



**PVS Australia Pty Ltd**

**Responsible Gambling Code of Conduct**

**Star Hotel Sale**

**August 2020**



## 1. Responsible Gambling Message

*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.*

*This venue has a duty to take all reasonable steps to prevent and minimise harm from the operation of gaming machines in this venue, including by monitoring the welfare of gaming machine players, discouraging intensive and prolonged gaming machine play and intervening when a person is displaying behaviour that is consistent with gambling harm.*

*Responsible gambling in a regulated environment is when consumers have informed choices and can exercise a rational and sensible choice based on their circumstances. It means a shared responsibility with collective action by the gambling industry, government, individuals, and communities.*

This message is displayed at the entrance to the gaming room and/or at the cashier's station in the gaming room.

## 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 addition to English) in community languages on the venue's website. (Applies only where the venue has a website)

Languages will include:

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

### **3. Responsible Gambling Information**

This venue displays responsible gambling information in a range of forms, including talkers, brochures, posters, and Electronic Gaming Machine (EGM) on-screen Player Information Displays (PIDs).

Responsible gambling information will be made available for patrons at the cashier's desk and in venue restrooms. Talkers will be displayed next to each machine and posters will be displayed in the gaming room of each venue.

Responsible gambling information includes:

- How to gamble responsibly
- How to make and keep a pre-commitment decision
- The availability of support services
- The payment of winnings policy
- The prohibition on the provision of credit or the lending of money for gambling
- The venue's self-exclusion program

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

- How to access the Commonwealth Government's website 'Money Smart' [www.moneysmart.gov.au](http://www.moneysmart.gov.au) or similar government money management website.
- 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.responsiblegambling.vic.gov.au](http://www.responsiblegambling.vic.gov.au)

### **4. Gambling Product Information**

The rules for each Electronic Gaming Machine (EGM) game, including the chances of winning, are available by going to the Player Information Display (PID) screens on the machine. Information on how to view the PID screens is available from a member of staff and/or by reading the Player Information Display (PID) brochure, available within the gaming room at a minimum.

## **5. Responsible Gambling Register**

This venue must establish and maintain a responsible gambling register and must ensure that details of all responsible gambling incidents and interventions are recorded in this register, including:

- date and time the incident occurred;
- details of the incident;
- details of the intervention made in response to the incident;
- details of the customer's response to the intervention, if known
- date and time the entry was recorded in the responsible gambling register; and
- the name of the individual if this is provided voluntarily by that individual.

In accordance with the Privacy Act 1988, the responsible gambling register will be held in a secure location within the venue and will only be accessible to venue staff, Victoria Police and VCGLR inspectors.

This venue must retain the information in the responsible gambling register for not less than six months from the day it was recorded in the responsible gambling register.

This venue must provide a copy of the responsible gambling register to the Victorian Commission for Gambling and Liquor Regulation on request.

This venue must provide information in the responsible gambling register to a Venue Support Worker for training and development purposes provided that information does not include the name or identifying characteristics of any person.

## **6. 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 Your Play and Player

Information Display (PID) brochures displayed throughout the venue. Staff at this venue are available to assist customers who wish to use Your Play both at the gaming machine and the kiosk.

Customers can use Your Play to:

- track time and money spent on gaming machines
- set limits of the amount of time and money spent
- set personal messages that appear on the machine while they play
- view their playing history

## **7. Interaction with Customers-Communications with Gamblers**

This venue is 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 must ensure that communications with customers do not:

- induce a person to enter or remain in the gaming machine area;
- induce gaming machine play (with the exception of communication that forms part of a lawful loyalty scheme); or
- reinforce or encourage fallacies or misconceptions about gaming machines, including but not limited to:
  - telling a person that he or she can make money playing a gaming machine;
  - telling a person that a gaming machine or gaming machine jackpot has or has not paid, or that it is due to pay winnings;
  - discussing luck or superstitions;
  - telling a person that a 'near miss' means the gaming machine is about to pay winnings;
  - suggesting or encouraging the belief that a spin on a gaming machine is not independent of another spin on that gaming machine;
  - suggesting or encouraging the belief that there are strategies that a person can use to win when playing a gaming machine (for example, increasing or decreasing the amount bet per line or number of lines on which a bet is made); or

- o telling a person that he or she deserves to win.

This venue must take reasonable steps to ensure that communications with customers discourage intensive and prolonged gaming machine play. With the exception of EFTPOS signage, this venue must not induce a person to:

- withdraw money, or withdraw more money, from a cash facility; or
- leave the approved venue to obtain money, or obtain more money, to enable that person to play, or to continue to play, a gaming machine.

This venue may however direct a person to a cash facility when requested to do so by a customer.

## **8. Interaction with customers – Signs of Distress**

This venue must take all reasonable steps to ensure the gaming machine area and entrances to the gaming machine area are monitored at all times gaming machines are available for gaming.

A venue operator must take all reasonable steps to ensure that customers in the gaming machine area are regularly observed to monitor behaviour that is consistent with gambling harm.

This venue must not encourage or induce a person to engage in intensive or prolonged gaming machine play.

Staff at this venue are expected to ask a person to take a break away from the gaming machine area where an interaction has occurred and that interaction has determined that the person is angry while gaming or has requested assistance as a consequence of their gaming.

Staff at this venue are expected to interact with a person who has been observed to have been playing gaming machines for a prolonged period without a break and ask that person to take a break away from the gaming machine area.

Staff at this venue are expected to interact with a person who:

- has been asked to take a break and refuses to take a break away from the gaming machine area;
- plays multiple gaming machines simultaneously; or
- reserves a gaming machine in order to play another gaming machine.

A person, who approaches a staff member for information about problem gambling services or shows signs of having a problem with their gambling, will be directed to the Responsible Gambling Officer/Gaming Duty Manager for help.

A customer displaying signs of distress or unacceptable behaviour will be approached by a staff member who will offer assistance. These signs may include, but not be limited to:

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

This assistance may take the form of:

- staff interacting with the customer and encouraging them to take a break from the gaming machine;
- staff offering the customer some refreshments (e.g. cup of tea or coffee) in a quieter, more private part of the gaming venue.

If the behaviour could be due to problem gambling, the customer will be referred to the Responsible Gambling Officer.

Contacts with customers by the Responsible Gambling Officer are to be recorded in a Responsible Gambling Register.

## **9. Interaction with Venue Staff**

Staff at this venue are not permitted to gamble, including playing gaming machines, keno, or wagering on their rostered day of work.

Venue management may decide not to permit staff from playing gaming machines at any time.

This venue will reflect their staff gambling policy in the Venue's Responsible Gambling Policy and Procedures Manual together with a Staff Gambling Policy Statement in the Venue's Responsible Gambling Register.

This venue must provide information to staff so that they are aware of their increased risk of harm from gambling. This venue will also assist any staff member who indicates they may have a gambling problem by ensuring they are given information about problem gambling and the support services available. The employee's right to privacy will be respected and any such matters will not be recorded in the register.

## **10. Interaction with Problem Gambling Support Services**

This venue is committed to maintaining strong links with local problem gambling support services. This venue is expected to ensure that staff who have day-to-day management of the operation of the venue and responsible gambling officers meet with the venue's nominated venue support worker at least once every six months.

Examples of these meetings may include:

- holding annual staff training session, run by the local Gambler's Help service;
- information sessions between the Venue Operator / Manager and the Gambler's Help service.

Details of these meetings will be kept in a Responsible Gambling Folder/ Register to be located in the Gaming Room. The meeting details must include:

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

Senior management, in consultation with the Gambler's Help Venue Support Program, may decide to conduct more frequent staff training sessions/meetings. Additional engagement will be negotiated with the Gambler's Help Venue Support program.



## **11. The 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 entertainment activities.

This venue must take all reasonable steps to discourage a person from reserving a gaming machine in order to play another gaming machine in the gaming machine area.

During the opening hours of food and beverage facilities outside the gaming machine floor, this venue must ensure that a person can order and be served food and beverage without having to enter the gaming machine area.

This venue may offer a person seated at or playing a gaming machine food or beverage provided it is offered as part of an interaction with that person.

## **12. Responsible Gambling Officer**

This venue must nominate Responsible Gambling Officers for this venue.

A Responsible Gambling Officer must be available in the gaming machine area at all times gaming machines are available for gaming.

This venue must display prominently in the gaming machine area a notice advising that a Responsible Gambling Officer is available for assistance at all times.

This venue's Responsible Gambling Officer must take all reasonable steps to:

- monitor the gaming machine area and ensure compliance with the Act, regulations and this Code;
- ensure that staff record responsible gambling incidents and interventions in the responsible gambling register;
- observe customers who display behaviour that is consistent with gambling harm and provide assistance as necessary;

- provide advice to staff about gambling harm and how to respond to signs of gambling harm: and
- respond to customer enquiries and complaints about the supply of gambling in the approved venue.

A Responsible Gambling Officer must complete prescribed responsible service of gambling training, if any.

### **13. 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:

- 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 the Venue Manager may seek information from the staff member concerned on the subject of the complaint;
- the Venue Manager will seek to establish whether you have been treated reasonably and in accordance with the Responsible Gambling Code of Conduct;
- if your complaint is substantiated, the Venue Manager 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;
- complaint details will be maintained in the Responsible Gambling Register;
- information about the complaints will be provided to the VCGLR if requested.

If a complaint cannot be resolved at the venue it goes for resolution to the Institute of Arbitrators and Mediators Australia (IAMA). Either party involved

in the complaint may contact the IAMA. To initiate a complaint either party can go to IAMA's web site ([www.iama.org.au](http://www.iama.org.au)), download a Dispute Resolver form, and then submit this completed form with the relevant fee to the IAMA. The mediator / arbitrator will then contact both parties to facilitate a resolution. These forms are also available at this venue.

Note: Complaints sent to this independent body for resolution may be expensive. All parties are urged to attempt to resolve the matter at the venue level before going to professional mediation.

Documentation regarding all complaints (both valid and invalid) against the Code must be maintained in the Responsible Gambling Folder / Register for access by the VCGLR as required.

#### **14. Prohibition of Gambling by Minors**

Gambling by minors, including the sale of gambling products and services, is prohibited. Signs are located at every gaming room entrance banning minors from entering the room. All staff share the responsibility for asking for proof of age if they are uncertain whether a customer is at least 18. If relevant verification cannot be produced, the customer must be asked to leave the gaming room.

#### **15. 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 \$2,000 from gaming machines at this venue can be paid by cash and/or cheque. By law, all winnings, or accumulated credits of \$2,000 or more must be paid out entirely by cheque, which cannot be made out to cash. These winnings or accumulated credits cannot be provided as machine credits. A Prize Payment Register is maintained in the gaming room.

#### **16. Advertising and promotions**

Unaddressed 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.

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

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;
- 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.

## **17. Customer Loyalty Scheme Information**

In the event of this venue offering a customer loyalty scheme, a brochure will be made available detailing the appropriate information about the 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.

Participants 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.

## **18. Implementation of the Code**

This venue is to ensure that the Code is included in the induction process provided for staff prior to their commencement of employment. At the introduction of the Code the venue is to ensure that all staff currently employed by the venue receives a copy of the Code. The venue will also ensure that PVS Australia Pty Ltd conduct regular Code compliance audits. The frequency of these audits will be at the discretion of the venue and PVS Australia Pty Ltd.

## **19. Review of the Code**

This Code is reviewed annually to ensure that it complies with the Gambling Regulation Act and any Ministerial Directions. The operation and effectiveness of the Code for the preceding 12 months will also be reviewed at this time. The review seeks feedback from all relevant stakeholders, including venue staff, customers, and problem gambling support services.

Required changes to the venue's practices will be noted and then implemented where possible. Any changes will be recorded in the venue's Responsible Gambling Register.