



BREAKWATER ISLAND LIMITED

SAFER GAMBLING STRATEGY

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1. Introduction

1.1 Our Commitment

The Ville Resort-Casino ("The Ville") operates a integrated casino facility located in Townsville, Queensland, encompassing a wide range of amenities and services for the local community and broader demographics. This incorporates food, beverage, gaming and accommodation.

The entertainment facilities including gaming services are enjoyed by the vast majority, however, The Ville recognises that a small number of our customers may experience difficulties in their association to gaming which may cause them personal and financial difficulties and potentially impact family, friends and the wider community.

While the decision to utilise the gambling facilities rests with the individual, The Ville acknowledges the importance of informing customers about potential gambling-related harm and the availability of tools and support services for those who may need assistance with their gaming behaviours.

Our commitment is to provide gaming services for our customers in a responsible manner, with a focus being on harm minimisation paramount to the success of the operations. The Ville have developed this Safer Gambling Strategy in alignment with the local community, regulator and government expectations and is structured and aligned with the regulator lead "**Gambling Harm Minimisation Plan for Queensland 2021-25**".

In addition to complying with all legislation, The Ville has implemented a range of additional policies and initiatives to promote and manage the Safer Gambling Strategy. The Ville is committed to continually evolving and improving the Safer Gambling Strategy through the evolvement of technology and community expectations.

1.2 Availability of the Safer Gambling Strategy

The Safer Gambling Strategy is available to customers upon request at our cashiers, promotions and concierge desks and is additionally located on our website <https://www.the-ville.com.au/>.

Customers of The Ville will be notified about this commitment through direct communication channels and internal signage and marketing materials.

1.3 Purpose of the Safer Gambling Strategy

The purpose of the Safer Gambling Strategy is to encompass the following:

- Manage potential harm associated with gambling by creating a safer gambling environment;
- educate and inform patrons and employees about the potential harm associated with gambling;
- to reduce the prevalence and severity of harm associated with the misuse and abuse of gambling activities;
- to foster safe conduct in relation to gambling and in particular, to ensure that gambling is conducted responsibly, fairly and honestly, with regard to minimising the harm associated with gambling;
- to facilitate a sustainable model that is in the broader public interest, which is economically viable yet socially responsible, recognising both the positive and negative potential impacts of gambling within communities;
- to ensure that gambling is conducted honestly and free from interference, criminal influence and exploitation;
- ensure compliance with industry legislation, code of practice and best practice measures; and
- to ensure, as far as practicable, that the conduct of gambling is consistent with the expectations and aspirations of the public and local community.

2. Safer Gambling Strategy

2.1 Customer Admission and Engagement

To support a safer and lawful environment, The Ville has procedures in place to provide oversight to consider if members are eligible and appropriately qualified for admission.

To be considered an eligible member, individuals should:

- Freely choose to engage with our services;
- Use funds that are lawfully obtained and within their personal financial means;
- Not be subject to exclusion (or where The Ville is not obligated to reciprocate that exclusion an undertaking to the exclusion specifics is considered); and
- Meet any additional qualification requirements where applicable (e.g. individuals with known criminal history, bankruptcy status, or certain occupations).

These measures help ensure that our services are accessed safely and responsibly, and that considerations are in place to prevent financial harm and minimise gambling-related risks. Aiming to provide an environment where gambling remains a form of entertainment, free from undue influence or harm.

2.2 Safer Gambling Committee

The Ville has an established Safer Gambling Committee comprising senior managers and safer gambling team members. This committee meets regularly reviewing safer gambling matters and effectively addressing and managing risks related to gambling harm. Its focus is on mitigating the impact to individuals and the community, ensuring appropriate oversight and action is taken.

2.3 Safer Gambling Team and Internal Support

The Ville has a dedicated safer gambling team onsite. The Safer Gambling Team play a key role in supporting a safe and responsible gaming environment. The team is responsible for monitoring gambling activity, engaging with patrons where concerns arise, and promoting awareness of safer gambling practices. They provide support and information to individuals who may be experiencing gambling-related harm, as well as those seeking to better understand and utilise safer gambling tools. In doing so, they work collaboratively across a wide range of operational and customer-facing areas to ensure gambling is conducted responsibly and in alignment with our harm minimisation and safer gambling commitments.

The Safer Gambling Team is available to all customers to provide support, information, and guidance on safer gambling tools and practices. Whether you're seeking advice, assistance, or simply have questions, the team is here to help. You can contact them during business hours by phone at (07) 4722 2333 or via email at patroncare@the-ville.com.au.

2.4 Safer Gambling Information and Getting Help

The following services are available to people who feel they may need assistance in controlling their gambling behaviour. All communication is private and confidential.

- The Gambling Help Line is an independently run, free, confidential service (available 24 hours a day) which offers support for individuals who are adversely affected by either their own or somebody else's gambling behaviour. Call on 1800 858 858 or visit their website <https://gamblinghelpqld.org.au/>
- Centacare is a social services organisation that provides free and confidential counselling services. For Townsville and Northwest Queensland you can phone 1300 NQCARE (1300 672 273) or visit their website <https://www.centacarenq.org.au/centacare-services/counselling/gambling-help-hjnb3g/>

Safer gambling messages are displayed in various places around the property and within the casino to raise awareness about safer gambling practices. This includes both customer-facing areas, such as the

casino floor, and employee-only areas, such as the back of house. These messages, often in the form of tag lines or links to our Safer Gambling Strategy, are also included in all gaming-related marketing material to reinforce the importance of safer gambling.

Gambling Helpline number is displayed on a banner on every gaming machine to provide patrons with the number should they require assistance. Additional messages are also included on iVISTA platforms (Player Information Display) to encourage patrons to “Take a Break” which are displayed after there is continual play for 20 minutes on that gaming machine.

Safer gambling and exclusion information brochures, which are readily available are also included in material for all new memberships.

Safer gambling signage and brochures are displayed in public toilet facilities, in close proximity to ATMs and cashier desks.

2.5 Cash Payout Limits

All cash will be paid in accordance with applicable legislation and policy.

Payment amounts in excess of the cash payout limits will be paid by cheque, direct deposit to the member's nominated bank account or deposited to the member's Vantage Rewards account. Cash payout limits are set at the discretion of The Ville. These limits can be viewed on our Cash Payout Limits Policy available at the Cashiers.

For EGM Jackpot payouts, the balance of any amount over the limits set must be paid by cheque.

The Ville will not cash cheques issued for payments until the next trading day, for the intent of being a safer gambling measure.

2.6 Customer Loyalty Programs

The Ville operates a precinct-wide Loyalty Program referred to as “Vantage Rewards” that entitles members to certain benefits and privileges.

Customers are able to obtain information from our staff on how to join the Vantage Rewards program, benefits of the program and player support mechanisms via:

- Casino Promotions Desk;
- Cashier Desks;
- Concierge Desk; or
- Visit our website to review the benefits of the Vantage Rewards program.

When joining the Vantage Rewards program, members are supplied with information about the rewards program, how to use features of the card, exclusion assistance and provided information about the opportunity to utilise the pre-commitment system.

The loyalty program encompasses a wide range of benefits for all patrons using the facilities of the property that include restaurants, food and beverage, accommodation and gaming services.

While participation in the loyalty program is voluntary, it can serve as a valuable tool for the safer gambling team by providing access to data that supports the identification of behavioural changes, raises potential alerts, and enables proactive interventions aimed at reducing gambling-related harm and managing the frequency or intensity of play.

The use of membership cards associated with the loyalty program in electronic gaming machine play additionally act as a secure and safe way to transfer funds.

Further benefits of carded gaming include the ability to request detailed player activity statements that are made available to members upon request which will include at a minimum, all wins and losses for the period of the statement.

2.7 Exclusion Provisions

The Ville provides the option for patrons to exclude (ban) themselves from our casino facility under the Casino Control Act 1982. We aim to do this by providing an environment that ensures the matter is dealt with sensitively, confidentially and in a timely manner.

There are two types of exclusions available for individuals who may be experiencing difficulties with their gambling behaviour:

- Self-exclusion (Self-Ban) is when you approach the casino and ask to be excluded. Information will be provided upon request and your exclusion will be processed under section 91O, as soon as practicable – generally immediately. This exclusion will remain in force for a period five years, after which it will expire. A request to revoke your exclusion may only be submitted within 24 hours (cooling off period) or after a minimum period of one year has passed from the commencement of your exclusion.
- Venue initiated exclusion is when our casino management bans you under section 93A from the gambling facilities at The Ville Resort – Casino. This may occur when the casino believes, on reasonable grounds, that you are unable to control your gambling activity or are a person experiencing harm from gambling. This exclusion will remain in force for a period five years, after which it will expire. A request to revoke your exclusion may only be submitted after a minimum period of one year has passed from the commencement of your exclusion. The Ville may decline a request if sufficient information is not provided to demonstrate that you are no longer experiencing harm from gambling. A revocation request for this exclusion type can only be made once in any 12 month period.

The Ville upholds a Memorandum of Understanding with Centacare North Queensland to facilitate remote exclusions, allowing individuals to request an exclusion without needing to attend the venue in person. For assistance, you can also contact our Safer Gambling Team at patroncare@the-ville.com.au

Excluded persons are prohibited from entering or remaining in the licensed gaming areas at The Ville, including participating in Keno gaming and approved wagering.

Consequences of breaching an exclusion include prosecution in a court and potential penalties including fines. Once a person is excluded, any membership of the Vantage Rewards program is suspended with associated benefits no longer available to the excluded person and the person is removed from all mailing lists used for marketing purposes by the casino.

Further information is available from the Safer Gambling Team, Security Team or Customer Liaison Officers.

2.8 Prohibition on Gambling by Minors

It is an offence by law for any person under the age of eighteen (18) years to participate in gambling activities. The Ville prohibits persons less than 18 years of age from entering and remaining in any gambling area. The Ville also prohibits persons from leaving their children unattended in any area. Persons found doing so may be excluded from the precinct and reported to the appropriate Government Authority.

2.9 Prohibition of Money and Chip Lending

The Ville does not condone money or chip lending between patrons, particularly where it involves financial gain or coercive arrangements. Such practices commonly referred to as loan sharking, not only pose significant risks to vulnerable individuals but are also inconsistent with the principles of safer gambling and the obligations of the Anti-money Laundering and Counter-terrorism Financing (AML/CTF) ACT 2006. These activities may facilitate financial harm, increase gambling-related harm, and obscure the source and flow of funds. The Ville is committed to maintaining a safer gambling environment for its patrons and is against any activities that could compromise this objective.

2.10 Pre-Commitment System

The Ville provides members with the ability to set limits based on time on device, visitation and expenditure levels with respect to turnover and player loss. The pre-commitment technology is advertised to players upon registration of membership and through the iVISTA units installed on each electronic gaming machine.

Players are able to register for pre-commitment at the Cashiers, located on the main gaming floor. Notifications and alert messages are displayed on the iVISTA units during game play based on the limits set by the members, the messages include the following:

- limit notification
- limit reached

When setting limits through the pre-commitment system the customer may choose any of the following options:

- total amount the player can lose in a day, week or month;
- total amount the player can bet in a day, week or month;
- number of gaming days the player is allowed to play continuously;
- time duration a player can spend playing at a gaming machine on a single day, week or month.

If a patron reaches the limits set, their membership card will temporarily disable for their applicable time frame. Due to the temporarily disabled membership card, the patron will be restricted from any gaming, promotions and accumulating and redeeming any further benefits of their membership through their membership card, until the pre-commitment resets as per their allocated limits.

Any ease in pre-commitment restrictions will incur a 24 hour activation period. Further constriction of limits will be activated at the time of the request.

Upon registration to the pre-commitment system, there is an acknowledgement from the user that this simply acts as a tool to assist them in providing an alert and account-lock mechanism. However, there remains an element of personal responsibility that is accepted upon the initial request.

From time to time, the Safer Gambling Team may see fit to impose a mandatory pre-commitment on a patron. This tool can be used for early intervention, assisting in controlling gambling behaviours, or as a mandated condition when returning from an exclusion period.

2.11 Gambling Environment

2.11.1 Breaks in play

Customers are encouraged to take regular breaks when utilising the gambling facilities, The Ville assists through:

- The casino license permits operation 24 hours a day, seven days a week. However, the casino will close at the end of each designated gaming day in accordance with the published operating hours.
- requiring patrons to leave gaming machines to participate in most promotional draws to claim prizes;
- announcements to take refreshment breaks;
- reminders through iVISTA units;
- café and lounge facilities located throughout the casino facilities;
- ability for patrons to lock gaming machine with member card ensuring security of funds and reserving the machine while they take a break.

2.11.2 Clocks

Clocks are located on each electronic gaming machine, along with a clearly visible clock on the main gaming floor, to help customers stay aware of the passing of time.

2.11.3 ATMs

In accordance with relevant legislation, ATMs are placed outside of, and away from designated gaming areas. Due to the location of these ATMs, the access to cash naturally facilitates a break-in-play, and requires re-entry into the licensed areas whereby further screening is able to be undertaken by security and team members.

2.12 Advertising and Promotions

The Ville adheres to the Queensland Responsible Gambling Advertising and Promotions guideline. This guideline covers gambling related communication activities including advertising in the media, sponsorship, point of sale material, leaflets, displays, internal and external signage, the internet, subscriber products and other materials designed for public communication.

The guideline is used in conjunction with all regulatory requirements for the conduct of gambling in Queensland.

The Ville will ensure at all times that any advertising or promotion for gambling:

- complies with Queensland Responsible Gambling Advertising and Promotions guidelines;
- is not false, misleading or deceptive;
- does not implicitly or explicitly misrepresent the probability of winning a prize;
- does not give the impression that gambling is a reasonable strategy for financial betterment;
- does not include misleading statements about odds, prizes or chances of winning;
- does not offend prevailing community standards;
- is not implicitly or explicitly directed at sales or promoted to minors and vulnerable or disadvantaged groups, such as static billboards or external signage that promotes jackpot values which are viewed broadly in the public domain;
- does not involve any irresponsible trading practices;
- does not depict or promote the consumption of alcohol while engaged in the activity of fund-raising;
- has the consent of the person before publishing or causing to be published anything that identifies a person who has won a prize; and
where appropriate, positive safer gambling messages are incorporated in advertising and promotions.

Each prospective advertisement and promotion is checked by relevant staff against codes and standards, and checked against relevant legal requirements, including compliance with the Australian Consumer Law.

Further to the above The Ville is committed to the dissemination and communication of safer gambling messages via the following means:

- Advertising messages through iVista units and EGM screens (scrolling messages)
- Flyers, pamphlets and posters
- Safer Gambling messages on all external gaming advertisements and promotions
- In-house electronic systems

2.13 Service of Alcohol to Gaming Machines and Tables

The Ville aims to provide a safe venue and responsible service of alcohol to our patrons by implementing and performing harm minimisation practices to reduce the potential risk of alcohol abuse and misuse. Staff will monitor the consumption of alcohol in line with RSA policy and procedures. Non-alcoholic beverages, including water, tea and coffee, are available to customers on a complimentary basis whilst engaging in gambling activities. Any patron participating in gambling activity showing signs of unduly intoxication or disorderly behaviour will be required to cease gambling activity and will be required to leave the premises immediately. Our casino advocates the responsible service of alcohol with staff. Training regarding individual and company responsibilities, in relation to gambling and the service of alcohol, is provided to relevant staff members.

Additional responsible service of alcohol strategies and policies are outlined in The Ville Resort - Casino Risk Assessed Management Plan (RAMP). You may ask a friendly staff member to view our RAMP, also available in all our F&B outlets.

2.14 Training and Skills Development

The Ville has developed and continues to develop safer gaming training programs and refresher training courses to assist relevant staff in the delivery of safer gambling. There are a range of training programs in place that include internal and external providers.

The aim of the training programs is to:

- ensure the staff members understand the commitments and provisions of the Safer Gambling Strategy;
- equip staff to deliver gambling products and ancillary services in accordance with the Safer Gambling Strategy;
- increase the awareness and understanding of possible behavioural indicators of gambling harm;
- ensure staff understand the support and counselling services available to customers;
- ensure staff are suitably skilled to be aware of when a customer is displaying behaviours potentially consistent with gambling harm, or displaying observable signs of distress and understand what actions should be taken;
- ensure staff have the ability and skills to respond appropriately to customer requests and or situations in which require further action;
- ensure staff are provided with the tools and systems to maintain communication and records of each instance.

The Ville will review and assess the safer gambling training program annually to ensure it remains effective in supporting the Safer Gambling Strategy document and community expectations.

In line with the Queensland Gambling Harm Minimisation Plan, there is growing recognition of the increased risks faced by certain high-risk demographics and community groups. The Ville acknowledges its role in raising awareness of potential harms associated with gambling products. To help address these concerns, The Ville will implement initiatives aimed at reducing risk through community engagement and awareness initiatives, in collaboration with government agencies and healthcare providers such as Centacare North Queensland.

Figure 2.1 – Training and Skills Program

| | 2022 | 2023 | 2024 | 2025 |
|---|------|------|------|------|
| Review current training processes | | | | |
| Evaluate effectiveness | | | | |
| Research and update training and skills development program | | | | |
| Refine training and skills development program using research phase | | | | |
| Implement and adopt new skills and development training program | | | | |
| Review changes to the training program for effectiveness | | | | |
| Source: The Ville | | | | |

2.15 Customer Liaison Officer (CLO)

The Ville recognises that there are limitations on the knowledge and ability for each staff member to interact with customers at a high level. Identifying and addressing certain situations requires a high level of understanding, empathy, experience and confidentiality.

The Ville have trained all Gaming Supervisors to be Customer Liaison Officers (CLO) where at least one of which is available in the gaming area at all times of the gaming operations.

The role of the CLO includes the following:

- monitor the gaming areas for patron behaviours
- ensure that staff record/report safer gambling incidents, interactions and interventions which are escalated for management review
- observe customers who display behaviour that is consistent with gambling harm and provide assistance/information as necessary
- provide advice to staff about gambling harm and how to respond to signs of gambling harm, and
- respond to customer enquiries and complaints relating to gambling products and services.

2.16 Interaction with Customers

If an employee believes that a person in the casino is acting in an unacceptable manner, or is visibly affected by alcohol, the casino will take appropriate action which may include removal from the property or directed to their room, if an inhouse guest.

Where a person in the casino is exhibiting or displaying signs of distress, or behaviours potentially indicating a gambling-related issue, The Ville will implement procedures designed to provide an appropriate response to the needs of the guest.

Such signs of distress, behaviour or situations may include:

- gambling every day of the week;
- person gambles continuously without taking a break for extended periods of time;
- gets cash out from an ATM at the venue on multiple occasions;
- trying to borrow, 'scam' money or sell valuables to others for gambling;
- puts large win amounts back into the machine and keeps playing;
- displaying anger, kicking machines, looking sad and/or crying;
- friend or relatives call or arrive to ask if the person is still at the casino;
- blames the casino, the staff or gaming machines because they lost;
- having an unrealistic perception about the chance/odds of winning;
- they are suffering from depression and/or have thoughts of suicide due to gambling behaviour;
- a changed attitude towards their gambling;
- trying obsessively to win on a particular machine; or
- spending too much time and/or money gambling.

We understand that employees should not make assessments as to whether an individual is, or is not able to control their gambling behaviour. Rather we require that the employee be aware of and respond to such indicators of distress, behaviour or requests sensitively and within an appropriate timeframe.

In circumstances where it may be clear that a patron is displaying ongoing harm indicators, the Safer Gambling Team will be engaged to make an assessment and carry out any necessary actions if applicable.

All safer gambling incidents, interactions and interventions including actions taken in such circumstances must be reported to the Safer Gambling Committee, to support ongoing monitoring and documentation. This ensures appropriate oversight and allows for consideration of any additional support measures that may be required.

2.17 Interaction with Gambling Support Services

As a major stakeholder in Townsville, The Ville is an active member of and participates in industry peak bodies and consultative groups to enable it to maintain awareness of gambling-related issues.

The Ville have developed a strong relationship with Centacare North Queensland to assist in the development of the Safer Gambling Strategy incorporating a strategy that has shifted from “Responsible Gambling” to “Safer Gambling”. The Ville and Centacare have established a “Memorandum of Understanding” which outlines the practices and relationship between the two parties on dealing with gambling-related issues.

This relationship aims to:

- Recognises that there are safe levels of gambling consumption;
- Reinforces both the safe provision and consumption of gambling; and
- Aims to reduce the harms associated with gambling, irrespective of where this harm occurs on the gambling spectrum.

The Ville and Centacare NQ meet on a regular basis to discuss safer gambling practices and Centacare provides training support and advice for staff members involved in the service and monitoring of the gambling products and services.

Details of all meetings with safer gambling support services are maintained.

2.18 Gambling Related Feedback

The Ville has procedures in place to ensure that gambling-related feedback and complaints are dealt with promptly. Where the complainant is not satisfied the venue will inform the complainant of other avenues of redress, in particular the Queensland Office of Gaming Regulation.

2.19 Emerging Technology and New Products

The increasing sophistication of gambling products and systems through electronic technologies has increased accessibility to gambling products and has posed challenges from a safer gambling perspective.

Providing individuals and venues with tools that facilitate awareness and control mechanisms is one measure that is continuously being investigated to assist in reducing harm. A number of studies and trials are being investigated to provide evidence-based solutions.

The Ville is committed to the adoption of technological solutions through collaborative and systemic approaches to the minimisation of gambling related harm being addressed by the Gambling Harm Minimisation Plan for Queensland 2021-25.

The Ville acknowledges the role it has to play in the development of harm minimisation tools and is acutely aware of the need to implement technologies that are effective in reducing harm. There are many options available to casino operators that all have varied levels of success and history has shown the ineffectiveness of a one size fits all approach.

Although it is inherently difficult to commit to a timeframe based on technology systems, The Ville have developed an action plan and timeline to address the implementation of technology and systems addressing the key areas to include digitalisation and eCommerce gambling.

2.19.1 Digitalisation and eCommerce

The evolution of digital payments over recent years have presented many businesses with opportunities to reduce the reliance of cash transactions, instead moving towards a digital environment.

The gambling industry is undertaking trials of the digital payments pertaining to gambling activities and The Ville is working with industry peak bodies to examine the effectiveness of the changes.

There are several factors that must be considered through the implementation process and varying systems will require additional frameworks to incorporate.

The Ville has not yet identified a suitable technology solution to support the proposed initiatives. While we remain open to exploring options, we are not currently engaged in active development with any provider. We will continue to monitor available solutions in line with the timeframe outlined below.

| Figure 2.2 – Digitalisation and eCommerce Project | | | | |
|--|------|------|------|------|
| | 2025 | 2026 | 2027 | 2028 |
| Define system requirements and key features | | | | |
| Investigate current system capabilities | | | | |
| Investigate alternate systems solutions | | | | |
| Recommend system | | | | |
| Undertake trial | | | | |
| Evaluate effectiveness | | | | |
| Implement system if deemed appropriate and effective | | | | |
| Source: The Ville | | | | |

The above is an indicative guideline only and relies on 3rd party assistance and industry inclusion.

2.19.2 Facial Recognition System (FRS)

Facial recognition software has been used infrequently in hospitality venues however recent technological changes have allowed further study and implementation of the technology to be used for harm minimisation strategies.

The Ville adopted the use of FRS in its harm minimisation efforts in 2022. The technology was implemented in stages to ensure its effectiveness and system capabilities meet the required standards. The Ville has now successfully implemented the FRS technology in full and continue to enhance its integration into the Safer Gambling Strategy.

The Ville continues utilising FRS across the venue as part of a broader strategy to support venue operations, safety, and harm minimisation. FRS has proven to be a particularly effective tool in assisting with monitoring and preventing access to licensed gaming areas by excluded patrons, thereby protecting both the individual and the venue.

The following outlines the program inception.

| Figure 2.3 – Facial Recognition | | | | |
|--|------|------|------|------|
| | 2022 | 2023 | 2024 | 2025 |
| Define system requirements and key features | | | | |
| Investigate current system capabilities | | | | |
| Investigate alternate systems solutions | | | | |
| Recommend system | | | | |
| Undertake trial | | | | |
| Evaluate effectiveness | | | | |
| Implement system if deemed appropriate and effective | | | | |
| Source: The Ville | | | | |

2.20 Evidence Based Research and Trials

As technology and community expectations evolve, The Ville is committed to working in collaboration with regulators and technology providers to undertake research and implement continuous improvement methods to address gambling-related issues.

When considering changes to practices, policies and technology systems, The Ville will rely on evidence-based outcomes and research to implement change and or modification to existing policies and practices.

2.21 Review of the Safer Gambling Strategy

The Safer Gambling Strategy will be reviewed internally at least annually to ensure compliance with relevant legislation and any changes to relevant codes of practice and guidelines.

The Ville may, where appropriate, engage third-party specialists and relevant industry bodies to support the ongoing evaluation and enhancement of this strategy and its supporting policies and procedures, ensuring continuous improvement based on their demonstrated effectiveness.

3. Gambling Harm Minimisation 2021-2025

The Queensland government introduced in late 2021 the Harm Minimisation Plan with an emphasis on industry social responsibility and the adoption of technological, collaborative and systemic approaches to the minimisation of gambling-related harm.

The strategy document includes four pillars referred to in the document as:

- Leadership and Culture
- Technology and Environment
- Public Health Approach
- Regulatory Framework

Each pillar defines the expectations through goals, strategies and key deliverables. The Ville is committed to working with government and regulators toward the common goal over this period and into the future.

Many of the strategies have been outlined in The Ville Safer Gambling Strategy with some measures requiring a longer process of investigation, trial and implementation.

3.1 Leadership and Culture

The following table identifies the strategic pillar goals, strategies and key deliverables contained in the Queensland Government Harm Minimisation Plan and provides assessment of The Ville's aligned strategies to meet the expectations.

| Figure 3.1 – Leadership and Culture | | | |
|--|--|--|--|
| Goals | | | |
| Socially responsible industry | Industry, community and government working together to drive cultural change | | Gambling harm prevention integrated into all aspects of operators' business |
| Strategies | | | |
| Creating a strong mandate, identifying and encouraging leadership and grass roots level engagement | Informing and building capability of boards and governance structures to better understand and address gambling-related harm | Ensuring all consumers can make informed choices | Taking a harm prevention and precautionary approach to product and environment |
| Key Deliverables | | Area within Safer Gambling document | |

| | |
|--|---|
| Industry developed customer care framework | <ul style="list-style-type: none"> ○ Section 2.7 Exclusion Provisions ○ Section 2.9 Pre-Commitment System ○ Section 2.12 Service of Alcohol to Gaming Machines and Tables ○ Section 2.13 Training and Skills Development ○ Section 2.15 Interaction with Customers |
| Responsible Gambling Advisory Committee (RGAC) engages industry, community and people with lived experience | <ul style="list-style-type: none"> ○ Role of the RGAC which will be supported by The Ville Casino and disseminated through awareness programs ○ Memorandum of Understanding with Centacare |
| Information, tools and services tailored for general, at-risk and high-risk populations | <ul style="list-style-type: none"> ○ Section 2.5 Cash Payout Limits ○ Section 2.7 Exclusion Provisions ○ Section 2.9 Pre-Commitment System ○ Section 2.13 Interaction with Gambling Support Services |
| Elevate and connect safer gambling networks across the state into harm minimisation policy and program development | <ul style="list-style-type: none"> ○ Section 2.16 Interaction with Gambling Support Services |

3.2 Technology and Environment

| Figure 3.2 – Technology and Environment | | | | |
|--|-------------------|--|--|--|
| Goals | | | | |
| Gambling products and environments are safer and an evidence-based approach is taken to development | | Gambling products and practices keep pace with community expectations | | Innovation is applied to consumer protection as much as it is product development |
| Strategies | | | | |
| Understanding emerging technologies, their market impact and the potential for harm | Knowledge sharing | Understand and respond to online emerging markets | Transition to safe cashless environments | All parts of the supply chain ‘design in’ protections to protect and empower consumers |
| Key Deliverables | | Area within Safer Gambling document | | |
| Facilitate the sharing and dissemination of research to inform the implementation of evidence-based technology and environmental interventions | | ○ Section 2.18 Evidence Based Research and Trials | | |
| Increase use of pilots and place-based technology trials | | ○ Section 2.16 Emerging Technology and New Products ○ Section 2.18 Evidence Based Research and Trials | | |
| Move to a safe digitalisation and eCommerce gambling environment | | ○ This will be examined under emerging technologies | | |
| Engage and contribute to implementation of the National Consumer Protection Framework for Online Wagering | | ○ The Ville currently do not provide online wagering | | |

3.3 Public Health Approach

| Figure 3.3 – Public Health Approach | | |
|--|---|---|
| Goals | | |
| Integrated whole-of-system approach that moves away from a focus on individual pathology | Gambling harm is addressed along all levels of the risk continuum | A focus on prevention and awareness raising as well as help and support |
| Strategies | | |

| Better understanding gambling harm to inform policy interventions | Improving cross-sectoral linkages and approaches | Implementing best practice gambling help and self-help support models | Collaborative, coordinated approaches to prevention and awareness raising initiatives | Interventions addressing specific needs of 'at risk' communities |
|---|--|---|---|--|
| Key Deliverables | | Area within Safer Gambling document | | |
| Population level research of gambling related harm and risk prevalence | | <ul style="list-style-type: none"> ○ This will be conducted in alignment with peak bodies and industry regulators | | |
| Deliver consistent and targeted gambling harm awareness campaigns and messaging | | <ul style="list-style-type: none"> ○ Section 2.11 Advertising and Promotions | | |
| Co-designed initiatives with government and sectors responsible for areas such as mental health, alcohol and drug use and financial resilience outcomes | | <ul style="list-style-type: none"> ○ Section 2.16 Interaction with Gambling Support Services | | |
| Revised Queensland Gambling Help model that is client focused and tailored to meet the specific needs of individuals and communities | | <ul style="list-style-type: none"> ○ Section 2.13 Training and Skills Development ○ Section 2.14 Customer Liaison Officer ○ Section 2.15 Interaction with Customers ○ Section 2.16 Interaction with Gambling Support Services | | |

3.4 Regulatory Framework

Figure 3.4 – Regulatory Framework

| Goals | | | | |
|---|--|--|--|--|
| Fit-for-purpose, proportionate and risk-based | Evidence-led and outcomes focused | Queensland actively participating and leading in the national regulatory space | | Transparent and accountable |
| Strategies | | | | |
| Strengthening harm minimisation controls | Taking a local and national approach to regulation | Building a more complete data picture and evidence base to inform decisions | Increased transparency in decision making and policy development | Engaging stakeholders in the design, implementation and evaluation of programs and interventions |
| Key Deliverables | | Area within Safer Gambling document | | |
| Review Code of Practice and mandatory requirements to strengthen and encourage effective harm minimisation outcomes | | <ul style="list-style-type: none">○ Section 2.18 Evidence Based Research and Trials○ Section 2.19 Review of the Safer Gambling Strategy | | |
| Combine government/industry information sets to assess impact on community wellbeing | | <ul style="list-style-type: none">○ Section 2.18 Evidence Based Research and Trials | | |
| Develop Commissioner guidelines targeting significant risks and emerging harms | | <ul style="list-style-type: none">○ Role of the Regulator | | |
| Publish significant gaming application decisions | | <ul style="list-style-type: none">○ Role of the Regulator | | |
| Encourage the Commonwealth Government to address gambling advertising | | <ul style="list-style-type: none">○ Role of the Regulator and Peak Body | | |

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