



Australian Hotels Association - Victoria

Level 1, 1 Little Collins Street,

Melbourne Vic 3000

Tel: (03) 9654 7100

Fax: (03) 9654 1724

**SUBMISSION TO PRODUCTIVITY
COMMISSION INQUIRY INTO
GAMBLING IN AUSTRALIA**

**This submission is supplementary to the submission of Australian
Hotels Association (National) and should be read in conjunction with
their submission**

Brian Kearney
Chief Executive Officer
Australian Hotels Association (Victoria)

31 March 2009

1. Australian Hotels Association (Victoria)

The overarching objective of the Australian Hotels Association (Victoria), a branch of the national industrially registered Australian Hotels Association, is to effectively contribute to the establishment and maintenance of an economic and social environment that fosters the business success of members and Victorian pubs and hotels generally.

AHA (Vic) strives to be the pre-eminent Victorian hospitality industry association representing the rights and interests of its members to state, federal and local government, other relevant parties and the community. AHA (Vic) provides industry leadership, lobbies on members' behalf and promotes best practice in hotel management, with a commitment to effective communication with members. AHA (Vic) actively contributes to the development and growth of tourism and tourism-related industries.

Within the diverse Victorian hospitality industry, AHA (Vic) membership incorporates CBD, metropolitan, regional and rural hotels and pubs, accommodation hotels, resorts and similar businesses.

The ongoing strategic objectives of AHA (Vic) are to:

- Protect, promote and advance the interest and rights of members;
- Uphold and promote the quality, integrity and reputation of the hotel industry;
- Provide timely, effective, relevant and value adding services to members;
- Develop and maintain value-adding partnerships with key industry stakeholders to the benefit of members and such partners, and
- As an organisation achieve best practice in administration within the industry association sector.

2. Introduction

The Australian Hotels Association (Victoria) welcomes the opportunity to lodge a submission in response to the Productivity Commission's 2008/09 inquiry into gambling in Australia.

As a branch of the National Australian Hotels Association, AHA (Vic) has contributed to and fully supports their submission to the inquiry. This submission is supplementary to that submission and should be read in conjunction with it.

As a member of the Australian Gaming Council, AHA (Vic) also supports their submission.

However, having regard to:

- the unique and changing gaming structure and regulatory management in Victoria;
- the substantial range of harm minimisation initiatives implemented by the State Government since 1999, including the publicly announced intention require the removal of automatic teller machines (ATMs) from gaming venues from 2012, and
- the requirement for “next generation” gaming machines from 2010 to have a voluntary pre-commitment capability,

we have opted to make a further short factual submission for the information of the Commission highlighting the Victorian gaming environment and continuing developments.

The particular matters which we wish to bring to the attention of the Commission include:

- The profile of the gaming industry in Victoria;
- The significant changes to the structure of the Victorian gaming industry in the period leading up to and beyond 2012 as a consequence of the Victorian Government’s decision to change the current operator-based system to a venue-owned system from 2012;
- Government imposed harm minimisation requirements implemented in Victoria since 1999 and further announced initiatives to be implemented by 2012, and
- Industry-based harm minimisation initiatives including Codes of Conduct and the industry developed and managed problem gambling self-exclusion program.

3. Profile of the Gaming Industry in Victoria

Gaming in Victoria is regulated through the Gambling Regulation Act 2003. The Commission is aware of the somewhat unique so-called operator model which has applied in Victoria since the introduction of gaming machines in 1992.

Further to the requirements of the Act, various Ministerial Directions issued by the Minister for Gaming specify, inter alia, requirements in regard to allocation and distribution of gaming machines, including:

- the total number of gaming machines that can be operated at Victorian venues (outside Melbourne Casino) is capped at 27500;
- no more than 50% of the total can be operated at either pubs or clubs (13750 – pubs, 13750 – clubs);
- no less than 20% (i.e. 5,500) of the total can be operated outside metropolitan Melbourne;
- regional caps on gaming machines apply to nineteen (19) defined regions and from 2010 municipal limits will apply to all uncapped regions providing that no more than ten (10) gaming machines per 1000 adults will be able to operate in any Local Government Area (LGA) with the exception of CBD Melbourne, Southbank and Docklands, and
- no more than one hundred and five (105) gaming machines can be operated in any one venue.

Data published by the Victorian Commission for Gambling Regulation provides the following in regard to the profile of the Victorian gaming industry over the period 2000 to 2008.

Table A: *Profile of Victorian Gaming Industry (non-casino) 200 – 2008*

Date	Adult Population *	No. of Venues **	No. of EGMs ***	Net EGM Expenditure	Average No. EGMs per 1,000 Adults	Average No. Adults per Venue	Average Net Expenditure per Adult \$
30 June 2000	3,531,882	536	27,408	2,170,581,995	7.76	6,589	615
30 June 2001	3,572,889	537	27,444	2,366,016,584	7.68	6,653	662
30 June 2002	3,679,669	534	27,400	2,562,820,950	7.45	6,891	696
30 June 2003	3,720,628	532	27,260	2,334,294,514	7.33	6,994	627
30 June 2004	3,816,854	530	27,132	2,290,929,976	7.11	7,202	600
30 June 2005	3,870,537	523	27,124	2,393,030,966	7.01	7,401	618
30 June 2006	3,924,728	521	27,147	2,472,451,853	6.92	7,533	630
30 June 2007	3,979,244	522	27,279	2,543,175,356	6.86	7,623	639
Most Recent Year Data							
30 June 2008	4,034,536	520	26,797	2,611,507,885	6.64	7,759	647

* Adult population – the projected adult population figures used in the table are sourced from the Department of Planning and Community Development.

**Number of Venues – only licensed venues with EGMs are reported in this table. Licensed venues with zero EGMs have been excluded from the total number of venues for each year so that they are not included when formulating above averages.

*** EGM – electronic gaming machine.

Source – Annual Report 2007-2008 Victorian Commission for Gambling Regulation

Extensive details of the profile of the Victorian gaming industry are presented in the paper issued by the Victorian Government (March 2009) :

“Overview of the Victorian Gaming Industry”. The paper is available at:
www.gamblinglicences.vic.gov.au/gamingmachines/about-gaming-machines.html

4. Significant changes to the structure of gaming in Victoria in the period leading up to and beyond 2012

On April 10 2008 the Victorian Government announced that from 2012 the management and delivery of gaming would change from the existing operator-based scheme (Tabcorp/Tatts) to a venue-based scheme, with machine ownership and operation being licensed directly to approved venues.

Available details on the new structure are provided at:
www.gamblinglicences.vic.gov.au

5. Victorian Government imposed problem-gambling harm minimisation interventions since 1999, including announced initiatives to be introduced from 2010

The Victorian Government has imposed an intensive range of problem gambling harm minimisation requirements in respect of the operation of gaming between 1999 and 2009.

Government interventions in gaming introduced since 1999 include:

- Total gaming machine numbers capped at 27,500
- Regional Caps on gaming machines introduced
- Restrictions on trading hours
- Warnings regarding problem gambling required on Advertisements
- Government Anti-Gambling Advertising Campaigns
- Gaming machines banned from unrestricted areas
- Clocks on gaming machines
- Minimum lighting levels in gaming rooms
- Gaming Machine Health Services Levy increased twice (paid by gaming machine operators)
- Social and Economic Impact Statements introduced for new or varied gaming venue applications
- Smoking bans in gaming rooms
- Display of printed player information in gaming rooms
- Electronic player information display screens on gaming machines introduced
- Limit on bank note acceptors
- Ban on autoplay

- Limit on spin rates
- Limit on maximum bets
- ATM restrictions
- Limits on winnings paid in cash
- Cheque cashing restrictions
- Conditions on loyalty programs
- Mandatory responsible gambling training
- Local Government included in venue application process
- Bans on gaming advertising
- Restrictions on venue signage
- Mandated self-exclusion program
- Mandated Code of Conduct
- Ban on 'outdoor' gaming machines

Whilst the prevalence of problem gambling in Victoria as reported over the period has declined to less than 1%, the lack of evaluation of the impact of individual interventions or a related group of such interventions does not allow the identification of what does actually produce a benefit in reducing problem gambling and at what cost in terms of the impact on gaming revenues.

Rather there appears to be a continual search for new interventions without adequate rigour in addressing the benefit/cost of previous interventions.

The Victorian Government has announced that two further significant problem gambling-related policies will be implemented over the 2010/2012 period, i.e.:

- from 2010 "new generation" gaming machines deployed across the Victorian gaming network will be required to have an as yet defined pre-commitment capability able to be utilised on a voluntary basis by players, and
- from 2012 automatic teller machines will not be permitted in gaming venues (the existing ATM-related restriction requiring a maximum \$200 debit card only per withdrawal will be replaced by a maximum \$400 per day per debit card from 2010, with ATMs to be removed from gaming venues from 2012)

6. Gaming industry-based problem gambling harm minimisation initiatives

Victorian hoteliers providing gaming maintain a high level of commitment to effectively contributing to minimising problem gambling.

Evidence of this commitment is seen in the Victorian gaming industry developed Code of Conduct and the gaming self-exclusion scheme which have operated for over ten (10) years.

By 1 July 2009 the Victorian Government will require all Victorian gaming venues to commit to an approved Code of Conduct and participate in an approved gaming self-exclusion scheme.

The industry-developed self-exclusion scheme has been approved for this purpose, as has an industry developed Code of Conduct.

See attachment 1 "AHA (Vic) gaming self-exclusion scheme"

See attachment 2 "Responsible Gambling Code of Conduct"

Internet links in submission:

www.gamblinglicences.vic.gov.au/gamingmachines/about-gaming-machines.html

www.gamblinglicences.vic.gov.au

Attachment 1:

AHA (Vic) gaming self-exclusion scheme



Australian Hotels Association - Victoria

Level 1, 1 Little Collins Street

Melbourne Vic 3000

Tel: (03) 9654 7100

Fax: (03) 9654 1724

AHA (Vic) Self-exclusion program

The Victorian Gaming Self-exclusion program began operation in 1997. During the formulation process AHA (Vic) sought input from problem gambling counselling service providers (including Gamblers Help) to assist in the construction of a program that would be effective and accessible.

Gamblers Help advised the Association that a Self-exclusion program should be based on a model of change to address problematic addictive behaviour. The model of change developed by Prochaska, J. O. and DiClemente, C. C. (1986) was used as a basis for the development of the Victorian Self-exclusion program. (*see attachment 1*)

At this time AHA (Vic) was informed that to maximize the effectiveness of the program it should be based on “self”-exclusion rather than a “barring” of patrons model. That is, the commitment to take action on problem gambling should come from the individual when the individual is ready to take action.

The instrument used to facilitate entry to the program is a Deed of Self Exclusion. This document provides all relevant information and obligations to participants.

Consistent with the principles contained in the Model of Change, the system places the emphasis on self-empowerment. The individual commits to abstaining from entering a gaming area. It is not designed to allow the individual to make a decision that a venue will bar them from entry. However, venue staff provide assistance to self-excluded individuals to maintain their adherence to the program.

The Victorian gaming venue Self-exclusion program is centrally administered by the Australian Hotels Association (Victoria) with support from Tatts Group and Tabcorp.

Since the inception of the Self-exclusion program in 1997, to date there have been 5120 persons who have utilized the program. In recent years, on a monthly basis an average of 100 Deeds are executed. (*see attachment 2*)

People become aware of and enlist to the Self-exclusion program in various ways, for example from problem gambling counsellors, medical practitioners, friends who are on the program, staff at gaming venues, website information, responsible gambling brochures available at venues, etc.

It is preferable for entry to the program to be recommended by a problem gambling counsellor on the basis that they are informed of self-empowerment principles consistent with participating in Self-exclusion.

During the first contact the S-E Officer will ascertain whether or not the person is receiving counselling. If the person is not receiving counselling the S-E Officer will recommend contact with Gamblers' Help. Consent documentation is offered to the participant to allow Gamblers Help to initiate counselling services. The S-E Officer will then outline the process to the participant and will arrange a Self-exclusion interview.

In the metropolitan area, most interviews are conducted at the AHA (Vic) offices located at Level 1, 1 Little Collins Street, Melbourne. In outer-suburban and regional areas the interview is most often conducted at the local Gamblers' Help office.

At the interview the S-E Officer explains the Self-exclusion process to the participant and carefully explains the contents of the Deed. At the end of the interview, if the person seeking Self-exclusion is prepared to proceed, the S-E Officer witnesses the execution of the Deed and photographs of front facial profile and side profile are obtained with the consent of the participant.

The Deed is not a contract between parties but rather an individual commitment. By signing the Deed of Self Exclusion the gambler does a number of things:

1. **Undertakes** not to enter the gaming room and not to play gaming machines at the venues that s/he has nominated.
2. **Authorises** the staff at the venue to stop him/her entering the gaming room and if necessary remove him/her from the gaming room. S/he also authorises the taking, dissemination and display of photographs and personal details.
3. **Releases** all other relevant persons from any legal liability in respect of the Self-exclusion, including assault, defamation, duty of care, and undertake not to sue in respect of the self exclusion.
4. **Indemnifies** all other relevant parties in respect of the Self-exclusion.
5. **Acknowledges** that s/he has entered the Deed voluntarily, and that the Deed is enforceable against him/her alone, that there is not legal duty on any other person except him/herself. S/he further acknowledges that s/he understands the contents of the deed.

During the interview the participant is advised that the Deed authorises the venue management to take any reasonable steps to enforce the undertaking not to enter the restricted gaming areas and not to play gaming machines at the nominated venues. The participant is also informed that staff at the venue will assist where possible and if detected in a gaming room s/he will be instructed to depart the area. By entering a Deed of Self-exclusion, a person does not commit to not entering non-gaming areas of a gaming venue.

After the S-E Officer has completed the explanation of the Deed and is satisfied that the participant understands the consequences of entering into it, as a final step of the interview the participant is asked to check that the appropriate venues are nominated, and to nominate the period of Self-exclusion (6 – 24 months).

Copies of their Deed are then distributed to the venues that have been nominated.

Upon receipt by a gaming venue of the photographs and details of a person entering a Deed of Self-exclusion relating to their particular venue, the venue gaming supervisor/manager is required to update venue records and maintain a full listing of persons Self-excluded from that particular venue.

The venue gaming supervisor/manager will ensure that photographs with participants' personal details and exclusion dates are placed on display at the 'back of house' to assist venue staff in monitoring customers to potentially detect those who may be Self-excluded. This information is stored in a private and secure area to which the public does not have access.

A centrally administered Self-exclusion computerized data base is maintained by AHA (Vic). Victorian gaming venues have access to the data base via an individual confidential security password. This web-based system allows individual gaming venues to only access information relating to persons who are Self-excluded from their respective venue. Information provided to venues includes names & address, date of birth, colour photographs (front and side profile), and dates deed expiry.

A recent initiative of the AHA (Vic) Self-exclusion program is the enhancement of the working relationship with problem gambling support agencies. This involves the operation of a Self-exclusion partnership with the Salvation Army and Gamblers Help which is funded by the Victorian Government. The partnership project allows for additional staff to assist in providing timely counselling services for persons enlisting in the Self-exclusion program. This initiative demonstrates the implementation of a protocol which provides direct referral of persons undertaking Self-exclusion to gambling support services, and enhances and facilitation of the enhancement of the venue operator's participation in the Self-exclusion program.

This program allows Gambler's Help officers to have an initial role at Self-exclusion interviews and by providing a link to ongoing local counselling services. It has been recognised that some people seeking Self-exclusion often do so without involvement from Gamblers Help and counselling support agencies and it would be advantageous to develop this support link. The Victorian Government has committed funding for the ongoing counselling service.

The project was developed with input from AHA (Vic), Tatts Group, Tabcorp and Gamblers Help with support from members of the Responsible Gambling Ministerial Advisory Council's Pathways to Recovery Working Group administered by the Department of Justice.

For further information regarding the Self-exclusion, contact Paddy O'Sullivan, AHA (Vic) ph 03 96547100

Attachment 2:

Responsible Gambling Code of Conduct

Venue Name

Responsible Gambling Code of Conduct

February 2008

(Final copy to have VCGR approval date)



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 where 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 is taken 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

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

Game Type	Winning Odds
Slot Machine	1 in 100
Table Game	1 in 10
Card Game	1 in 10
Cricket	1 in 10
Rugby	1 in 10
Football	1 in 10
Other	1 in 10

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

(c) The availability of support services

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

(d) The payment of winnings policy

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

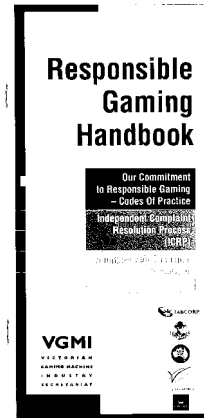
The *Gambling Regulation Act 2003* prohibits this venue from providing credit to customers for playing gaming machines.

(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.

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.)*

The current VGMI brochure is included in this document for approval. Once a new brochure is produced for the approved Self-Exclusion Program an image will be included in the Code.



(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.com.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

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 at minimum within the gaming room.



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:

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

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. A record of these meetings will be kept in a Responsible Gambling Folder / Register to be located in the Gaming Room.

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. A record of these meetings will be kept in a Responsible Gambling Folder / Register to be located in the Gaming Room.

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 your 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 further investigation is required.

If a complaint cannot be resolved at the venue it goes for resolution to the Institute of Arbitrators and Mediators Australia.

Forms for this are at this venue or may be found at
www.iama.org.au.

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.

10. Minors

Gambling by minors is prohibited. Signs are located at every gaming room entrance ban minors from entering the room. Staff must ask for proof of age if they are uncertain whether a customer is at least 18. If this cannot be produced, the customer must be asked to leave the venue.

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:

- Announcing that morning tea is now available.
- Announcing a member's draw.
- 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.

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 [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.

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 as well as any other Ministerial directions.

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 1st 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.

Operators of venue 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

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 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

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 important 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.
- 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.
 - 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.

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 could 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.

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: _____