

**RSL Sub-Branch
Incorporated
Returned & Services
League (RSL)
Responsible Gambling
Code of Conduct**

October 2018



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 Sub-Branches for EGM payouts;
- “ICRP” means the Independent Complaints Resolution Process;
- “Loyalty Scheme” means a scheme whereby a person is awarded points for EGM play;
- “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 who may be responsible for providing information about the Code to patrons during all times in which the Sub-Branch is delivering gambling products and services;
- “Patrons” means customers, members and visitors of the Sub-Branch;
- “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 Sub-Branch;
- “Responsible Gambling Incident Register” or RGIR means the register maintained by the Sub-Branch in which the Sub-Branch records the information required under the Code and may simultaneously contain the Responsible Alcohol Incident Register;
- “The Act” means the Victorian *Gambling Regulation Act 2003* (current version);
- “The Regulations” means the Victorian *Gambling Regulations 2015* (current version);
- “Sub-Branch” means this Sub-Branch; and
- “YourPlay” means the Victorian state-wide program that allows a patron to voluntarily set time and/or money limits on their EGM gambling play.

2. Responsible Gambling Code of Conduct

This RSL Sub-Branch is committed to the objects and purposes of the Returned & Services League. Such objects include the care and assistance of veterans and their families, and involvement and commitment to the members of the local community. The Sub-Branch accepts the responsibility for the care of its members and visitors to the Sub-Branch, including the responsible supervision of gambling and

associated activities. The following is the Sub-Branch's Responsible Gambling Code of Conduct.

3. Sub-Branch commitment to Responsible Gambling

“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.

The Sub-Branch commits to this policy as part of its commitment to the care of its members and the community”.

This message is displayed at the entrance to the gaming room and/or at the cashier's station in the gaming room. The message may also be displayed on the Sub-Branch's website (where applicable).

4. 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 at the Returned & Services League of Australia (Victorian Branch) Inc. website being www.rslvic.com.au

Languages will include:

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

The Code is supported by a Responsible Gambling Policies and Procedures Manual that is provided to every staff member of the Sub-Branch at induction.

The RSL Responsible Gambling Code of Conduct is also made available on the Sub-Branch's website (where applicable).

5. Responsible Gambling Information

Under the Act and/or the Code, when the Sub-Branch is required to:

- a. provide information to patrons; and/or
- b. make information available to patrons; and/or
- c. display information

the Sub-Branch 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 Sub-Branch website (where available),
(Whichever may be the most appropriate and effective).

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

- a. How to gamble responsibly;
- b. How to make and keep a pre-commitment decision, including how to access and utilise the YourPlay pre-commitment system;
- c. Conditions under which the payment of winnings must be made by cheque and/or electronic funds transfer (EFT);
- d. The prohibition of the provision of credit or the lending of money for the purposes of gambling;
- e. How gamblers and their families or friends can find gambling support services and self-exclusion programs;
- f. How to access the Commonwealth Government's 'MoneySmart' website www.moneysmart.gov.au (or similar government household budgeting website); and
- g. The Victorian problem gambling support website www.responsiblegambling.vic.gov.au.

In circumstances where the Sub-Branch has a website, links to the abovementioned websites may be displayed on the Sub-Branch's website.

This Sub-Branch also provides information for patrons in the gaming room on the triggers that can lead to overspending on gambling.

These include:

- i. Gambling every day or finding it hard to stop at closing time;
- ii. Gambling for long periods, that is, for three hours or more without a break;
- iii. Avoiding contact while gambling, communicating very little, barely reacting to events going on around the player;
- iv. Trying to borrow money from staff or other customers or continuing to gamble with the proceeds of large wins;
- v. Aggressive, anti-social or emotional behaviour while gambling;
- vi. Trying to win back what has been lost;
- vii. Gambling when feeling stressed or unhappy; and
- viii. Losing control because of too much alcohol.

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 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.



7. Pre-commitment Strategy

This Sub-Branch 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 a member or visitor set a limit and keep to it.

Every EGM at the Sub-Branch enables a player to track the time and amount of money spent during a session of play by accessing the Player Information Display (PID) screen. Information on how to activate session tracking is available from Sub-Branch staff and the Player Information Display (PID) brochures displayed in the RSL Sub-Branch.



Every EGM at the Sub-Branch also enable a person to set a time and/or money limit on their EGM play via the statewide YourPlay system. Information and assistance on how to register for YourPlay can be obtained from staff at the Sub-Branch or by accessing the website www.yourplay.com.au

8. The Sub-Branch's Self-exclusion program

This Sub-Branch 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. Material in relation to the self-exclusion shall be made available at the RSL Sub-Branch.

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

9. Customer Loyalty Scheme Information

Whenever a customer loyalty scheme is offered by this Sub-Branch a brochure will be made available to patrons detailing the appropriate

information about the particular 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.

Self-excluded persons may not join or remain in any loyalty scheme.

All written communications to members of the loyalty scheme will include a responsible gambling message.

10. Interaction with Customers

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

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

This Sub-Branch has a nominated Responsible Gambling Coordinator and all Gaming Duty Managers/Supervisors are nominated as Responsible Gambling Officers in the Sub-Branch. 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 Sub-Branch is open.

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

Any patron 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 patron displaying signs of distress or unacceptable behaviour may be approached by the 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 Sub-Branch, including at an EGM;
 - Appearing extremely sad or depressed in the Sub-Branch;
 - Sweating abnormally whilst playing an EGM;
 - Appearing very agitated in the Sub-Branch; and
 - Continually complaining to staff.
- Withdrawn
 - Not responding to interaction by staff;
 - Not responding to occurrences in the Sub-Branch 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 Sub-Branch every day;
 - Playing EGMs continuously for in excess of 3 hours; and
 - Not wanting to leave when the Sub-Branch 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 Sub-Branch.

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

- i. Approaching the patron and attempting to engage him/her in social interaction;
- ii. Encouraging the patron to consider food or beverage offers available at the Sub-Branch which would allow a break in play from the gaming machine;
- iii. Offering the patron some complimentary refreshments (eg. cup of tea or coffee) in a quieter, more private part of the gaming Sub-Branch 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 Sub-Branch 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 Sub-Branch will provide additional 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).

11. RSL Sub-Branch Employees Gambling Policy

Employees at this Sub-Branch are not permitted to gamble on gaming machines at this Sub-Branch at any time.

Off-duty employees at this Sub-Branch may gamble at the Sub-Branch premises provided they are not in uniform and not wearing their gaming licence identification and have been absent from the Sub-Branch premises since their last rostered shift.

(**select (a) or (b))

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 and this Code is included in the package received by staff members when they start employment.

In the event of a staff member showing signs of problem gambling, the Sub-Branch will actively arrange for the employee to receive

professional and other such appropriate support, and shall actively encourage the employee to take advantage of such professional support.

12. Responsible and Problem Gambling Support Services

The Sub-Branch is committed to maintaining strong links with local responsible and problem gambling support services. Senior staff from this Sub-Branch will meet regularly with the local Gambler's Help.

- Examples of these meetings may include:
 - Holding annual staff training session, run by the local Gambler's Help service;
 - Twice yearly meetings between the Sub-Branch/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 include:

- Time and date of the meeting;
- Attendees at the meeting;
- Topics discussed;
- Outcomes/action items from the meeting;
- Next meeting date.

13. Customer Complaints

A patron with a complaint about the operation of this Code of Conduct should make it in writing directly to the Sub-Branch management. All complaints will be checked by the Sub-Branch manager to ensure that they are about the operation of this Code. Complaints about customer service or machine operations should go directly to the Sub-Branch Manager / staff on duty. Sub-Branch staff will assist customers with this process where requested.

Complaints will be investigated sensitively and as soon as possible.

Complaints will be resolved 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, you will be informed of the reasons;
- During the investigation of a patron complaint the Sub-Branch Manager may seek information from the staff member concerned on the subject of the complaint;
- The Sub-Branch Manager will seek to establish whether the patron has been treated reasonably and in accordance with the Responsible Gambling Code of Conduct;

- o If the complaint is substantiated, the Sub-Branch Manager will inform the patron of the action that is to be taken to remedy the problem;
- o The patron will always be informed of the outcome of their complaint;
- o Complaint details will be maintained in the Responsible Gambling Folder/Register;
- o Information about the complaints will be provided to the VCGLR if requested.

If a complaint cannot be resolved at the Sub-Branch it will be referred for mediation 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 website (www.iama.org.au), download a Dispute Resolver form, and then submit this completed form with the relevant fee to the IAMA. The mediator will then contact both parties to facilitate a resolution. These forms are also available at this Sub-Branch.

Note: complaints sent to this independent body for mediation may be expensive. All parties are urged to attempt to resolve the matter at the Sub-Branch 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 VCGLR as required.

14. Minors

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

15. Gambling Environment

To ensure that people are aware of the passage of time, clocks are located on every EGM and in all major areas of the Sub-Branch and staff will include a statement regarding the time of day when making announcements of Sub-Branch activities.

Activities may include:

- Announcing that refreshments are available;
- Announcing a members' competition;

- The commencement of activities such as morning melodies, exercise classes, and other activities conducted at the Sub-Branch; and/or
- The conduct of "Stand To" by the Sub-Branch at 6:00pm.

16. Financial Transactions

This Sub-Branch does not cash cheques from patrons. A sign stating this is displayed at the cashier's station in the gaming room.

Winnings below \$2,000 from gaming machines at this RSL Sub-Branch can be paid by cash and/or cheque. For winnings or accumulated credits of \$ 2,000 or more, the entire amount must, by law, be paid by cheque or by EFT. These winnings or accumulated credits cannot be provided as machine credits.

A Prize Payment Register is maintained in the gaming room.

17. 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 the Sub-Branch will comply with the advertising code of ethics adopted by the Australian Association of National Advertisers.

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

Further this Sub-branch will ensure that our 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; and
- Have the consent of any person identified as winning a prize prior to publication.

18. Implementation of the Code

The Code is part of the induction information given to all new staff when they commence employment.

Matters raised by staff or patrons about the Code are referred 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 Sub-Branch management.

All members of the Sub-Branch Committee are provided with the same information and the same induction as is received by the Sub-Branch employees.

19. Review of the Code

This Code is reviewed annually to ensure that it complies with the *Gambling Regulation Act* in addition to any other relevant Ministerial directions. The review seeks feedback from the Committee of the Sub-Branch, the Sub-Branch staff, and responsible gambling support services.

Required changes will be noted and then implemented. Any changes will be recorded in the Sub-Branch's Responsible Gambling Folder/Register.