

Bells Hotel

Responsible Gambling Code of Conduct

2012

Approved by the VCGLR – 27 June 2012



Gaming Venue Responsible Gambling Code of Conduct

1. Venue commitment to Responsible Gambling

The Bells Hotel 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.

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

(d) The payment of winnings policy

By law, all winnings or accumulated credits of \$1,000 or more must be paid in full by cheque that is not made out to cash.

These winnings cannot be provided as machine credits.

(a) 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.

(b) The venue's self-exclusion program

The Bells Hotel 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.



Self-Exclusion

Self-exclusion is a self-help program to assist people to exclude themselves from playing gaming machines.

For more details contact:

- Staff at the gaming venue
- AHA Self-exclusion - Ph 03 9654 3491
- www.ahavic.com.au
- Gambler's Help – Ph 1800 858 858

Display screens in the venue 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.)*

(e) Further information

The Bells Hotel provides customers with further information regarding responsible gambling, including:

- How to access the Commonwealth Government's website 'Money Smart' 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.problemgambling.vic.gov.au

4. Gambling Product Information

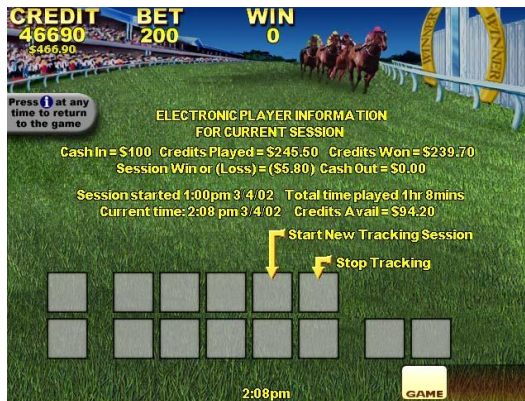
The rules for each Electronic Gaming Machine (EGM) game, including the chances of winning, are available by going to the Player Information Display (PID) screens on the machine. Information on how to view the PID screens is available from a member of staff and/or by reading the Player Information Display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



5. Pre-commitment Strategy

The Bells Hotel 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 Player Information Display (PID) brochure displayed in the venue.



The Bells Hotel also displays signs and brochures in the gaming room with information on the triggers that can lead to overspending. These include:

- o gambling every day or finding it hard to stop at closing time;
- o gambling for long periods, that is, for three hours or more without a break;
- o avoiding contact while gambling, communicating very little, barely reacting to events going on around the player;
- o trying to borrow money from staff or other customers or continuing to gamble with the proceeds of large wins;
- o aggressive, anti-social or emotional behaviour while gambling;
- o trying to win back what has been lost;
- o gambling when feeling stressed or unhappy;
- o losing control because of too much alcohol.

6. Interaction with Customers

The staff at the Bells Hotel 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 Bells Hotel 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 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 (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.

Contacts with customers by the Responsible Gambling Officer are recorded in a Responsible Gambling Register and include action taken. This register is covered by the Privacy Act. Details to be included in the register include:

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

7. Staff Gambling Policy

Employees of the Bells Hotel are not permitted to gamble here at any time, including playing gaming machines, keno, wagering or purchasing lottery tickets.

Venue management may decide to allow off duty employees to gamble in the venue however the following conditions apply;

- Staff cannot gamble prior to or after their shift and therefore are only permitted to gamble on their rostered day off.
- Staff are not to wear uniform and;
- Staff are not to wear their gaming Licence

This will be reflected in the Venues Responsible Gambling Policy and Procedures Manual together with a Staff Gambling Policy Statement in the Venues Responsible Gambling Register.

Customers who wish to obtain information regarding the Venues Staff Gambling Policy should direct their enquiries to the Duty Responsible Gambling Officer or the Duty Manager.

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 is in the package received by staff members when they start employment.

The Bells Hotel will 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.

8. Problem Gambling Support Services

The Bells Hotel is committed to maintaining strong links with local problem gambling support services. Senior staff from this venue will meet regularly with the local Gambler's Help/Venue Support Worker program.

- 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 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

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 Manger 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 Folder / 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), 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.

10. 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.

11. 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 activities such as morning melodies.

Clocks are in all major areas of the venue so customers know time is passing. Staff will mention the time when making announcements about venue activities.

12. Financial Transactions

The Bells Hotel does not cash cheques from customers.

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

Winnings below \$1,000 from gaming machines at this venue can be paid by cash and/or cheque. By law all of the winnings or accumulated credits of \$ 1,000 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.

13. 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.

14. Customer Loyalty Scheme Information

In the event of the Bells Hotel 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.

15. Implementation of the Code

The Bells Hotel 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 Bells

Hotel 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

16. 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 Bells Hotel's practices will be noted and then implemented where possible. Any changes will be recorded in the venue's Responsible Gambling Folder / Register. Any changes required to the Code will be made subject to approval by the VCGLR.