



GRV Minimum Bet Limit Policy Draft Conditions for Consultation

1. Introduction

GRV are seeking feedback on its *DRAFT Minimum Bet Limit Policy Conditions*.

The feedback GRV receive from wagering operators and customers will assist in informing possible changes to the draft policy which would subsequently be presented to the GRV Board in May 2018 for further consideration.

The conditions of a *Minimum Bet Limit Policy* would be applied as an addendum to the Conditions of Approval for Wagering Service Providers (WSPs) approved by GRV to publish and use Victorian Greyhound Racefields.

It is important that GRV continues to find ways to support customers who wager on its product and respond proactively to issues that are important to these customers, whilst being cognisant of the issues for Wagering Service Providers that are unique to fixed odds betting on greyhound racing.

2. Consultation Period

The consultation period for GRV's *DRAFT Minimum Bet Policy Conditions* runs from Tuesday 1 May until Wednesday 22 May 2018.

3. Submitting Feedback on the *DRAFT Minimum Bet Policy Conditions*

To submit feedback on the draft conditions detailed below, please email mblconsultation@grv.org.au using the *Subject Line: Feedback on GRV Draft Minimum Bet Policy*.

To assist GRV with understanding your perspective please clearly reference the specific parts of the draft policy you wish to provide feedback on.

Draft GRV Minimum Bet Limit Policy Conditions

Approved WSPs will be required to accept a fixed odds bet at odds which are publicly displayed by the approved WSP for any Victorian greyhound race to the maximum amount specified as follows:

Race Type	In any one Win, Win/Place or Each-way bet: to lose
Metropolitan Victorian Greyhound Races (primarily Sandown – Thurs and The Meadows – Sat)	\$750
Non-metropolitan Victorian Greyhound Races	\$500

An approved WSP must not do any act or refuse to do any act to avoid complying with the bet limits, including but not limited to:

1. Refusing to accept a fixed odds bet
2. Closing a person's account
3. Refusing to open a person's account
4. Placing any restrictions on a person's account in relation to Victorian greyhound racing product
5. Refusing to lay fixed odds to any person when those fixed odds are publicly displayed
6. Laying lesser odds to a person than those publicly displayed
7. Any other act or refusal to do an act in order to avoid these provisions

Exclusions:

An approved WSP will not be required to comply with the MBL obligations if:

1. The approved WSP's annual turnover (prior 12 months) on Victorian greyhound races is less than \$3 million
2. The customer is not domiciled in Australia
3. The bet is a betting transaction on a betting exchange
4. The customer has not provided the approved WSP with sufficient funds to pay for the bet
5. The bet is placed prior to 9am (AET) on the day of the Victorian greyhound race or 2pm (AET) for a night race meeting
6. The bet forms part of a multi bet
7. The bet is a retail betting transaction

8. An approved WSP reasonably suspects the customer placing the bet is not the beneficial owner of the bet or the account is being used in violation of the WSP's account terms and conditions, where the suspicion can be reasonably validated by the WSP through public records, IP address tracking, unique device tracking, etc
9. The customer has not yet met the required account identification and verification processes and thus the approved WSP cannot meet their obligations under The Anti-Money Laundering and Counter-Terrorism Finance Act 2006 and any responsible gambling legislation
10. An approved WSP has previously closed the customer's account because:
 - a. the customer engaged in activity which breached a material condition of the agreement with the WSP, unless the dominant purpose of such condition was to allow the WSP to avoid complying with the MBL conditions; or
 - b. there were other reasons that in the WSP's assessment, acting reasonably, raised material integrity concerns
11. The customer has been warned off or disqualified, engaged in fraudulent activity or there are other reasons that in GRV's assessment, acting reasonably, raises material integrity concerns
12. There has been an official price fluctuation or the WSP's own price fluctuation has changed
13. An approved WSP has already accepted a bet(s) from an eligible customer to the aggregate amount of the MBL
14. The customer placing the bet is, or is associated with, an employee of a licensed Australian WSP and there is a reasonably held belief that the bet is based on betting information (including but not limited to betting trends and bets placed with that licensed Australian WSP) that is not publicly available
15. The customer has been restricted to betting via a specified platform (e.g. telephone) arising from reasonably held concerns by the WSP as to robotic or systematic use via other platforms / channels
16. The bet is contrary to the Australian Rules of Racing and the Victorian Local Rules and Betting Rules
17. The situation where there are systematic multiple identical (or similar) bets from related / connected parties or from the same IP address
18. Where a customer is betting from, or a bet is received from, a proxy server
19. The bet was a promotional bet such as a bonus bet or free bet, where the customer has not provided payment for the stake
20. GRV publishes other exclusions or changes to the MBL framework on its website which will be amended as required
21. Unauthorised scraping of a WSP's website

Complaints

In the first instance, punters who believe that a WSP has refused their bet or excluded them in contravention of the Minimum Bet Limit condition should contact the WSP to ascertain the reason for the refusal or exclusion.

If the punter remains unsatisfied with the reason provided by the wagering operator, and they do not fall within one of the exclusions listed in the conditions, then they may lodge a formal complaint with GRV via an online form.