

NORTHERN TERRITORY
CODE OF PRACTICE FOR RESPONSIBLE GAMBLING
2016
REVISION MANUAL

For use in the Northern Territory by gambling staff with existing interstate Responsible Service of Gambling (RSG) certification and as an update based on current legislation and the 2016 Code, for existing staff delivering gambling services in the Northern Territory.

To complete this manual as an assessment, and receive a Completion Certificate, please use the [NT Responsible Gambling Code 2016 Revision Manual Assessment](#) available on the Responsible Service of Gambling page of the AHA (NT) website (www.ahant.com.au) and provide your contact and email details.



Australian Hotels Association (Northern Territory)

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This Revision Manual must be read in conjunction with the Northern Territory Code of Practice for Responsible Gambling 2016, as well as any relevant legislation and Practice Direction that may be amended by the NT Government or issued by the Director-General of Licensing from time to time.

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The AHA (NT) Responsible Service of Gambling Education and Training Project is supported by the Northern Territory Government and funded through the Community Benefit Fund.

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PREAMBLE

For many people, gambling is an enjoyable entertainment activity that doesn't cause any issues or problems. Unfortunately, some people can experience a loss of control from their gambling that results in problems for themselves, their families, their employer and the community in general.

The Northern Territory government has developed a problem gambling risk management and responsible gambling strategy, incorporating a range of legislative measures as well as the mandatory Northern Territory Code of Practice for Responsible Gambling 2016 (the Code). The strategy includes a wide range of harm minimisation and responsible gambling measures designed to reduce the harm caused by problem gambling.

As a part of this strategy, and under section 193A of the *Gaming Machine Act*, and similarly of other relevant gambling legislation, the Northern Territory Minister for Racing, Gaming and Licensing has gazetted the Northern Territory Code of Practice for Responsible Gambling 2016.

The Code came into force on 1 March 2016. It contains new and mandatory practices which must be implemented by gambling providers, with serious penalties (fines up to 85 Penalty Units (approx. \$13,000) and up to 2 years imprisonment) for contravention or non-compliance, applying to anyone issued a licence under this legislation (licensees and gaming machine managers).

The Code of Practice for Responsible Gambling aims to minimise to individuals and the community the harms associated with loss of control of gambling through the creation of responsible gambling environments in line with best practice and community expectations.

The Code sets out minimum requirements for NT gambling providers to adopt to reduce harms associated with problem gambling. Licensed operators are encouraged to implement additional strategies to further minimise harm.

The Code provides practical guidance to assist with problem gambling risk management and responsible gambling strategies. All gaming venues have an obligation to reduce social impacts of problem gambling.

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THE REVISION MANUAL AND TRAINING REQUIREMENTS

The AHA (NT) is proud to present this appropriate Responsible Gambling training resource for AHA members. This Revision Manual contains information, questions and activities designed to highlight critical areas of the NT Code of Practice for Responsible Gambling 2016 and other relevant legislation and practice directions, and to assist that staff who provide gambling services to understand their responsibilities under the current legislative and regulatory framework.

The Code requires all new staff to complete appropriate gambling training within 3 months of commencing employment, and it is expected that this requirement will be met through the NT Responsible Service of Gambling - RSG (on-line) qualification, contextualised for the NT Code and available through the AHA (NT) website. The NT RSG online qualification meets the formal requirements for the nationally accredited unit of competency Provide Responsible Gambling Services (SITHGAM201).

The Revision Manual is designed to update and familiarise current licensees, managers and staff with the requirements for providing responsible service of gambling as set out in the Code and relevant current Northern Territory legislative framework for responsible gambling.

This Revision Manual will also be particularly of value for those staff who already hold a Responsible Service of Gambling certification, as it provides important context for the NT Code.

All training provided to and completed by staff should be entered in the venue's Gambling Training Register. Staff member's completion of the Assessment components of the Manual should be recorded in the venue's Gambling Training Register and staff should be issued with a record of their completion of the Manual and Assessment.

To complete this Manual as an Assessment, and receive a Completion Certificate, staff can use the [NT Responsible Gambling Code 2016 Revision Manual Assessment](#) available on the Responsible Service of Gambling page of the AHA (NT) website (www.ahant.com.au)

Further information and advice can be found at:

- AHA (NT) www.ahant.com.au
- Department of Business, Licensing NT <http://www.dob.nt.gov.au/gambling-licensing>
- Dickson Wohlsen Strategies (DWS) www.dws.net.au
- Club Training Australia <http://clubtraining.com.au/>
- International College of Advanced Education www.icae.edu.au
- Amity Community Services www.amity.org.au
- Gambling Help Online www.gamblinghelponline.org.au
- Anglicare-NT www.anglicare-nt.org.au
- Somerville Community Services www.somerville.org.au

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WHAT IS RESPONSIBLE GAMBLING?

Responsible gambling allows individuals to make informed decisions about how they gamble. It can result from a regulated environment where the potential for gambling related harms are minimised. It occurs through the actions and ownership by individuals, communities, the regulator and the gambling industry to achieve socially acceptable outcomes.

For individuals:

- They may gamble for pleasure and entertainment but are aware of the likelihood of losing, and understand the associated risks;
- They exercise control over their gambling behaviour; and
- Gambling occurs in balance with other activities in their lives and is not causing problems of harms for themselves or others.

For the broader community, including online gambling operators:

- Shared responsibility for generating awareness of the risks associated with gambling;
- Creating and promoting environments that prevent or minimise problem gambling; and
- Being responsive to community concerns around gambling.

WHAT IS PROBLEM GAMBLING?

In their 2010 report, the Productivity Commission reported that adult prevalence rates are 0.7% and 1.7% of the adult population for problem and moderate risk gambling respectively. Further reports show that a further 1.5%-2% of adults have milder difficulties. However, problem gambling often impacts on those beyond the individual, such as family, friends, employers and those in the broader community.

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

Many problem gamblers started out in control of their gambling.

The negative impacts resulting from problem gambling can broadly include, but are not limited to:

- excessive financial losses relative to the gambler's income;
- adverse personal effects on the gambler, family, friends and work colleagues as well as the broader community;
- adverse physical and mental health issues;
- negative impacts on work performance; and
- legal problems.

However, the negative impacts from problem gambling can run much deeper.

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From a personal perspective, a problem gambler may experience:

- stress;
- depression;
- anxiety;
- poor health;
- thoughts of suicide and sometimes, attempts;
- isolation from family and friends;
- bankruptcy; and
- theft, fraud and other crimes.

From the family and friends' perspective of a problem gambler, they may experience:

- neglect by the gambler;
- the gambler missing family functions or other obligations;
- regular requests for money;
- pawning or selling family items;
- arguments over time and money spent gambling;
- domestic and family violence;
- children may be left unsupervised or neglected due to the time spent gambling; and
- family breakdown.

Employers may face issues with a problem gambler employee including:

- poor performance;
- absenteeism; and
- theft from the employer or other staff members.

While not as widely recognised as personal and family issues, the broader community suffers from problem gambling through:

- costs associated with family breakdown;
- the need for Government to establish intervention services and counselling support;
- costs associated with imprisonment for fraud and theft; and
- costs associated with hospitalisations.

EXPECTED OUTCOMES

The Code has been established to achieve the following outcomes:

1. Minimising the extent of gambling-related harm to individuals and the broader community;
2. Enabling people to make informed decisions about their gambling activities;
3. Enabling people (not just the gambler) adversely affected by gambling to have access to timely and appropriate assistance and information;
4. Promote a shared understanding between individuals, the broader community, the gambling industry and regulator of responsible gambling practices and an understanding of the rights and responsibilities of all parties;

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5. Ensure gambling providers have safe and supportive environments for the provision of gambling products and services.

CULTURAL AND GEOGRAPHIC DIVERSITY

The Northern Territory recognises there are cultural and geographic diversities that gambling providers need to respond to in their local community. Consideration should be given to ensuring people from culturally and linguistically diverse backgrounds can access the relevant prevention and protection measures outlined in the Code.

THE CODE OF PRACTICE FOR RESPONSIBLE GAMBLING – LEGISLATIVE BASIS

This Code includes practices which, when applied, can lead to best practice in the provision of gambling products and services.

While the Practices in this Code are intended to apply to all gambling providers, the method of achieving them will vary from venue to venue according to the form of gambling offered.

The Code is gazetted under the following legislation and penalties exist for licensees that contravene or fail to comply with the Code:

- Section 79A of the *Gaming Control Act*;
- Section 193A of the *Gaming Machine Act*;
- Section 148A of the *Racing and Betting Act*; and
- Section 28B of the *Soccer Football Pools Act*.

Gambling providers will be required to demonstrate implementation of the Code to achieve the expected outcomes of the Code. Appropriate records corroborating this are required by the regulator.

LEGISLATION

The following table outlines the legal framework surrounding gambling in Northern Territory:

Gambling Activity	Legislation
Electronic gaming machines in clubs, hotels and taverns	<i>Gaming Machine Act</i> <i>Gaming Machine Regulations</i> <i>Gaming Machine Rules</i> Directions to Gaming Machine Operator
All gaming at a casino including electronic gaming machines	<i>Gaming Control Act</i> <i>Gaming Control (Gaming Machines) Regulations</i> <i>Gaming Control (Licensing) Regulations</i>
Horse racing and sports betting	<i>Racing and Betting Act</i> <i>Racing and Betting Regulations</i>

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	<p><i>Totalisator Licensing and Regulation Act</i></p> <p><i>Totalisator Licensing and Regulation Regulation</i></p> <p><i>Totalisator Licensing and Regulation (Arbitration) Regulations</i></p> <p><i>Totalisator Licensing and Regulation (Hearings) Regulations</i></p> <p><i>Totalisator Licensing and Regulation (Wagering) Rules</i></p> <p><i>Totalizator Rules</i></p> <p><i>Sale of NT TAB Act</i></p> <p><i>Unlawful Betting Act</i></p>
Lotto, lotteries and scratchies	<p><i>Soccer Football Pools Act</i></p> <p><i>Soccer Football Pools Regulations</i></p> <p><i>Rules of Authorised Lotteries</i></p> <p><i>Pools Rules</i></p> <p><i>Gaming Control Act</i></p> <p><i>Gaming Control (Community Gaming) Regulations</i></p>
NT Keno all venues	<p><i>Gaming Control Act</i></p> <p>SkyCity Darwin Casino Operator's Agreement</p>
Bingo, raffles and calcuttas	<p><i>Gaming Control Act</i></p> <p><i>Gaming Control (Community Gaming) Regulations</i></p>
Online Gambling	<p><i>Gaming Control Act</i></p> <p><i>Gaming Control (Internet Operations) Regulations</i></p>

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INTRODUCTION TO THE CODE AND PRACTICES

The Northern Territory Code of Practice for Responsible Gambling 2106 (the Code) aims to minimise to individuals and the community the harms associated with loss of control of gambling through the creation of responsible gambling environments in line with best practice and community expectations. The Code sets out minimum requirements for NT gambling providers to adopt to reduce harms associated with problem gambling. Licenced operators are encouraged to implement additional strategies to further minimise harm.

The Code commits gambling service providers to responsible gambling practices with a focus on strong patron protection.

Practices have been organised into the following broad categories:

- Provision of Information
- Interaction with Patrons and Community
- Training and Skills Development
- Exclusion provisions
- Physical Environment
- Minors
- Financial Transactions
- Advertising and Promotions
- Participation in Gambling Research and Evaluation
- Privacy Policy

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Quiz Self-Assessment Questions – Preamble and Introduction to the Code and Practices

1. The negative consequences of problem gambling may include?

- A. ? Excessive financial losses relative to the gambler's means
- B. ? Adverse personal effects on the gambler, their family and friends
- C. ? Adverse personal effects on employers and work performance
- D. ? Other costs which are borne by the community
- E. ? All of the above

2. What does the NT Code of Practice for Responsible Gambling 2016 set out?

- A. ? methods to minimise all harm associated with gambling
- B. ? responsible gambling environments that absolutely meet community expectations
- C. ? minimum requirements for NT gambling providers to adopt to reduce the harms associated with problem gambling
- D. ? methods to decrease turnover of gaming revenue

3. How does problem gambling occur?

- A. ? When a patron doesn't win
- B. ? When there is a lack of control over gambling
- C. ? If a venue opens at irregular hours
- D. ? When cash is readily available

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**Responsible Gambling Practice 1 -
PROVISION OF INFORMATION**

- 1.1 Mission Statement**
- 1.2 Information about the Potential Risks**
- 1.3 Information on the Odds or Win Rates of Major Prizes**
- 1.4 Self-Exclusion**
- 1.5 Information Available on Request**
- 1.6 Gaming Machine Rules**
- 1.7 Gaming Machine Licence and Schedule**
- 1.8 Culturally and Linguistically Appropriate Information**

Introduction:

Being able to make an informed choice on gambling options is critical if consumers are to be able to make responsible decisions. Consumers often do not have access to sufficient information on probable outcomes from specific gambling activities. They may have incorrect and inflated expectations of the rewards to be received from participation in gambling activities.

All gambling providers are to make available information that will allow their patrons to make informed decisions about their gambling habits. This information must include:

1.1 Mission Statement

A Mission Statement that clearly demonstrates the venue's commitment to responsible gambling must be displayed at the venue in a location easily accessible by patrons and for those providers with websites, clearly displayed on their home page.

1.2 Information about the Potential Risks

Information about the potential risks associated with gambling and about where patrons can seek assistance with any gambling issues must be displayed prominently in all gambling areas and where an ATM/EFTPOS machine is available.

In addition to the Code there is a separate penalty provision under the *Gaming Machine Regulations* to provide appropriate signage to advise of services to assist compulsive gamblers (Regulation 17).

1.3 Information on the Odds or Win Rates of Major Prizes

Meaningful and accurate information regarding the odds or win rates of major prizes should be clearly displayed in all gambling areas and on websites.

1.4 Self-Exclusion

Application forms for self-exclusion must be at a venue's reception, within the gambling area, adjacent to the gambling products or/and on the website

1.5 Information Available on Request

Gambling providers must make available on request by patrons or members of the public:

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- Their Responsible Gambling Policy documentation;
- The nature of games, rules, odds or returns to players for all products offered;
- All provisions related to the Self-Exclusion process; and
- Gambling-related complaint resolution mechanisms and appropriate documentation.

1.6 Gaming Machine Rules

A copy of the *Gaming Machine Rules* (sections 89-90, *Gaming Machine Act*) must be available for inspection at the licensed premises, and display in the gaming area is recommended in order to assist with the enforcement of the Rules, as required by the Act.

1.7 Gaming Machine Licence

A copy of your Gaming Machine Licence and Gaming Machine Schedule must be displayed in a conspicuous (visible) position.

1.8 Culturally and Geographically Appropriate Information

In providing information for patrons, consideration should be given to ensuring people from culturally and geographically diverse backgrounds can access the relevant prevention and protection measures outlined in the Code and that the needs of patrons from different geographic areas will be taken onto account when implementing the Code.

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Quiz Self-Assessment Questions – Provision of Information

1. What information must gambling providers offer their patrons?

- A. ? How to operate the game
- B. ? The chances of winning
- C. ? Advice on counselling services
- D. ? How to recognise possible symptoms of problem gambling
- E. ? All of the above

2. Where are the minimum required locations for information about the potential risks associated with gambling?

- A. ? At the entrance of the venue
- B. ? Near the bar
- C. ? At the 'point of gaming' or 'point of sale' (in all gambling areas and where an ATM/EFTPOS machine is available)
- D. ? Behind all toilet doors

3. Where must the required information about the odds or win rates be displayed?

- A. ? Beside all ATM's
- B. ? In -house newsletters
- C. ? At the entrance to the venue
- D. ? In all gambling areas and on websites

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4. How would a gambling provider alert patrons to additional gambling information?

- A. ? Prominent notice board
- B. ? Signs around the venue
- C. ? Brochures in gambling area
- D. ? All of the above

5. Why should venues consider the needs of culturally diverse patrons and patrons from different geographical areas?

- A. ? To keep up with standards in the broader community
- B. ? To ensure that all patrons can make informed decisions about responsible gambling
- C. ? To be politically correct
- D. ? To make different patrons feel more comfortable when gambling

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**Responsible Gambling Practice 2 -
INTERACTION WITH PATRONS & COMMUNITY**

2.1 Community Liaison Officer Role

2.2 Patron Customer Complaints

2.3 Responsible Gambling Records

Introduction

Gambling providers must establish appropriate links with gambling-related support services and, as relevant, link with local community networks where gambling related issues could be raised.

2.1 Community Liaison Officer Role

Commercial gambling providers must appoint a person/s in the role of Community Liaison Officer to:

- be available during approved gaming opening hours;
- provide appropriate information and assistance to patrons with gambling related problems;
- support other staff in providing assistance to these affected patrons; and
- provide assistance to any staff that may themselves have gambling related issues.

It is likely that in most venues the practical application of the Code will mean that the required Community Liaison Officer (CLO) role (above) will be undertaken by Gaming Managers, and the CLOs will also be responsible for the venue's requirements in managing complaints and maintaining the Responsible Gambling Incident Register.

2.2 Patron Customer Complaints

Resolving patron complaints is important. Gambling providers must establish and promote resolution mechanisms for recognising and addressing complaints in an effective and timely manner. If the complaint is about a breach of the Code, it will be directed to the gambling provider, and the provider must have mechanisms in place to deal with legitimate issues and ensure the Code is upheld, and any breach is fixed as soon as possible.

2.3 Responsible Gambling Records

Gambling providers must maintain a comprehensive record of actions taken by staff to assist persons in accordance with the Code, through a Responsible Gambling Incident Register. There is minimum information that needs to be recorded about each "incident", including:

- a) The date, time, location and nature of any event, including where a patron reports a gambling related issue or complaint;
- b) The name and address (or description of person where this information is unavailable) of the person the incident relates to;
- c) The name of the staff member involved and the action they took; and

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- d) In the case where a patron has chosen self-exclusion, the patron's name address and contact details , the date self-exclusion commenced and (although not specified) the date exclusion ends and the nature of the exclusion (all or part/s of the venue).

Quiz Self-Assessment Questions – Interaction with patrons and community

1. What is the main intent of the role of the Community Liaison Officer (CLO)?

- A. ? Help patrons be more comfortable when gambling
- B. ? Provide information and assistance (including through supporting other staff) to patrons and staff with gambling related problems
- C. ? Referring all patrons with gambling problems to a website or phone number as soon as possible
- D. ? Keeping patrons who complain happy

2. What networks might your venue's CLO have links to or be involved with?

- A. ? Local, regional and NT-wide gambling support services
- B. ? Networks of other CLO's and venues to discuss common operational issues and solutions
- C. ? Community organisations and Government agencies to discuss gambling related issues and regulation.
- D. ? All of the above

3. What should gambling providers establish and promote with regards to customer complaints?

- A. ? A visitors book
- B. ? A "Help Line" brochure in the gaming area
- C. ? Venue resolution mechanisms to recognise and address complaints
- D. ? A phone number to register patron complaints

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4. What is the reason for keeping a Responsible Gambling Incident Register?

- A. ? To make more work for all staff involved in the service of gambling
- B. ? To keep the regulators, Licensing NT, happy
- C. ? So staff can talk about the problem gamblers
- D. ? So staff can deliver more effective and responsible service of gambling by knowing what actions have been taken to respond to a patron's gambling related issues and complaints, including self exclusion

5. Complaints of a gambling related nature should be handled by?

- A. ? The staff member who is first approached
- B. ? Any staff member working in gaming areas
- C. ? The Community Liaison Officer
- D. ? Any staff member who holds a certificate in conflict resolution

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**Responsible Gambling Practice 3 -
TRAINING AND SKILLS DEVELOPMENT**

- 3.1 New Staff**
- 3.2 On-going Training**
- 3.3 Licensees and Managers**
- 3.4 Record of Training**

Gambling providers are to ensure that all relevant staff receive appropriate information and training in the provision of responsible gambling services and products.

To be most effective, responsible gambling should become part of the providers' business culture. It should inform all actions taken by providers and means that responsible gambling is not an "add-on" nor the specific task of just one individual, but is understood and applied by all relevant staff. This calls for on-going training, to both instil the basic concepts and to up-date practices in the light of new research and commercial developments.

3.1 New Staff

All new staff engaged in providing gambling services must complete appropriate training within 3 months of starting employment. This training should include the identification and response to 'Red Flag' behaviours as well as gambling and gambling products offered by the venue.

3.2 On-going Training

Once a year, all current electronic gaming machine staff must undertake refresher training regarding harm minimisation strategies to enable ongoing provision of a responsible gambling environment. This training will be approved by the Director General of Licensing. If gambling providers do not operate electronic gaming machines, then the refresher training must occur once every 2 years.

3.3 Licensees and Managers

Licensees and Managers must participate in training at least once every 5 years to guide decision making in relation to responsible gambling practices and environment.

3.4 Record of Training

Each venue must maintain a Gambling Training Register, including staff names and dates and types of training, as part of its responsible gambling records. This Register must record all required training, and can also record additional training and development provided by the venue/ provider.

Training may take the form of:

- Education and information sessions provided by counselling services or other bodies
- In-house training sourced from external providers (e.g. Industry Associations).
- In-house training by internal expertise (e.g. a manager, a company learning module, employee induction).
- Attendance at an accredited training course offered by an accredited provider.

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As additional initiatives providers could:

- Introduce certificates of competence for particular skills.
- Offer professional development, short courses and workshops.
- Attend trade shows featuring gambling products and services.
- Collaborate with staff on formulation of training materials.
- Subscribe to relevant publications.
- Research the internet.
- Provide feedback regarding effectiveness of measures.

Quiz Self-Assessment Questions – Training and skills development

1. Under the Code, what are the main focus areas of required training and skills development for all gambling related staff?

- A. ? Decreasing problem gambling activity
- B. ? Removing patrons who are problem gamblers
- C. ? Identifying and responding to 'Red Flag' behaviours, harm minimisation strategies and a responsible gambling environment
- D. ? Keeping detailed training records

2. How long after commencing employment must new staff complete appropriate gambling training?

- A. ? Within 1 month
- B. ? Immediately
- C. ? Within 3 months
- D. ? Within 6 months

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3. How must a gambling provider record what staff training has been provided?

- A. ? In each Gaming Manager's diary
- B. ? By using the "Machine Managing for Dummies" book
- C. ? By recording accredited gambling-related training for each staff member in the venue's Gambling Training Register
- D. ? By recording all gambling-related training and skills development for each staff member in the venue's Gambling Training Register

4. Who should undertake training in the responsible provision of gambling products?

- A. ? Management only
- B. ? Licence holders
- C. ? Licensees, managers, new and current gambling related staff
- D. ? Gaming supervisors

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**Responsible Gambling Practice 4 -
EXCLUSION PROVISIONS**

- 4.1 Patron Responsibility**
- 4.2 Self-exclusion Procedures**
- 4.3 Completed Self-Exclusion Forms**
- 4.4 Counselling Contact Information**
- 4.5 Self-exclusion from Other Gambling Providers**
- 4.6 Correspondence or Promotional Material**
- 4.7 Licensee Exclusion**
- 4.8 Additional Initiatives**

Gambling providers are to make available the option of patrons excluding themselves from the gambling venue or site to patrons who feel they are developing a problem with gambling.

The Code acknowledges the need for players to take personal responsibility for their actions.

4.1 Patron Responsibility

Personal responsibility can be evidenced in many ways, but a major step that can be taken by a problem gambler is to exclude himself or herself from access to gambling. Self-exclusion helps individuals bar themselves from specific venues or activities and is a good method to “take a long break and take control of your gambling”.

4.3 Self-Exclusion Procedures

To this end the gambling provider is expected to develop and implement self-exclusion procedures to encourage patrons who believe they may have a problem with gambling to consider excluding themselves from gambling services.

The Code prescribes a Licensing NT prescribed form for self-exclusion (‘Self-Exclusion Notice’) which must be used if patrons want to self-exclude from a venue or from part/s of a gambling venue. The Notice requires the patron to commit to a minimum of 3 months’ self-exclusion, and provides a 3-day cooling off period.

Application forms for self-exclusion must be available at reception, within the gambling areas, adjacent to gambling products or/and on the website.

The gambling provider must develop and implement procedures with clear supporting documentation. These procedures may include mechanisms, for identification and response to potential patron ‘Red Flag’ behaviours, or in response to approaches from patrons, and for referral of the patron to the venue’s Community Liaison Officer (CLO). The procedures may then provide for the CLO to discuss self-exclusion and/ or referral to counselling agencies with the patron, amongst other options. It is also likely that these procedures may deal with requirements of the Code regarding recording of the incident, completed self-exclusion and other details in the Responsible Gambling Incident Register; advice to all

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relevant venue staff; the options available for multi-venue self-exclusion; as well as third-party issues; and privacy and confidentiality procedures.

4.3 Completed Self-Exclusion Forms

If a patron completes a self-exclusion notice, Management, Community Liaison Officer/s and/or security staff of the gambling provider are to be supplied with the completed self-exclusion forms together with a photo of the patron. Details of the Notice will also be entered into the Responsible Gambling Incident Register.

4.4 Counselling Contact Information

Gambling providers must offer contact information for appropriate counselling services to patrons who are seeking self-exclusion and/or express a concern they have a gambling problem.

4.5 Self-exclusion from Other Gambling Providers

Self-exclusion patrons are to be given support and encouragement in seeking self-exclusions from other gambling providers.

4.6 Correspondence or Promotional Material

Gambling providers are not to send correspondence or promotional material to gambling customers who are excluded from their services or who request that this information not be sent to them.

4.7 Licensee Exclusion

With regard to licensee or venue –initiated exclusion, gambling providers operating electronic gaming machines will have adequate procedures in place to exclude patrons in accordance with section 112 of the *Gaming Machine Act*.

Section 112 states that where there are reasonable grounds for a licensee to believe that the peace and happiness of a person's family are endangered due to excessive playing of gaming machines by the person, the licensee shall prohibit the person from playing gaming machines on the licensee's licensed premises for one month from the date of prohibition.

4.8 Additional Initiatives

As additional initiatives the gambling provider could:

- Permit the Community Liaison Officer to enable players in loyalty schemes to access their own detailed playing records to assess their pattern of play.
- Provide regular staff information and training on self-exclusion.
- Have clear reporting procedures (staff to management) of relevant incidents (observations, inquiries, breaches, frequency) and actions taken by the venue with regard to patrons seeking self-exclusion.
- Review the procedures for self-exclusion and licensee exclusion on a regular basis to see if they are working and what areas may need improvement.

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Quiz Self-Assessment Questions –Exclusion Provisions

1. If a patron is considering self-exclusion, who should they be referred to?

- A. ? The Gamblers Anonymous Association
- B. ? The Duty Manager
- C. ? The Community Liaison Officer
- D. ? "Help Line"

2. What should a patron considering self-exclusion be informed of?

- A. ? The effects and consequences of self-exclusion
- B. ? The need for a signed agreement
- C. ? Contact information for appropriate counselling services
- D. ? All of the above

3. What should a gambling staff member do when approached by a patron displaying signs of discomfort resulting from gambling?

- A. ? Provide the patron with complimentary gaming vouchers
- B. ? Offer a discounted meal or refreshments
- C. ? Raise the option of self-exclusion and ask the patron if they are comfortable with a referral to the Community Liaison Officer
- D. ? Ask the patron to leave the premises

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4. Where should applications for self-exclusion be available?

- A. ? Reception
- B. ? Gambling areas
- C. ? Adjacent to gambling products
- D. ? On the website
- E. ? All of the above

5. Who should be advised when a completed Self-Exclusion Notice has come into effect?

- A. ? Management and/or security staff
- B. ? Gaming and other relevant staff
- C. ? Community Liaison Officer
- D. ? All of the above

6. After a Self-Exclusion Notice has been signed, is there a cooling off period?

- A. ? No, it comes into effect immediately
- B. ? Yes, 24 hours
- C. ? Yes, 3 days
- D. ? Yes, 1 week

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**Responsible Gambling Practice 5 -
PHYSICAL ENVIRONMENT**

- 5.1 Passage of Time**
- 5.2 Removal of Patrons**
- 5.4 Intoxicated Customers**
- 5.5 Child Care Facilities**
- 5.6 Procedures to Check Venues and Car Parks**
- 5.7 Marked Gaming Area**
- 5.8 Layout**

Gambling providers must maintain a safe environment to protect the interests of gamblers themselves, their friends and family, and a physical environment that is consistent with responsible gambling.

Physical environments can impact on problem gambling, and on the welfare of the gambler's family and associates. The following actions will mitigate the risk of harm.

5.1 Passage of Time

Gambling providers will ensure that patrons are aware of the passage of time by installing clocks in appropriate locations, together with natural lighting, wherever possible.

5.2 Removal of Patrons

Under the *Gaming Machine Act*, section 113, a licensee or gaming staff may remove patrons for breaches of the Gaming Machine Rules, damage or physically abuses a gaming machine, behaves in an offensive manner or is reasonable suspected of being on the venue for the purpose of committing an offence or assisting someone else commit an offence under the *Gaming Machine Act*.

Section 113 of the Act also states that a licensee (or their staff) may use reasonable force to remove patrons who are prohibited from the gaming area of the venue due to being a minor, or a person who has been excluded from playing gaming machines (section 112, 'Licensee/ Venue Initiated Exclusion'), if they play a gaming machine or get someone else to play a gaming machine on their behalf.

5.4 Intoxicated Customers

Customers who are intoxicated ('drunk') are to be prevented from gambling, and must be removed from the premises as per the requirements under section 121 of the *Liquor Act*. Section 121 'Power to Exclude or Remove Persons' of the *Liquor Act* states that a licensee or employee of the licensee must, or an inspector or police officer may, exclude or remove a person, not being a bona fide resident of the licensee's licensed premises, from the licensed premises if the person is drunk, violent, quarrelsome, disorderly or incapable of controlling his or her behaviour.

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Under section 7 of the *Liquor Act*, a person is drunk if:

- (a) the person's speech, balance, coordination or behaviour appears to be noticeably impaired; and
- (b) it is reasonable in the circumstances to believe the impairment results from the person's consumption of liquor.

5.5 Child Care Facilities

Where gambling providers offer child care facilities, these facilities must recognise all child care legislation and staff overseeing the facility must be appropriately accredited. The facility should be set up so that children cannot see gambling activities taking place.

5.6 Procedures to Check Venues and Car Parks

Where Gambling providers offer patrons a car park, as opposed to a general public car park, where practical, they will adopt procedures to check car parks under their control with the aim of reducing the risk of children being left unattended.

5.7 Marked Gaming Area

A licensee shall ensure that signage is placed in a prominent position at each entrance to the approved gaming area stating that persons under the age of 18 years are not permitted to enter that area.

5.8 Layout

A licensee shall ensure that the layout of the interior of the licensee's licensed premise allows:

- a) the licensee, or an employee of the licensee, from a place in the licensed premises where the licensee or employee would normally be carrying out duties at the material time, to have continuous supervision of each gaming machine that is available for gaming; and
- b) a clear passageway between banks of gaming machines of at least 2 metres unless the Director-General, under section 161 of the Act, directs that a greater distance be allowed.

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Quiz Self-Assessment Questions – Physical Environment

1. How must patrons be made aware of the passage of time?

- A. ? It is a patron's responsibility
- B. ? Patrons should be encouraged use their own watches or to set alarms on their mobile phones
- C. ? Patrons are informed about the closing time for the gambling services
- D. ? Clearly visible clocks, including in the vicinity of cash cages, automatic teller machines and coin dispensers, together with natural lighting where possible

2. How can gambling providers reduce the risk of children being left unattended in a patron's car?

- A. ? Allow children into the gaming area
- B. ? Providing free cakes & lollies for children under 18 years
- C. ? Check the carpark where practical
- D. ? All of the above

3. Are intoxicated patrons allowed to be provided with gambling services?

- A. ? Only if the patron reverts to drinking water whilst gambling
- B. ? Intoxicated patrons are not permitted to gamble and must be removed from the premises
- C. ? Patrons may finish the drink they have, then stop gambling
- D. ? Only if they have consumed a meal at the venue

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4. Where childcare facilities are provided, the facility must?

- A. ? Provide facilities with baby food and toys for the children
- B. ? Be close to gambling areas
- C. ? Be designed and located so that children cannot see gambling activities taking place
- D. ? Provide one responsible adult to supervise the children

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**Responsible Gambling Practice 6 -
MINORS**

6.1 Prohibition of Minors

6.2 Activities for Minors

6.3 Minors as Staff Members

All gambling providers are to adopt appropriate strategies to ensure minors are prohibited from gambling and not induced to gamble.

Concerns have been raised by the Ministerial Council on Education, Employment, Training and Youth Affairs (MCEETYA), amongst others, that children may learn gambling behaviours at an early age and there is increasing evidence of the extent and prevalence of adolescent gambling.

It is recognised that the similarity between the features of some arcade and computer games and gaming machines can prove alluring and that there is a need to minimise children's visual exposure to gambling activities in general.

One of the foundation stones for Northern Territory gambling policy is that minors are to be excluded from commercial gambling, and sensitively exposed to low-level fund raising and community gaming. Charitable and non-profit gaming is the only form of legalised gambling that permits participation by children, including selling tickets in small fundraising lotteries, as this is generally accepted by the community.

6.1 Prohibition of Minors

Under section 105 of the *Gaming Machine Act*, licensees and their staff must prohibit patrons under the age of 18 from entering into gaming areas, and from gaming or gambling, and strict penalties apply.

A licensee shall ensure that signage is placed in a prominent position at each entrance to the approved gaming area stating that persons under the age of 18 are not permitted to enter the area (Practice Direction, 2014).

A licensee, a gaming machine manager and employee of a licensee shall not allow a person under the age of 18 years to enter or remain in an approved gaming area (Practice Direction, 2014).

A licensee shall ensure that approved gaming machine areas within licensed premises are clearly marked and separated from general amenities (Practice Direction, 2014).

Minors are prohibited from gambling and it is the responsibility of the operator to ensure minors are not permitted to be present at gambling service points and do not gamble. Signs are to be displayed to reinforce this commitment.

Staff are required to ask patrons for appropriate proof of age if they are in any doubt as to

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whether the patron is over 18 years of age. (Note - in the case of the Darwin Casino only Security Officers request and confirm proof of age.)

The only acceptable forms of identification in Northern Territory are:

- Government-issued proof of age card – for example, 18+ card;
- State or Territory Driver's Licence; or
- Passport.

No other forms or means of ascertaining a patron's age will be accepted.

6.2 Activities for Minors

Activities run by gambling providers for minors must not promote any aspect of gambling and should not be conducted in close proximity to gambling activities.

6.3 Minors as Staff Members

Where legislated, minors are not permitted to work in gambling activities, and where no legislation is applicable, gambling product providers are discouraged from allowing minors to sell NT Keno and lottery products.

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Quiz Self-Assessment Questions - Minors

1. What are acceptable forms of identification in the Northern Territory

- A. ? Government issued proof of age cards
- B. ? Driver's licence including interstate licence
- C. ? Current passport
- D. ? All of the above

2. When are underage patrons permitted to use gaming machines?

- A. ? If they are directly related to the Licensee
- B. ? When in the company of a parent or guardian
- C. ? If they have written permission from their parents
- D. ? Under no circumstances

3. Who is responsible for checking the age of patrons involved in gambling activities?

- A. ? Senior management only
- B. ? Duty managers only
- C. ? Concerned patrons
- D. ? All staff employed at the licensed premises

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**Responsible Gambling Practice 7 -
FINANCIAL TRANSACTIONS**

7.1 Signage

7.2 Location

7.3 ATM and EFTPOS Facilities

7.4 Credit and Money Lending

7.5 Cashing of Cheques

7.6 Payment of winnings

7.7 Auto-Change Machines

Financial transactions associated with gambling are to be undertaken in a responsible manner, which includes such factors as signage, the location and operation of Automatic Teller Machines (“ATMs”), the provision of credit or granting loans for the purpose of gambling, the cashing of cheques, payment of winnings and auto-change machines.

Gambling providers are expected to provide an environment where patrons are able to make independent, informed decisions that are not hastily made in relation to their spending on gambling products.

7.1 Signage

Problem gambling warning signage and appropriate support service contact details must be clearly displayed on or close to ATMs situated within licensed premises.

7.2 Location

ATMs must not be located within designated gaming areas. The position of an ATM in a venue is subject to the approval of the Director (Practice Direction, 2014). ATMs must not be located within or in sight of gaming areas, and where safe and practicable, not in the entry to gaming areas.

7.3 ATM and EFTPOS Facilities

Cash withdrawal from credit accounts is prohibited. Withdrawals are to be restricted to access from savings or cheque accounts (i.e. debit accounts).

7.4 Credit and Money Lending

Section 91 of the *Gaming Machine Act* states that licensees shall not make a loan or extend credit in any form to a person on the licensee’s licensed premises (excluding bookmakers and NT casino licensees).

7.5 Cashing of Cheques

Personal or third party cheques must not be cashed for the sole purpose of gambling on the gambling provider’s licensed premises (excluding NT casino licensees).

7.6 Payment of winnings

There are restrictions on the payment of winnings. Payment of winnings of over \$500 must be made by cheque to the player, or electronic transfer to the player, where offered by the venue. Gambling winnings cheques should not be cashed at the venue within 24 hours of

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the win. NT casino licensees and Tatts Group lotteries and wagering (UBET) outlets are excluded from this clause.

7.7 Auto-Change Machines

A change machine installed by the licensee shall not accept notes of a denomination greater than \$50. Only one automatic change machine is permitted per approved gaming area unless otherwise authorised by the Director (Practice Direction, 2014).

Quiz Self-Assessment Questions – Financial Transactions

1. Under what circumstances can a patron access cash for gambling from their credit card accounts?

- A. ? If they are known by the Manager
- B. ? If a meal is purchased
- C. ? If they have a 'gold' card
- D. ? Not under any circumstances

2. When must a payment of cancelled credits/ winnings be made via cheque or bank transfer?

- A. ? For wins over \$500
- B. ? For wins over \$1000
- C. ? For wins over \$150
- D. ? For wins over \$250

3. ATMs & EFTPOS facilities are permitted to provide access to what accounts?

- A. ? Credit accounts if a purchase is made
- B. ? Savings & Credit Accounts
- C. ? Debit accounts only
- D. ? Credit Account if all other accounts have been used up

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4. What gambling providers are permitted to provide credit to gamblers?

- A. ? Venue Manager
- B. ? Responsible Gambling Liaison Officer
- C. ? Bookmakers
- D. ? None of the above

5. When are cheques that are issued by the venue for gambling wins allowed to be cashed?

- A. ? 24 hours after the win
- B. ? On the same day, as long as it is at the venue who issued the cheque
- C. ? 5 working days
- D. ? Next trading day

6. Problem gaming warning and support services signage must?

- A. ? Be on or in sight of ATMs; and ATMs can be located within gaming areas
- B. ? Be somewhere in the gaming venue, as long as ATMs are not in gaming areas
- C. ? Be somewhere in the gaming venue; and ATMs can be located near or within gaming areas
- D. ? Be on or in sight of ATMs; and ATMs must be located outside of, and not in the sight of, gaming areas

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**Responsible Gambling Practice 8 -
ADVERTISING & PROMOTIONS**

- 8.1 General Gaming Advertising Restrictions**
- 8.2 External Advertisements**
- 8.3 Compliance with the Advertising Code of Ethics**
- 8.4 Return to Player and Accurate Details**
- 8.5 False Impressions**
- 8.6 Minors**
- 8.7 Problem Gambling Signage**
- 8.8 Notices of Winnings Paid**
- 8.9 Urging to Buy**
- 8.10 Alcohol Consumption**
- 8.11 ATM Advertising**

Advertising and promotions are to be delivered in an honest and responsible manner, with consideration given to the potential impact on people adversely affected by gambling.

Advertising and promotions for gambling should allow patrons to make informed decisions regarding their gambling.

8.1 General Gaming Advertising Restrictions

For licensees operating a pub or club, gaming should only be an ancillary entertainment service. Therefore gaming must not dominate advertising or promotions. Instead, they should promote the range of amenities available.

Regulation 39 of the *Gaming Machine Regulations* states that a person who advertises gaming shall ensure that an advertisement: (a) is not indecent or offensive, (b) is based on fact, (c) is not false, deceptive or misleading.

Furthermore, regulation 39 also states that a person who advertises shall ensure that the advertisement does not contain an inducement to engage in gaming or any material, determined by the Director-General, to be an inducement to engage in gaming.

Inducement to engage in gaming includes an offer of transport to licensed premises (conditional on gaming), whether or not a charge applies, an offer of free or concessional rates for accommodation, meals, refreshments, liquor or other amenities to a person who plays a gaming machine, an offer of gaming tokens to play a gaming machine and an offer of jackpots or other prizes or gifts that are not available to a person in the normal course of playing a gaming machine.

The prohibitions on advertisements that induce people to gamble, *excludes* advertisements that are (a) located on licensed premises and only able to be seen by a person in or on those premises; (b) distributed only to the members of a club and relates only to gaming on the licensed premises of the club; or (c) relates to gaming in a casino, within the meaning of the Gaming Control Act.

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Please be aware, that the Director-General may, from time to time, determine material that the Director-General considers to be an inducement to engage in gaming.

Venues should also check their licence conditions in relation to what they can and cannot advertise in regards to their gambling products.

8.2 External Advertising

Advertising material regarding gaming, or the presence of gaming machines on licensed premises, on the exterior of licensed premises, shall be restricted to a statement that the premises has gaming machines as a facility for members and bona fide guests of members, or patrons of the premises, as the case may be (Practice Direction 2014).

8.3 Compliance with the Advertising Code of Ethics

Advertisements must comply with the Advertising Code of Ethics as adopted by the Australian Association of National Advertisers or the Advertising Federation of Australia. Any television advertising and promotion must also comply with the Federation of Commercial Television Stations (FACTS) Code of Practice.

8.4 Return to Player and Accurate Details

Advertising, marketing and promotions must accurately detail prizes on offer and the game results available.

8.5 False Impressions

No advertising produced by any gambling provider is to give the impression that gambling is a reasonable strategy for financial betterment, i.e. advertisements should centre on entertainment purposes.

8.6 Minors

Advertising displays and point of sale material for gambling products must not be directed at minors, portray minors participating in gambling, or be set up in an areas specifically to target minors.

8.7 Problem Gambling Signage

Advertising displays at the point of sale are to have on or within sight of them appropriate problem gambling warning signage in a clearly visible manner.

8.8 Notices of Winnings Paid

Advertising of individuals' winnings paid should only be displayed within the gambling provider's premises and personal particulars of winners must only be published with their consent.

8.9 Urging to Buy

Gambling providers are not to verbally urge non-gambling customers to buy gambling products.

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8.10 Alcohol Consumption

Advertising must not depict or promote the consumption of alcohol while engaged in gambling activities.

8.11 ATM Advertising

Media advertising of ATM facilities will be restricted to advertisements as an amenity in common with other amenities, and advertising of an ATM in conjunction with gaming products will not be permitted e.g. 'Pokies, TAB, KENO, ATM' (Practice Direction, 2014).

Advertising must not:

- Suggest that winning a prize is the probable outcome.
- Describe money spent as "an investment".
- Imply that skill can influence the outcome where this is not the case.
- Suggest chances of winning are influenced by the length of time or number of attempts.
- Offer inducements or promotions which encourage excessive participation.
- Be directed at minors.

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Quiz Self-Assessment Questions – Advertising and Promotions

1. In terms of responsible advertising and promotions, gambling providers can?

- A. ? All of the below
- B. ? Display winnings inside a venue, but personal particulars only with consent
- C. ? Speak to gambling patrons about how a game works and what its return to player is
- D. ? Speak to, but must not urge non-gambling patrons to buy gambling products

2. All gambling advertisements must comply with the Code of Ethics from which of the following organisations?

- A. ? Australasian Promotional Marketing Association
- B. ? ADMA - Association for Data-driven Marketing and Advertising
- C. ? Australian Association of National Advertisers and the Federation of Commercial Television Stations (FACTS)
- D. ? All of the above

3. Gambling advertising must NOT be directed at?

- A. ? Business people
- B. ? Holiday makers
- C. ? Young families
- D. ? Persons under the minimum age

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4. What is an impression that advertising should NOT project?

- A. ? That gambling is enjoyable
- B. ? Patrons may be eligible for discounted services provided by the venue
- C. ? That gambling is a reasonable strategy for financial betterment
- D. ? All of the above

5. What must Licensees include in their advertising at point of sale?

- A. ? Current Jackpot totals
- B. ? "ATM & EFTPOS facilities available!!"
- C. ? Win/Loss ratios
- D. ? Appropriate problem gambling warning signage

6. Advertising should...

- A. ? Accurately detail prizes on offer and game results available
- B. ? In the case of Clubs, include a statement of "Information for members and bona fide guests of a member"
- C. ? Not suggest the winning of a prize is a probable outcome
- D. ? All of the above

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**Responsible Gambling Practice 9 -
PARTICIPATION IN GAMBLING RESEARCH AND EVALUATION**

All commercial gambling venues have a social responsibility to participate in research and evaluation activities associated with gambling. Gambling Service Providers are encouraged to participate in all gambling research projects endorsed by the Director General of Licensing.

Quiz Self-Assessment Questions – Participation in Gambling Research and Evaluation

1. What research projects are gambling providers encouraged to participate in?

- A. ? Projects that aim to show that gambling is a social problem
- B. ? Only research projects from recognised and neutral organisations, like universities
- C. ? Any projects that will benefit patrons
- D. ? Research projects that are endorsed by the Director General of Licensing

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**Responsible Gambling Practice 10 -
PRIVACY POLICY**

Gambling providers must maintain the privacy of player information and must ensure, as far as possible, that there is no unauthorised or inappropriate disclosure of personal information obtained or kept under the Code of Practice. This applies to all records maintained by the gambling provider, including the Responsible Gambling Incident Register and Self-Exclusion Notices.

Persons authorised under the *Gaming Machine Act* and other applicable legislation do have access to those records for the purposes of the legislation, and are themselves also required to comply with the privacy provisions of both the NT *Information Act* and the Commonwealth's *Privacy Act* and Australian Privacy Principles.

Quiz Self-Assessment Questions – Privacy Policy

1. What must gambling providers maintain under the Code of Practice?

- A. ? Consistent promotion of gambling products & services available
- B. ? Constant supply of free products to gamblers
- C. ? Privacy of player information
- D. ? Up to date products and services

2. With regards to personal information, how can you assure privacy to a player?

- A. ? Provide a Privacy Act agreement
- B. ? Restrict access to player information
- C. ? Use separate mailing & residential address information for 'mail outs'
- D. ? All of the above

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IMPLEMENTATION & ENFORCEMENT

Considerable effort has been directed to the development of the Northern Territory Code of Practice for Responsible Gambling 2016.

There are serious expectations on licensed operators to ensure all the applicable measures are applied. As of 1 March 2016, this is now a mandatory Code under the *Gaming Machine Act*, and contravention or failure to comply is an offence by the Licensee, with penalties of 85 penalty units (approximately \$13,005) or 2 years' prison.

The preceding sections outline the minimum requirements of the gambling providers.

Each and every Licensee can aim to do more. Gambling providers are encouraged to adapt and expand upon the practices contained in the Code to suit their own operation.

Management, directors and committee members should be made aware of the Code, and participate in the provider's development of House Policy and separate Operational Procedures, in addition to any training and development requirements.

The Australian Hotels Association (NT) intends to provide support to providers through advice and through development of a Responsible Service of Gambling Manual.

Gambling providers can develop their own House Policy and Operational Procedures that suit their own operations. Some points to consider are:

- Develop the main points of the Code and any operational adaptations into a House Policy and display in appropriate locations.
- All staff, or as many as practical, should be involved in the development or expansion of the gambling provider's House Policy and its Operational Procedures.
- Launch the House Policy with patrons either formally or informally, at the manager's discretion – for example, a small function or mail out to patrons.
- Instil in staff, particularly supervisory and managerial, a sense of ownership and accountability by seeking input on inclusions or suggestions. At the very least, including as part of induction, staff should have each point explained in detail to them including their role in the enforcement and ongoing development of the Code.
- Refine the information presented to clear, concise statements that are directly relevant to your operation, unambiguous and easy to read.

Inspections

Under 162 of the *Gaming Machine Act*, authorised inspectors, NT Police Officer and other authorised persons, for instance officers authorised under the *Anti-Terrorism and Money Laundering Act*, may inspect, for the purposes of determining compliance with the Code, *Gaming Machine Act* or any other relevant legislation.

Australian Hotels Association (NT)

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Licencees and staff must give their name and address and cooperate with Inspectors or authorised offices undertaking investigations and enquires.

Machine managers must have their Machine Managers Licence available for inspection at all times (Regulations).

Quiz Self-Assessment Questions – Implementation and Enforcement

1. Who should be involved in House Policy development?

- A. ? The Manager
- B. ? As many staff as practical
- C. ? Gaming licence holders only
- D. ? Patrons

2. After reading the Code of Practice, gambling providers are encouraged to do what?

- A. ? Adapt and expand upon practices in the Code to suit their own operation
- B. ? Ensure management has read the Code
- C. ? Send the Code to all directors and committee members
- D. ? All of the above

3. What should gambling providers try to instil in their staff?

- A. ? A sense of ownership & accountability for responsible gambling and the House Policy and Operational Procedures by seeking their input
- B. ? Be careful not to get caught by licensing inspectors
- C. ? To promote gambling to more patrons
- D. ? Keep paper work up to date

**NORTHERN TERRITORY CODE of PRACTICE for RESPONSIBLE GAMBLING 2016
AHA(NT) REVISION MANUAL**

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