

# Gambling Administration Guidelines

*Authorised Betting Operations Act 2000*

## Staff training – Interactive wagering services

Effective 30 March 2023

The following guidelines have been published by the Liquor and Gambling Commissioner (Commissioner) under section 17 of the *Gambling Administration Act 2019* for the purposes of the Authorised Betting Operations Gambling Code of Practice.

### 1. Introduction

The National Consumer Protection Framework (**NCPF**) for online wagering is an agreement between the Commonwealth of Australia and States and Territories of Australia which aims to reduce the harm of online wagering to Australian wagering customers.

The NCPF is the end result of a process which began on 7 September 2015, when the Commonwealth Government asked the Hon Barry O’Farrell to conduct a “Review of Illegal Offshore Wagering” (**the Review**).

On 28 April 2016, the Commonwealth Government publicly released its response to the Review accepting, 18 of the 19 recommendations, either in full or in-principle, and noting one.

Following that, with respect to the recommendations relating to onshore wagering services, the Commonwealth Government has been working with state and territory governments to establish a nationally consistent framework of consumer protections for Australian wagering customers.

This resulted in Ministers from the Commonwealth Government and states and territories releasing a National Policy Statement (**NPS**) of agreed commitments to provide for a NCPF for interactive wagering in Australia.

Some of the measures of the NCPF have already been implemented by the Commonwealth through the *Interactive Gambling Act 2001*, while other measures have been enacted by state and territory governments through various regulatory instruments.

One of the measures of the NCPF is that all staff involved in the provision of online wagering services, or with the capacity to influence the wagering service, are required to undertake and successfully complete responsible service of gambling training to create a culture of responsible gambling within the organisation.

Following that, those staff members must undertake an annual refresher training course to refresh content knowledge and information on any recent changes in consumer protection and/or gambling harm.

The training is an important consumer protection tool to educate relevant staff on the responsible provision of interactive wagering services and harm minimisation principles. Once staff have undertaken and successfully completed the training, they then have the tools to assist customers who identify with potentially harmful consumer gambling behavior or to escalate the matter if necessary.

## 2. Overview

South Australia enacts the measures of the NCPF that individual states and territories are responsible to implement via the Authorised Betting Operations Gambling Code of Practice (**the Code**) prescribed by the Commissioner.

These guidelines are intended to provide authorised betting operators, that operate interactively, with practical guidance about the training that certain staff are required to undertake and successfully complete, details of the content of training courses, method of delivery of the courses and quality assurance of training delivered in-house.

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*.

The information in these guidelines is provided on the understanding that the Commissioner is not giving legal opinion, interpretation, or other professional advice.

When considering whether the training of relevant staff is compliant with the Code, the Commissioner will have regard to any relevant information provided in these guidelines.

It is the responsibility of an Interactive Wagering Service Provider (**IWSP**) to consider the training undertaken by relevant staff and if necessary, seek independent legal advice on whether it or the method of delivery of such may be contrary to the Code.

Any matters arising from the regulation of the provision of staff training by IWSPs not covered by these guidelines will be resolved at the discretion of the Commissioner.

## 3. Staff training

- (1) Wagering service providers, which provide their services interactively, are required to ensure that all staff involved in the provision of wagering services, or with the capacity to influence the wagering service, have received and successfully completed training in line with the minimum requirements set out in the National Unit of Competency CHCFIN005 – Provide responsible online wagering services (**UoC**).
- (2) Following that, those staff members must undertake and successfully complete an annual refresher training course to refresh content knowledge and information on any recent changes in consumer protection and/or gambling harm.
- (3) The UoC has been endorsed by Commonwealth, state and territory ministers responsible for skills and training, and is published at [www.training.gov.au/Training/Details/CHCFIN005](http://www.training.gov.au/Training/Details/CHCFIN005).
- (4) The UoC outlines the criteria to demonstrate the achievement of competency and establishes a nationally consistent minimum standard for training of certain staff of IWSPs.
- (5) If an IWSP does not deliver the training courses in-house, TAFE Queensland has developed a micro-credentials and knowledge test aligned with the UoC that IWSPs may choose to use; or alternatively an accredited training course of the UoC delivered by a registered training organisation of a TAFE can be used, if available.

## 4. Guidance for the implementation and on-going requirements of the staff training measure

- (1) The NCPF's Implementation Governance Committee (**IGC**) comprises of Commonwealth, state and territory government senior officials with responsibility for online wagering policy and regulation and is established to, amongst other things, facilitate inter-governmental collaboration on key policy and operational issues related to the NCPF.
- (2) The Commonwealth Department of Social Services (**DSS**) provides secretariat support to the IGC.
- (3) Decisions of the IGC are made via consensus.
- (4) The DSS has prepared a document which provides practical information in relation to the implementation and on-going requirements for the staff training measure. All members of the IGC have endorsed that document.

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- (5) For the purposes of the clause in the Code in relation to staff training, the Commissioner has adopted the document prepared by DSS and approved by the IGC, as providing guidance to IWSPs in relation to the implementation and on-going requirements for the staff training measure as set out in Schedule 1 to this Guideline.

### 5. Provision of reports for independent reviews of in-house training

- (1) Independent reviews of in-house training must be furnished to the Commissioner within 21 days of completion.

### 6. Records of training

- (1) IWSPs must ensure that records of all successful completion of training are maintained and available for inspection upon request by an inspector.

### 7. References

[Gambling Administration Act 2019](#)

[Authorised Betting Operations Act 2000](#)

[Authorised Betting Operations Gambling Codes of Practice](#)

[National Consumer Protection Framework for Online Gambling](#)

### Revision History

Version	Details	Government Gazette publication details	Effective Date
1	Authorised Betting Operations (Staff Training – Interactive Wagering Services Guidelines) Notice 2023 <ul style="list-style-type: none"><li>Original document.</li></ul>	30 March 2023 (No 21. of 2023)	30 March 2023

# National Consumer Protection Framework for Online Wagering

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## Staff Training measure

### *How will staff training help make it safer for people gambling online?*

Staff training is an important consumer protection tool under the National Consumer Protection Framework for online wagering (National Framework). It educates staff on the responsible provision of online wagering services and harm minimisation principles. The training provides staff with tools to assist a consumer when they are identified as potentially experiencing harm from gambling.

Training of all staff employed by an Australian licensed provider who are involved in the provision of online wagering services, or who have the capacity to influence the wagering service (such as management, marketing, and product development staff) is important. This helps to build a culture of responsible service of online gambling within organisations nationally.

### *How do staff complete the staff training measure?*

All staff involved in the provision of online wagering services, or with the capacity to influence the service, are required to complete staff training in line with the minimum requirements set out in the [National Unit of Competency, CHCFIN005 – Provide responsible online wagering services \(UoC\)](#), in order to create a culture of responsible service of online wagering within organisations nationally.

Online wagering service providers can choose from the following training delivery options:

#### **External training**

Providers can choose between 2 options for external training:

- [Online micro-credential operated by TAFE Queensland](#), with a cost to the online wagering service provider of \$38.50 (GST inclusive) per participant.
- Accredited training of the UoC developed by a Registered Training Organisation or TAFE at market price.

#### **Internal training**

Providers can choose to develop and deliver training in-house, based on the UoC.

### *How will the training be funded?*

The online training module is industry funded, as outlined in the agreed principles of the National Consumer Protection Framework for Online Wagering National Policy Statement.

To support industry in delivering this training the Commonwealth, under the auspices of the Implementation Governance Committee, commissioned TAFE Queensland to develop a micro-credential and knowledge test aligned with the UoC. This training can be found at: <https://coursegateway.tafeqld.edu.au/product?catalog=MCC00045>

If online wagering service providers choose to use this format to fulfil their staff training obligations, they will be charged \$38.50 (GST inclusive) per participant.

Otherwise, online wagering service providers will need to fund the development of a suitable in-house training package aligning with the UoC, and the cost of an annual independent review. Alternatively, online wagering service providers can elect to choose an accredited training course of the UoC delivered by a registered training organisation, if available.

### ***Is there a requirement for staff to undertake refresher training?***

Yes, there is a requirement for all staff to undertake annual refresher training.

Refresher training can be developed and delivered in-house by wagering service providers or is available through TAFE Queensland's annual refresher micro-credential and knowledge test at a cost per participant of \$38.50 (GST inclusive), funded by the wagering service provider.

### ***Will there be reminders for individuals annually to complete the refresher course?***

No, wagering service providers will be responsible for ensuring all staff who have undertaken the approved online training program undertake an annual refresher training course to refresh content knowledge and information on any recent changes in consumer protection and/or gambling harm.

## **Implementation**

### ***How long will online wagering service providers have to train all staff?***

Existing staff must complete staff training aligned with the UoC within the 6-month implementation period (30 September 2022 to 30 March 2023).

Following the 6-month implementation period, all newly engaged staff are required to have successfully completed responsible online wagering training within **one** month of commencement prior to any interactions with customers.

### ***What is the implementation timeframe for this measure?***

<b>Date</b>	<b>Activity</b>
<b>28 September 2022</b>	<b>Micro-credential training module and knowledge test is live.</b>
<b>30 September 2022 – 30 March 2023</b>	<b>States and territories will implement the measure through existing legislation, regulation or ministerial direction.</b>
<b>30 March 2023</b>	<b>The staff training measure must be implemented by online wagering service providers, including training undertaken by all existing staff.</b>

### ***Will extensions be considered for implementation of this measure?***

No, extensions to this timeframe will not be considered by state and territory regulators, and failure to meet this deadline could result in disciplinary action by the relevant regulator.

Online wagering service providers were formally notified of the requirement to implement the staff training measure of the National Framework within 6 months of 30 September 2022. Implementation of the staff training measure, including the training of all existing staff, is to be completed by 30 March 2023.



# National Unit of Competency (UoC)

## ***What is the National Unit of Competency?***

The National Unit of Competency, *CHCFIN005 – Provide responsible online wagering services* (UoC) was endorsed by Commonwealth, state and territory ministers responsible for skills and training, and is published at [www.training.gov.au/Training/Details/CHCFIN005](http://www.training.gov.au/Training/Details/CHCFIN005).

The UoC describes the performance outcomes, skills and knowledge required to provide responsible online wagering services and to assist consumers who may be at risk of, or already experiencing, harm from online wagering. The UoC outlines the criteria to demonstrate the achievement of competency and establishes a nationally consistent minimum standard for all staff of online wagering service providers

## ***How will any changes to the UoC be communicated?***

Any updates to the UoC will be reflected on training.gov.au. Wagering service providers may sign up to be notified of any updates or changes to the training by [creating an account](#).

## ***Where can I access the responsible service of online wagering micro-credential?***

The responsible service of online wagering micro-credential can be accessed on the TAFE Queensland Course Gateway at <https://coursegateway.tafeqld.edu.au/product?catalog=MCC00045>.

The platform that TAFE Queensland uses to run the micro-credential - Course Gateway - allows organisations to register for an account and purchase licenses under that account.

Once the licenses are purchased, these are able to be allocated to individual staff members.

## Staff required to complete the training

### ***Which staff are required to complete training?***

All staff involved in the provision of online wagering services, or with the capacity to influence the service, are required to complete staff training aligned with the UoC.

In practice, this requirement applies, but is not limited to:

- all staff involved in customer-facing roles and their team leaders,
- organisational leadership and executive,
- marketing, communications and promotions staff.

The staff training measure aims to build a culture of responsible service of online wagering throughout wagering service provider's organisations nationally. Wagering service providers are strongly encouraged to consider which staff in their organisation will benefit from completing this training. If there is any element of doubt as to whether staff of a particular role are required to complete the training, it is recommended the wagering service provider err on the side of caution by ensuring those staff members undertake the training.



### ***Are there any staff not required to complete staff training in responsible service of online wagering?***

Staff who do not deliver online wagering services to consumers and do not have the capacity to influence the service do not need to complete the training. This may include, but is not limited to:

- staff delivering human resource or people and culture functions,
- staff delivering purely administrative functions,
- staff involved in accounting and finance functions.

However, given the aim of the measure is to build a culture of responsible service of online wagering throughout wagering service provider's organisations nationally, wagering service providers are strongly encouraged to consider which staff in their organisation will benefit from completing this training.

### ***How does the requirement apply to staff on part time, casual or temporary contracts and third-party contractors?***

All staff involved in the provision of online wagering services, or with the capacity to influence the service, regardless of the nature of their engagement or contract must complete the training. This includes staff engaged in all capacities, such as: full time, part time, casual, agency, contractor and temporary staff.

### ***Do I need to complete the training in full or can I only complete the sections that are relevant to my job?***

All staff involved in the provision of online wagering services, or with the capacity to influence the wagering service, must complete and pass the entire responsible service of online wagering training, aligned with the UoC. The UoC is intended to cover a range of competencies.

### ***What about staff on extended leave?***

Staff on extended leave will be required to complete the responsible service of online wagering training within one month of their return to work prior to any interactions with customers.

## **Compliance**

### ***Will the requirement to comply with this measure be nationally consistent?***

Yes, all employees who are involved in the provision of wagering services, or with the capacity to influence wagering services are required to complete and pass the responsible service of online wagering training, aligned with the UoC.

This approach has been applied nationally.

### ***How will compliance with the staff training measure be monitored?***

State and Territory regulators will monitor compliance with the staff training measure. Any concerns regarding compliance should be directed to the relevant state or territory regulator. Wagering service providers should take reasonable steps to satisfy their obligations to meet minimum requirements of this measure.

## In-house training

### ***How can wagering service providers ensure in-house training achieves the minimum learning objectives of the staff training measure?***

A National Unit of Competency, CHCFIN005 – Provide responsible online wagering services (UoC) was endorsed by Commonwealth, state and territory ministers responsible for skills and training, and is published at [www.training.gov.au/Training/Details/CHCFIN005](http://www.training.gov.au/Training/Details/CHCFIN005).

The UoC outlines the criteria to demonstrate the achievement of competency and establishes a nationally consistent minimum standard for all staff of online wagering service providers.

Wagering service providers can choose to develop and deliver an in-house training module, or include the minimum requirements to their existing induction training, based on the UoC.

Where in-house training is used, wagering service providers must demonstrate their training is meeting the requirements of the UoC. To do this wagering service providers can choose from the following quality assurance methods:

- staff can complete and pass the TAFE Queensland micro-credential knowledge test; or
- online wagering service providers can engage an independent reviewer to audit their training materials annually to confirm they meet the standards of the UoC.
  - providers can engage an independent reviewer to confirm in-house training meets the standards outlined in the UoC, and provide a report to the state or territory regulator.
  - the completed independent review report must be provided to your state or territory regulator annually.

In addition to these requirements, training records must be made available should your regulator request them.

If a wagering service provider has an existing relationship with a law firm, accounting firm or auditing body, they are permitted to engage these organisations to conduct the independent review. To avoid any doubt, the individual conducting the review must be an employee external to the wagering service provider.

### ***What are the requirements of an independent reviewer?***

To preserve the integrity and purpose of the independent review process, an independent reviewer must:

- be external to the wagering provider and not have been involved, in any way, in the development or delivery of the provider's staff training materials
- understand the overall aims of the staff training measure of the National Consumer Protection Framework
- understand the training requirements set out in the UoC.

To ensure a high standard of reviews, independent reviews must be completed by individuals/firms holding one of the following qualifications:

- a registered Solicitor
- a registered Certified Practicing Accountant or Chartered Accountant
- a person holding a Diploma of Training Design and Development qualification
- a registered Qualified Internal Auditor (such individuals must still be external to the provider they are conducting the independent review for).

## Responsible Service of Online Wagering Micro-Credential

***Will TAFE Queensland be able to accept enrolment and have capacity to deliver training to all staff by the end of the implementation period?***

TAFE Queensland delivers globally to over 120,000 students annually, in over 80 countries worldwide, and are the leading provider of vocational training in Queensland.

These figures ensure that TAFE Queensland have sufficient capacity to supply training for staff engaging in the Staff Training Micro-credential and Refresher Course.

***What is the maximum volume of students TAFE Queensland can support at a given time?***

The volume of students anticipated to enrol in the Responsible service of online wagering micro-credential or annual refresher course is within TAFE Queensland's capacity to service.

***How will data collected for participation in the TAFE Queensland micro-credential be protected?***

TAFE Queensland operates in line with its Information Security Policy based on ISO27001.

The micro-credentials and knowledge tests are hosted by TAFE Queensland in onshore, Australian data centres and meet all relevant data security and privacy obligations.

Any personal information collected by TAFE Queensland will be treated in line with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles.

***Will TAFE Queensland enter into individual contracts with each Wagering Service Provider?***

No, TAFE Queensland will not be entering into individual contracts with each wagering service provider.

## Responsible Service of Online Wagering Micro-credential: Knowledge Test

### ***Will staff members have the opportunity to re-sit the knowledge test?***

Staff can re-sit the knowledge test an unlimited number of times if they are unsuccessful in passing the knowledge test and correctly answering all questions.

## Responsible Service of Online Wagering Micro-credential: Reporting

### ***Will reports be provided to the Wagering Service Providers of all staff who have completed the training and any staff due to complete the refresher training?***

TAFE Queensland will not provide reports of individual completions of the micro-credential to wagering service providers due to the obligations of the *Privacy Act 1988*.

Wagering service providers are required to request a copy of the Digital Badge from their employees (which can be shared via email, downloaded, or printed as required) to confirm completion of the micro-credential. This is sufficient to demonstrate completion of the training and compliance with the requirements of the staff training measure.

## Responsible Service of Online Wagering Micro-credential: Accessibility

### ***Is the course accessible for staff of CALD or First Nations backgrounds?***

The Responsible Service of Online Wagering Micro-credential and Refresher Course contains appropriate content for individuals of First Nations or culturally and linguistically diverse backgrounds.

### ***Is the course fully accessible to those with: vision, hearing impairment and/or other disabilities?***

TAFE Queensland has ensured all content or associated material is accessible in nature including for individuals with hearing or vision impairments, or with linguistic differences.

### ***Will the program be available for those who require an accessibility solution?***

Where there are additional accessibility requirements identified, TAFE Queensland can provide advice on available technologies and services.