CLUB LAVERTON

Club Laverton

Responsible Gambling Code of Conduct

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LEIGH BARRETT & ASSOCIATES

Expert Advice in Regulatory Compliance Policy and Procedure

Club Laverton
Responsible Gambling Code of Conduct

1. Some Definitions

- "Code" means this specific Responsible Gambling Code of Conduct;
- "EGM" means electronic gaming machine;
- "EFT" means the electronic funds transfer facility potentially made available by venues for EGM payouts;
- "ICRP" means the Independent Complaints Resolution Process;
- "Ministerial Standards" means the mandated Responsible Gambling poster, signage and standards required by the Act'
- "Minor" means a person under the age of eighteen (18) years;
- "Nominated person" means the person appointed in accordance with clause 9 who may be responsible for providing information about the Code to patrons during all times in which the Venue is delivering gambling products and services;
- "Patrons" means customers, members and visitors of the venue; "PID" means player information display on EGM screens;
- "Responsible Gambling Officer" means the person responsible for the administration of the Code and ICRP at the venue;
- "Responsible Gambling Incident Register" or RGIR means the register maintained by the venue in which the venue records the information required under the Code and may simultaneously contain the Responsible Alcohol Incident Register;
- "Review form" means the form(s) required to be completed annually by the venue in accordance with clause 17 of this Code;
- "The Act" means the Victorian *Gambling Regulation Act* 2003" (current version);
- "The Regulations" means the Victorian *Gambling Regulations* 2015 (current version);
- "Venue" means this gaming venue;

2. Responsible Gambling Message

This venue will provide the highest standards of customer care and responsible service of gambling to all our patrons and will display the following responsible gambling message at the cashier's desk/station and/or entrance to the gaming room so that it is clearly visible wherever the venue provides electronic gaming machine (EGM) products:

This venue is committed to the wellbeing of its patrons, employees and the wider community in which it operates. It strives to deliver all its services in a responsible and sustainable manner providing the means for our patrons to have informed choices and to exercise a rational and sensible informed

choice based on their personal and individual circumstances. As part of this commitment, the venue has adopted a comprehensive Responsible Gambling Code of Conduct and a Self-Exclusion Program, and will provide the necessary resources, both financial and human, to support the proper operation and fulfilment of the Code at these premises.

Our Responsible Gambling Code of Conduct describes how we do this and continue to provide gambling services in a socially rewarding, enjoyable and responsive manner.

3. Preparation of the Code

Club Laverton Responsible Gambling Code of Conduct has been prepared on our behalf by Leigh Barrett & Associates Pty Ltd and has been made readily available for adoption and integration into our gaming business operations. It is a straightforward document and has been written in such a manner as to enable a ready understanding by our patrons and a simple interpretation and explanation by our staff. It has been written in plain English and presented in such a way as to be accessible to all our patrons, including those from culturally and linguistically diverse backgrounds.

The Code is supported by a Responsible Gambling Policies and Procedures Manual which is provided to every staff member of the venue at induction.

4. Availability

A copy of the Code of Conduct will be made available in written form to patrons upon request. A sign advising patrons of how to obtain a copy will be displayed at the gaming room entrance and/or the cashier's station in the gaming room.

The Code will also be available on the venue's website (where available) including in various community languages which include Greek, Italian, Chinese, Vietnamese, Arabic, Turkish and Spanish.

The venue will ensure that the Responsible Gambling Register is made readily available to any authorised person or VCGLR inspector upon request.

5. Responsible Gambling Information

Under the Act and/or the Code, when the venue is required to:

- provide information to patrons, and/or
- make information available to patrons, and/or
- display information.

The venue will do so by:

- Displaying responsible gambling information in a wide range of forms, including information brochures, posters and Electronic Gaming Machine (EGM) on-screen Player Information Displays (PIDs), including information required by the Act and the Regulations;
- Having information brochures readily available for patrons to take away on their own initiative or upon request; and/or

- Making the information available on the venue website (where available),
  (Whichever may be the most appropriate and effective).

The following information about responsible gambling will be made available to patrons;

a. how to gamble responsibly;

b. how to make and keep a pre-commitment decision; and

c. restrictions that apply to the payment of winnings by cheque and the provision of credit or the lending of money for the purposes of gambling.

Further Responsible Gambling information

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

a. How to access the Commonwealth Government's website 'Money Smart' www.moneysmart.gov.au (or similar government household budgeting website); and

b. 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.

In circumstances where the venue has a website links to the abovementioned website will be displayed on the venue's website.

6. 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 EGM.

Information on how to view the PID screens is available from any gaming staff member and/or by reading the Player Information Display (PID) brochure, available within the gaming room.

7. Self-exclusion Program

This venue provides a self-exclusion program. For information about the program, patrons may speak with the responsible gambling officer or nominated person or pick up a copy of the Self-Exclusion brochure displayed.

8. Customer Loyalty Scheme Information

Whenever a customer loyalty scheme is periodically offered by this venue a brochure will be made available to patrons detailing the appropriate information about the particular customer loyalty scheme available to participants.

This information will include the rules of the loyalty scheme including how and when rewards accrue, expire and are redeemed. Participating patrons will be informed about any benefits they have accrued as part of the loyalty scheme via a written statement or email at least once a year. Self-excluded

persons may not join or remain in any loyalty scheme. All written communications to members of the loyalty scheme shall include the following statement:

It is strongly recommended that you set sensible limits on the time and money you spend gambling and that you remain within these limits. Please ask any of the gaming staff for assistance if you are having problems of any type with your gambling including setting and maintaining limits.

9. Pre-commitment Strategy

This Venue encourages patrons who play EGMs to set a time and money limit according to their individual circumstances

Responsible gambling signage and brochures in the gaming room and on all EGMs will assist a customer make a pre-commitment decision in setting a limit and not exceeding that limit. Gaming staff members are required to be willing to discuss how to access help in setting and keeping to limits and to access help to identify triggers which lead to overspending on gambling.

The venue will also make information available on any aspect of access to various gambling support services and/or the State Government website www.problemgambling.vic.gov.au to patrons, their families and their friends.

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 also in the PID brochure available in the venue. This information is available on each EGM to support a customer who has made or wishes to make a pre-commitment decision.

This venue will comply with all regulations relating to pre-commitment with respect to the playing of gaming machines, including the Victorian YourPlay facility whereby patrons can set periodic limits on time and/or money spent on EGMs.

10. Interaction with Patrons

Interaction between staff and patrons is regarded by this venue as an essential element in the promotion of responsible gambling/customer care.

The staff at this venue are committed to providing consistently high levels of customer service and customer care, including being constantly aware of their patrons' needs and the venue's responsibility towards Responsible Gambling. Gaming staff receive Code training as part of their induction and subsequent refresher courses.

This venue has a nominated Responsible Gambling Coordinator and all Gaming Duty Managers/Supervisors are nominated as Responsible Gambling Officers in the venue. The Coordinator and Officers are aware of the responsibilities of the position, how to perform his or her duties and who is always available to manage any customer care/responsible gambling matter whenever the venue is open.

All staff members are aware of who the nominated person is for each shift.

Any person, who approaches a staff member for information about problem gambling services or shows any signs of having a problem with their

gambling, will be directed to the Responsible Gambling Officer for personal assistance and any necessary action.

Any customer displaying signs of distress or unacceptable behaviour may be approached by nominated person who will offer any assistance in a helpful manner and in strict confidence.

Unacceptable behaviour includes (but is not limited to):

- Aggression
    - Hitting a machine/buttons with undue force;
    - Shouting at the machine or other people in the gaming room;
    - Abusing staff and/or other patrons; and
    - Behaving in a threatening manner.
- Emotion
    - Crying anywhere in the venue, including at an EGM;
    - Appearing extremely sad or depressed in the venue;
    - Sweating abnormally whilst playing an EGM;
    - Appearing very agitated in the venue; and
    - Continually complaining to staff.
- Withdrawn
    - Not responding to interaction by staff;
    - Not responding to occurrences in the venue that would normally attract a customer's attention.
- Appearance
    - Attempting to wear a disguise in order not to be recognised; and
    - General reduction in hygiene/self care over time.
- Extended gambling
    - Playing EGMS at the venue every day;
    - Playing EGMs continuously for in excess of 3 hours; and
    - Not wanting to leave when the venue is closing.
- Asking for money to gamble
    - Asking staff for the loan of money (for any purpose);
    - Asking other patrons for the loan of money (for any purpose); and
    - Attempting to sell goods or services in the venue.

The process for interacting with such patrons includes measured assistance depending on case by case assessment by appropriate venue staff including the nominated person. This interaction may take the form of:

i. approaching the customer or visitor and attempting to engage the customer or visitor in social interaction;

ii. encouraging the customer to consider food or beverage offers available at the venue which would allow a break in play from the gaming machine;

iii. offering the customer some complimentary refreshments (eg. cup of tea or coffee) in a quieter, more private part of the gaming venue where the customer can be provided with all the relevant information and access to support services, including self exclusion and financial advice, in a confidential manner;

iv. offering some other appropriate assistance including the use of a venue telephone to contact family or a friend; and/or

v. assisting the customer with transport arrangements in order to travel home.

Contacts with patrons by the Responsible Gambling Officer are recorded in the Responsible Gambling Register and include details of action taken. The venue will provide training for all employees who carry out nominated person duties. Nominated persons will be trained to know the indicators of problem gambling and the appropriate responses to problematic behaviour together with the requirements of the Australian Privacy Principles.

The content of this register is covered by the *Privacy Act* 1988 and the nominated person will ensure compliance with the Australian Privacy Principles.

Details to be included in the Register include:

i. the date and time of the incident or matter;

ii. the name(s) of the staff member(s) involved;

iii. the name of the customer involved (if available or appropriate);

iv. an outline or overview of the incident or matter;

v. action taken by staff (eg: the provision of Gambler's Help / Self Exclusion information).

The venue will also comply with the laws and regulations regarding the responsible service of alcohol.

11. Interaction with Venue Staff

The venue is concerned to ensure the safety of its entire staff and to maintain the perceived integrity of the gambling products provided at the venue.

In accordance with the law, employees of this venue are not permitted to gamble on gaming machines, play Keno, purchase lottery tickets or engage in wagering whilst on duty in the course of their employment.

The venue has a policy regarding employees purchasing gambling products (including playing gaming machines) and a copy of this policy is included in venue's Responsible Gambling Policies and Procedures Manual and the staff hand-book and attached to any copy of the Code that is distributed.

Any staff member who indicates to another staff member or directly to the nominated person that he or she may have a gambling problem will be provided with full counselling support and problem gambling information by the venue operator (relevant responsible person) in a confidential manner. In determining what action is appropriate in any situation involving a staff member, the venue will ensure that every attempt is made to be discreet, and to draw as little attention as possible to the situation and to the staff member. The staff member will be encouraged to pursue non-gambling related duties wherever available in the venue.

Action taken in accordance with this clause will be recorded on the staff member's employment file, and not in the Responsible Gambling Register. Copies of any inclusions on an employee's employment file made in

accordance with this clause will be made available to VCGLR inspectors upon request.

Responsible gambling professional development sessions for all staff will be held on an annual basis in conjunction with appropriate training organisations including the local Gambler's Help Service and other such services as the venue determines.

Information about responsible gambling and problem gambling support services will be included in the induction package/staff handbook provided to all employees on commencement of employment with the venue.

If the venue adopts a different policy to that set out above the venue must advise the VCGLR in writing of the policy change and must await approval of the venue's policy prior to implementing the policy.

12. Interaction with Problem Gambling Support Services

This Venue is committed to maintaining strong links and regular contact with local problem gambling support services and related bodies.

The venue will make available to patrons various publications and contact details of the local Gamblers Help Service and/or other relevant problem gambling support and self-help services.

Senior staff from this venue will initiate meetings at regular intervals (at least annually) with the local Gambler's Help and designated Venue Support Workers (VSW) from the relevant regional Gambler's Help service.

Examples of these meetings may include:

- Convening an annual staff training session, run by the local Gambler's Help service;
- Convening meetings between the Venue Operator / Manager and the Gambler's Help service or designated VSW, or
- Maintaining regular contact via email to support services.

The venue will record details of all contact with the Gamblers Help Services and/or other relevant problem gambling support services in its Responsible Gambling Policies and Procedures Folder. The meeting details will include:

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

13. Customer Complaints

The venue subscribes to an ICRP that complies with the relevant ministerial directions on ICRP and has been approved by the VCGLR

The venue will make available to patrons information about the ICRP including:

- how to make a complaint;
- the process for resolution of a complaint;
- the independent review of decisions made by Club Laverton about member or visitor complaints;
- how information about complaints will be collected and retained; and
- how the VCGLR will be assisted to monitor compliance with the complaints process.

A customer with a complaint about compliance with and/or the operation of this Code should make it in writing directly to the venue management.

All complaints will be checked by the venue manager to make sure it relates to the operation of this Code. Complaints about customer service or machine operations which do not relate to the operation of the code should be directed to the Duty Manager. Venue staff will assist patrons with this process if asked.

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

- all complaints will be acknowledged promptly;
- if it is decided not to investigate the complaint as it does not relate to the operation of the Code, the customer will be informed accordingly;
- during the investigation of the complaint, the Venue Manager may seek information from the staff member concerned relating to the subject of the complaint;
- the Venue Manager will seek to establish whether the customer has been treated reasonably and in accordance with the Code;
- if the complaint is substantiated, the Venue Manager will detail the action that is to be taken to remedy the issue;
- the customer will always be informed of the outcome of the complaint;
- complaint details will be maintained in the Responsible Gambling Policies and Procedures Folder and noted in the Register; and
- information about the complaints will be provided to the VCGLR if requested.

If a complaint cannot be resolved at the venue level it will be put for resolution before 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 website (www.iama.org.au), download a Dispute Resolver form, and then submit this completed form with the relevant fee to the IAMA.

Documentation regarding all complaints relating to the Code must be maintained in the Responsible Gambling Policies and Procedures Folder, and noted in the Register, for access by the VCGLR as required.

14. Compliance with the Prohibition on Gambling by Minors

Gambling by minors is strictly prohibited and minors, regardless of age, are not permitted to enter or remain in EGM gaming rooms.

The venue will ensure that signs are located at every entrance to the gaming room prohibiting all minors from entering the gaming room.

As all venue staff have the responsibility for seeking proof of age, the venue requires that gaming room employees ask for verification of age if they are uncertain whether or not a customer or visitor to the gaming room is at least 18 years of age.

For the purpose of verification of age the following (current) original documents are acceptable:

- Proof of age card;
- Drivers licence;
- Victorian learners' permit; and/or
- Passport

If relevant verification of age cannot be produced, the customer or visitor will be required to leave the gaming room and will not be served any gambling product in the venue.

15. The Gambling Environment

Clocks are placed in all major areas of the venue so patrons will be aware of the passage of time.

Staff will mention the time when making announcements about venue activities.

Patrons will be encouraged to take regular breaks from gaming machine play. This encouragement may take the form of an announcement on the venue's public address system and may include:

a) Announcing that morning tea/lunch/dinner is now available;

b) Announcing a promotional draw;

c) Announcing the commencement of other non-gaming related customer activities within the venue.

Venue staff will also monitor the activities of patrons and interact as appropriate to discourage patrons from engaging in extended and intensive gambling. This interaction may take the form of casual dialogue consistent with general hospitality initiated by staff towards patrons, for example, relating to the availability of food and/or beverages.

16. Financial Transactions

This venue does not cash cheques. If a customer seeks to cash a cheque, the staff member will advise the customer that the venue does not cash cheques.

By law, winnings or accumulated credits of $2,000 or more from gaming machines must be paid in full by cheque which must not be made payable to cash, or by EFT (where available) that does not allow the person to access the funds within 24 hours of the payout. These winnings or accumulated credits cannot be provided as machine credits.

Patrons and visitors may request that winnings and/or accumulated credits of less than $2,000 from gaming machines, and winnings and/or credits from other gambling products are to be paid by cash and/or cheque. The venue will comply with such a request.

The venue will maintain a prize payment register to record the payment of significant prizes on gambling products, including, but not limited to, cheque payments of over $2,000. The prize payment register will be maintained in the gaming room and be made available to VCGLR inspectors upon request.

Entries in the prize payment register may be subject to the *Privacy Act* 1988 and the venue will comply with the Australian Privacy Principles with respect to the prize payment register.

The provision of gaming machines and wagering is subject to the federal *Anti Money Laundering and Counter Terrorism Financing* (AML/CTF) *Act* 2006. The venue has adopted a responsible AML/CTF Program and the venue will ensure that all financial transactions comply with appropriate AML/CTF Program and AML/CTF Act.

The venue will provide, maintain and display information regarding the venue's policy on the cashing of cheques and how patrons may have winnings paid by cheque.

17. Responsible Advertising and Promotions

Unsolicited advertising of 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.

Prior to publishing, management will review all advertising and promotion material to ensure that it complies with the code of ethics adopted by the Australian Association of National Advertisers.

Further, prior to publishing, management will review all advertising and promotional material to ensure that it will:

- not be false, misleading or deceptive about odds, prizes or the chances of winning;
- have the consent of any person identified as winning a prize prior to publication;
- 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; and
- not depict nor be targeted to persons under the age of 18 years.

18. Review of the Code

This Code is reviewed annually to ensure that it complies with the Victorian *Gambling Regulation Act* 2003, the Victorian *Gambling Regulation Regulations 2005* and related Ministerial Directions. Leigh Barrett & Associates Pty Ltd, the Code author, will facilitate the annual review on behalf of the venue operator.

The venue's compliance with the Code and the operation and effectiveness of the Code in the venue for the preceding 12 months will also be reviewed at this time.

The venue will ensure that a Code feedback form is available with the Responsible Gambling Register

The review seeks feedback from relevant stakeholders, including venue staff, patrons and problem gambling support services.

Required changes to this Code will be noted in the Register and written notification provided to the VGCLR. When required changes have been approved by the VCGLR, they will be implemented.

Any changes will be recorded in the venue's Responsible Gambling Policies and Procedures Folder.