Victorian Commission for Gambling and Liquor Regulation

Gambling guidelines
Industry review guidelines for responsible gambling codes of conduct

The Responsible gambling codes of conduct (codes) aim to foster responsible gambling.

Purpose of the guidelines

These guidelines provide licensees, and the gambling industry, with information and support to review the performance of the codes. Licensees are persons deemed by section 10.6.5 of the *Gambling Regulation Act 2003* to be relevant persons.

Recommended methodology

These guidelines examine how the codes implement each Ministerial Direction operationally. Code reviews should provide evidence of:

- Operational support: outlines policies and procedures implemented to bring the codes into operation.
- Possible effectiveness measures: show how effective code requirements are in their operation and in fostering responsible gambling.

The 'possible effectiveness measures' allow licensees and code authors/administrators to identify measures relevant to their particular code and use these as questions in both customer and staff surveys.

The VCGLR has developed the following methodology, recommended to assist licensees to determine appropriate representative samples.

Customer surveys

Customer surveys should indicate the following information about respondents:

- sample size (number of customers surveyed and percentage) of overall customer base
- age, gender and other relevant characteristics of respondents
- date, time and method of responses (these may be obtained at different times, on multiple days over a period of time and by using different media including interview, paper, online etc).

Staff surveys

Staff surveys should indicate the following information about respondents:

- sample size (number of staff surveyed and percentage) of overall staff required to operate under the responsible gambling code
- position (e.g. committee/board member, manager, floor/phone sales staff, gaming area or retail outlet staff, other)
- term of employment (staff surveys should involve a mix of casual, temporary, permanent and, where applicable, volunteer staff).

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Licensee or codes author/administrator feedback

The following questions should be answered by licensees and code authors/administrators about each of the code requirements. Provide additional feedback where available.

1. Have any issues arisen concerning any of the code requirements? If yes, what steps were taken to mitigate these issues?

2. Do you have any recommendations to further improve the codes?

3. Do you propose any amendment to the approved codes?

Are there any other issues you wish to raise regarding any aspect of the codes or the Ministerial Directions?

Possible effectiveness measures

1. What percentage of staff know they must make a copy of the code available to customers upon request?

2. What percentage of staff know where copies of the code are located?

3. What percentage of customers know that the venue or retail outlet operates under a code?

Operational support

1. Describe the steps taken to meet the code's notification and publication requirements (e.g. displaying a notice regarding its availability, maintaining a physical copy in other languages, displaying a copy on the licensee's website etc).

2. Describe the steps taken to inform staff of the requirement to make copies of the code available to customers and where to locate copies.

3. What steps have been undertaken by the venue or retail outlet to promote the availability of the code?

Responsible gambling messages

Possible effectiveness measures

1. Is the responsible gambling message contained in the licensee's code displayed so that it is clearly visible to customers?

2. What percentage of staff correctly identified the licensee's responsible gambling message in its code?

3. What percentage of customers correctly identified the licensee's responsible gambling message in its code?

Operational support

What steps have been taken to promote the approved responsible gambling message contained in the licensee's code?

Responsible gambling information

Possible effectiveness measures

1. Is the current responsible gambling promotional material on display, in all requisite forms, at the venue or retail outlet?

2. What percentage of staff know what responsible gambling information and promotional material is required to be made available?

3. What percentage of staff know how to replenish stocks of responsible gambling material?

Operational support

1. What steps have been taken to ensure current information is available about:

   - how to gamble responsibly?

   - how to make and keep a pre-commitment decision?

   - the availability of gambling support services?

   - restrictions that apply to the payment of winnings by cheque, the provision of credit or the lending of money for the purposes of gambling?

   - self-exclusion programs?

2. What procedures have been developed to ensure responsible gambling information and promotional material is on display and consistently replenished?

3. How does the venue or retail outlet ensure staff are aware of these requirements and procedures?

Gambling product information

Possible effectiveness measures

1. If a gaming machine venue, what percentage of staff have received training on operating the player information display functionality on gaming machines?

2. What percentage of staff know how to provide this information to customers?

3. If a gaming machine venue, what percentage of customers:

   - know that gaming machines include a player information display functionality detailing rules of play and their chances of winning?

   - have referenced content contained in the player information display, indicating knowledge and understanding of the rules of play and chances of winning?

4. If a non-gaming machine venue, what percentage of customers know the rules of the game?

Operational support

1. What steps have been taken to make information available regarding game rules or the player information display functionality of gaming machines?

2. Provide details of training undertaken by staff so that they can supply gaming machine information to customers on request.

3. Has a process been established to make customers aware of the game rules or how to operate the player information display functionality? If yes, what methods are used to inform customers of the game rules or player information display functionality?

Customer loyalty schemes

Possible effectiveness measures

1. What percentage of staff received training in relation to the venue or retail outlet loyalty scheme and how to provide information to customers about its operation?

2. What percentage of customers know and can correctly identify the process to redeem any loyalty scheme rewards?

3. What percentage of customers know and can correctly identify the process to opt out of a loyalty scheme?

4. Were any self-excluded persons provided with loyalty scheme information or promotional material? If yes, how many?

Operational support

1. What steps have been taken to provide information to customers regarding the operation of customer loyalty schemes including how to redeem rewards and the process to opt out of the loyalty scheme?

2. What information do staff provide about loyalty schemes?

3. What processes have been developed to ensure that self-excluded persons are not provided with loyalty scheme information or promotional material?

Pre-commitment

Possible effectiveness measures

1. What percentage of staff received training on how to:

   - assist a customer to make a pre-commitment decision?

   - support a customer who has made a pre-commitment decision?

2. What percentage of customers know the venue or retail outlet provides customers with assistance to make and keep a pre-commitment decision?

Operational support

1. What steps have been taken to provide information to customers regarding pre-commitment?

2. If a gaming machine venue, does the venue have steps in place to encourage pre-commitment strategies and behaviours? If yes, what strategies are utilised?

3. If a non-gaming machine venue, are customers provided with relevant information to assist them make a pre-commitment decision? If yes, what type of information is provided and how?

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Customer Interactions

Possible effectiveness measures

1. What percentage of staff received training to identify behaviours that may be related to problem gambling and to respond appropriately to customers who display these behaviours?

2. What percentage of staff are able to correctly identify behaviours that may be related to problem gambling?

3. What percentage of staff received training on the use of the responsible gambling incident register?

4. What percentage of staff know the process for recording incidents in the gambling incident register?

5. What percentage of staff know the level of information that must be recorded in the register after an incident?

6. What percentage of staff are able to provide correct examples of incidents required to be recorded?

Operational support

1. What steps have been taken to ensure staff are trained to recognise indicators of distress that may be related to problem gambling, and how to respond appropriately to these indicators in a timely and professional manner?

2. If staff were provided training:

   - Who provided the training?
   - What did the training comprise?
   - How was the training evaluated?
   - Have any additional policies been developed as a result of the training and, if so, are these policies reviewed?

3. What steps have been taken to encourage or assist affiliated venues or retail outlets to maintain, and appropriately use, a responsible gambling incident register?

4. What information is required to be recorded in the register and what training has been provided to staff regarding the use of the register?

Staff interactions

Possible effectiveness measures

1. What percentage of staff are aware of the procedures to support them if they develop, or are at risk of developing, a gambling problem?

2. What percentage of staff have attended a responsible gambling workshop?

3. What percentage of staff know the licensee's policy concerning gambling by staff?

Operational support

1. What information is provided to staff about responsible gambling?

2. Have staff completed any responsible gambling workshops? If yes:

   - Who provided these activities and what did they comprise?
   - How were the activities evaluated?

3. Have any additional policies been developed as a result and, if so, how are these policies reviewed?

4. Have any procedures been established to support staff that have developed, or may be at risk of developing, a gambling problem? If yes:

   - What procedures have been developed?
   - How are staff made aware of these procedures?

5. Have procedures been established concerning gambling by staff? If yes, what are they?

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Problem gambling support services interactions

Possible effectiveness measures

1. Are interaction requirements contained in the code on target to be met?
2. Are the interaction requirements in place with the local problem gambling support service on target to be met?
3. What percentage of staff have attended training presented by the local problem gambling support service?

Operational support

1. Describe the steps taken to establish links with problem gambling support services.
2. Has a professional relationship with the local problem gambling support service been established? If yes:

   - Detail the engagement with the gambling support service (e.g. in face-to-face meetings, emails, phone calls etc)
   - What records have been kept of the engagement with the local problem gambling support service and can records be verified by the gambling support service?

3. Has the local problem gambling service provided staff training? If yes:

   - What did this training comprise?
   - Did staff training result in any in-house policies being developed and, if so, how are these policies reviewed?

Customer complaints

Possible effectiveness measures

1. What percentage of staff know the procedures to follow should they receive a complaint about the code?
2. What percentage of customers know of the complaints process about the code?

Operational support

1. What steps have been taken to effectively respond to customer complaints regarding the operation of the code?
2. Have customer complaints about the code been analysed and process improvements identified and implemented? If yes, provide details.
3. What steps have been implemented to promote customer awareness of the complaints process?

Compliance with the prohibition on gambling by minors

Possible effectiveness measures

1. What percentage of staff received training on requirements for complying with the prohibition on gambling by minors?
2. What percentage of staff know the procedure if they are uncertain if a customer is underage?

Operational support

1. What steps have been taken to comply with the prohibition on gambling by minors?
2. Have staff been trained on methods to identify and stop minors gambling? If yes, please provide details on the training provided?

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Gambling environment

Possible effectiveness measures

1. What percentage of staff know the strategies to discourage extended and intensive gambling (e.g.break activities)?

2. What percentage of staff know the strategies for making customers aware of the passage of time?

3. What percentage of staff are observed participating in activities mentioned in points one and two?

4. If a gaming machine venue, what percentage of customers are aware of break activities available at the venue?

5. If a non-gaming machine venue, where required under the code, where is a responsible gambling message printed on the gambling product (e.g. lottery ticket, raffle ticket, keno ticket, betting slip)?

Operational support

1. What steps have been taken to develop strategies to discourage customers from engaging in extended and intensive gambling (e.g. establishment of in-house policies, conduct of break activities such as member's draws, morning melodies etc)?

2. What methods do staff use to discourage customers from engaging in extended and intensive gambling?

3. What methods do staff use to ensure customers are aware of the passage of time?

4. What in-house policies are in place to ensure customers take part in break activities and are aware of the passage of time?

5. What policies and procedures have been adopted to ensure strategies are followed?

Financial transactions

Possible effectiveness measures

1. What percentage of staff know the rules applying to customers cashing cheques?

2. What percentage of staff have received training about rules applying to customers cashing cheques?

3. What percentage of staff know the options available for customers to collect their winnings at the venue or retail outlet?

Operational support

1. What steps have been taken to provide information to customers about the rules that apply to cashing cheques or the payment of winnings?

2. How are staff informed about the rules that apply to customers cashing cheques?

3. How are customers advised of the options available to them for the payment of winnings at the venue or retail outlet?

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Responsible advertising and promotions

Possible effectiveness measures

1. Do advertising and promotions comply with responsible gaming advertising requirements?

2. Does advertising comply with the Code of Ethics (Australian Association of National Advertisers)?

Operational support

1. What steps have been taken to comply with responsible gambling advertising requirements?

2. How are advertising and promotional activities reviewed to ensure compliance with responsible gaming advertising standards?

3. Have any additional resources or tools been developed, to support compliance (e.g. advertising checklist)?