable, if engaged in responsibly.

The following PLP Guidelines outline “acceptable” and “unacceptable” practices where the specific aspects and functions of the PLP itself are concerned.

At all times, consideration should be given to the potential impact of particular aspects of a PLP on a person with a problem with gambling, or at risk of developing a gambling problem¹. If future research is able to identify correlates for problem gambling (that can be used to build a profile that may assist in identifying those at risk of developing gambling problems) then these research findings may lead to discussions around the possible modification or updating of these PLP Guidelines.

Player Loyalty Program practices

Some of the following practices relating to the functionality of a PLP resemble some of the practices in the broader Advertising Guideline (ie. where these practices are judged applicable or relevant to specific aspects of PLPs). Other (new) practices may have been included to directly address PLP features or functions.

¹ Correlates for problem gambling may be identified by research such as the Queensland Gambling Household Survey. Some possible correlates are outlined in Appendix 3 of the Advertising and Promotion Guidelines.

The appendices provide further information including industry examples of Player Loyalty Program practices that support the spirit of the Code of Practice and examples of Player Loyalty Program practices that do not support the Code of Practice. Although the appendices have provided examples for specific industry groups, industry groups are not limited by these examples as some examples may be a useful guide across different industry groups and will assist in gaining a wider perspective on the practices.

Practice 1

Advertising or promotion of a PLP within the wider community complies with the Queensland Responsible Gambling Advertising and Promotions Guideline (March 2005).

Practice 2

Direct marketing practices comply with the Australian Direct Marketing Association (ADMA) Direct Marketing Code of Practice.

Practice 3

Registration process provides relevant information for the consumer to make informed decisions regarding their participation in the PLP.

Practice 4

PLP features and functions do not offend prevailing community standards.

Practice 5

PLP reward point accrual and redemption mechanisms do not focus exclusively on gambling activities where other venue activities are available, where practicable.

Practice 6

PLP features and functions are not implicitly or explicitly directed at minors or vulnerable or disadvantaged groups.

Practice 7

PLP features and functions do not involve any irresponsible trading practices by the gambling provider.

The Code of Practice defines irresponsible trading practices as:

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

Irresponsible trading practices are actions designed to persuade an individual to gamble in an excessive and irresponsible manner by offering inappropriate inducements. Such inducements may involve

individuals who are persuaded to gamble who, in the absence of an inappropriate inducement, would not have otherwise gambled. This may result in individuals being persuaded to gamble for longer periods of time and in a more excessive and irresponsible manner than they otherwise would have done. Inappropriate inducements therefore have the potential to impact on people who are at risk of, or have, a gambling problem.

Practice 8

Where appropriate and possible, positive responsible gambling messages are to be incorporated in PLP features and functions.

Practice 9

PLPs must comply with the Exclusions Framework.

Industry Examples: Acceptable and Unacceptable Practices

The following Appendices outline Industry Examples of Acceptable and Unacceptable Practices:

- Appendix One – Hotels and Clubs
- Appendix Two – Casino
- Appendix Three – Lotteries
- Appendix Four – UNITAB.

Glossary of terms

“Player Loyalty Program (PLP)” means a system or program designed to build player loyalty, by suitably and responsibly recognising and rewarding its members for their loyalty to the organisation and / or its products.

“Inducements” means things that are offered to persuade a person to gamble. For example:

- prizes or gifts directly linked to winning a particular game
- promotions conditional to a person gambling
- offer of free credit to customers or potential customers.

“PLP features and functions” means the elements of the PLP itself – these can include:

- the promotional and operational functionality of a PLP system (eg. ability to scroll electronic messages across a sandwich card reader screen)
- the side promotions undertaken at a venue associated with PLP membership
- the direct marketing materials associated with a PLP.

Queensland Responsible Gambling Guidelines for Player Loyalty Programs

Appendum to the Queensland Responsible Gambling Advertising & Promotions Guideline (March 2005)

Appendix one – hotels and clubs

As with the Advertising and Promotions Guideline, consideration should be given to the potential impact of the Player Loyalty Program on a person with a gambling problem.

Practice	Acceptable practices	Unacceptable practices
1. Advertising/promotion of PLP complies with Queensland Responsible Gambling Advertising and Promotions Guideline (March 2005).	Any advertising or promotion aligns with the <i>Queensland Responsible Gambling Advertising and Promotions Guideline (March 2005)</i> . Advertising of PLPs that accrues points across multiple of venue activities. <u>For example</u> -“ <i>Earn Bonus Points when you spend at our bars, bistro, gaming room, and bottle shop</i> ”.	Developing advertising or promotional material that contradicts the <i>Queensland Responsible Gambling Advertising and Promotions Guideline (March 2005)</i> . <u>For example</u> - <i>The PLP is the dominant feature of advertising where the PLP does not accrue points across multiple venue activities but only gambling.</i>
2. PLP direct marketing practices comply with ADMA Direct Marketing Code of Practice.	Any advertising or promotion aligns with the ADMA Direct Marketing Code of Practice. PLP has the ability to recognise which patrons would like to receive gaming promotional material. <u>For example</u> -“ <i>You may choose to opt-in or opt-out of receiving our newsletter or other promotional material at any time. You will never receive information if you don’t want to</i> ”.	Developing advertising or promotional material that contradicts the ADMA Direct Marketing Code of Practice. <u>For example</u> - <i>The PLP does not have the ability to recognise which patrons would like to receive gaming promotional material.</i>
3. PLP registration process provides relevant information for consumer to make informed decisions regarding their participation in the PLP.	a) Any registration materials, and any statement, phrase or inclusion in any registration materials, is based on fact and will not mislead or deceive, or is not likely to be misleading or deceptive. b) Any registration materials to include terms and conditions of participation in the PLP. c) Provide company’s privacy information policy on request. <u>For example</u> – “ <i>Our loyalty club’s Terms & Conditions can be found on the back of our application form, and a copy of our Privacy Policy is available at any time- just ask us</i> ”.	a) Any registration materials that are not based on fact. b) Any registration materials that mislead or deceive, or are likely to mislead or deceive. <u>For example</u> – “ <i>The loyalty club with the greatest rewards in the world</i> ”. <u>For example</u> – <i>Not supplying Terms & Conditions of membership upon joining.</i>
4. PLP features and functions do not offend prevailing community standards.	PLP features and functions which support prevailing community standards in providing a responsible gambling culture and environment. <u>For example</u> -“ <i>We take great pride in providing you with gambling entertainment and continually seek to raise our own standards and maintain those of our industry</i> ”. <u>For example</u> -“ <i>We support the responsible service of alcohol and all prizes of liquor will be issued from our bottle shop for off-premise (takeaway) consumption only</i> ”.	a) PLP features and functions which involve minors or any person reasonably construed as being under 18 years, in any stage or aspect of gambling. <u>For example</u> – <i>Using images of children in or near gambling areas, or imagery associated with and appealing to children in PLP campaigns.</i> b) PLP features and functions which may offend people from different religious or ethnic backgrounds. c) PLP features and functions which are linked to irresponsible service of alcohol. <u>For example</u> – “ <i>Win six Tequila Slammers- valid for day of issue only</i> ”. d) PLP features and functions which are sexually explicit or provocative in nature. e) PLP features and functions which may offend minority groups. <u>For example</u> – <i>Using racist or sexist language and imagery.</i>

Queensland Responsible Gambling Guidelines for Player Loyalty Programs

Appendum to the Queensland Responsible Gambling Advertising & Promotions Guideline (March 2005)

Appendix one – hotels and clubs - continued

Practice	Acceptable practices	Unacceptable practices
5. PLP reward point accrual or redemption mechanisms do not focus exclusively on gambling activities where other venue activities are available, where practicable.	<p>a) PLP reward point accrual or redemption mechanisms link with other venue activities where available and practicable. <i>For example</i> – “Redeem your Reward Points in our bistro, bars, and bottle shop. Gift certificates also available”.</p> <p>b) Ensure cash vouchers have no reference to gambling. <i>For example</i> – “Redeem your rewards points for club/hotel/venue dollars”.</p> <p>c) Members redeem their loyalty points away from a gaming machine.</p>	<p>a) Redemption of points for gaming credits only. <i>For example</i> – “Rewards Points can only be redeemed for \$10 Pokie Cash Vouchers”.</p> <p>b) Using gambling references with cash vouchers. <i>For example</i> – “Redeem your rewards points for Pokie Cash”.</p> <p>c) Members can redeem their loyalty points without leaving a gaming machine.</p>
6. PLP features or functions are not implicitly or explicitly directed at minors or vulnerable or disadvantaged groups.	<p>a) Any PLP material is aimed at adults over 18 years of age.</p> <p>b) Ensuring any PLP material is not directly sent to an excluded patron or a person who has requested such material not be sent. <i>For example</i> – “We understand if you do not wish to receive our promotional material. Our staff recognise the importance of making sure this will never happen”.</p>	<p>a) Any PLP material which contains graphics, imagery or text which would ordinarily attract minors or disadvantaged groups. <i>For example</i> – Prizes that may attract minors (e.g. video games aimed specifically at attracting children). <i>For example</i> – Cartoon-related theme for rewards advertisement or ‘Down & Out Winners Club’.</p>
7. PLP features or functions do not involve any irresponsible trading practices by the gambling provider.	<p>a) PLP features or functions which encourage the use of all the venue’s facilities and services.</p> <p>b) PLP features or functions which promote a range of venue facilities and services. <i>For example</i> – “Earn Bonus Points when you spend at our bars, bistro, gaming room, and bottle shop”.</p> <p>c) PLP redemption list prioritises non cash vouchers. <i>For example</i> – “Redeem your loyalty points for:</p> <ul style="list-style-type: none"> • Meals • Bar Service • Bottle Shop • Gift Certificates • Club Dollars”. 	<p>a) Implying the participation in a loyalty scheme improves the chances of winning on a gambling product.</p> <p>b) A rewards system that encourages irresponsible play to receive a reward or entry into an additional prize draw. <i>For example</i> – “The privileges of membership-Join today and win more often”. <i>For example</i> – “The more you bet the more you win”.</p> <p>c) A PLP redemption list prioritises cash vouchers. <i>For example</i> – “Redeem your loyalty points for:</p> <ul style="list-style-type: none"> • Club Dollars • Gift Certificates • Bottle Shop • Bar Service • Meals”.
8. Where appropriate and possible, positive responsible gambling messages are to be incorporated in PLP features and functions.	<p>Using a responsible message in PLP advertisements and promotions. <i>For example</i> – “This venue is committed to your responsible enjoyment for gambling”.</p>	<p>Using an irresponsible message in a PLP advertisement or promotion. <i>For example</i> – “Everyone is a winner” or “Brisbane’s most rewarding venue”.</p>
9. PLPs must comply with Exclusions Framework.	<p>a) Any advertising, promotion, features and functions comply with the Exclusions Framework.</p> <p>b) Ensuring any PLP material is not directly sent to an excluded patron or a person who has requested such material not be sent. <i>For example</i> – “We understand that if you have excluded yourself from our venue that you will not wish to receive our promotional material. Our staff recognise the importance of making sure this will never happen”.</p>	<p>Developing advertising or promotional material, features or functions that contradict the Exclusions Framework. <i>For example</i> – NOT immediately removing excluded persons from mailing lists.</p>

Queensland Responsible Gambling Guidelines for Player Loyalty Programs

Appendum to the Queensland Responsible Gambling Advertising & Promotions Guideline (March 2005)

Appendix two – casinos

As with the advertising and promotions guideline, consideration should be given to the potential impact of the player loyalty program on a person with a gambling problem.

Practice	Acceptable practices	Unacceptable practices
1. Advertising/ promotion of PLP complies with Queensland Responsible Gambling Advertising and Promotions Guideline (March 2005).	Any advertising or promotion aligns with the <i>Queensland Responsible Gambling Advertising and Promotions Guideline (March 2005)</i> . <i>For example – Advertising of PLPs that accrue points across a range of venue activities.</i>	Developing advertising or promotional material that contradicts the <i>Queensland Responsible Gambling Advertising and Promotions Guideline (March 2005)</i> . <i>For example – When the PLP is the dominant feature of advertising where the PLP only accrues loyalty points from gambling activities.</i>
2. PLP direct marketing practices comply with ADMA Direct Marketing Code of Practice.	Any advertising or promotion aligns with the ADMA Direct Marketing Code of Practice. a) PLP has the ability to recognise which members would like to receive gaming promotional material. b) PLP direct marketing component provides patrons with the ability to opt out of any part of the direct marketing program be it gambling related or not. c) Patrons are notified of their right to opt out of receiving direct marketing material.	Developing advertising or promotional material that contradicts the ADMA Direct Marketing Code of Practice. a) PLP does not have the ability to recognise which members would like to receive gaming promotional material. b) To email or direct market gambling material or promotions to members who have not consented to receive such material. c) To email or direct market gambling material or promotions to members who have expressed a wish in writing not to receive such information. d) To email or direct market gambling material or promotions to any excluded person.
3. PLP registration process provides relevant information for consumers to make informed decisions regarding their participation in the PLP.	a) Any registration materials, and any statement, phrase or inclusion in any registration materials, is based on fact and will not mislead or deceive, or is not likely to be misleading or deceptive. b) Any registration materials are to include terms and conditions of participation in the PLP. c) Provide company’s privacy information policy on request. d) Provide a copy of the company’s Responsible Gambling Code of Practice on request.	a) Any registration materials that are not based on fact. <i>For example – “The PLP with the greatest rewards in Queensland.”</i> b) Any registration materials that mislead or deceive, or are likely to mislead or deceive. c) Not to include a copy of the full terms and conditions of the PLP with information provided to new members who join the program.
4. PLP features and functions do not offend prevailing community standards.	a) PLP features and functions which support prevailing community standards. b) Using imagery and / or language in all advertising and promotions, direct mail or email campaigns that is in step with prevailing community standards.	a) PLP features and functions which involve minors or any person reasonably construed as being under 18 years of age, in any stage or aspect of gambling. b) PLP features and functions which are linked to irresponsible service of alcohol. c) PLP features and functions which may offend people from different religious or ethnic backgrounds. d) PLP features and functions which may offend minority groups. e) PLP features and functions which are sexually explicit or provocative in nature. <i>For example – Using images or people dressed inappropriately to the context of the direct mail and which do not conform to prevailing community standards.</i> <i>For example – Using imagery or text in direct mail or email campaigns which aims to encourage or incite violence.</i> <i>For example – Using racist or sexist language and imagery in direct mail and email campaigns.</i>

Queensland Responsible Gambling Guidelines for Player Loyalty Programs

Appendum to the Queensland Responsible Gambling Advertising & Promotions Guideline (March 2005)

Appendix two – casinos - continued

Practice	Acceptable practices	Unacceptable practices
5. PLP reward point accrual or redemption mechanisms do not focus exclusively on gambling activities where other venue activities are available, where practicable.	<p>a) PLP reward point accrual or redemption mechanisms link with other venue activities where available and practicable.</p> <p>b) Ensure cash vouchers have no reference to gambling. <u>For example</u> – “Redeem your rewards points for Casino dollars”.</p> <p>c) Members redeem their loyalty points away from a gaming machine.</p>	<p>a) Redemption of points for gaming credits only. <u>For example</u> – <i>Casino cash is only redeemable in an EGM.</i></p> <p>b) Using gambling references with cash vouchers. <u>For example</u> – “Redeem your rewards points for Pokie Cash”.</p> <p>c) Members can redeem their loyalty points without leaving a gaming machine.</p>
6. PLP features or functions are not implicitly or explicitly directed at minors or vulnerable or disadvantaged groups.	<p>a) Any PLP material is aimed at adults aged over 18 years of age and over.</p> <p>b) Ensuring any PLP material is not intentionally sent to an excluded patron or a person who has requested such material not be sent.</p> <p>c) Conducting direct mail campaigns that responsibly communicate with members based on their purchase history.</p> <p>d) Use graphics, photos and text that are generally associated with an adult market.</p>	<p>a) Any PLP material which contains graphics, imagery or text which would ordinarily attract minors or disadvantaged groups.</p> <p>b) Conducting a campaign that specifically targets extremely disadvantaged groups or areas. <u>For example</u> – <i>those known to exhibit unusually high levels of people who have a mental disability or illness or are unemployed.</i></p> <p>c) Focusing solely on children. <u>For example</u> – <i>Using images of children picking numbers for games or imagery strongly associated with and appealing to children in direct mail campaigns.</i> <u>For example</u> – <i>Using graphics or photos of recognised children’s cartoon characters or children’s entertainers.</i> <u>For example</u> – <i>Using advertising talent that projects the image of a minor.</i></p>
7. PLP features or functions do not involve any irresponsible trading practices by the gambling provider.	<p>a) PLP features or functions which encourage the use of a range of the venue’s facilities and services.</p> <p>b) PLP features or functions which promote a range of venue facilities and services.</p> <p>c) Rewarding patrons for their loyalty or encouraging them to modify their buying behaviour in a responsible manner.</p> <p>d) Offering responsible rewards. <u>For example</u> – <i>for every dollar spent across a range of the casino services/ products patrons receive an entry into a prize draw.</i> <u>For example</u> – <i>offering additional entries as rewards.</i></p> <p>e) PLP redemption list prioritises non cash vouchers. <u>For example</u> – “Redeem your loyalty points for:</p> <ul style="list-style-type: none"> • Accommodation • Meals • Bottle Shop • Bar Service • Gift Certificates • Casino Dollars”. 	<p>a) Implying the participation in a loyalty scheme improves the chances of winning on a gambling product.</p> <p>b) A rewards system that encourages irresponsible play to receive a reward or entry into an additional prize draw.</p> <p>c) To implement PLP promotions or features that imply the use of the PLP increases a patron’s luck or increases the likely winning outcome of the game.</p> <p>d) Implement a PLP that encourages irresponsible play. <u>For example</u> – <i>by implying the punter is due for a win or luck is about to change.</i> <u>For example</u> – <i>punter has a streak of losses so their luck must change.</i></p> <p>e) A PLP redemption list prioritises cash vouchers. <u>For example</u> – “Redeem your loyalty points for:</p> <ul style="list-style-type: none"> • Casino Dollars • Gift Certificates • Bottle Shop • Bar Service • Meals • Accommodation”.

Queensland Responsible Gambling Guidelines for Player Loyalty Programs

Appendum to the Queensland Responsible Gambling Advertising & Promotions Guideline (March 2005)

Appendix two – casinos - continued

Practice	Acceptable practices	Unacceptable practices
8. Where appropriate and possible, positive responsible gambling messages are to be incorporated in PLP features and functions.	<p>a) Using a responsible gambling message in PLP advertisements and promotions. <u>For example</u> – <i>Bet with your head, not over it.</i></p> <p>b) Including the messages on:</p> <ul style="list-style-type: none"> • the PLP Membership cards where practicable • the PLP application form • the PLP information on a casino’s Website <p>c) PLP correspondence & marketing material carries responsible gambling messages.</p>	<p>a) Using an irresponsible message in a PLP advertisement or promotion. <u>For example</u> – <i>“Everyone is a winner”.</i> <u>For example</u> – <i>“Queensland’s luckiest rewards program”.</i></p>
9. PLPs must comply with Exclusions Framework.	<p>a) Any advertising, promotion, features and functions comply with the Exclusions Framework.</p> <p>b) Ensuring any PLP material is not intentionally sent to an excluded patron or a person who has requested such material not be sent.</p> <p>c) Patrons can opt out of receiving PLP direct mail by contacting the casino.</p> <p>d) An automatic general opt out option is included on PLP email campaigns.</p> <p>e) Patrons can also request:</p> <ul style="list-style-type: none"> • deactivation of their loyalty card for responsible gambling reasons by contacting the casino and/or • promotional letters or offers to cease from being personally mailed or emailed to them for responsible gambling reasons by contacting the casino. <p>f) PLP terms provide for excluded patrons to be excluded from participating in any gambling related component of a PLP.</p>	<p>a) Developing advertising or promotional material, features or functions that contradict the Exclusions Framework.</p> <p>b) Knowingly sending direct mail or emails to patrons who are known to have formally opted out of receiving such materials or who have been excluded from the casino.</p> <p>c) Reactivating a patron PLP membership whilst they are still excluded from any gambling activities within the casino.</p>

Queensland Responsible Gambling Guidelines for Player Loyalty Programs

Appendum to the Queensland Responsible Gambling Advertising & Promotions Guideline (March 2005)

Appendix three – lotteries

As with the Advertising and Promotions Guideline, consideration should be given to the potential impact of the Player Loyalty Program on a person with a gambling problem.

Practice	Acceptable practices	Unacceptable practices
1. Advertising/promotion of PLP complies with Queensland Responsible Gambling and Promotions Guideline (March 2005).	Any advertising or promotion aligns with the Queensland Responsible Gambling Advertising and Promotions Guideline (March 2005).	Advertising or promotions that contradict the Guideline. <i>For example – Implying to customers a big win is coming like “hang in there and you’ll win soon or later”.</i> <i>For example – Stating as a fact or implying that certain lotto numbers are “luckier” than others.</i> <i>For example – Encouraging people to buy a lottery entry to save their life or to relieve all their personal problems.</i>
2. PLP direct marketing practices comply with ADMA Direct Marketing Code of Practice.	Any advertising or promotions align with the ADMA Direct Marketing Code of Practice. <i>For example – Using a clearly visible opt-out option for the PLP.</i>	Advertising or promotions that contradict the ADMA Direct Marketing Code of Practice. <i>For example – Not offering, or making it difficult to, opt out of the PLP.</i>
3. PLP registration process provides relevant information for consumer to make informed decisions regarding their participation in the PLP.	Information on Golden Casket’s PLP, its benefits, associated prizes and fees are included on the application form and on www.goldencasket.com <i>For example – Using a clearly visible opt-out option for the PLP.</i>	Omitting major details about the mechanics etc of Golden Casket’s PLP, so customers are unable to determine how the program works prior to joining. <i>For example – Not offering, or making it difficult to, opt out of the PLP.</i>
4. PLP features and functions do not offend prevailing community standards.	Using imagery and / or language that is in step with prevailing community standards and that maintains a high industry standard.	a) Using images or people dressed inappropriately to the context and which do not conform to prevailing community standards. b) Using imagery or text which aims to encourage or incite violence. c) Using racist or sexist language and imagery.
5. PLP reward point accrual or redemption mechanisms do not focus exclusively on gambling activities where other venue activities are available, where practicable.	Not applicable to lotteries since Golden Casket’s PLP (Winners Circle) is a player registration and reward program designed solely for Golden Casket games (there are no other activities to promote).	Not applicable to lotteries since there are no other activities to promote.

Queensland Responsible Gambling Guidelines for Player Loyalty Programs

Appendum to the Queensland Responsible Gambling Advertising & Promotions Guideline (March 2005)

Appendix three – lotteries - continued

Practice	Acceptable practices	Unacceptable practices
6. PLP features or functions are not implicitly or explicitly directed at minors or vulnerable or disadvantaged groups.	<p>a) Conducting PLP campaigns that target customers based on their purchase history in a responsible manner.</p> <p>b) Focusing on a family as a whole and the parent figures in particular in PLP campaigns.</p>	<p>a) Conducting a campaign that specifically targets extremely disadvantaged groups or areas (i.e. those known to exhibit unusually high levels of people who for example have a mental disability or illness or are unemployed).</p> <p>b) Using images of children picking numbers for games, or watching televised lottery draws or imagery strongly associated with and appealing to children in PLP campaigns. <i>For example – Showing lottery play as a way of dealing with grief or depression.</i></p>
7. PLP features or functions do not involve any irresponsible trading practices by the gambling provider.	<p>a) Rewarding customers for their loyalty or encouraging them to modify their play in a responsible manner . <i>For example – upon customer’s requests notifying them upcoming events / jackpots.</i></p> <p>b) Offering responsible rewards. <i>For example – randomly drawn surprise entries.</i></p>	<p>A rewards system that encourages irresponsible play in order to receive a reward or entry into an additional prize draw. <i>For example – spend \$300 to receive one entry into a promotional draw.</i> <i>For example – Encouraging people to spend their last dollar on lottery entries.</i></p>
8. Where appropriate and possible, positive responsible gambling messages are to be incorporated in PLP features and functions.	<p>Including the “Have Fun & Play Responsibly“ message on:</p> <ul style="list-style-type: none"> • the PLP application form; and • Winners Circle and Lotto Direct pages of www.goldencasket.com 	
9. PLPs must comply with Exclusions Framework.	<p>Not strictly applicable, since the Exclusions Framework does not apply to lotteries. However, Golden Casket advocates the following for its PLP.</p> <p>a) Customers can opt out of receiving PLP direct mail by calling or emailing Golden Casket.</p> <p>b) An automatic general opt out option is clearly visible on PLP email campaigns.</p> <p>c) In addition to the standard opt out options, customers can also:</p> <ul style="list-style-type: none"> - deactivate their Winners Circle card for responsible play reasons by calling Golden Casket; and/or - stop promotional letters or offers from being personally mailed or emailed to them for responsible play reasons by calling Golden Casket. <p>d) Customers can self exclude from Lotto Direct for responsible play reasons for a minimum of 30 days by calling Golden Casket.</p>	<p>a) Knowingly sending direct mail or emails to customers who are known to have formally opted out or who have excluded from Lotto Direct for responsible play reasons.</p> <p>b) Lifting a customer’s responsible play-instigated self exclusion from Lotto Direct before the 30 day minimum period has been reached.</p>

Queensland Responsible Gambling Guidelines for Player Loyalty Programs

Appendum to the Queensland Responsible Gambling Advertising & Promotions Guideline (March 2005)

Appendix four – UNiTAB

As with the Advertising and Promotions Guideline, consideration should be given to the potential impact of the Player Loyalty Program on a person with a gambling problem.

Practice	Acceptable practices	Unacceptable practices
1. Advertising/promotion of PLP complies with Queensland Responsible Gambling and Promotions Guideline (March 2005).	Any advertising or promotion aligns with the Queensland Responsible Gambling Advertising and Promotions Guideline (March 2005). To advertise or promote a PLP that rewards customers for using a particular distribution channel in preference to another type of distribution channel or one betting product over alternate betting products.	To implement a PLP that provides rewards for expenditure above the customer's normal spend or encourages customers to bet for longer periods than they would normally.
2. PLP direct marketing practices comply with ADMA Direct Marketing Code of Practice.	Any advertising or promotion aligns with the ADMA Direct Marketing Code of Practice. a) To implement a PLP direct marketing component that provides customers with the ability to opt out of any part of the direct marketing program be it gambling related or not. b) Notify customers of their right to opt out of receiving direct marketing material.	To email or direct market in any way gambling material to customers who have not consented to receive such material or who have expressed a wish in writing not to receive such information or to any excluded person.
3. PLP registration process provides relevant information for consumer to make informed decisions regarding their participation in the PLP.	a) Provide PLP customer with UNiTAB's privacy statement and to obtain from the customer agreement to receive direct mail promotional material. b) Provide customer with the conditions for participation in the PLP and all benefits and obligations for the customer.	a) Not to provide customers with the full terms and conditions of the PLP when they join the program. b) Not to provide customers with the option to opt out of any player loyalty rewards programme. c) To explicitly state or infer a benefit not actually available to the customer participating in PLP or to imply inflated or exaggerated benefits or changes of winning through participation.
4. PLP features and functions do not offend prevailing community standards.	To use text and images that are in step with prevailing community standards and that maintain a high industry standard.	To use text or images that are sexually explicit, profane, mocking or degrading of a person's physical appearance, gender, racial or religious beliefs.
5. PLP reward point accrual or redemption mechanisms do not focus exclusively on gambling activities where other venue activities are available, where practicable.	Not applicable to UNiTAB as no other activities to promote.	Not applicable to UNiTAB as no other activities to promote.
6. PLP features or functions are not implicitly or explicitly directed at minors or vulnerable or disadvantaged groups.	To use graphics, photos and text that is specifically directed at an adult market.	a) To use graphics or photos of recognised children's cartoon characters or children's entertainers. b) To use advertising talent that projects the image of a minor.

Queensland Responsible Gambling Guidelines for Player Loyalty Programs

Appendum to the Queensland Responsible Gambling Advertising & Promotions Guideline (March 2005)

Appendix four – UNiTAB - continued

Practice	Acceptable practices	Unacceptable practices
7. PLP features or functions do not involve any irresponsible trading practices by the gambling provider.	Implementing PLP promotions and features that provide customers with the actual benefits and the actual cost of participating in the PLP.	<p>a) To implement PLP promotions of features that implies the use of the PLP increases a customer's luck or increases the likely winning outcome of the game or wager for the punter.</p> <p>b) Implement a PLP that encourages irresponsible play by implying the punter is due for a win, luck is about to change or has a streak of losses so your luck must change.</p>
8. Where appropriate and possible, positive responsible gambling messages are to be incorporated in PLP features and functions.	<p>Using a responsible message in PLP advertisements and promotions.</p> <p>PLP correspondence and marketing material carries responsible gambling messages and where to get help information and supports responsible gambling.</p>	To use terms that imply everyone is a winner or implies that participation in the PLP increases the chance of winning.
9. PLPs must comply with Exclusions Framework.	Excluded customers are removed by UNiTAB from participating in any gambling related component of a PLP.	Not to remove excluded persons from the PLP.

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