

**RESPONSIBLE GAMBLING**

**CODE OF CONDUCT**

**FOR**

**WHITE EAGLE HOUSE**



**OCTOBER 2011**

**Version 1**



**MERCURY**

## Table of Contents

<b>1. INTERPRETATIONS .....</b>	<b>3</b>
<b>2. RESPONSIBLE GAMBLING MESSAGE .....</b>	<b>5</b>
<b>3. AVAILABILITY OF THE CODE AND THE RESPONSIBLE GAMING REGISTER .....</b>	<b>5</b>
<b>4. RESPONSIBLE GAMBLING INFORMATION .....</b>	<b>6</b>
<b>5. GAMBLING PRODUCT INFORMATION .....</b>	<b>6</b>
<b>6. LOYALTY SCHEME INFORMATION.....</b>	<b>6</b>
<b>7. PRE-COMMITMENT STRATEGY .....</b>	<b>7</b>
<b>8. INTERACTION WITH PATRONS .....</b>	<b>7</b>
<b>9. INTERACTION WITH EMPLOYEES .....</b>	<b>9</b>
<b>10. INTERACTION WITH PROBLEM GAMBLING SUPPORT SERVICES .....</b>	<b>11</b>
<b>11. COMPLAINTS ABOUT THE CODE.....</b>	<b>11</b>
<b>12. COMPLIANCE WITH THE PROHIBITION ON GAMBLING BY MINORS.....</b>	<b>13</b>
<b>13. THE GAMBLING ENVIRONMENT.....</b>	<b>13</b>
<b>14. FINANCIAL TRANSACTIONS.....</b>	<b>14</b>
<b>15. ADVERTISING AND PROMOTIONS.....</b>	<b>14</b>
<b>16. REVIEW PROCESS.....</b>	<b>15</b>
<b>17. TRAINING &amp; EMPLOYEE INCENTIVES.....</b>	<b>17</b>

## 1. INTERPRETATIONS

### 1.1. Definitions

Term	Meaning
Compliance Office	the administrator of the ICRP and the Code
the Code	this Code of Conduct
Code Review form	the form to be completed by the Venue annually in accordance with clause 16.7.3
Complaint Form	the ICRP form as approved from time to time by the Compliance Office for use by persons wishing to lodge a complaint with the ICRP
Gaming machine	electronic gaming machine
ICRP	independent complaints resolution process
Independent Person	the person appointed in accordance with clause 11 and who is responsible for conducting the independent review of unresolved complaints about compliance of the Code
PID	player information display
Patron	people who attend at the Venue and in the case of clubs are the members and visitors
Management	the management of the Venue
Mercury RSG Employee Training Manual	the training manual that accompanies the Code
Nominated Person	person appointed in accordance with clause 8 and who is responsible for providing information about the Code and responsible gambling during each shift
Patron feedback forms	forms provided by the Compliance Office on which patrons provide feedback on the Code
Responsible gambling register	the register maintained at the Venue in which the information required under the Code is recorded, and may also be the liquor and/or AML/CTF registers.
RSG	responsible service of gaming
Venue	the premises in respect of which the Code has been adopted and, where the context implies, the entity responsible for the management of the Venue which may be the venue operator or the manager of the Venue
Venue RSG Manager	person appointed to ensure compliance with the Code and the Self Exclusion Program at this Venue

- 1.1. In the Code, when there is a requirement to:
  - 1.1.1. provide information to patrons,
  - 1.1.2. make information available to patrons,
  - 1.1.3. display information,
  - 1.1.4. provide copies of documents
- 1.2. this will be done in one or more of the following ways:
  - 1.2.1. clearly and visibly displaying appropriate posters, brochures and/or convenience notices:
    - 1.2.1.1. in the area/s where gambling products are provided,:
    - 1.2.1.2. at the cashier stations;
    - 1.2.1.3. at the welcome/reception desk (if any);
    - 1.2.1.4. in the lounge area (if any); and/or
    - 1.2.1.5. on the communal notice board
  - 1.2.2. having brochures readily available for patrons to take away on their own initiative or upon request;
  - 1.2.3. displaying the information on electronic display screens at this Venue;
  - 1.2.4. making the information available on this Venue's website (if any),

## 2. RESPONSIBLE GAMBLING MESSAGE

- 2.1. This Venue is committed to responsible gambling and has adopted the following Responsible Gambling Message:

***This Venue is an integral part of its community.***

***The Management is committed to the wellbeing of its patrons, employees and the wider community that it serves. We strive to deliver all our services in a responsible and sustainable manner. As part of this commitment, we have adopted this Responsible Gambling Code of Conduct and will provide the necessary resources (financial and human) to support the proper operation of the Code at this Venue and to support the Compliance Office.***

***The Code is designed to assist the management and staff to provide gambling in a socially rewarding, enjoyable and responsible manner.***

***A Venue RSG Manager has been appointed to ensure compliance with the Code and the Self Exclusion Program at this Venue, and a Nominated Person is available at all times to assist patrons with responsible gambling matters.***

***Patrons are encouraged to ask employees to identify the Nominated Person.***

- 2.2. The Responsible Gambling Message will be displayed on a brochure wherever gambling is available at this Venue.
- 2.3. The Responsible Gambling Message will be displayed on this Venue's website (if any).

## 3. AVAILABILITY OF THE CODE AND THE RESPONSIBLE GAMING REGISTER

- 3.1. A copy of the Code will be available in English and other major community languages on the following websites:
- 3.1.1. [www.whiteeaglehouse.com.au](http://www.whiteeaglehouse.com.au)
  - 3.1.2. [www.mgv.org.au](http://www.mgv.org.au)
- 3.2. A printed copy of the Code will be made available to patrons upon request and will also be available at the cashier and/or reception area (if any).
- 3.3. Information on how to obtain a copy of the Code will be made available to patrons upon request.
- 3.4. The Responsible Gambling Register will be kept at this Venue and made available to VCGR inspectors upon request.

#### 4. RESPONSIBLE GAMBLING INFORMATION

- 4.1. All regulatory requirements regarding the display of responsible gambling information will be complied with, and the following information about responsible gambling will be made available to patrons:
  - 4.1.1. how to gamble responsibly;
  - 4.1.2. how to access the Commonwealth Government's website Money Smart [www.moneysmart.gov.au](http://www.moneysmart.gov.au) (or a similar Government household budgeting website as advised by the Compliance Office);
  - 4.1.3. how gamblers and their families or friends can access gambling support services and self exclusion programs;
  - 4.1.4. the state government's problem gambling support website [www.problemgambling.vic.gov.au](http://www.problemgambling.vic.gov.au);
  - 4.1.5. Information produced by Gamblers Help and other relevant local gambling support services;
  - 4.1.6. how to make and keep pre-commitment decisions;
  - 4.1.7. restrictions on the cash payment of winnings and the provision of credit for gambling.

#### 5. GAMBLING PRODUCT INFORMATION

- 5.1. Information about any relevant rules for all gambling products provided by this venue is made available to patrons and for gaming machines, by way of PID screens on the machine.
- 5.2. Information on how to access the PID screens is displayed and/or will be explained to patrons by employees.

#### 6. LOYALTY SCHEME INFORMATION

- 6.1. This clause only applies if there is a loyalty scheme which operates at this Venue which:
  - 6.1.1. tracks a patron's expenditure on gambling products **and**
  - 6.1.2. rewards that expenditure.
- 6.2. At the time the patron joins the loyalty scheme or shortly after, the patron will be provided with written information that sets out:
  - 6.2.1. the rules of the scheme **and**
  - 6.2.2. how and when rewards are accrued, redeemed and how they expire.
- 6.3. This Venue will comply with all regulations governing the conduct of a loyalty scheme.
- 6.4. A least once a year patrons participating in the loyalty scheme will be provided with a written statement that sets out what rewards the patron accrued as part of the loyalty scheme.

- 6.5. Self-excluded persons are not permitted to join or remain in any loyalty scheme that tracks and rewards gaming expenditure.
  - 6.5.1. If the loyalty scheme does not track and reward gaming expenditure, then self excluded persons can join or remain in the scheme; but
  - 6.5.2. if the loyalty scheme includes any rewards that are redeemable only in the gaming room then self excluded persons may not join or remain in the scheme.
- 6.6. All written communications to patrons relating to the loyalty scheme will include the following statement:

***It is strongly recommended that you set sensible limits on the time and money you spend gambling, and that you stick to your limits. Please ask the Venue employees for assistance if you are having problems with your gambling including setting and maintaining limits.***

## **7. PRE-COMMITMENT STRATEGY**

- 7.1. Patrons are encouraged to set limits on the amount of money and time that they spend on gambling. The limits should be suitable for the individual's circumstances.
- 7.2. In order to assist patrons to set and comply with the limits, appropriate information will be displayed which recommends that patrons set limits and do not exceed those limits.
- 7.3. Information will be available to patrons advising them how to access help in setting and keeping limits, and also how to identify the triggers that lead to overspending on gambling.
- 7.4. Information will be made available to patrons and their families or friends about how to access gambling support services and the state government's problem gambling support website [www.problemgambling.vic.gov.au](http://www.problemgambling.vic.gov.au)
- 7.5. All gaming machines at this Venue will enable a patron to track the time and amount of money spent during a session of play by way of PID screens.
- 7.6. Information on how to access the PID screens will be displayed and/or explained by an employee upon request.
- 7.7. This Venue will comply with all regulations relating to pre-commitment with respect to the playing of gaming machines.

## **8. INTERACTION WITH PATRONS**

- 8.1. This Venue has an RSG Manager who is responsible for ensuring compliance with the Code and the Self Exclusion Program at this Venue.

- 8.2. A Nominated Person is available to provide information about the Code, Self Exclusion and responsible gambling, to patrons during all times that gambling products are available at this Venue.
- 8.3. Usually the Nominated Person is the duty manager for the shift and may be a different person from the Venue RSG Manager.
- 8.4. During each shift the employees will be made aware of whom the nominated person is for that shift.
- 8.5. An employee will alert the nominated person if he/she observes a patron doing one or more of the following:
  - a) approaching an employee and asking for information about problem gambling services;
  - b) telling an employee that he/she has a problem with his/her gambling;
  - c) displaying signs of distress or unacceptable behaviour;
  - d) acting aggressively or in an overtly anti-social or emotional manner including physically attacking gaming machines or crying after losing money;
  - e) gambling every day over an extended period of time and having difficulty leaving at closing times;
  - f) gambling for excessively long periods of time without a break;
  - g) requesting to borrow money from employees;
  - h) avoiding contact while gambling and being non-communicative and unaware of surroundings.
- 8.6. The nominated person will assess the situation and make such immediate arrangements as the nominated person considers appropriate. These immediate arrangements will include one or more of the following:
  - a) suggest that the patron leave the area;
  - b) suggest that the patron take refreshments in a different area;
  - c) offer to call a taxi to take the patron home;
  - d) offer to contact a friend of the patron;
  - e) offer the patron the use of the Venue's telephone;
  - f) offer to provide the patron with some refreshment (eg coffee);
  - g) approach the patron and attempt to engage the patron in social interaction;
  - h) provide the patron with all the relevant information about accessing help services, including self exclusion and financial advice;
  - i) provide patron with some other appropriate assistance;
  - j) nothing, if, in the reasonable opinion of the nominated person, any interaction with the patron is not warranted.



- 8.7. The Nominated Person will make every attempt to be discreet when approaching a patron, and to draw as little attention as possible to the situation and to the patron.
- 8.8. If the Nominated Person considers that interaction with a patron is warranted, the Nominated Person will record the incident in the Responsible Gambling Register and include the action taken by the nominated person.
- 8.9. Inclusions in the Responsible Gambling Register may be subject to the Privacy Act and the Nominated Person ensures compliance with the National Privacy Principles.
- 8.10. This Venue will comply with the laws regarding the responsible service of alcohol.

## **9. INTERACTION WITH EMPLOYEES**

- 9.1. The safety of employees and the perceived integrity of the gambling products sold at this Venue are of paramount concern.
- 9.2. Gaming employees are, by law, not permitted to play gaming machines during their shifts, including during breaks in their shifts.
- 9.3. This Venue has adopted a policy regarding employees purchasing gambling products (including playing gaming machines) and a copy of the policy is included in the staff hand-book and attached to any copy of the Code that is distributed.
- 9.4. Unless the policy is that employees are prohibited from gambling in this Venue at any time, employees are permitted to gamble only in the following circumstances:
  - Employees are not permitted to purchase any gambling product while on duty (including playing gaming machines, keno or wagering or purchasing lottery tickets).*
  - Off-duty employees are permitted to purchase any gambling product providing that they are not in uniform and are not wearing the gaming employee licence or venue ID badge*
  - The restrictions on employees purchasing gambling products cover all employees, not only those employees who deliver gambling products.*
- 9.5. Responsible gambling professional development sessions for employees will be held on an annual basis in conjunction with the local Gambler's Help Service or other appropriate organisation.
- 9.6. Information about responsible gambling and problem gambling support services will be included in the induction package/staff handbook provided to all employees on commencement of employment at this Venue.

- 9.7. All employees who are employed at this Venue at the time of subscription to the Code will be provided with information about responsible gambling and problem gambling support services.
- 9.8. An employee will advise the Venue RSG Manager if the employee:
  - 9.8.1. observes another employee exhibiting behaviours set out in clause 8.5 and/or
  - 9.8.2. is told by another employee that the other employee has a gambling problem:
- 9.9. If an employee is having problems with gambling, and this Venue's operations can accommodate the particular employee being set duties which do not involve working with gambling products, the employee and the employer may agree to change the employee's duties.
- 9.10. In determining what action is appropriate in any situation involving an employee, every attempt will be made to be discreet, and to draw as little attention as possible to the situation and to the employee.
- 9.11. Action taken in accordance with this clause 9 will be recorded on the employee's employment file, **and not** in the *Responsible* Gambling Register. Copies of any inclusions on an employee's employment file made in accordance with this clause will be made available to VCGR inspectors upon request.

## **10. INTERACTION WITH PROBLEM GAMBLING SUPPORT SERVICES**

- 10.1. This Venue will maintain regular contact with the local Gambler's Help Service and/or other relevant problem gambling support services.
- 10.2. At least annually local Gambler's Help Service personnel and/or other relevant problem gambling support services personnel will be invited to meet with senior RSG staff and/or Management at this Venue, and this may include holding an annual staff training session.
- 10.3. The Compliance Office has established referral procedures with local problem gambling support services. This Venue will comply with the Compliance Office referral procedures, and any changes to these protocols as advised by the Compliance Office from time to time.
- 10.4. Details of all contact with the Gambler's Help Service and/or other relevant problem gambling support services will be recorded in the Venue's Responsible Gambling Register.
- 10.5. The publications and contact details of the local Gambler's Help Services and/or other relevant problem gambling support services will be made available to patrons and staff in the gaming room at this Venue.

## **11. COMPLAINTS ABOUT THE CODE**

- 11.1. This Venue subscribes to the Mercury ICRP administered by the Compliance Office and fully explained in the ICRP Procedural Handbook which is available from the Compliance Office on request.
- 11.2. The ICRP is a free, effective, independent and discreet means to resolve complaints about compliance with the Code.
- 11.3. Complaints must:
  - 11.3.1. relate to the Code, the Compliance Office will assist to explore options for resolution of complaints that do not involve complaints about compliance with the Code;
  - 11.3.2. relate to matters of compliance with, the Code which have occurred within the last 12 months; and
  - 11.3.3. not relate to complaints that have been previously resolved.
- 11.4. How to make a complaint:
  - 11.4.1. A patron contacts the Venue Manager to discuss his/her complaint and to try to reach a resolution;
  - 11.4.2. If the complaint is not resolved in discussions with Venue Management the patron contacts the Compliance Office to make a complaint;
  - 11.4.3. Contact is made by telephone or by completing a Complaint Form;

- 11.4.4. Complaints Forms are available from the Compliance Office and this Venue;
- 11.4.5. The Compliance Office assists patrons to complete the Complaint Form if required;
- 11.5. The process for resolution of a Complaint
  - 11.5.1. The Compliance Office forwards a copy of the completed Complaint Form to this Venue;
  - 11.5.2. This Venue has 14 days from receipt of the Complaint Form to contact the patron and resolve the complaint.
- 11.6. Independent Review of unresolved complaints
  - 11.6.1. If the complaint is not resolved within the 14 day period it is referred to an Independent Person by the Compliance Office;
  - 11.6.2. The Independent Person investigates the complaint by appropriate means including:
    - 11.6.2.1. consideration of all written submissions made by the parties;
    - 11.6.2.2. conduct a conference; and/or
    - 11.6.2.3. meeting with the parties and/or other relevant persons.
  - 11.6.3. Submission/s to the Independent Person may be in writing or in person at the conference (if any);
  - 11.6.4. The Independent Person is required to conduct his/her investigations expeditiously and informally.
  - 11.6.5. The Independent Person provides the Compliance Office with a written conclusion as to whether or not there has been non-compliance with the Code including reasons and recommendations for remedy (if any);
  - 11.6.6. Recommendations for remedy may include:
    - 11.6.6.1. that this Venue perform or refrain from some action
    - 11.6.6.2. that this Venue pay to the patron an amount not in excess of the Maximum Amount (currently \$2,500)
    - 11.6.6.3. that no further action be taken.
  - 11.6.7. The Compliance Office will forward a copy of the Independent Person's reasons and recommendations to both parties.
  - 11.6.8. The rules of natural justice apply to the ICRP.
- 11.7. Collation and retention of information about complaints
  - The Compliance Office will collect and maintain data in relation to:
    - 11.7.1. completed Complaint Forms;
    - 11.7.2. resolution of complaints at Venue level in accordance with clause 11.5;

11.7.3. complaints referred to an Independent Person in accordance with clause 11.5;

11.7.4. all documentation produced as a part of the ICRP.

11.8. Enabling the Commission to monitor compliance with the ICRP

11.8.1. This Venue will make available to VCGR Inspectors all documentation kept by the Venue regarding compliance with the ICRP.

11.8.2. The Compliance Office will make available to the VCGR on request all data kept by the Compliance Office regarding the ICRP.

## **12. COMPLIANCE WITH THE PROHIBITION ON GAMBLING BY MINORS**

12.1. Gambling by minors is banned, and minors are not permitted to enter gaming rooms.

12.2. Signs will be located at every entrance to the gaming room prohibiting minors from entering the gaming room.

12.3. All employees are required to ask for verification of age when they are uncertain whether a patron is at least 18 years of age.

12.4. For the purpose of verification of age the following documents are acceptable proof of age:

- a) Proof of age card
- b) Drivers licence
- c) Victorian learners' permit
- d) Passport
- e) Key card

12.5. If relevant verification cannot be produced, the patron will be requested to leave the gaming room and/or will not be served any gambling product.

## **13. THE GAMBLING ENVIRONMENT**

13.1. To assist patrons to be aware of the passage of time, a wall mounted clock will be displayed in the gaming room at this Venue, and the time will be displayed in the area where gambling products are available.

13.2. This Venue will encourage patrons to take breaks from playing gaming machines and regular announcements, which include the time of day, will be made in the gaming room. These announcements can be made in conjunction with other announcements for example:

- a) The bistro will open in 10 minutes time at Noon.
- b) The bistro will close in 10 minutes time at 8.30pm.
- c) It's 10 o'clock - fresh coffee has just been made.
- d) The courtesy bus is leaving in 10 minutes at 8pm.
- e) It's 5pm the members draw is about to be drawn.
- f) It's 7.30 the band is about to start in the dining room.

- 13.3. If there is no PA system in the gaming room, the staff may approach patrons in the gaming room and tell them individually about an event that is time specific like those set out above.
- 13.4. If the announcement referred to in clause 13.2 is not made by an automated system the Nominated Person will record in the Gambling Register that the announcement has been made.

#### **14. FINANCIAL TRANSACTIONS**

- 14.1. Patrons' cheques will not be cashed unless the patron has made prior arrangements with the Management for cashing of his/her cheques.
- 14.2. Even if prior arrangements have been made for the cashing of cheques, no more than one cheque may be cashed for any patron per day, and that cheque cannot be for more than \$400.
- 14.3. Details of cheques cashed at this Venue are recorded in the banking records for this Venue.
- 14.4. By law, winnings or accumulated credits of \$1,000 or more from gaming machines must be paid in full by cheque that is not payable to cash.
- 14.5. Patrons may request that winnings and/or accumulated credits of less than \$1,000 from gaming machines, and winnings and/or credits from other gambling products are to be paid by cash and/or cheque. All requests for payment by cheque will be complied with.
- 14.6. A Prize Payment Register will be maintained to record the payment of significant prizes on gambling products, including, but not limited to, cheque payments of over \$1,000. The Prize Payment Register will be made available to VCGR inspectors upon request.
- 14.7. Entries in the Prize Payment Register may be subject to the Privacy Act and the National Privacy Principles will be observed with respect to the Prize Payment Register
- 14.8. Displayed at the cashier's station and/or reception is the information about:
  - 14.8.1. the policy on the cashing of cheques and
  - 14.8.2. how patrons may have winnings paid by cheque.

#### **15. ADVERTISING AND PROMOTIONS**

- 15.1. All advertising and promotions relating to gambling undertaken by or on behalf of this Venue will:
  - 15.1.1. comply with the regulations that govern the advertising of gambling products including but not limited to the complete ban on unsolicited advertising of gaming machines outside the gaming room;

- 15.1.2. comply with the advertising Code of ethics adopted by the Australian Association of National Advertisers (AANA) a copy of which is available at [www.aana.com.au/codes.html](http://www.aana.com.au/codes.html) ;
  - 15.1.3. are not false, misleading or deceptive about the odds, prizes or the chances of winning;
  - 15.1.4. have the consent of any person identified as winning a prize prior to publication;
  - 15.1.5. are not offensive or indecent in nature;
  - 15.1.6. do not create an impression that gambling is a reasonable strategy for financial betterment;
  - 15.1.7. do not promote the consumption of alcohol while purchasing gambling products.
- 15.2. Prior to publishing, Management will assess all advertising and promotion of gambling products against the AANA's Code of ethics and the check list in clause 15.1.
  - 15.3. If in doubt as to whether an advertisement or promotion complies with the AANA's Code of ethics and/or this clause, the advertisement or promotion may be referred to the Compliance Office for its opinion.
  - 15.4. Notwithstanding that this Venue complies with the AANA's Code of ethics, any complaint regarding this Venue's advertising and promotions will be handled in accordance with the Mercury ICRP and **not** by the Advertising Standards Complaints Board.

## **16. REVIEW PROCESS**

- 16.1. The Code will be reviewed annually. The review will include information gathered from various sources using the following processes.
- 16.2. **Employee feedback**
  - 16.2.1. Code Employee Feedback Forms will be available with the Responsible Gambling Register.
  - 16.2.2. This Venue's induction package/staff handbook provided to all employees on commencement of employment at the Venue will include advice on how the employees can provide feedback on the Code by completing the Employee Feedback Form that is available with the Responsible Gambling Register.
- 16.3. All employees who are employed at this Venue at the time of adoption of the Code will be provided with information about how the employees can provide feedback on the Code by completing the Employee Feedback Form that is available with the Responsible Gambling Register.
- 16.4. At the end of each shift the Nominated Person will collect any completed Employee Feedback Forms and deliver them to the Management.

16.5. The Management will consider any completed Employee Feedback Forms and:

16.5.1. if the matter can be dealt with at Venue level, management will take appropriate action, file the completed form with the Responsible Gambling Register and will attach copies of any completed forms to the Annual Review Form;

16.5.2. if the matter involves a systemic issue in relation to the Code, the matter will be referred to the Compliance Office for its consideration and appropriate action, which may include applying to the VCGR for an alteration of the Code.

16.5.3. All completed Employee Feedback Forms will be maintained by the Management and made available to VCGR inspectors upon request.

**16.6. Patron feedback**

16.6.1. Each year prior to 31 March Patron Feedback Forms will be made available in all areas of the Venue where gambling is provided. The Patron Feedback Forms will be available for a minimum period of two weeks.

16.6.2. The Compliance Office may, upon application, grant an extension of time past 31 March for making the Patron Feedback Forms available.

16.6.3. The Management will consider the completed Patron Feedback Forms and:

16.6.3.1. if the matter can be dealt with at Venue level, management will take appropriate action and file the completed Patron Feedback Form with the Responsible Gambling Register and attach copies of any completed forms to the Annual Review Form;

16.6.3.2. if the matter involves a systemic issue in relation to the Code, the matter will be referred to the Compliance Office for its consideration and appropriate action, which may include applying to the VCGR for alteration of the Code.

16.6.4. All completed Patron Feedback Forms will be kept at the Venue and made available to VCGR inspectors upon request.

**16.7. Venue feedback**

16.7.1. The Management will complete the Code Review Form prior to 30 April in each year.

16.7.2. The Compliance Office may, upon application, grant an extension of time for completion of the Code Review Form.



16.7.3. The completed Code Review Form will be kept at this Venue together with any Patron Feed Back Forms and Employee Feed Back Forms that are received through the preceding year.

**16.8. Compliance Office Review**

16.8.1. Prior to 30 June each year the Compliance Office will conduct a survey of completed Code Review Forms, Patron Feed Back Forms and Employee Feed Back Forms and a general appraisal of the Code (including consideration of complaints received) to assess the Code's effectiveness and operation.

16.9. The criteria the Compliance Office will use in its assessment of the Code's effectiveness and operation includes:

16.9.1. the employees' awareness of the Code;

16.9.2. whether the particular requirements of the Code have been met; and

16.9.3. whether there have been any complaints involving this Venue.

16.10. The Compliance Office will make any appropriate changes to the Code and will seek approval of those changes by the VCGR.

16.11. Upon approval of the changes, the Compliance Office will advise this Venue and provide this Venue with the appropriate documentation.

**17. TRAINING & EMPLOYEE INCENTIVES**

17.1. All employees who are involved in the delivery of gambling products will complete the Mercury RSG Employee Training Manual each year.

17.2. The Mercury RSG Employee Training Manual covers matters which are referred to throughout the Code, such as –

17.2.1. how to access PID screens;

17.2.2. the duties of the Nominated Person;

17.2.3. how to identify the indicators of distress factors that relate to problem gambling;

17.2.4. the requirements of the National Privacy Principles;

17.2.5. the identification of minors and appropriate action to be taken if minors are detected on licensed premises.

17.3. In respect of gaming employees, the employees will complete an RSG course and every three years complete a refresher RSG course;

17.4. The management will reinforce awareness and compliance with the Code:

17.4.1. at employee meetings at this Venue

17.4.2. by employees attending at Code training sessions conducted by the Compliance Office;

17.4.3. by conducting employee training sessions conducted at this Venue.

- 17.5. Any incidence of non-compliance with the Code by an employee will lead to remedial action being taken by the employer against the employee and repeated non-compliance will lead to disciplinary action.
- 17.6. Annual Performance Reviews for all employees will include an assessment of the employee's commitment to and compliance with the requirements of the Code. The Annual Performance Review will include questions regarding the requirements of the Code and how it impacts on the employee, and whether the employee has meet the requirements of the Code.

## APPENDIX

### HOW TO SUBSCRIBE TO THE CODE

1. In order to subscribe to the Code a Venue must:
  - a) formally resolve to apply for acceptance as a subscriber to the Code.
  - b) apply to the Compliance Office to subscribe to the Code.
2. The Compliance Office only accepts applications from venues which it determines are suitable venues to subscribe to the Code.
3. If the Venue is accepted as a subscriber to the Code the Venue must:
  - a. formally adopt the Code in accordance with its constitution and the requirements of the VCGR.
  - b. formally advise the VCGR in writing on a form that the Venue subscribes to the Code.
4. The Compliance Office may, from time to time, determine that the Venue is not a suitable Venue to subscribe to the Code and, after providing the Venue with adequate opportunity to address the issue/s, the Compliance Office may expel the Venue from inclusion in the Code subscription.
5. If a Venue is expelled from the Code subscription, the Compliance Office will notify in writing:
  - a. the Venue; and
  - b. the VCGR that the Venue is no longer a subscriber to the Code.