

# Responsible Gambling Code of Conduct

*March 2009*

*Version 1.1*

*ALH Hotel / Club Name*



The ALH Group is committed to providing responsible gambling in our venues. Whilst gambling is enjoyed by the majority of people responsibly, ALH acknowledges that problem gambling is a serious community issue and that a small proportion of customers are harmed by their gambling activities.

ALH will continue to develop balanced businesses, offering patrons an overall entertainment experience including where appropriate, dining, drinking and gaming activities. Our goal is to ensure our hotels provide a safe and supportive environment where our customers make informed decisions about gambling and timely appropriate assistance and information is provided.

ALH complies with all applicable responsible gambling legislative requirements in each state. ALH participates in many state and local government gambling working groups to assist in identifying and developing appropriate responsible gambling initiatives.

All ALH gaming staff are trained in the Responsible Service of Gambling.

### **ALH Group and David Schwarz**

The ALH Group has engaged David Schwarz, a well known ex AFL footballer and media identity as its Responsible Gambling Ambassador to provide employee education and customer awareness about the importance of "being honest with yourself about your gambling."

The ALH Group is committed to providing responsible gambling in our venues and has implemented a nationwide responsible gambling initiative with David Schwarz.

The program with David is based on real life experiences, not the replication of research or statistical analysis.

David has completed an accredited Responsible Service of Gambling course and will provide additional support to existing state based initiatives.

Key elements of the program include:

- State venue manager and staff meetings covering David's personal experiences and learnings with the aim of assisting our staff in interacting with problem gamblers. ALH invite interested community groups, welfare agencies and local government representatives to many of these meetings.
- Venue posters and other material highlighting the importance of "being honest with yourself about your gambling."
- Working with ALH management to further identify opportunities where we can proactively assist those who have a problem with their gambling.

David's role includes being available for our staff to discuss any gambling problems they or their families and friends may be experiencing.

## 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:

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



- (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

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.

## 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 Manger 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.