

Keno

Responsible Gambling

Code of Conduct

Victoria

Approved 13 December 2011

Version 1.0



Keno Responsible Gambling Code of Conduct Victoria

1. Definitions

Accredited agent means the person or persons who have been accredited by the Keno Licensee under section 6A.2.4(3) of the *Gambling Regulation Act 2003* to sell tickets in keno games

Tabcorp means the Keno licensee, which is Tabcorp Investments No. 5 Pty. Ltd. ABN 72 105 341 366 of 5 Bowen Crescent, Melbourne, Victoria

Outlet or **Keno outlet** means the place of business of the accredited agent

2. Our commitment to Responsible Gambling

Tabcorp and accredited agents are committed to providing the highest standards of responsible gambling and customer care. Our Keno Responsible Gambling Code of Conduct shows how we demonstrate this commitment and will be displayed in keno outlets.

Responsible gambling in a regulated environment is when consumers are in a position, and have the information and support available, to, and can, exercise a rational and sensible choice in relation to their gambling activities based on their circumstances. It means a shared responsibility and collective action of the gambling industry, government, communities and individuals.

3. Availability of the Code of Conduct

This Code is available in English and major community languages in keno outlets, and in the Responsible Gambling section of Tabcorp's website at www.tabcorp.com.au.

Major community languages are:

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

Copies of the Code in all languages will be provided to customers on request.

4. Product Information

The game rules for Keno are on display at each Keno outlet.

Brochures containing the game rules for Keno are also provided to accredited agents for display at each Keno outlet.

5. Responsible Gambling Information

Tabcorp works with Victorian accredited agents and outlets to provide responsible gambling information in a range of forms, including brochures and posters. This includes information in relation to:

- how to gamble responsibly
- how to make and keep a pre-commitment decision
- the availability of gambling support services
- the prohibition on the provision of credit for gambling
- restrictions that apply to the payment of winnings by cheque

Contact information details for problem gambling support services and Responsible gambling tips are also displayed by various means, including screen displays, within Keno outlets.

The following responsible gambling message will be displayed on all relevant material.

Think! About your choices
Call Gambler's Help
1800 858 858
www.problemgambling.vic.gov.au
www.gamblinghelponline.org.au

6. Interaction with customers

Tabcorp does not have direct contact with customers who play Keno. However, Tabcorp encourages accredited agents and outlets and their staff to engage with customers and provide information supplied by Tabcorp to customers upon request.

In a venue, a person who approaches a staff member for information about, or assistance with, a gambling problem or who is displaying indicators that may be related to problem 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 need 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 their gambling

- 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. Pre-commitment

Tabcorp encourages, and supports all accredited agents to encourage, all customers who play Keno to set a time and money limit according to their circumstances. Signs located near the Keno terminal recommend that customers set a limit and stick to it.

Keno outlets also display signs and brochures in the venue and where Keno terminals are located, with information on circumstances 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 gambling losses
- when feeling stressed or unhappy
- losing control because of excessive consumption of alcohol

Accredited agents and outlet staff will support customers who inform them of a pre-commitment decision, by encouraging them to keep their pre-commitment decision.

8. Staff Gambling Policy

Under Tabcorp's Employee Gambling Policy, Tabcorp's Gaming Division staff are not permitted to play Keno at any time.

Tabcorp's non-gaming division staff are not permitted to play Keno while on duty unless it is required in order to perform their normal work duties.

Keno outlet staff are not permitted to play Keno while on duty unless required to do so in order to perform their normal work duties. They are given responsible gambling training as part of their employment induction. 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.

9. Problem Gambling Support Services

Tabcorp works with accredited agents and outlets to ensure that information about local gambling support services is available at each Keno outlet. Tabcorp is committed to facilitating strong links between Keno outlets 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 sessions, run by the local Gambler's Help service
- twice yearly/regular meetings between the keno outlet/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

10. Customer Complaints

Customers who have complaints relating to this Code should write directly to:

Manager, Gaming Operations
Tabcorp
5 Bowen Crescent,
Melbourne VIC 3004

A customer with a complaint about an outlet's operation of this Code should write directly to the outlet's management. All complaints will be checked by Tabcorp to ensure that they pertain to the operation of this Code.

Complaints about customer service or Keno operations should go directly to the outlet manager/staff on duty. Outlet staff will assist with this process if requested. Complaints will be investigated sensitively and promptly. If it is decided not to investigate the complaint because it does not relate to the operation of this Code, the complainant will be informed of the reasons.

During the investigation of the complaint information may be sought from the staff member concerned. If a complaint is substantiated, Tabcorp will inform the complainant of the action that is to be taken to remedy the problem. The complainant will always be informed of the outcome of a complaint. Information will be provided to the VCGR if requested.

If a complaint cannot be resolved at the outlet level or by Tabcorp it will be referred to the Institute of Arbitrators and Mediators Australia (IAMA) for resolution. 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/arbitrator will then contact both parties to facilitate a resolution. These forms are also available in the Keno outlet.

Note: Costs may be associated with complaints sent to IAMA for resolution. All Parties are encouraged to attempt to resolve the matter at the venue level before seeking professional mediation.

Documentation regarding all complaints must be maintained in the Responsible Gambling Folder/Register for access by the VCGR as required.

11. Minors

Gambling by minors is prohibited. Tabcorp works with accredited agents and outlets to ensure that signs informing customers of this prohibition are displayed in Keno outlets.

All staff share the responsibility for asking for proof of age if they are uncertain whether a customer is at least 18 years of age. If relevant verification cannot be produced, the customer must be asked to leave the gaming room/area where Keno is sold.

12. Gambling Environment

Keno customers will be encouraged to take regular breaks from gambling and not to engage in extended or intensive 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 outlet so customers are made aware of the passage of time. Outlet staff will mention the time when making announcements about venue activities.

13. Transactions

Keno outlets do not cash cheques from customers, including the cashing of cheques for the purpose of playing Keno. A sign stating this is displayed at the cashier's station in the gaming room.

Keno winnings will be paid wholly or partly by cheque if requested by a customer.

14. Advertising and promotions

All Keno advertising undertaken by or on behalf of Tabcorp 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, Tabcorp will ensure that Keno 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, prior to publication, the consent of any person identified as winning a prize

15. Implementation of the Code

Tabcorp's Responsible Gambling Code of Conduct is included with induction materials given to all new Gaming Division staff upon commencement of employment with Tabcorp, and to outlet staff. Staff 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.

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

16. Review

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 Tabcorp staff, outlet staff, customers and problem gambling support services. Required changes will be implemented where possible.