



Club Keno Responsible Gambling Code of Conduct

May 2009



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1. Club Keno commitment to Responsible Gambling

The operators of Club Keno, Tabcorp and Tatts Group, are committed to providing the highest standards of customer care and responsible gambling. The Club Keno Responsible Gambling Code of Conduct articulates how we demonstrate this commitment.

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 clearly visible in venues where Club Keno is sold.

2. Availability of the Code of Conduct

This Code is available in English and major community languages on the Club Keno Operators' websites.

Tabcorp: www.tabcorp.com.au - listed under Responsible Gambling
Tatts Group: www.tattsgroup.com - listed under Responsible Gambling

Languages will include:

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

3. Responsible Gambling Information

The Club Keno Operators work with Venue Operators who sell Club Keno to provide responsible gambling information in a range of forms, including brochures and posters. This information includes:

- (a) How to gamble responsibly;
- (b) How to set and keep to limits to gambling;
- (c) The availability of problem gambling support services
- (d) The venue payment of winnings policy
- (e) The prohibition on the provision of credit for gambling

Display screens in the venues where Club Keno is sold 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.)*

4. Gambling Product Information

The game rules for Club Keno are on display at each Club Keno Sales location.

Brochures containing the game rules for Club Keno are also provided to venues that sell Club Keno for display at each Club Keno sale location.

5. Pre-commitment Strategy

The Club Keno Operators encourage all customers who play Club Keno to set a time and money limit according to their circumstances. Signs located near the Club Keno terminal recommend that customers set a limit and stick to it.

Venues selling Club Keno also display signs and brochures in the venue and where a Club Keno terminal is located, with information on the triggers that can lead to overspending. 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;
- viii. losing control because of too much alcohol;

6. Interaction with Club Keno customers

The Club Keno Operators do not have direct contact with customers who play Club Keno at venues. However, the Club Keno Operators encourage Venue Operators to engage with customers and provide information supplied by the Club Keno Operators to customers upon request.

Venue Operators are also bound by a Code of Conduct to engage with customers who are displaying behaviours or indicators that may be associated with problem gambling.

In a Venue, 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 Venue's 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:

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

This assistance may take the form of:

- vi. staff interacting with the customer and encouraging them to take a break from their gambling;
- vii. 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. At all times interaction with customers will occur to ensure that a customer's right to privacy is respected.

7. Staff Gambling Policy

Staff employed by the Club Keno Operators are not permitted to play Club Keno whilst on duty unless it is required in order to perform their normal work duties.

Staff employed by the Venue Operators are not permitted to play Club Keno when they are on duty unless it is required in order to perform their normal work duties.

Staff employed by the Venue Operator are given responsible gambling training as part of the employment induction process. Any staff member who indicates that they have a gambling problem will be directed to the Venue's Responsible Gambling Officer/Duty Manager. Any contact with a staff member who indicates that they have a gambling problem will occur in a manner that respects the staff member's right to privacy.

8. Problem Gambling Support Services

The Club Keno Operators work with Venue Operators to ensure that information about local problem gambling support services is available at each venue from which Club Keno is sold. The Club Keno Operators are committed to facilitating strong links between Venue Operators and local problem gambling support services, including encouraging regular meetings with local Gambler's Help services.

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 Venue Operator's 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

If a customer has a complaint relating to this Code of Conduct, they should make the complaint in writing directly to:

Field Services Manager

Tatts Pokies

615 St Kilda Road

Melbourne VIC 3004

OR

Manager, Gaming Operations

Tabcorp

5 Bowen Crescent,

Melbourne VIC 3004

A customer with a complaint about a Venue's operation of this Code of Conduct should make it in writing directly to the venue management. All complaints will be checked by the Club Keno Operator to make sure that they are about the operation of this Code. Complaints about customer service or Club Keno 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:

- 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 your complaint information may be sought from the staff member concerned on the subject of the complaint;
- if your complaint is substantiated, the Club Keno operator will inform you of the action that is to be taken to remedy the problem;
- you will always be informed of the outcome of your complaint;
- information about the complaints will be provided to the VCGR if requested.

If a complaint cannot be resolved at the venue or by the Club Keno Operator 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), 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. The Club Keno Operators work with Venue Operators to ensure that signs informing customers of this prohibition are displayed at locations where Club Keno is sold.

All venue 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/area where Club Keno is sold.

11. Gambling Environment

Club Keno customers will be encouraged to take regular breaks from gambling. 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 can keep track of the passing of time. Venue staff will mention the time when making announcements about venue activities.

12. Advertising and promotions

All Club Keno advertising undertaken by or on behalf of the Club Keno Operators complies with the Advertising Code of Ethics adopted by the Australian Association of National Advertisers.

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

Further this venue 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;
- have the consent of any person identified as winning a prize prior to publication.

13. Financial Transactions

This venue does not cash cheques from customers including the cashing of cheques for the playing of Club Keno.

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

If requested by customers, Club Keno winnings will be paid wholly or partly by cheque.

14. Implementation of the Code

The Club Keno Operators' Responsible Gambling Code of Conduct is included with induction materials given to all new staff upon commencement of employment with both the Club Keno Operators and Venue Operators. Staff members who were employed when the Code was introduced have received training about its purpose, contents and procedures.

Issues identified by staff or customers relating to this Code will be directed to the Manager, Gaming Operations Tabcorp, and/or Field Services Manager, Tatts Pokies for attention.

Staff members who are identified as effectively implementing and then adopting the practices outlined under the Code will be recognised by the Venue Operators.

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 Club Keno Operators' staff, Venue staff, customers and problem gambling support services.

Required changes will be noted and then implemented where possible.