

# Venue Name

# Responsible Gambling Code of Conduct

*March 2009*

*Version 1.1*



## EGM/Keno Gaming Venue Responsible Gambling Code of Conduct

### 1. Venue commitment to Responsible Gambling

*This Venue is committed to providing the highest standards of customer care and responsible gambling. Our Responsible Gambling Code of Conduct describes how we do this.*

*Responsible gambling in a regulated environment is when consumers have informed choices and can exercise a rational and sensible choice based on their circumstances. It means a shared responsibility with collective action by the gambling industry, government, individuals and communities.*

This message is displayed at the entrance to the gaming room and/or at the cashier's station in the gaming room. The message is also displayed in the venue where Club Keno is sold.

### 2. Availability of the Code of Conduct

This Code will be made available in written form, including in major community languages, to customers upon request. A sign advising customers of this is displayed at the gaming room entrance or the cashier's station in the gaming room.

The Code will also be available in community languages on the venue's website. (Applies only where the venue has a website)

Languages will include:

- Greek
- Italian
- Vietnamese
- Chinese
- Arabic
- Turkish
- Spanish

### 3. Responsible Gambling Information

This venue displays responsible gambling information in a range of forms, including brochures, posters and Electronic Gaming Machine (EGM) on-screen Player Information Displays (PIDs).

Examples include:

#### (a) How to gamble responsibly

**PLAYING THE POKIES KNOW THE FACTS**

**WHO REALLY WINS?**

**HOW DO GAMING MACHINES WORK?**

**THE REAL CHANCE OF WINNING.**

YOUR BET	CHANCE OF WINNING
More than 100 credits	1 in 100,000
100 to 100 credits	1 in 10,000
10 to 10 credits	1 in 1,000
1 to 1 credit	1 in 100
1 to 1 credit	1 in 10
1 to 1 credit	1 in 1

#### (b) How to make and keep a pre-commitment decision

**SET YOURSELF A LIMIT & DO NOT EXCEED IT**

**YOU CAN BE AN INFORMED GAMBLER.**

**DON'T CHASE YOUR LOSSES WALK AWAY**

#### (c) The availability of support services

**STARTING TO PUT YOUR GAMBLING FIRST?**

**YOUR NEXT STEP IS EASIER THAN YOU THINK.**

**GAMBLER'S HELP LINE 1800 150 150**

- (d) The payment of winnings policy


**By law, all winnings or accumulated credits of \$1,000 or more must be paid in full by cheque that is not made out to cash. These winnings cannot be provided as machine credits.**

- (e) The prohibition on the provision of credit for gambling

The *Gambling Regulation Act 2003* prohibits this venue from providing credit to customers for playing gaming machines.

- (f) The venue's self-exclusion program

This gaming venue provides a self-exclusion program. For information about the program, customers may speak with the Responsible Gaming Officer/Gaming Duty Manager or pick up a copy of the Self-Exclusion brochure displayed in the gaming room.



## Self-Exclusion

Self-exclusion is a self-help program to assist people to exclude themselves from playing gaming machines.

**For more details contact:**

- Staff at the gaming venue
- AHA Self-exclusion - Ph 03 9654 3491
- [www.ahavic.com.au](http://www.ahavic.com.au)
- Gambler's Help – Ph 1800 858 858

Display screens in the venue also periodically show responsible gambling tips and contact information details for problem gambling support services. *(This is only applicable where the venue has display screens that are capable of displaying this information.)*

(g) Further information

This venue provides customers with further information regarding responsible gambling, including:

- o How to access the Commonwealth Government's website 'Understanding Money' [www.understandingmoney.gov.au](http://www.understandingmoney.gov.au)
- o How gamblers and their families or friends can find gambling support services and self-exclusion programs and the State Government's problem gambling support website [www.problemgambling.vic.gov.au](http://www.problemgambling.vic.gov.au)

#### 4. Gambling Product Information

The rules for each Electronic Gaming Machine (EGM) game, including the chances of winning, are available by going to the Player Information Display (PID) screens on the machine. Information on how to view the PID screens is available from a member of staff and/or by reading the Player Information Display (PID) brochure, available within the gaming room at a minimum.



Club Keno game rules are available for inspection at each Club Keno sale location (applies only to venues where Club Keno is sold).

Club Keno Game Guides including 'How to Play' instructions are available at each Club Keno sales point (applies only to venues where Club Keno is sold).

## 5. Pre-commitment Strategy

This Venue encourages customers who play Electronic Gaming Machines (EGMs) to set a time and money limit according to their circumstances. Signs in the gaming room and on EGMs recommend that customers set a limit and keep to it.

All EGMs at this venue enable a player to track the time and amount of money spent during a session of play. Information on how to activate session tracking is available from venue staff and in the Player Information Display (PID) brochure displayed in the venue.



This Venue also displays signs and brochures in the gaming room with information on the triggers that can lead to overspending. These include:

- o gambling every day or finding it hard to stop at closing time;
- o gambling for long periods, that is, for three hours or more without a break;
- o avoiding contact while gambling, communicating very little, barely reacting to events going on around the player;
- o trying to borrow money from staff or other customers or continuing to gamble with the proceeds of large wins;
- o aggressive, anti-social or emotional behaviour while gambling;
- o trying to win back what has been lost;
- o gambling when feeling stressed or unhappy;
- o losing control because of too much alcohol;

## 6. Interaction with Customers

The staff at this venue are committed to providing consistently high levels of customer service, including being constantly aware of their customers and the venue's responsibility towards Responsible Gambling.

This Venue has a nominated Responsible Gambling Officer/Gaming Duty Manager who is always available when the venue is open.

A person, who approaches a staff member for information about problem gambling services or shows signs of having a problem with their gambling, will be directed to the Responsible Gambling Officer/Gaming Duty Manager for help.

A customer displaying signs of distress or unacceptable behaviour will be approached by a staff member who will offer assistance. These signs may include, but not be limited to:

- o a person either gambling every day or finding it difficult to stop gambling at closing time;
- o gambling for extended periods. That is, gambling for three hours or more without a break;
- o avoiding contact while gambling, communicating very little with anyone else, barely reacting to events going on around them;
- o making requests to borrow money from staff or other customers or continuing to gamble with the proceeds of large wins;
- o displaying aggressive, anti-social or emotional behaviour while gambling.

This assistance may take the form of:

- o staff interacting with the customer and encouraging them to take a break from the gaming machine;
- o staff offering the customer some refreshments (eg. cup of tea or coffee) in a quieter, more private part of the gaming venue.

If the behaviour could be due to problem gambling, the customer will be referred to the Responsible Gambling Officer.

Contacts with customers by the Responsible Gambling Officer are recorded in a Responsible Gambling Incident Register and include action taken. This register is covered by the Privacy Act. Details to be included in the incident register include:

- o the date and time of the incident;
- o the name(s) of the staff member(s) involved;
- o the name of the customer involved (if available);
- o an outline or overview of the incident;
- o action taken by staff (eg: the provision of Gambler's Help / Self Exclusion information);



## 7. Staff Gambling Policy

(\*\* Venue to select one option – 2 x page 9s included.)

\*\*Employees of this venue are not permitted to gamble on gaming machines here *at any time*.

Each year responsible gambling professional development sessions for staff are held in conjunction with the local Gambler's Help service. Information about responsible gambling and problem gambling support services is in the package received by staff members when they start employment.

## 8. Problem Gambling Support Services

This Venue is committed to maintaining strong links with local problem gambling support services. Senior staff from this venue will meet regularly with the local Gambler's Help.

- o Examples of these meetings may include:
  - holding annual staff training session, run by the local Gambler's Help service;
  - twice yearly meetings between the Venue Operator / Manager and the Gambler's Help service.

Details of these meetings will be kept in a Responsible Gambling Folder / Register to be located in the Gaming Room. The meeting details must include:

- time and date of the meeting;
- attendees at the meeting;
- topics discussed;
- outcomes / action items from the meeting;
- next meeting date.

## **7. Staff Gambling Policy**

(\*\* Venue to select one option – 2 x page 9s included.)

\*\* Off-duty employees of this venue may gamble at the venue providing they are not in uniform, not wearing their gaming licence identification and have been absent from the venue since their last rostered shift.

Each year responsible gambling professional development sessions for staff are held in conjunction with the local Gambler's Help service. Information about responsible gambling and problem gambling support services is in the package received by staff members when they start employment.

## **8. Problem Gambling Support Services**

This Venue is committed to maintaining strong links with local problem gambling support services. Senior staff from this venue will meet regularly with the local Gambler's Help.

- o Examples of these meetings may include:
  - holding annual staff training session, run by the local Gambler's Help service;
  - twice yearly meetings between the Venue Operator / Manager and the Gambler's Help service.

Details of these meetings will be kept in a Responsible Gambling Folder / Register to be located in the Gaming Room. The meeting details must include:

- time and date of the meeting;
- attendees at the meeting;
- topics discussed;
- outcomes / action items from the meeting;
- next meeting date.

## 9. Customer Complaints

A customer with a complaint about the operation of this Code of Conduct should make it in writing directly to the venue management. All complaints will be checked by the venue manager to make sure that they are about the operation of this Code. Complaints about customer service or machine operations should go directly to the venue manager / staff on duty. Venue staff will assist customers with this process if asked.

Complaints will be investigated sensitively and as soon as possible. Complaints will be resolved in the following way:

- o all complaints will be acknowledged promptly;
- o if it is decided not to investigate the complaint as it does not relate to the operation of the code, you will be informed of the reasons;
- o during the investigation of your complaint the Venue Manager may seek information from the staff member concerned on the subject of the complaint;
- o the Venue Manager will seek to establish whether you have been treated reasonably and in accordance with the Responsible Gambling Code of Conduct;
- o if your complaint is substantiated, the Venue Manager will inform you of the action that is to be taken to remedy the problem;
- o you will always be informed of the outcome of your complaint;
- o complaint details will be maintained in the Responsible Gambling Folder / Register;
- o information about the complaints will be provided to the VCGR if requested.

If a complaint cannot be resolved at the venue it goes for resolution to the Institute of Arbitrators and Mediators Australia (IAMA). Either party involved in the complaint may contact the IAMA. To initiate a complaint either party can go to IAMA's web site ([www.iama.org.au](http://www.iama.org.au)), download a Dispute Resolver form, and then submit this completed form with the relevant fee to the IAMA. The mediator / arbitrator will then contact both parties to facilitate a resolution. These forms are also available at this venue  
Note: Complaints sent to this independent body for resolution may be expensive. All parties are urged to attempt to resolve the matter at the venue level before going to professional mediation.

Documentation regarding all complaints (both valid and invalid) against the code must be maintained in the Responsible Gambling Folder / Register for access by the VCGR as required.

## **10. Minors**

Gambling by minors is prohibited. Signs are located at every gaming room entrance banning minors from entering the room. All staff share the responsibility for asking for proof of age if they are uncertain whether a customer is at least 18. If relevant verification cannot be produced, the customer must be asked to leave the gaming room.

## **11. Gambling Environment**

Customers will be encouraged to take regular breaks from gaming machine play. This encouragement may take the form of an announcement regarding a staged event. Types of staged events may include:

- o Announcing that morning tea is now available;
- o Announcing a member's draw;
- o The commencement of activities such as morning melodies.

Clocks are in all major areas of the venue so customers know time is passing. Staff will mention the time when making announcements about venue activities.

## **12. Financial Transactions**

This venue does not cash cheques from customers.

A sign stating this is displayed at the cashier's station in the gaming room.

Winnings below \$1,000 from gaming machines at this venue can be paid by cash and/or cheque. By law all of the winnings or accumulated credits of \$ 1,000 or more must be paid out entirely by cheque, which cannot be made out to cash. These winnings or accumulated credits cannot be provided as machine credits.

A Prize Payment Register is maintained in the gaming room.

### **13. Advertising and promotions**

Unaddressed advertising of Electronic Gaming Machine (EGM) gambling products is prohibited in Victoria.

All non-EGM advertising undertaken by or on behalf of this venue will comply with the advertising code of ethics adopted by the Australian Association of National Advertisers (see Appendix B).

Each prospective advertisement and promotion will be checked against a checklist developed from the AANA Code of Ethics to ensure compliance.

Further this venue will ensure that our advertising materials will:

- o not be false, misleading or deceptive about odds, prizes or the chances of winning;
- o not be offensive or indecent in nature;
- o not create an impression that gambling is a reasonable strategy for financial betterment;
- o not promote the consumption of alcohol while purchasing gambling products;
- o have the consent of any person identified as winning a prize prior to publication.

#### **14. Implementation of the Code**

The Code is part of the induction information given to all new staff when they start employment. Staff members employed when the Code was introduced have received training about its purpose, contents and procedures.

Matters raised by staff or customers about the Code should go to the Responsible Gambling Officer/Duty Manager for attention.

Staff members who effectively implement and adopt the practices in the Code will be recognised by venue management.

#### **15. Review of the Code**

This Code is reviewed annually to ensure that it complies with the Gambling Regulation Act and any other Ministerial directions. The operation and effectiveness of the Code for the preceding 12 months will also be reviewed at this time. The review seeks feedback from all relevant stakeholders, including venue staff, customers and problem gambling support services.

Required changes will be noted and then implemented where possible. Any changes will be recorded in the venue's Responsible Gambling Folder / Register.

## Appendix A

### Venue Directions / Instructions

This Responsible Gambling Code of Conduct has been developed in co-operation between the two gaming operators, Tatts Pokies and Tabaret. This Code arose in response to amendments to the *Gambling Regulation Act 2003*.

By law all gaming venues must have a Responsible Gambling Code of Conduct and participate in a Self-Exclusion Program. These must be approved by the Victorian Commission for Gambling Regulation (VCGR). All venues are required to operate under an approved Code of Conduct as of the 1<sup>st</sup> June 2009.

**This code has been prepared by the Gaming Operators (Tatts and Tabcorp), but its application and implementation are the responsibility of the Venue Operators.** Information sessions / training will be provided to venues adopting this Code of Conduct.

Guidelines are provided to assist you to implement this code in your venue. It is expected that each venue will ensure all staff read and understand the code and are able to ensure that the requirements of the code are fulfilled.

Venue operator's wanting to use this Industry Responsible Gambling Code of Conduct must:

- read and understand the requirements of this code;
- ensure all staff are aware of these requirements;
- participate in regular reviews of this code;
- regularly engage with their local Gambler's Help organisation.

Venues need to ensure that all records that are maintained as part of this code need to be accessible by VCGR inspectors. For this purpose, Venues need to have a Responsible Gambling Folder / Register in which all information is maintained and it must be kept in a central and accessible location.

Examples of records to be maintained include:

- records of contact with customers by the Responsible Gambling Officer /Gaming Duty Manager;
- records of meetings with Gambler's Help services;
- customer complaints;
- review feedback that is obtained from staff, customers and gambling support services.

Venue instructions for implementation of the Responsible Gambling Code of Conduct:

- 1. Venue Commitment to Responsible Gambling**
  - Venue to have this message on display either at the entrance to the Gaming Room or at the Cashier's Station. This message also needs to be on display at the Club Keno sales terminal.
  - Message provided in Attachment 1.
  
- 2. Availability of the Code of Conduct**
  - Code will be provided in written form, including in a number of major community languages.
  - If a venue has a website the Code should be included on the site.
  
- 3. Responsible Gambling Information**

Each venue should ensure that the following listed information (brochures, posters etc) is on display, and available to customers, in the Gaming Room.

  - Brochures to be on display:
    - Playing the Pokies – Know the Facts
    - Gambler's Help Brochures
    - Self Exclusion Brochures (available via the AHA)
    - Player Information Display (PID) Brochures
  - Posters on display:
    - Set yourself a limit and DO NOT EXCEED IT
    - Don't chase your losses WALK AWAY
    - In the end THE MACHINES WILL WIN
    - Stay in Control
  - Payment of Winnings Policy
  - Information on the provision of credit for gambling
  
- 4. Gambling Product Information**
  - Ensure all staff are aware of and are able to use the EGM Player Information Display Screens (PIDs) and the information that these screens hold.
  
- 5. Pre-Commitment Strategy**
  - Ensure all staff are aware of how to activate the session tracking capability on all EGMs.



## 6. Interaction with Customers

- Ensure all staff are aware of signs of distress and what constitutes unacceptable behaviour.
- Determine protocols for staff to follow once they have identified a customer showing signs of distress or behaving in an unacceptable manner (eg: when to notify the Responsible Gambling Officer).  
These signs may include, but not be limited to:
  - i. A person either gambling every day or finding it difficult to stop gambling at closing time;
  - ii. Gambling for extended periods, that is, gambling for three hours or more without a break;
  - iii. Avoiding contact while gambling, communicating very little with anyone else, barely reacting to events going on around them;
  - iv. Making requests to borrow money from staff or other customers or continuing to gamble with the proceeds of large wins;
  - v. Displaying aggressive, anti-social or emotional behaviour while gambling.
- This assistance may take the form of staff:
  - Approaching the customer and encouraging them to take a break from the gaming machine;
  - Offering the customer some refreshments (eg: cup of tea or coffee) in a quieter, more private part of the gaming venue.

## 7. Staff Gambling Policy

- Remove the page that **DOES NOT** apply to your venue and ensure all staff are aware of the applicable policy. This page is repeated twice in the document, with a differing option under Section 7 on each page.
- Plan sessions in conjunction with your region's Gambler's Help service regarding professional development for staff.
- Include information regarding Responsible Gambling in induction materials provided to staff at the commencement of employment.

## 8. Problem Gambling Support Services

- It is necessary to establish links with your local Gambler's Help service. This could be done through email links, face to face meetings or attending seminars or conferences with support service staff.
  - Examples may include:
    - Holding annual staff training session, run by your local Gambler's Help service;
    - Twice yearly meetings between the Venue Operator / Manager and the Gambler's Help service.
- It is a requirement that each venue determines their own venue protocols with their local Gambler's Help provider. These protocols should include the frequency, location and aims of those meetings. These details **MUST** be included as an attachment to your venue's RSG Code of Conduct. These protocols can be subject to VCGR audit and review.
- Details of all meetings (etc) held with Gambler's Help should be noted and then these details maintained in your Venue's Responsible Gambling Folder / Register.

## 9. Customer Complaints

- Establish a venue specific complaint resolution process: (broad guidelines are outlined in the Code of Conduct)
  - Document this process so that all staff have this information if and when required;
  - Clearly highlight to all staff what sort of incidents would 'qualify' as complaints against the Code.
  - Any customer complaints relating to the operation of the Code of Conduct should be made in writing and then sent directly to venue management.
    - Proforma Complaint Form provided – Attachment 2
  - Complaints are to be investigated in a timely and sensitive manner.

Advice about the handling of complaints may be sought from a relevant industry Peak Body.

    - Hotels – AHA
    - Clubs – ClubsVic, CCAV
    - RSLs - LSBA
  - If a complaint cannot be resolved the matter will be referred to the Institute of Arbitrators and Mediators Australia (IAMA) for resolution. Their website can be found at [www.iama.org.au](http://www.iama.org.au).
    - A fee will be incurred for all matters referred to the IAMA; these fees can be found on the organisation's website.
  - Also document other types of customer complaints, and how these will be handled at your venue eg EGM complaints, customer service complaints.
  - Details and information of all complaints should be maintained in the Venues' Responsible Gambling Folder / Register.

#### **10. Minors**

- Ensure there is a sign located at every gaming room entrance prohibiting minors from entering the gaming room.
- Venue staff should continually monitor the gaming room for the possible presence of minors.

#### **11. Gambling Environment**

- Ensure customers are made aware of any 'Staged Events' that are held in the gaming room. For example: announcing the availability of morning tea; the time of a members draw; morning melodies etc.
- Ensure there are clocks working and visible within the gaming room.
- Ensure staff are aware of possible 'passage of time' statements that can be made when making announcements in the gaming room.

#### **12. Financial Transactions**

- As a Responsible Gambling measure, the venue does not cash cheques from customers. This notice should be displayed to customers at the Cashier's station.
- Prize Payments registers will be maintained.

#### **13. Advertising and promotions**

- All advertising will comply with the relevant legislation and with the Australian Association of National Advertisers (AANA) advertising code of ethics.
- Further your venue should ensure that its advertising materials will:
  - not be false, misleading or deceptive about odds, prizes or the chances of winning;
  - not be offensive or indecent in nature;
  - not create an impression that gambling is a reasonable strategy for financial betterment;
  - not promote the consumption of alcohol while purchasing gambling products;
  - have the consent of any person identified as winning a prize prior to publication.

#### **14. Implementation of the Code**

- Existing staff will have to receive training on the implementation and requirements of the new Code during the introduction phase.
- Include information on the Responsible Gambling Code of Conduct with all induction materials provided to new venue staff.

#### **15. Review of the Code**

- The Minister requires that the venue will review the effectiveness of the Responsible Gambling Code of Conduct annually.
- This review must involve consulting Venue staff, customers and problem gambling support services.

## ***Commitment to Responsible Gambling***

*This Venue is committed to providing the highest standards of customer care and responsible gambling. The Venue's Responsible Gambling Code of Conduct describes how we demonstrate this commitment.*

*Responsible Gambling exists when gambling occurs in a regulated environment where consumers can make informed choices about gambling, and can exercise a rational and sensible choice based on their individual circumstances. Responsible gambling exists where there is a shared responsibility and collective action is taken by the gambling industry, government, individuals and communities.*

# Complaint Form

The following information is required for your complaint to be dealt with in accordance with this Code of Conduct.

<b>Your Name:</b>
<b>Your Address:</b>
<b>Phone Number:</b>
<i>Complaint made against</i>
<b>Name of Venue:</b>
<b>Address of Venue:</b>
<b>Telephone No:</b>
<b>Facsimile No:</b>
<b>Manager's Name:</b>
<b>Gaming Manager:</b>
<b>Date of the event you are complaining about:</b>
<b>Explain the details of your complaint in this space:</b>
<i>(Include any information which you believe is relevant, please attach an extra piece of paper if there is not enough space)</i>

## Complaint Form

Have you discussed the complaint  No  Yes

With anyone from this hotel / club?

What was this person's name and/or title?

*(Eg Venue Manager / Gaming Manager / Supervisor)*

What was their response?

I acknowledge that my complaint will be dealt with according to the conditions outlined in the Complaint Process section of the Victorian Gaming Industry Responsible Gambling Code of Conduct and I am bound by those provisions.

I do / do not (circle preference) want my identity to be disclosed in the resolution of this complaint.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_