

# Safer Gambling Policy

**NOTE:**

All amendments to this policy must be authorised by the Policy Owner and notified to the Casino Regulator within 7 days of approval.

Contact Group Compliance at [complianceseg@star.com.au](mailto:complianceseg@star.com.au) for further details

**Policy Details**

**Policy Owner**

Group Chief Risk Officer

**Effective Date**

28 February 2024

**Last Review Date**

20 October 2023

**Next Review Date**

20 October 2024

**Approved by**

TSEG Board

**Document Control**

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1.1

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Version	Amended by	Reason for change	Details of changes	Date
<b>1.0</b>	Safer Gambling/ Compliance Team	Updated in line with ICM updates	Policy created from Responsible Gambling Policy	20 October 2023
<b>1.1</b>	Customer Lifecycle Management Team	Updated in line with TSEG Remediation Plan requirements (Milestone 6.2.5)	Updates to Purpose & Scope, with changes approved by General Manager of Safer Gaming Compliance.	28 February 2024

## 01 Purpose and Scope

The Star Entertainment Group Limited (TSEG) provides a variety of engaging gambling and entertainment experiences. TSEG seeks to provide an industry leading safer gambling environment that enables guests to gamble for their entertainment in a way that minimises harm to individuals and to the broader community.

TSEG commits to meeting both the requirements of and the spirit of the Gambling Harm Minimisation plan for Queensland 2021–2025 and Queensland Responsible Gambling Codes of Practice. This Policy is designed to support the Code and applies to all properties operated by TSEG. TSEG ensures our Safer Gambling Policy documents, including relevant policies for addressing issues related to gambling harm, are available upon request.

This policy concerns Safer Gambling and should be read in conjunction with NSW ICM 13: Responsible Gambling & Exclusions, QLD ICM P: Safer Gambling & Exclusions, the *Casino Control Act 1992* (NSW) and the *Casino Control Act 1982* (QLD). TSEG maintains a separate policy in relation to exclusions. Please refer to the *Exclusions Policy* for more detail on the guest exclusion process.

This Policy applies to all TSEG Directors, Executives, Team Members, Contractors at all TSEG locations.

## 02 Policy Requirements

As a responsible casino operator, TSEG will seek to apply the relevant principles of harm reduction through a public health framework. Our core Safer Gambling principles are:

Guiding Principle	Description
<b>Providing a Safe and Supportive Gambling Environment</b>	<ul style="list-style-type: none"> <li>• We aim to provide a safe, supportive and inclusive gambling environment where Safer Gambling is a critical part of our organisational culture.</li> <li>• We enable our guests to enjoy the leisure and entertainment activities they seek in a controlled manner.</li> <li>• We avoid stigmatising our guests, ensure that we demonstrate care and concern for their wellbeing, and encourage and reward positive play.</li> <li>• We do not allow excluded persons or minors into our casinos and we actively monitor to ensure they do not enter.</li> </ul>
<b>Preventing and Minimising Harm</b>	<ul style="list-style-type: none"> <li>• We have established processes to identify indicators of risk to our guests and we respond appropriately to prevent and/or minimise gambling related harm.</li> <li>• TSEG has a specially trained and dedicated Safer Gambling team on duty at all times.</li> <li>• We recognise that gambling harm is not limited to people with diagnosed gambling disorders and that they may be experiencing other concurrent challenges like substance abuse or mental health issues.</li> <li>• Any guest may have gambling experiences that require support from us as a provider of gaming services.</li> </ul>

Guiding Principle	Description
<b>Training</b>	<ul style="list-style-type: none"> <li>• We ensure that all team members understand their role and responsibilities to uphold TSEG’s safer gambling practices, and to identify guests who may be at risk of gambling related harm.</li> <li>• Our team members are trained to educate guests about where and how they can get help when needed, and to help guests set gambling limits and self-exclude themselves from gambling.</li> </ul>
<b>Enabling informed decision-making</b>	<ul style="list-style-type: none"> <li>• We ensure our guests have access to the information they need to make informed choices about their participation in gambling. This includes providing our guests with player activity statements and information about the risks and potential harms associated with gambling, how our games work and the odds or likelihood of losing.</li> <li>• This Safer Gambling Policy and information about how guests can self-exclude will be available at all times on property, and on TSEG app and website. A copy of this Policy will be provided to a guest upon request.</li> </ul>
<b>Affordability</b>	<ul style="list-style-type: none"> <li>• We encourage and support our guests to gamble safely by helping to manage the amount of time and money they spend gambling in relation to their financial resources. This necessitates understanding aspects of guests’ livelihoods such as their income and wealth.</li> </ul>
<b>Time Play Management</b>	<ul style="list-style-type: none"> <li>• We will monitor the length of time guests spend engaged in gambling activities.</li> <li>• TSEG is committed to reducing instances of gambling-related harm and will actively engage with guests whenever necessary including through early intervention measures.</li> </ul>
<b>Gambling Incident Register</b>	<ul style="list-style-type: none"> <li>• TSEG maintains a dedicated gambling incident register to record all incidents related to the conduct of gambling.</li> <li>• All Team Members are required to report any gambling incidents to a manager for inclusion in the register.</li> </ul>
<b>Advertising and Promotional Initiatives</b>	<ul style="list-style-type: none"> <li>• TSEG’s Marketing Policy requires that it does not publish or cause to be published, marketing material or promotional activities which encourages irresponsible use of gambling services or have the potential to contribute to gambling harm among our guests. (i.e., advertising that is attractive to minors, advertising that suggests gambling improves a person's social standing or financial prospects and advertising that targets disadvantaged groups or minorities.)</li> <li>• Marketing teams are trained in appropriate advertising guardrails that reflect harm minimisation principles, and actively promote Safer Gambling tools, support services and public awareness campaigns.</li> </ul>

## 03 Roles and Responsibilities

All TSEG team members have access to this Policy and will be provided with training on this Policy and obligations under it. All TSEG team members are responsible for creating an environment in which guests can gamble safely and responsibly. The Safer Gambling team, including Safer Gambling team members, receive regular training, including in how to respond to guests displaying indicators of Gambling Harm.

Role	Responsibilities
<b>All Team Members</b>	<p>All team members are responsible for showing awareness of Safer Gambling practices and knowing where to access further information. Team members must:</p> <ul style="list-style-type: none"> <li>• be able to identify and respond to indicators of Gambling Harm</li> <li>• participate in required Safer Gambling training</li> <li>• be able to direct guests to relevant information and assistance</li> <li>• respond immediately to guests requesting self-exclusion and make appropriate referrals</li> <li>• report any intoxicated (alcohol and drugs) guests attempting to gamble</li> <li>• recognise and report suspected extended and intensive play</li> <li>• report any suspected instances where minimum supervision is not being met</li> <li>• report any gambling-related incidents to a manager</li> <li>• not allow someone in the casino if they believe that person to be a minor or an excluded person</li> <li>• report any unattended children</li> <li>• understand the complaint resolution procedure</li> <li>• know where to get further information.</li> </ul> <p>TSEG will invite a selection of team members identified as supporting gambling services to undertake Guest Support Advocate Training.</p>
<b>TSEG People Leaders</b>	<p>Members of management are responsible for:</p> <ul style="list-style-type: none"> <li>• ensuring team members complete role appropriate training</li> <li>• providing support and coaching about identifying and responding to indicators of gambling harm</li> <li>• ensuring intoxicated (alcohol and drugs) guests are not allowed to gamble</li> <li>• ensuring guests requesting self-exclusion are referred to the Guest Support Manager/Officer on duty immediately</li> <li>• interacting with guests at risk of gambling related harm to ensure they receive appropriate support and intervention</li> </ul>
<b>Group Leadership Team (GLT)</b>	<p>Property CEOs have ultimate accountability for compliance with this policy for their respective properties. Property CEOs /and other members of the GLT are responsible for:</p> <ul style="list-style-type: none"> <li>• providing leadership and driving ownership of safer gambling practices and awareness across their areas of responsibilities</li> <li>• driving culture change to support a focus on harm minimisation across the Group</li> </ul>

Role	Responsibilities
<b>Line 1</b>	<p>Line 1 Safer Gambling Team are responsible for:</p> <ul style="list-style-type: none"> <li>• coordination of safer gambling activity across the property and for leading the local Safer Gambling Team (Patron Liaison Manager)</li> <li>• providing appropriate information and support to assist guests with gambling related problems</li> <li>• conducting welfare checks with guests to explore potential indicators of gambling harm</li> <li>• managing time-play alerts and engaging with guests to manage temporary prevention of entry and other actions to support harm minimisation</li> <li>• providing support to team members in assisting guests</li> <li>• providing support to team members with gambling-related problems</li> <li>• supporting management and internal committees as appropriate</li> </ul>
<b>Line 2</b>	<p>Line 2 Safer Gambling Team are responsible for:</p> <ul style="list-style-type: none"> <li>• developing TSEG’s safer gambling strategy and executing against that strategy</li> <li>• providing proactive Safer Gambling education and awareness</li> <li>• providing appropriate information and support to assist guests with gambling related problems</li> <li>• providing support to team members in assisting guests monitoring Line 1 activities to ensure compliance with established policies, SOPs and guidance, including for time-play management</li> <li>• providing support to team members with gambling-related problems</li> <li>• establishing effective links with local gambling-related support services</li> <li>• maintain a Gambling Incident Register and provide reporting</li> <li>• acting in response to reported incidents in the Safer Gambling Incident Register</li> <li>• supporting management and internal committees as appropriate</li> <li>• approving Safer Gambling procedures</li> <li>• influencing external Safer Gambling strategies</li> <li>• reviewing marketing materials to ensure they align with harm minimisation principles and ensuring the marketing team supports Safer Gambling marketing</li> <li>• provide information on harm minimisation initiatives and opportunities to the marketing for promotion</li> </ul>
<b>Property-Level Compliance Committees</b>	Oversee the Group’s compliance with regulatory and ICM aspects of TSEG’s Safer Gambling activities.
<b>The Safer Gambling, Governance and Ethics Committee</b>	Members of The Safer Gambling, Governance and Ethics Committee (SGGEC) are responsible for recommending approval of TSEG’s Safer Gambling Policy to The Board. The SGGEC also approves the Safer Gambling Strategy, including objectives, goals and initiatives for a

Role	Responsibilities
	<p>company-wide integrated approach to creating safer gambling environments and minimising gambling-related harm to individuals, families and the community.</p> <p>The SGGEC operates under a documented charter which sets out the Committee's objectives in relation to overseeing Safer Gambling activities at TSEG.</p>

## 04 Breaches of this Policy

TSEG is committed to conducting its operations in a way that meets its commitments to regulators, guests, and the wider community. Non-conformance with a policy, including this policy, can pose a significant risk to TSEG, guests, and the wider community, potentially resulting in punitive measures against TSEG.

Team members who become aware of an actual or possible breach of this policy must follow the established protocols set out in the Incident and Breach Management Policy. The Incident and Breach Management Policy has strict timelines in place to satisfy regulatory requirements; if a team member has reason to believe that a breach may have occurred it is imperative that those protocols are followed expeditiously to avoid adverse consequences.

Non-conformance with this policy may also amount to a breach of TSEG's Code of Conduct and values. Breaches of the Code of Conduct may result in disciplinary action, including termination of employment, fines, penalties, and potential prosecution.

## 05 Definitions

Term	Definition
<b>Act</b>	Means an Act passed by a Parliament, either State or Federal.
<b>Contractor</b>	<p>Means one of the following:</p> <ul style="list-style-type: none"> <li>• <b>Independent contractors:</b> self-employed individuals or are part of a proprietary company (ABN) usually engaged for project work and paid for results achieved.</li> <li>• <b>Contingent workers:</b> individuals engaged to ensure coverage or support for TSEG roles. For example, a contingent worker is in a role that is vacant, whilst the position is being recruited.</li> <li>• <b>Consultants:</b> individuals engaged to deliver set outcomes, provide advice or recommendations, and are usually paid on completion of milestones or deliverables. Procurement is to be engaged when considering using consultants to agree the terms and conditions with TSEG.</li> </ul>
<b>Gambling Harm</b>	The negative personal and societal impacts arising from gambling beyond an individual's available resources. In this context, resources are most commonly measured by financial capacity and time availability. Indicators of gambling harm are set out in the Gambling Harm Indicators Matrix.



Term	Definition
<b>Gambling-related Incident</b>	An occurrence of a gambling action or situation that leads to a decrease to the health or wellbeing of an individual, family unit, community, or population
<b>Safer Gambling</b>	Safer 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 because of the collective actions and shared ownership of individuals, communities, the gambling industry, and government.
<b>Safer Gambling Team</b>	The General Manager Safer Gambling and team members reporting to them. Also includes the Group Manager Safer Gambling and the property-based leaders who have completed Safer Gambling training are part of the Safer Gambling team.
<b>TSEG</b>	The Star Entertainment Group.

## 06 Related Policies and Documentation

The following policies and documentation related to this policy can be found on TSEG’s intranet site.

- Exclusion Policy
- Code of Conduct
- Responsible Gambling Code of Practice (Queensland)
- Safer Gambling & Exclusions SOP (*refer to for list of TSEG’s guest collateral*)
- RDC Charter
- ICM 13 – Responsible Gambling & Exclusions
- ICM P – Safer Gambling & Exclusions

## 07 Feedback and Questions

Please contact the Safer Gambling team or Group Compliance for any questions relating to this policy.

## Appendix A – Gambling Harm Indicator Matrix

Strong Indicators	What to do
<ul style="list-style-type: none"> <li>Requests exclusion</li> <li>Advises that they are a problem gambler or are experiencing problems with gambling</li> <li>Presents with emotional distress due to gambling – expressing suicide ideation, depression/anxiety</li> <li>Presents in an emotional state – comments regarding gambling behaviour/impacts on personal life/finances</li> <li>Leaves children unattended while gambling</li> <li>Third party raises concerns</li> <li>Attempts suicide or harms self</li> <li>Displaying anger – kicking, damaging a gaming machine out of anger</li> <li><b>Displaying rude, violent, or aggressive behaviour</b></li> </ul>	<p><b>Refer to a Senior Manager or Safer Gambling team:</b>  <i>Approach the Guest sensitively and discretely:</i></p> <ul style="list-style-type: none"> <li>Assist with exclusion request.</li> <li>Request a break is taken.</li> <li>Provide Guest with an envelope containing appropriate Responsible Gambling collateral and Guest Support contacts.</li> <li>Offer to assist Guest in contacting a support service or BetCare.</li> <li>Responsible Gambling Policy (if requested)</li> <li>Liaise with Safety &amp; Security and the Casino Manager on duty for appropriate crisis support Report in Trackvia or as incident on Star Connect portal: Raise Incident. The Safer Gambling team will record the incident in Protecht.</li> </ul>
General Indicators	What to do
<p><b>Intensity and Frequency of Play</b></p> <ul style="list-style-type: none"> <li>Significant changes in patterns of play – time/money spent, behaviour</li> <li>Gambling every day of the week</li> <li>Spending all available time or money on gambling</li> <li>Gambling for long periods of time with minimal breaks</li> <li>Disconnect with time spent gambling, including missing meals, work, study, family commitments, etc.</li> <li>Falling asleep at a gaming machine or table game</li> <li>Inability to stop gambling whether winning or losing</li> <li>Gambling at the casino for more than 12 hours in a 24 hour period</li> <li>Gambling at the casino for more than 48 hours in a week.</li> </ul>	<p><b>1-2 indicators: Gentle check in, report and observe response from the Guest:</b></p> <ul style="list-style-type: none"> <li>How are you going / how are things going for you?</li> <li>How's the game?</li> <li>What are your plans for the rest of the day?</li> <li>How long do you think you might be here for?</li> <li>Have you set any limits for today?</li> <li>Have you had a break?</li> <li>It is part of our service to remind Guests of the importance of taking breaks.</li> <li>Have you had something to eat or drink?</li> <li>Perhaps it is time to take a break?</li> <li>Maybe some fresh air could be helpful?</li> <li>Taking a break will allow you to rest and refresh, you are welcome to return another day.</li> <li>Report in Trackvia or as incident on Star Connect portal: Raise Incident. The Safer Gambling team will record the incident in Protecht.</li> </ul>
<p><b>Visible Emotion</b></p> <ul style="list-style-type: none"> <li>Personalising machines e.g., treating the EGM affectionately or acting as if it is a friend</li> <li>Showing emotional distress (crying, holding head in hands, shaking, outburst towards staff or machine)</li> </ul>	

General Indicators	What to do
<ul style="list-style-type: none"> <li>• Trying obsessively to win on a particular machine</li> <li>• Blaming their loss on the staff or gaming machines</li> </ul>	<p><b>3 plus indicators: Interact with Guest and report to Safer Gambling team for action:</b></p> <ul style="list-style-type: none"> <li>• Is everything OK? You don't seem to be enjoying yourself.</li> <li>• We've noticed. Are you ok?</li> <li>• Is there something we can do to help? It is part of our service to check in and offer support.</li> <li>• Can I offer you some information from the Guest Support team?</li> <li>• Can we offer some information from Support Services that may be helpful?</li> <li>• There are free counselling and Support Services – can we assist you in contacting one?</li> <li>• Have you considered taking a break from gambling – we can explain self-exclusion?</li> <li>• There are free counselling and Support Services – can we assist you in contacting one?</li> <li>• Report in Trackvia or as incident on Star Connect portal: Raise Incident. The Safer Gambling team will record the incident in Protecht.</li> </ul>
<p><b>Social Behaviour</b></p> <ul style="list-style-type: none"> <li>• Deterioration of hygiene or appearance over time</li> <li>• Change to behaviour/personality</li> <li>• Loss of relationship, job, or educational opportunity</li> <li>• Conceals their presence at the venue (e.g. asks staff not to let others know they are there)</li> <li>• Gambles intensely without reacting to what's going on around him/her</li> <li>• Attempt to conceal gambling e.g., plays un-carded</li> <li>• High consumption of alcohol while gambling</li> <li>• Withdrawal from social interactions</li> <li>• Friends or relatives enquire if the person is at the Casino</li> <li>• Unrealistic expectation of the chance/odds of winning</li> </ul>	
<p><b>Money</b></p> <ul style="list-style-type: none"> <li>• Relying on others (family or friends) to provide money as the result of gambling losses</li> <li>• EFTPOS repeatedly declined</li> <li>• Putting large wins back into a machine and continuing to play</li> <li>• Getting cash out ATMs on multiple occasions</li> <li>• Trying to borrow, 'scam' money or sell valuables to others for gambling, asking others to place bets</li> <li>• Not having money for meals or transport</li> <li>• Frequent demand for complimentary items or that complimentary points be converted to cash</li> <li>• Expressing concern with their spending</li> <li>• Avoids Cage and only uses automatic cash facilities</li> <li>• Significant spend compared to employment or remuneration details</li> </ul>	