

Questions from Compliance Focus Areas information session

Q: Can our Responsible Gambling register be digital?

A: Yes, you can have a digital RG register, but you must be able to provide at least 6 months of entries to the VGCCC upon request. The digital register must comply with Ministerial Directions. [Guidance on maintaining an RG register is available on our website](#). If your register requires a password to access, make sure your staff know the password.

Q: Is it possible for the VGCCC to notify venues of any discretions within the 28 days required to keep CCTV footage? We were recently notified of an issue on Anzac Day but couldn't go back through vision to confirm and/or deal with staff, using vision as proof as the notification was 5 plus weeks after the indiscretion.

A: Where feasible, notifications regarding breaches of permitted operating hours will be sent to venues within 28 days of suspected violations.

Monitoring on Anzac Day and Good Friday involves more detailed scrutiny compared to standard permitted hours monitoring. Therefore, notification within 28 days can be challenging. We are exploring options to enhance turnaround times and engagement in the future.

Q: The new advertising of 'take a break' says staff can't take a coffee to someone playing an EGM. What if they are just sitting at an EGM and not playing?

A: These rules apply to patrons using machines, but not patrons who are sitting at machines and not using them. However, to avoid any confusion the VGCCC advises venues to take a consistent approach to eliminate any potential risks, and not deliver food/beverage to anyone seated at a gaming machine. You may assist those patrons with mobility or safety issues.

[Posters to let your patrons know about taking break can be found here.](#)

[More information about serving food and drink to patrons can be found here.](#)

Q: What is the ruling on external road signs with the word "pokies" being lit up at night?

A: The VGCCC is working closely with peak bodies and the Department to develop guidance to assist industry to understand the requirements.

Q: Is a digital driver's licence acceptable ID when a cheque is issued, and how is it best recorded as you cannot photocopy a mobile phone?

A: There is currently no function in the VicRoads or ServiceNow app for a patron to share a copy of their digital driver licence, and VicRoads doesn't recommend that anyone shares or accepts screen shots of digital driver licences.

Gambling providers must follow their existing procedures to appropriately identify gaming patrons and meet their obligations to verify, record and copy ID details where required. For example, when gaming venues need to issue a cheque.

Therefore, a physical driver licence or alternative acceptable form of ID should be used when a gambling provider is required to copy and record the patrons ID.

Q: What is the position regarding donation boxes for TITO tickets?

A: Donating unclaimed TITO tickets is not allowed. If a patron wishes to donate the value of a TITO ticket to a charity, the value of the ticket must first be paid to the patron and then these funds can be donated. Any monies on a TITO ticket are considered unclaimed and must be paid to the State Revenue Office in line with existing processes.

Q: Can a staff member be an RGO without their gaming licence, even with all correct module training? Our understanding is that only module 1 training is required, as long as another staff member has their gaming licence in the venue. Could you please clarify?

A: The minimum requirement to work as a Responsible Gambling Officer (RGO) is completing RSG module 1, however staff must continue to complete the correct RSG training modules as required:

- Module 1, online. Venue staff must complete this module within one month of starting work in a gaming venue.
- Module 2 is face-to-face training that venue staff must complete within 6 months of starting work in a gaming venue.
- Module 3, online, and Module 4, face to face, must be attained within 3 years of completing Module 2.
- Module 4 must be completed within 3 months of completing Module 3.
- Modules 3 and 4 must be completed every 3 years as refresher training.

There is no requirement that they have a Gaming Industry Employee (GIE) licence.

[Read more about GIE requirements here.](#)

[Read more about RGO requirements here.](#)

[Read more about RSG training requirements here.](#)

Q: Can staff without a gaming industry licence have gaming keys issued to them, while supervised by another staff with their gaming licence (for clearance etc)?

A: Staff who do not possess a GIE licence can have gaming machine keys issued to them, unsupervised or otherwise, as long as they are not performing a prescribed duty such as:

- any task that requires them to access the logic area of a gaming machine
- any task that requires them to access a prescribed restricted monitoring component at the premises of an approved venue, e.g. a Jackpot Interface Board, Slot Machine Interface Board (SMIB), Intralot Site Controller.

Tasks such as accessing a gaming machine to clear coins/notes, perform hopper refills, replenish TITO ticket paper, perform a book pay, or investigate faults or patron disputes that

do not require the staff member to access the logic area or a restricted monitoring component are not prescribed duties.

Accessing the audit menu of a gaming machine to investigate faults or patron disputes, reset a fault condition or key off a large win, are also not prescribed duties.

Q: There was talk of a module 5 & 6. Is this still in the process as I have staff nearing the end of module 4?

A: The training requirements have not changed. Venue staff working in a gaming-related capacity at a venue must complete the following training modules:

- Module 1, online. Venue staff must complete this module within one month of starting work in a gaming venue.
- Module 2 is face-to-face training that venue staff must complete within 6 months of starting work in a gaming venue.
- Module 3, online, and Module 4, face to face, must be attained within 3 years of completing Module 2.
- Module 4 must be completed within 3 months of completing Module 3.
- Modules 3 and 4 must be completed every 3 years as refresher training.

[Read more about RSG training requirements here.](#)

Q: If you have both a Gaming Industry Employee (GIE) and nominee identification, which do you wear? Or both?

A: Both, GIE and nominee identification should be worn at all times while on shift.

Q: Electronic transfer funds from EGM winnings - how long is required prior to patron being able to access that cash?

A: *The Gambling Regulation Act 2003* (subsection 3.5.33 (3)) permits venues to pay out accumulated wins of at least \$2,000 using EFT. Venues must ensure funds are not transferred until at least 24 hours after the request has been made.

[Read more about EFT payments here.](#)

Q: If keno is online only, do we still need a screen outside the green line area?

A: A Keno screen cannot be located in a gaming room only.

Q: Is a TAB EBT considered a facility? If the sports bar is closed and the second EBT (TAB lounge) is shut, are we allowed to keep the EBT on if there are no other EBTs outside the gaming room on?

A: Yes, an EBT is considered a facility. Therefore, a second EBT needs to be available outside the gaming room to ensure compliance.

Q: Our venue closes all other areas except the Gaming room after midnight so the only bar open is in the gaming room, only toilets are in the gaming room and only entry and exit are in the gaming room for 3 hours. Are we compliant?

A: The VGCCC steps out the requirements under alternate facilities [Commission Direction 3.5.27](#)