

Gambling Administration Guidelines

*Gambling Administration Act 2019
Casino Act 1997*

*Employee Training Requirements
Staff Involved In Casino Gaming Operations*

Effective 31 March 2023



Government of South Australia
Consumer and Business Services

Gambling Administration Guidelines

The following Gambling Administration Guidelines (the Guidelines) have been issued by the Liquor and Gambling Commissioner (Commissioner) under section 17 of the *Gambling Administration 2019* for the purposes of section 40C of the *Casino Act 1997*.

These guidelines are intended to inform training providers and other persons about the requirements for making an application for approval to deliver a course of training in South Australia which is required to be undertaken by a staff member performing duties in relation to casino gaming operations.

Consumer and Business Services

For any further information or assistance in relation to these guidelines, contact Consumer and Business Services (**CBS**) Liquor & Gambling on 131 882 or by email at liquorandgaming@sa.gov.au.

Alternatively, written enquiries can be made by mail to:

Consumer and Business Services
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Preliminary

1. Introduction

Under section 40C of the *Casino Act 1997* the Commissioner may, on application by a person, approve courses of training to be undertaken by casino staff.

The Commissioner must not approve a training course unless the course complies with the requirements of any applicable responsible gambling codes of practice or any applicable gambling administration guidelines.

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2. Intended audience

These guidelines are intended for use by training providers seeking approval to deliver an approved course of training which must be undertaken by a **casino staff member only**.

3. Commencement

These guidelines come into effect from 31 March 2024, being the date determined by the Commissioner by notice published in the South Australian Government Gazette.

The Commissioner may by notice in the Government Gazette vary or revoke these guidelines at any time in accordance with section 17(3) of the *Gambling Administration Act 2019*.

Version control is being used to indicate revisions to these guidelines.

Gambling Administration Guidelines

4. Purpose and scope

- (1) These guidelines are intended to guide training providers about the requirements for approval to deliver a course of training to be delivered in South Australia which is required to be undertaken by a staff member performing duties in relation to casino operations, which must—
 - (a) achieve the outcomes set out in these guidelines for the appropriate course
 - (b) be delivered by a person (the **trainer**) with the appropriate level of qualifications, industry background and experience
 - (c) provide a satisfactory basis for assessment
 - (d) meet quality assurance needs, and
 - (e) be able to be delivered in accordance with any other criteria as determined by the Commissioner from time to time.
- (2) A course of training for the purpose of the Casino Gambling Code of Practice (the **Code**) shall be classified as—
 - (a) RSG1 – Responsible Service of Gambling Level 1
 - (b) RSG2 – Responsible Service of Gambling Level 2
 - (c) RSG3 – Responsible Service of Gambling Level 3
- (3) Any matters arising from the evaluation of a course of training for casino operations not covered by these guidelines will be considered at the discretion of the Commissioner.
- (4) These guidelines are also a valuable document for informing a person undertaking a course of training about the expected outcomes and assessment elements.

5. Applications for approval

- (1) A training provider seeking approval for a course of training for the purposes of section 40C of the *Casino Act 1997* must submit an application to Consumer and Business Services (CBS).
- (2) The application and payment of the prescribed fee must be made in the manner and form approved by the Commissioner.
- (3) An application for the approval of a course of training must contain at a minimum, the following elements—
 - (a) the date of the submission
 - (b) the full name of the training provider, address for service and address of the principal place of business
 - (c) the contact details of where enquiries regarding the submission may be directed
 - (d) if the applicant is a registered training provider (RTO), proof of registration with the Australian Skills Quality Authority

- (e) written evidence that all trainers delivering the training meet the requirements as outlined in clause 7(2) of this document and how the training provider will ensure that all trainers continue to meet these requirements
- (f) a proposed course outline or details of any variation to the course outline for the purpose of satisfying the Commissioner that the course meets the regulatory need, identifies appropriate competency outcomes and a satisfactory basis for assessment and meets quality assurance needs
- (g) indicative course materials (including the proposed method of instruction and assessment, copies of relevant course materials, workbooks, videos, handouts and presentations)
- (h) details of where the course of training (if a revision) is currently in operation, and
- (i) an indication of which content, if any, is to be delivered online (online training delivery) or via video conferencing tools (virtual training delivery).

(4) An application must also include the details of any consultation undertaken regarding course content with researchers or gambling help services.

(5) If the training provider intends to deliver course content online, the following must also be provided—

- (a) written confirmation that any content delivered in this manner complies with the Australian Accessible ICT standard: EN 301 549:2016 for accessibility, or the action plan to meet this requirement
- (b) written confirmation that any content delivered in this manner will be delivered using a Learning Management System (LMS), to allow student tracking, provide reporting tools and support student interactions
- (c) written confirmation that there is a mechanism in place for students to seek timely assistance from trainers with respect to the content of the material and support with any technical issues, and
- (d) written confirmation of measures in place to verify the identity of the student enrolled in the course and that the student undertaking the assessment is the student enrolled in the course.

6. Training course and provider requirements

(1) A course of training must be delivered by a Registered Training Organisation (RTO) registered with the Australian Skills Quality Authority (ASQA) or, if the training is to be delivered in-house, the licensee must satisfy the Commissioner that the provider of in-house training will be of an equivalent standard to training delivered by an RTO, and must be approved by the Commissioner.

(2) All persons delivering a course of training must—

- (a) have attained competency in the nationally accredited Certificate IV in Training and Assessment
- (b) have attained competency in the courses of training that they are delivering

- (c) have at least three years' experience in a role involving the provision of responsible gambling products, hospitality industry and commercial gambling operations, and
- (d) have the understanding and awareness of literature on gambling, problem gambling and gambling harm, addictions and addiction-like behaviour and interventions with problem gamblers and people at risk of gambling harm.

RSG1 Attributes

- (3) A course of training to be classified as RSG1 for the purposes of the Code must include the nationally accredited course of training **[SITHGAM022 – Provide responsible gambling services](#)** (or its current equivalent) and any information specific to South Australian gambling laws.

RSG2 Attributes

- (4) A course of training to be classified as RSG2 for the purposes of the Code must include case studies on patron reporting and engagement. RSG2 training must also include a consumer voice component which may be presented in person, via video conferencing tools or video format.

RSG3 Attributes

- (5) A course of training to be classified as RSG3 for the purposes of the Code must include case studies regarding complex patron situations and management level responses to these situations. RSG3 training must also include—
 - (a) a consumer voice component which may be presented in person, via video conferencing tools or video format
 - (b) general information regarding co-morbidities such as mental health, dementia, domestic violence or any additional matters deemed to be relevant. Detailed information regarding these topics may be delivered by a subject matter expert via optional modules or video format
 - (c) general information regarding support services available for industry staff that may be having difficulty as a result of providing assistance to patrons. Detailed information regarding this topic may be delivered by a subject matter expert via optional modules or video format, and
 - (d) general information on managing cultural sensitivities when approaching patrons that are displaying indicators of gambling harm.

Course Delivery

- (6) Delivery of training may be face to face, virtual, online, or a combination of face to face, virtual and online components.
- (7) Presentation of course content should be engaging through the use of mechanisms such as simulation, scenarios (whether via group discussion, student participation or video presentation), case study or lecture-style presentation.
- (8) Presentation and assessment mechanisms should take into account the needs of those from diverse backgrounds and with differing learning styles.

- (9) Assessment methods must include a combination of written responses, multiple choice questions, verbal answers (if applicable) and group participation (if applicable). For the purposes of clause 6(8), a person delivering a course of training may vary the methods of assessment as required to accommodate the needs of those from diverse backgrounds with different learning styles if applicable.
- (10) A person appointed by the Commissioner as an inspector for the purposes of a gambling Act must, at any reasonable time and without notice, be permitted to observe the delivery of an approved course of training. Inspectors will show identification in these circumstances.
- (11) Training providers delivering online content must provide log in details to CBS on request for the purpose of checking course content and presentation.

7. Provision of courses by approved training providers

- (1) A training provider must for the purposes of the Code only deliver a course of training approved by the Commissioner as RSG1, RSG2 or RSG3 without alteration.
- (2) A training provider may however update content, their presentation and assessment mechanisms in line with any legislative or operational changes, or to include alternate case studies or scenarios, without seeking further approval. The Commissioner must be notified of these updates within 28 days of the change being made. Failure to notify the Commissioner of these updates may result in revocation of approval.
- (3) A training provider may not amend the method of delivery for training (i.e. face to face, virtual, online, or combination) without the approval of the Commissioner.
- (4) A training provider delivering ongoing training must retain records of any optional modules that have been included as part of the training and retain these records for a period of not less than 3 years from the date of the training. These records must be provided to an inspector on request.

8. Requirements for virtual and online training delivery

- (1) These requirements are in addition to those listed above.
- (2) Any virtual or online content must—
 - (a) be engaging
 - (b) use authentic learning contexts
 - (c) have a navigation structure that is clear and consistent
 - (d) use plain English and explain all legal terms
 - (e) meet the needs of learners taking in to account cultural diversity and different learning styles
 - (f) be contextualised to meet the requirements of specific industry sectors and workplaces
 - (g) have content created in recommended formats (pdf, jpeg etc.)
 - (h) have media elements (graphics, audio and video) optimised for smallest file size and download time

- (i) contain an introduction page setting out the purpose of the course
- (j) be divided into sections such that a person enrolled in the course must pass each section before progressing on to the next (if applicable).

(3) Before enrolling in a course which includes virtual or online content, students must be advised of any peripheral requirements such as the technology required to complete the course which may include webcams or other technology to interact with a trainer and other students (if applicable).

(4) There must be a mechanism in place for students to seek timely assistance from training providers with respect to the content of the material including support with any technical issues.

(5) There must be measures in place to verify the identity of the student enrolled in the course, that any pre-requisites have been met and that the student undertaking the assessment is the student enrolled in the course.

Online training only

(6) Online content must comply with the Australian Accessible ICT standard: EN 301 549:2016, which supports access to information, communication and technology (ICT) for people with a disability.

(7) If online content is to form part of the assessment process, a person enrolled in the course must have the ability to change their answers while completing the assessment. However, they should not be advised whether their answers are correct or otherwise until they have completed the assessment. If the student does not pass the assessment, they must repeat that part of the content until a successful assessment is achieved.

(8) When assessing a students' understanding of appropriate behaviour in a scenario, multiple choice answers may be used, provided the answers available include several actions that could be taken and the student is required to identify the correct actions and put them in the correct order.

Example

When faced with a scenario where a patron is becoming increasingly aggressive while playing Baccarat, the choice of answers should include all of the steps for engaging with the patron, offering assistance and documenting the engagement. It should also include procedures unrelated to engaging with the patron and offering assistance. The student needs to choose the correct steps and put them in order.

(9) Online content must be tested for stability and be able to be delivered in the most commonly used web browsers or software before being offered to students. All hyperlinks should be checked for accuracy.

(10) Online content must be delivered using a Learning Management System (LMS) to allow student tracking, provide reporting tools and support student interactions.

9. RSG1 training outcomes

Casino operations

(1) A person who has successfully completed an approved course of training at the RSG1 level will be able to—

- (a) explain gaming activities and game features consistently with regulatory and procedural requirements
- (b) explain the process and theory of casino table games, automated table games and gaming machine operations and to operate and maintain gaming machines (minimum standard)
- (c) pay claims for prizes
- (d) operate and maintain coin dispensing equipment and cash redemption terminals
- (e) identify and respond to breakdowns in security, and
- (f) make and maintain accurate records of gambling related incidents and associated staff action in accordance with regulatory and procedural requirements.

(2) A training provider may not offer this component via virtual or online training delivery.

Responsible Gambling

(3) A person who has successfully completed an approved course of training at the RSG1 level will be able to—

- (a) display signage and information related to responsible gambling in accordance with regulatory and procedural requirements
- (b) apply responsible service of gambling procedures in accordance with regulatory and procedural requirements
- (c) provide accurate and appropriate basic information on gambling harm as requested, and
- (d) identify the relevant casino staff that can provide advice regarding early intervention of patrons at risk of gambling harm.

Gambling harm identification (including automated risk monitoring)

(4) A person who has successfully completed an approved course of training at the RSG1 level will be able to—

- (a) observe players and onlookers, identifying, reporting on and responding to indicators of gambling harm
- (b) understand the reporting process for the identification of people displaying indicators of gambling harm and make accurate records in accordance with regulatory and procedural requirements, and
- (c) having been instructed in the user documentation for an approved automated risk monitoring system, to operate the automated risk monitoring system, respond appropriately to alerts from the system and document the response in accordance with regulatory and procedural requirements. Training providers may not offer this component via virtual or online training delivery

Pre-Commitment

(5) A person who has successfully completed an approved course of training at the RSG1 level will be able to—

- understand and explain the principles of pre-commitment, both generally and by reference to pre-commitment systems in operation in South Australia at the time of the training, and
- appropriately suggest a referral to a financial counselling service and facilitate such referral.

Loyalty

(6) A person who has successfully completed an approved course of training at the RSG1 level will be able to understand and explain the principles of an acceptable loyalty program, both generally and by reference to loyalty systems in operation in South Australia at the time of the training.

Barring

(7) A person who has successfully completed an approved course of training at the RSG1 level will be able to—

- explain the barring arrangements provided for under Part 6 of the *Gambling Administration Act 2019*
- receive and action applications for voluntary barring
- refer to an appropriately trained staff member applications for involuntary barring
- understand where information relating to barred persons may be found, and
- identify, engage with and, if appropriate, remove individuals believed to be barred persons.

Gambling Help Services

(8) A person who has successfully completed an approved course of training at the RSG1 level will be able to respond appropriately to approaches for—

- information on funded gambling help services, and
- referral to the national gambling help line, gambling help online or to a particular gambling help service.

Regulatory and procedural requirements

(9) A person who has successfully completed an approved course of training at the RSG1 level will be able to identify regulatory and procedural requirements from source documentation.

10. RSG2 training outcomes

Gambling harm identification (including automated risk monitoring)

(1) A person who has successfully completed an approved course of training at the RSG2 level will be able to—

- (a) interpret observations made by others of players and onlookers, in relation to indicators of gambling harm
- (b) review and act upon records made of people displaying indicators of gambling harm in accordance with regulatory and procedural requirements, and
- (c) receive and interpret reports and alerts produced by an installed automated risk monitoring system.

Patron engagement and referral to gambling help services

(2) A person who has successfully completed an approved course of training at the RSG2 level will be able to—

- (a) approach and engage with all casino patrons, whether or not that person is displaying indicators of gambling harm, so as to assist with early identification and intervention
- (b) form a view as to whether an identified person is at risk of gambling harm
- (c) approach and engage with a person who is at risk of gambling harm and respond appropriately
- (d) communicate detailed information about gambling harm and gambling help services (including to non-gamblers who may seek advice and support as gamblers' family members or concerned friends)
- (e) engage directly with a gambling help service on behalf of a person seeking assistance (including a family member or other third party seeking assistance), and
- (f) identify, engage with and provide assistance to staff displaying indicators of gambling harm (involving any sort of gambling) including referral to counselling, support or therapy.

Pre-commitment

(3) A person who has successfully completed an approved course of training at the RSG2 level will be able to—

- (a) assist a gambler to set a pre-commitment limit, and
- (b) approach and engage with patrons who have exceeded a pre-commitment limit.

Loyalty

(4) A person who has successfully completed an approved course of training at the RSG2 level will be able to explain how data from an acceptable loyalty program can assist to identify or verify patrons at risk of gambling harm.

Account based cashless gaming system

(5) A person who has successfully completed an approved course of training at the RSG2 level will be able to understand and explain the principles of an account based gaming system for anonymous and transparent accounts, both generally and by reference to any such systems in operation in South Australia at the time of the training.

Barring

(6) A person who has successfully completed an approved course of training at the RSG2 level will be able to—

- (a) receive and determine applications for involuntary barring
- (b) provide assistance to staff and patrons regarding complex barring issues
- (c) escalate barring issues to the relevant regulator if necessary and engage with the regulator about them, and
- (d) exercise judgment about law enforcement action in respect of the removal of barred persons in accordance with the *Gambling Administration Act 2019*.

Gambling Help Services

(7) A person who has successfully completed an approved course of training at the RSG2 level will be able to understand and where appropriate, explain the different sorts of services provided by—

- (a) the national gambling helpline and gambling help online
- (b) local or regional gambling help services, and
- (c) specialised and statewide gambling help services.

Regulatory and industry bodies

(8) A person who has successfully completed an approved course of training at the RSG2 level will be able to differentiate in practical workplace situations the roles of bodies or officials relevant to regulatory and procedural requirements (but not limited to):

- (a) the Liquor and Gambling Commissioner, and
- (b) host responsibility coordinators.

11. RSG3 training outcomes

(1) A person who has successfully completed an approved course of training at the RSG3 level will in addition to the attributes at the RSG2 level be able to—

- (a) understand, interpret and respond to automated risk monitoring system reports and alerts
- (b) assist players to set a pre-commitment limit or enter into a flexible informal arrangement to manage or control the persons gambling in accordance with regulatory and procedural requirements
- (c) understand how co-morbidities influence gambling behaviour
- (d) explain the roles of, and refer patrons to, services other than gambling help services if applicable

- (e) demonstrate ability to manage cultural sensitivities when approaching patrons that are displaying indicators of gambling harm, and
- (f) understand the functions and powers of South Australian regulatory and industry bodies

12. References

[Casino Act 1997](#)

[Casino Regulations 2013](#)

[Casino Gambling Code of Practice](#)

Revision History

Version	Effective date	Changes from previous version
1	3 December 2020	Original document
2 (Current)	31 March 2024	Updated following gambling industry staff training review