

Smart Health Australia

Responsible Gambling Code of Conduct

1. Availability of the Responsible Gambling Code of Conduct

The Responsible Gambling Code of Conduct is available on the Smart Health Australia website at www.sha.net.au or upon request from Client Services Support or via email at leanne@sha.net.au or by phone on (03) 8554-6100.

A copy of this 'Responsible Gambling Code of Conduct' will be made readily available for all 'Smart Health Australia's' telephone fundraisers as a reminder and for their reference.

2. Responsible Gambling Message

Smart Health Australia is committed to selling raffle tickets responsibly to support community and charitable organisations.

A message promoting responsible gambling will be displayed on Smart Health Australia's website (www.sha.net.au).

Our Code of Conduct will also be available to customers upon request and will be sent to them in printed form.

3. Responsible Gambling Information

Information regarding responsible gambling is available through Problem Gambling Victoria's website of www.problemgambling.vic.gov.au or by phoning the free call, 24 hour, Gamblers Helpline on 1800 858 858. This information is also provided on Smart Health Australia's website (www.sha.net.au), or upon request from:

Client Services Support

Phone number: (03) 8554-6100

4. Gambling product information

The terms and conditions for the conduct of a raffle will be printed on the raffle ticket and on all materials designed to promote the raffle. This information is also available on Smart Health Australia's website and upon request from:

Client Services Support

Phone number: (03) 8554-6100

This information will include details of how to enter the raffle as well as the chances of winning based on the total possible ticket sales.

2a Carlisle Ave PO Box 32

Balaclava VIC 3183

T 03 8554 6100

F 03 9527 8055

5. Customer loyalty scheme information

'Smart Health Australia' currently does not have a customer loyalty scheme in place.

6. Interaction with customers

Smart Health Australia's telephone fundraisers will provide customers who request it, with information regarding obtaining help for a gambling problem. This information will include referral details to a Gambler's Help telephone service and/ or information materials prepared by Gambler's Help services e.g. website address.

In addition for customers that indicate they may have a gambling problem or the telephone fundraiser feels the customer is over extending themselves financially:

- a. The telephone fundraiser will offer to terminate the phone call or give the customer the option of re-scheduling the phone call if they wish to continue with the purchase of raffle tickets. This will act as a cooling off period.
- b. If the customer chooses to make a purchase via credit card, the telephone fundraiser will provide the donor with a telephone number where they can amend or cancel their purchase within 72 hours. This will also act as a cool off period.
- c. If a telephone fundraiser feels the customer is committing themselves to the purchase of a substantial amount of tickets or value of raffle tickets, they will ask the customer to take a moment to reflect to ensure they want to follow through with their intended purchase. The fundraiser will make this decision based on their judgement and knowledge obtained via training regarding such scenarios.

7. Interaction with staff

Staff at Smart Health Australia will not be permitted to purchase raffle tickets being sold by Smart Health Australia.

A nominated manager at Smart Health Australia will assist a staff member who requests it, with information regarding getting help for a gambling problem. This information will include referral details to a Gambler's Help telephone service and/ or information materials provided and prepared by a Gambler's Help service e.g. website address. The staff member will be spoken to away from the general work area to ensure their privacy is protected.

Any staff member that displays signs of distress that may be related to a gambling problem will be offered the above information, assistance and support.

8. Interaction with problem

gambling support

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A manager or a senior administration staff member at Smart Health Australia will contact Gambler's Help services twice a year to obtain updated publications and any changes to contact details or the services they have available. Once this information is obtained, the staff member will then ensure it is communicated to staff, as well as ensure it is made available for use with customers, as soon as practicable after it is received.

9. Customer complaints

If a customer wishes to lodge a complaint relating to Smart Health Australia's Responsible Gambling Code of Conduct, they can do so in writing to:

Smart Health Australia
Attention: Chief Executive Officer
2a Carlisle Avenue
Balaclava VIC 3183

The Chief Executive Officer will investigate the complaint and take the following steps to resolve the complaint:

- Acknowledge the complaint within 48 hours of receipt.
- Assess whether the complaint is relevant to the Responsible Gambling Code of Conduct and advise the customer in writing.
- Where further investigation is required, information will be obtained from relevant parties. The customer will be kept informed on the progress of the complaint and will be notified in writing of the final outcome (including actions taken and complaint resolution). The client will also be notified in writing of the final outcome.
- The complaint will be recorded in the Complaints Register.
- On request, complaint details will be provided to the Victorian Commission for Gambling Regulation
- If Smart Health Australia is unable to deal with the complaint internally, we will seek guidance from an independent mediator with the costs of this process to be shared between both parties.

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10. Compliance with the prohibition on gambling by minors

Smart Health Australia will not target a promotion or sales campaign at minors and will not knowingly sell raffle tickets to minors. Smart Health Australia will qualify each customer prior to sale of raffle tickets to ensure they are over 18 years of age.

11. The gambling environment

Smart Health Australia will discourage the repetitive and/ or excessive purchase of raffle tickets by customers. To achieve this, Smart Health Australia will:

- a. set a limit on the number or value of tickets that can be sold to an individual customer.
- b. analyse the database for regular ticket purchasers to detect patterns of excessive purchase
- c. not engage in hard/ pressure sales techniques
- d. have a call cycle in place to ensure that customers are not exposed to repetitive / excessive requests to purchase raffle tickets.

12. Financial Transactions

Smart Health Australia will not cash customer's cheques or extend credit to customers to purchase raffle tickets. Customers will be advised of this at the time if they request such a service.

Prizes of cash are not permitted in Victoria by law except that cash may form up to 10% of a travel prize.

13. Responsible Advertising Promotions

Smart Health Australia does not usually undertake advertising and promotions on behalf of its clients. However, any advertising and promotions undertaken by Smart Health Australia in relation to a raffle will:

- a. comply with the advertising code of ethics adopted by the Australian Association of National Advertisers
- b. not be false, misleading or deceptive about the odds, prizes, or chances of winning
- c. have the consent of any person identified as winning a prize prior to publication
- d. not be offensive or indecent in nature
- e. not create an impression to the public, that entering a raffle is a reasonable strategy for financial betterment
- f. not promote the consumption of alcohol while buying raffle tickets.

Smart Health Australia will incorporate all applicable standards into its advertising checklist and will assess all proposed advertising against these standards.

Processes and Structures to Support the Ongoing Implementation of the Code:

- 1. Responsible Gambling matters will be made an on going agenda point for all Board and staff meetings.**
- 2. A Responsible Gambling Officer will be identified from among senior staff to:**
 - a) Handle any difficult customer complaints and/ or queries.
 - b) Liaise with Gambler's Help services to obtain relevant information, advice and training and make this available to staff and customers.
 - c) Induct new staff members to ensure they are informed about responsible gambling issues and the Code of Conduct.
 - d) Handle responsible gambling issues or queries raised by staff
 - e) Identify staff worthy of reward and recognition for their awareness and implementation of responsible gambling efforts.

Code Review Process:

1. Smart Health Australia's Responsible Gambling Code of Conduct will be reviewed each year on the anniversary of its commencement.
2. All relevant and applicable input will be obtained from management, staff and a sample of patrons about the operation and effectiveness of the Responsible Gambling Code of Conduct.
3. A report of the review will be provided to the VCGR by 31st of March, each year, unless an extended period is allowed by the VCGR.

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