

The Ville

HARM MINIMISATION STRATEGY

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Version 2.0

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1. Introduction

1.1 Introduction

The Ville Resort-Casino (“The Ville”) operates a Casino located in Townsville Qld encompassing a wide range of facilities and services for the local community and wider demographics which incorporates food, beverage gaming and accommodation facilities. The entertainment facilities including gaming are enjoyed by the vast majority however The Ville recognises that some of our customers will at some time 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 lies with the individual, The Ville recognises that customers need to be informed about the gambling harm that may be associated and the tools and support services that are available should they need to seek assistance with gaming behaviours.

Our commitment to providing gaming services for our customers in a responsible manner, with a focus on Harm Minimisation is paramount to the success of the operations. The Ville have developed a Harm Minimisation Strategy in alignment with the local community, regulator and government expectations and more recently is aligned with the **“Gambling Harm Minimisation Plan for Queensland 2021-25”**.

In addition to complying with all legislation The Ville has implemented a range of additional policy and initiatives to promote and manage the Harm Minimisation strategy. The Ville is committed to continually evolving and improving the Harm Minimisation strategy through the involvement of technology and community expectations.

1.2 Availability of the program

The Gambling Harm Minimisation Strategy is available to customers upon request and will be located on the website <https://www.the-ville.com.au/> .

Customers of The Ville will be notified about the strategy through direct communication means and internal signage.

1.3 Purpose of the Harm Minimisation Strategy

The purpose of the Harm Minimisation Strategy is to encompass the following:

- Manage potential harm associated with gambling by creating a responsible 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 responsible 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 the balanced development and maintenance, in the public interest, of an economically viable and socially responsible gambling industry recognising the positive and negative impacts of gambling on 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;
- 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. Harm Minimisation Strategy

2.1 Responsible Gambling Information

Responsible Gambling messaging is displayed in both the casino and back of house areas to ensure adequate exposure and information is readily available to both patrons and staff. Tag lines to “Gamble Responsibly” are displayed on all gaming related marketing material to continually remind patrons to gamble responsibly.

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.

Responsible Gambling and Exclusion information brochures, which are readily available are also included in material for all new memberships.

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

2.2 Payment of Winnings, Credit and Lending

All winnings will be paid in accordance with the applicable legislation requirements as set out by the regulations and policies.

Gambling winnings above the set limits will be paid by cheque in full or part payment (cash and cheque) or entirely in cheque payment, in accordance with current policy on payouts and payout limits. The Ville will ensure cheque payments are not cashed on the premise until the next trading day or within 24 hours of the win.

2.3 Customer Loyalty Programs

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

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

- at Casino Promotions Desk;
- at Cashier Desks
- or online.

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

The loyalty program encompasses a wide range of incentives for all patrons using the facilities of the venue and include restaurants, beverages, accommodation and gambling services.

Player activity statements are made available to members upon request which will include at a minimum, all wins and losses for the period of the statement.

2.4 Exclusion provisions

The Ville provides the option for players to exclude (ban) themselves from our casino facility. We aim to do this by providing an environment that ensures the matter is dealt with sensitively, confidentially and in a timely manner. Exclusion options are available for individuals who may be experiencing difficulties with their gambling behaviour: The Ville Casino have a Memorandum of Understanding with Centacare North Queensland to facilitate remote exclusions easing the need for patrons to attend the venue in person to process an exclusion.

What happens once my exclusion order is processed?

Exclusions will take effect immediately and remain in force for a period of five years. 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. Further information is available from the Compliance Manager, Security Team, or Gaming Supervisors.

Excluded persons are prohibited from entering or remaining in the casino 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.

2.5 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 casino and reported to the appropriate Government Authority.

2.6 Pre-Commitment

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

Players are able to register for pre-commitment through the following means:

- at each individual gaming machine
- members service/cashier's desk

Various notification 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:

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

If a player reaches the limits set they will have the ability to continue playing however the member will be restricted from accumulating any further system rewards or incentives.

2.7 Gambling environment

2.7.1 Breaks in play

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

- requiring patrons to leave gaming machines to participate in most promotional draws to claim prizes;
- announcements or verbal encouragement by staff to take refreshment breaks;
- reminders through iVISTA units;
- café and lounge facilities located throughout the casino facilities;
- ability of patrons to lock gaming machine with member card ensuring security of funds and reserving the machine while they take a break.

2.7.2 Clocks

Clocks are located on each gaming machine so customers can be aware of the passing of time.

2.7.3 ATMs

ATMs are not located within the designated gaming areas and are positioned in consultation with and approval by relevant legislation.

2.8 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 to minors or vulnerable or disadvantaged groups;
- 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 responsible gambling messages are incorporated in advertising and promotion

Each prospective advertisement and promotion is checked by relevant staff against Codes and standards, and also 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 Responsible Gambling messages via the following means:

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

2.9 Service of Alcohol to Gaming Machines and Tables

Non-alcoholic beverages, including tea and coffee, are available to customers. As part of our commitment to responsible gambling, persons who are unduly intoxicated are not permitted to continue to gamble and are requested to leave the venue. 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.

3.0 Training and Skills Development

The Ville have developed and continue to develop responsible gaming training programs and refresher training courses to assist staff in the delivery of responsible 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 Harm Minimisation Strategy;
- equip staff to deliver gambling products and ancillary services in accordance with the Harm Minimisation Strategy;
- increase the awareness and understanding of possible behavioural indicators of problem gambling;
- 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 problem gambling, 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 Responsible Gambling training program annually to ensure it remains effective in supporting the Harm Minimisation Strategy document and community expectations.

Further to the aforementioned, it is acknowledged through the Queensland Gambling Harm Minimisation Plan the increase in high-risk demographics and community groups. The Ville has a role to play in increasing the awareness of potential risks through gambling products. In addressing these concerns, The Ville will be embarking on strategies to reduce the potential risks through community engagement and awareness programs in conjunction with government agencies and health care 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

2.11 Customer Liaison Representatives

The Ville recognise 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 and experience.

The Ville have trained customer liaison representatives (Gaming Shift Managers) that are available in the gaming area at all times of the gambling operations. The role of the customer liaison representatives include the following:

- monitor the gaming areas for patron behaviours
- ensure that staff record/report responsible gambling incidents 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.

2.12 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 casino complex.

Where a person in the casino is exhibiting or displaying signs of distress, or behaviours potentially indicating a problem with their gambling, 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, a problem gambler. 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. We also require that action taken in such circumstances be recorded by the casino in an appropriately maintained incident register.

2.13 Interaction with Problem 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 harm minimisation issues.

The Ville have developed a strong relationship with Centacare North Queensland to assist in the development of the Harm Minimisation Strategy incorporating a strategy to shift 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 Harm Minimisation 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 Harm Minimisation 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 problem gambling support services are maintained.

2.14 Customer 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.

2.15 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 many questions and challenges from a responsible 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.

2.15.1 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 currently 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 is also working with the current gaming providers to ascertain the ability of the current systems to incorporate the changes, this will be conducted along the timeframe as outlined below.

Figure 2.2 – Digitalisation and eCommerce Project				
	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

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

2.15.2 Facial Recognition

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 is embarking on the introduction of the technology through a staged approach to ensure the system capability and effectiveness is at the required level to administer and incorporate harm minimisation strategies.

The Ville has commenced research into the current system capabilities and further requirements and will move toward implementing the technology to assist in the harm minimisation strategy.

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 Casino

2.16 Evidence Based Research and Trials

As technology and community expectations evolve The Ville are committed to working in collaboration with regulators and the community to undertake research and implement continuous improvement methods to address Harm Minimisation 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.

2.17 Review of the Harm Minimisation Strategy

The Harm Minimisation 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 will also engage with 3rd party associates and industry associations to incept continuous improvements based on the effectiveness of incepted policy and procedures.

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 the next 5 years.

Many of the strategies have been outlined in The Ville Harm Minimisation document 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	Taking a harm prevention and precautionary approach to product and environment
Ensuring all consumers can make informed choices		
Key Deliverables	Area within Harm Minimisation document	
Industry developed customer care framework	<ul style="list-style-type: none"> ○ Section 0 2.4 Exclusion provisions ○ Section 0 2.6 Pre-Commitment ○ Section 0 2.9 Service of Alcohol to Gaming Machines and Tables ○ Non-alcoholic beverages, including tea and coffee, are available to customers. As part of our commitment to responsible gambling, persons who are unduly intoxicated are not permitted to continue to gamble and are requested to leave the venue. 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. ○ ○ 3.0 Training and Skills Development ○ Section 0 2.12 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 0 2.2 Payment of Winnings, Credit and Lending ○ 0 2.4 Exclusion provisions ○ Section 0 2.6 Pre-Commitment ○ Section 0 2.13 Interaction with Problem Gambling Support Services 	
Elevate and connect responsible gambling networks across the state into harm minimisation policy and program development	<ul style="list-style-type: none"> ○ Section 0 2.13 Interaction with Problem 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	All parts of the supply chain 'design in' protections to protect and empower consumers
Transition to safe cashless environments	Understand and respond to online emerging markets	
Key Deliverables		
	Area within Harm Minimisation document	
Facilitate the sharing and dissemination of research to inform the implementation of evidence-based technology and environmental interventions	<ul style="list-style-type: none"> ○ 0 ○ 2.16 Evidence Based Research and Trials 	
Increase use of pilots and place-based technology trials	<ul style="list-style-type: none"> ○ 0 2.15 Emerging Technology and New Products ○ 0 ○ 2.16 Evidence Based Research and Trials 	
Move to a safe digitalisation and eCommerce gambling environment	<ul style="list-style-type: none"> ○ This will be examined under emerging technologies 	
Engage and contribute to implementation of the National Consumer Protection Framework for Online Wagering	<ul style="list-style-type: none"> ○ 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	Interventions addressing specific needs of 'at risk' communities
Collaborative, coordinated approaches to prevention and awareness raising initiatives	Implementing best practice gambling help and self-help support models	
Key Deliverables	Area within Harm Minimisation 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"> ○ 0 2.8 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"> ○ 0 2.13 Interaction with Problem 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"> ○ 0 3.0 Training and Skills Development ○ 0 2.11 Customer Liaison Representatives ○ 0 2.12 Interaction with Customers ○ 0 2.13 Interaction with Problem 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	Transparent and accountable
Queensland actively participating and leading in the national regulatory space		
Strategies		
Strengthening harm minimisation controls	Taking a local and national approach to regulation	Engaging stakeholders in the design, implementation and evaluation of programs and interventions
Building a more complete data picture and evidence base to inform decisions	Increased transparency in decision making and policy development	
Key Deliverables		
Review Code of Practice and mandatory requirements to strengthen and encourage effective harm minimisation outcomes	<ul style="list-style-type: none"> ○ 0 ○ 2.16 Evidence Based Research and Trials ○ 0 2.17 Review of the Harm Minimisation Strategy 	
Combine government/industry information sets to assess impact on community wellbeing	<ul style="list-style-type: none"> ○ 0 ○ 2.16 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 	