

# Cumberland Hotel

## Responsible Gambling Code of Conduct



## **Gaming Venue Responsible Gambling Code of Conduct**

### **1. Definitions**

The terms used in this Gaming Venue Responsible Gambling Code of Conduct are consistent with the Gambling Regulation Act 2003 (the Act) unless the context otherwise requires or the contrary intention appears.

### **2. Preparation of a Code**

This Gaming Venue Responsible Gambling Code of Conduct was prepared by the Australian Hotels Association (Victoria) and will be available to gaming venues for adoption. This Code of Conduct was written in a manner that will enable it to be readily understood by customers. It was prepared with the intention of being written in plain English and presented in such a way as to be reasonably accessible to customers, including customers from culturally and linguistically diverse backgrounds.

### **3. Availability**

This Code will be made available in written form to customers upon request. A sign advising customers of this will be 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 where possible. Languages may include:

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

### **4. Responsible Gambling Message**

The following message will be displayed at the entrance to the gaming room and/or at the cashier's station in the gaming room:

*"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 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."*

### **5. 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



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



c) The availability of support services



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 may 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.)*

g) Further information

This venue 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)
- 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](http://www.problemgambling.vic.gov.au) (or similar government household budgeting website).

**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.



## 7. Customer Loyalty Scheme Information

Where a customer loyalty scheme is offered by this venue a brochure will be made available to customers detailing the appropriate information about the customer loyalty scheme available to participants. This information will include the rules of the loyalty scheme and how and when rewards are accrued and redeemed.

Participating customers will be informed about any benefits they have accrued as part of the loyalty scheme via direct mail or email on a periodic basis as determined by the venue.



## 8. Pre-commitment Strategy

This Venue encourages customers who play Electronic Gaming Machines (EGMs) to set a time and money limit according to their circumstances. Responsible gambling signage in the gaming room and on EGMs will assist a customer to make a pre-commitment decision by setting a limit and keeping 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 information offers support to a customer who has made a pre-commitment decision.

## 9. 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.

The staff receive Code training as part of their induction.

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 having a problem with their gambling, will be directed to the Responsible Gambling Officer/Gaming Duty Manager for assistance and necessary action.

A customer displaying signs of distress or unacceptable behaviour will be approached by a staff member who will offer assistance.

Indicators of problem gambling may include, but not be limited to, customers who:

- i.** approach a staff member seeking information in relation to problem gambling;
- ii.** identify themselves as having problems with their gambling behaviours;
- iii.** gambling for extended periods without a break;
- iv.** avoiding contact interaction with venue staff while gambling;
- v.** make requests to borrow money from staff or other customers;
- vi.** collate a stock of problem gambling brochures;
- vii.** display signs of distress or unacceptable behaviour, and
- viii.** display aggressive, anti-social or emotional behaviour while gambling.

The process for interacting with such customers includes measured assistance depending on case by case assessment by appropriate venue staff. This interaction may take the form of:

- i.** encouraging the customer to consider food and beverage offers available at the venue which would allow a break in play from the gaming machine;
- ii.** offering the customer some refreshments (eg. cup of tea or coffee) in a quieter, more private part of the gaming venue where the customer has the opportunity to request appropriate support information in a confidential manner;
- iii.** assisting the customer with travel arrangements in order to depart the venue

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. Details to be included in the incident register include:

- i.** the date and time of the incident;
- ii.** the name(s) of the staff member(s) involved;
- iii.** the name of the customer involved (if available);
- iv.** an outline or overview of the incident;
- v.** action taken by staff (eg: the provision of Gambler's Help / Self Exclusion information);

## **10. Interaction with Staff**

In accordance with the law, employees of this venue are not permitted to gamble on gaming machines whilst in the course of their employment.

Depending on the specific employer directions to staff at a gaming venue which may alter from time to time, 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 most recent rostered shift.

Any staff member who indicates that he or she has a gambling problem will be provided with counselling support information by the venue operator (relevant person) in a confidential manner. Such staff can be encouraged to pursue non-gambling related duties if available.

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

This Venue is committed to maintaining strong links with local problem gambling support services and related bodies. Senior staff from this venue will initiate meetings at regular intervals with the local Gambler's Help and designated Venue Support Workers (VSW) from the Department of Justice.

- Examples of these meetings may include:
  - Convening an annual staff training session, run by the local Gambler's Help service;
  - annual meetings between the Venue Operator / Manager and the Gambler's Help service or designated VSW, or
  - regular contact via email to support services.

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.

## **12. Customer Complaints**

A customer with a complaint about compliance with, and 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 it relates to the operation of this Code. Complaints about customer service or machine operations which do not relate to the operation of the code should be directed to the Duty Manager. 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, the customer will be informed accordingly;
- during the investigation of the complaint, the Venue Manager may seek information from the staff member concerned relating to the subject of the complaint;
- the Venue Manager will seek to establish whether the customer has been treated reasonably and in accordance with the Responsible Gambling Code of Conduct;
- if the complaint is substantiated, the Venue Manager will detail the action that is to be taken to remedy the issue;

- the customer will always be informed of the outcome of the complaint;
- Complaint details will be maintained in the Responsible Gambling Folder / Register;
- Information about the complaints will be provided to the VCGR 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 website ([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.

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

### **13. Compliance with the Prohibition on Gambling by Minors**

Gambling by minors is prohibited. Signs are located at every gaming room entrance banning minors from entry. All venue staff have the responsibility for seeking proof of age documentation if they are uncertain of the age of a customer. If relevant proof of age documentation cannot be established, the customer must be asked to leave the gaming room.

### **14. The Gambling Environment**

Customers will be encouraged to take regular breaks from gaming machine play. This encouragement may take the form of an announcement on the venue's public address system and may include:

- a) Announcing that morning tea is now available;
- b) Announcing a member's draw;
- c) Announcing the commencement of other non-gaming related customer activities within the venue.

Venue staff will also monitor the activities of customers and interact as appropriate to discourage customers from engaging in extended and intensive gambling. This interaction may take the form of dialogue consistent with general hospitality engagement initiated by staff towards customers relating to the availability of food and beverage.

Clocks will be placed in major areas of the venue so customers will be aware of the passage of time. Staff will mention the time when making announcements about venue activities.

### **15. Financial Transactions**

This venue does not cash cheques. If a customer seeks to cash a cheque, the staff member will advise the customer that the venue does not cash cheques.

Winnings below \$2,000 from gaming machines at this venue can be paid by cash and/or cheque. By law all of the winnings or accumulated credits of \$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. Responsible Advertising and Promotions**

Un-solicited advertising of Electronic Gaming Machine (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.

Further this venue will ensure that our advertising materials will:

- not be false, misleading or deceptive about odds, prizes or the chances of winning
- have the consent of any person identified as winning a prize prior to publication
- 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.

## **17. Review of the Code**

This Code is reviewed annually to ensure that it complies with the Gambling Regulation Act 2003 and related Ministerial Directions. The Code author – the Australian Hotels Association (Victoria) - will facilitate the annual review on behalf of participating venue operators.

The operation and effectiveness of the Code for the preceding 12 months will also be reviewed at this time. The review seeks feedback from 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.