

*Responsible Gambling Code of Conduct*

# Availability of the Responsible Gambling Code of Conduct

The Code is available on The Luxe Lottery website at [**www.theluxelottery.com**](http://www.theluxelottery.com/)or by request to Sean Brickley (Customer and client relations) by email; sean@theluxelottery.com or by phone 1800100711.

# Responsible Gambling Message

The Luxe Lottery is committed to selling raffle tickets responsibly to support community and charitable organisations. This message will be displayed on The Luxe Lottery website and on material developed by The Luxe Lottery for the promotion and conduct of raffles on behalf of community and charitable organisations. A responsible gambling message is available to any customers placed on hold prior to or during a telephone contact.

# Responsible Gambling Information

Information about the following is available on The Luxe Lottery website at [**www.theluxelottery.com**](http://www.theluxelottery.com/)or by request to Sean Brickley (Customer and client relations) by email; sean@theluxelottery.com or by phone 1800100711.

* how to gamble responsibly, e.g., decide before you buy how much you want to spend
* the availability of gambling support services
* restrictions that apply to the provision of credit or the lending of money by The Luxe Lottery for the purposes of purchasing raffle tickets

# Gambling Product Information

The terms and conditions for the conduct of a raffle will be printed on the ticket and/or information material designed to promote the raffle, and the The Luxe Lottery website at [**www.theluxelottery.com**](http://www.theluxelottery.com/)or by request Sean Brickley (Customer and client relations) by email; sean@theluxelottery.com or by phone 1800100711

This information will include how to enter and the odds of winning the stated prizes based on the total possible ticket sales.

# Customer Loyalty Scheme Information

Refer to the definition of ‘customer loyalty scheme’ in the Minister’s Direction. Currently there are no loyalty

schemes offered by The Luxe Lottery.

# Interaction with Customers

The Luxe Lottery telephone staff will assist customers who request it with information about help with 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. In addition, customers who have indicated that they have a gambling problem or where a canvasser forms the view from the caller that a caller may be overextending themselves financially:

* + Telephone canvassers will offer to end the call/call back later if the customer wishes to continue with their

ticket purchase (cooling off period)

* + Provide a telephone number whereby credit card purchasers could amend or cancel their order (cooling off

period)

* + Where tickets are sold in person suggest that the purchaser take a moment to reflect on whether they wish to

purchase tickets/as many tickets [cooling off period]

* + Where tickets sold by mail an upper limit of [X ] books will be issued to a customer to purchase/sell at any one

time

The Luxe Lottery has a designated Responsible Play Liaison Officers (RPLO’s) who are available during business hours (approximately 6am until 9pm Monday -Saturday & 6am until 12pm on Sunday.

The Luxe Lottery RPLO’s can be contacted on 1800100711. The Luxe Lottery customer service team are trained in the service of responsible gambling. Each employee receives “responsible gambling training” prior to their commencement by and already trained Employee of The Luxe Lottery. Records of the training will be kept for reference that the employee has been inducted into the “responsible gambling training”.

A customer who approaches an employee of The Luxe Lottery in public or via social media and asks for information about problem gambling services or indicates a problem with their gambling will be directed to The Luxe Lottery RPLO and our 1800100711 for help. Customers who are noticeably distressed from gambling will be provided with information detailing gambling support services that are also accessible outside The Luxe Lottery RPLO service. When required, the employee will assist the customer by contacting The Luxe Lottery RPLO on behalf of the customer and direct them to The Luxe Lottery Responsible Gambling Code of Conduct.

The Luxe Lottery and its employees respect the protection of customers privacy. All interaction with customers will be done with due respect for their privacy.

# Interaction with Staff

Staff are permitted to purchase raffle tickets being sold by The Luxe Lottery. A nominated manager/supervisor of The Luxe Lottery will assist a staff member who requests it, with information about help with 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. This will be done away from the general work area and in such a way as to protect the staff member’s privacy.

Staff members who are displaying indicators of distress that may be related to problem gambling (not confined to raffle purchases) will be offered information and assistance.

If a Luxe Lottery employee, a or a family member of the employee asks for information about the problem gambling services or advises that they may have a problem with their gambling, they will immediately be directed

to The Luxe Lottery RPLO for assistance on 1800100711, always with due respect for the privacy of the employee or the employee’s family. The Luxe Lottery provides responsible gambling training through an onboarding Induction and take-home material. The Luxe Lottery also provides regular updates to its policy in relation to responsible gambling at staff training days.

# Interaction with Problem Gambling Support Services

The Manager or a senior staff member of The Luxe Lottery will contact Gambler’s Help services twice a year to obtain updated publications and any changes to contact details or available services. This information will be communicated to staff, and made available for use with customers, as soon as practicable after it is received.

# Customer Complaints

If a complaint is made in person or by telephone, the complainant may be asked to submit details of the complaint in writing or via email. All contacts details are provided on our website at [www.theluxelottery.com](http://www.theluxelottery.com/) . We encourage all complaints to be handled in writing for the complaint to be dealt with efficiently.

If an incident has occurred the incident will be investigated within 24hrs and for written complaints, within 14 days. The Luxe Lottery Complaints department investigates, determines and implements a resolution and informs the complainant of the Luxe Lottery conclusion and outcome of the complaint and the reason for the conclusion. The Luxe Lottery will log the details of the complaint and its outcome. If the matter is resolved, no further action will need to be taken.

If the complainant requests a review of the decision, an internal independent review will be conducted, which may include the following:

* all material in relation to the incident or complaint is provided and examined.
* discussions may be held with the complainant, the subject of the complaint, and/or employees involved with the management of the complaint. If the complainant requests a review of the internal decision, the matter will be to a member of a panel of independent mediators by The Luxe Lottery, for either a determination based on submitted paperwork or to arrange mediation if necessary. Costs of this process will be shared equally by The Luxe Lottery and the complainant. If the process determines that The Luxe Lottery to be in breach of the Code, The Luxe Lottery will rectify that breach within the terms of the determination or mediation agreement. Records of complaints and decisions of any review process made in relation to the operation of this Code will be held for a period of seven years and will be made available for inspection by the Minister or the Regulator on request.

# Commitment to discourage gambling by minors

The Luxe Lottery does not encourage early gambling habits in children. The Luxe Lottery will not target a promotion or sales campaign at minors and will not knowingly sell raffle tickets to minors.

The Luxe Lottery will not supply a prize of a raffle which includes liquor (or any other product that cannot be legally purchased by a minor) to a minor.

# The Gambling Environment

The Luxe Lottery will discourage repeatedly excessive purchase of tickets by customers. To achieve this The Luxe Lottery will:

* Set a limit on the quantum or value of tickets to be sold to an individual
* Check data base of regular ticket purchasers to detect a pattern of excessive purchase
* Not engage in hard/pressure sales techniques

# Financial Transactions

The Luxe Lottery 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 per cent of a travel prize.

# Responsible Advertising Promotions

Any advertising and promotions undertaken by The Luxe Lottery in relation to a raffle will:

* Comply with the advertising code of ethics adopted by the Australian Association of National Advertisers
* Not be false or 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 entering a raffle is a reasonable strategy for financial betterment
* Not promote the consumption of alcohol while buying raffle tickets. The Luxe Lottery will incorporate the above

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 a standing item for Board and staff meetings.
2. A Responsible Gambling Officer will be identified from among senior staff to:
	1. Handle more difficult customer contacts
	2. Liaise with Gambler’s Help services to obtain relevant information, advice and training and make this available

to staff and customers.

* 1. Induct new staff members to ensure they are informed about responsible gambling issues and the Code.
	2. Handle responsible gambling issues raised by staff.
	3. Identify staff worthy of reward and recognition for their responsible gambling efforts.

# Code Review Process

* + 1. The Luxe Lottery Code will be reviewed each year on the anniversary of its commencement.
		2. Input will be obtained from management and staff and a sample of patrons about the operation and effectiveness of the Code. A report of the review will be provided to the VCGLR by 30 June each year.
		3. Records in relation to the operation of this Code will be held for a period of seven years and will be made available for inspection by the Minister or the Regulator on request.