The Amstel Golf Club ("the club")

1. Venue commitment to Responsible Gambling

The club is committed to responsible service of gambling and will display the following responsible gambling message wherever the club provides gambling products so that it is clearly visible to members and visitors.

> ***The club is an integral part of its community. It is run for and by its members on a not-for-profit basis to meet the community purposes for which it was founded, both now and into the future.***
>
> ***The club is committed to the wellbeing of its members, visitors, employees and the wider community that it serves. It strives to deliver all its services in a responsible and sustainable manner. As part of this commitment, the club has adopted this Responsible Service of Gambling Code and will provide the necessary resources (financial and human) to support the proper operation of the code at the club's premises and the code office.***
>
> ***The code is designed to assist the club to provide gambling in a socially rewarding, enjoyable and responsible manner.***

2. Interpretations

2.1. Definitions

- "Club" means the Amstel Golf club
- "code office" means the administrator of the ICRP and the code
- EGM" means electronic gaming machine

- “ICRP” means the Independent Complaints Resolution Process set out in clause 11
- “PID” means player information display
- “Nominated person” means the person responsible for providing information about the code and responsible gambling to members and visitors during all times that the club is delivering gambling products appointed in accordance with clause 8
- “Responsible gambling incident register” means the register maintained by the club in which the club records the information required under the Code and may also be the liquor and/or AML/CTF registers.
- “Review form” means the form to be completed annually by the club in accordance with clause 16

2.2. In the code, when the club is required to:

- provide information to members and visitors, or
- make information available to members and visitors, or
- display information,

the club will do so by:

- displaying appropriate posters, brochures and/or convenience notices in the area/s where the club provides gambling products, and the display will be clearly visible and accessible to members and visitors in those areas;
- having brochures readily available for customers to take away on their own initiative or upon request;
- making the information available on the club website (if any)

Which ever is most appropriate.

3. Availability of the Code and the responsible gaming incident register

3.1. A copy of the code is available in English and other major community languages on the following websites:

- www.amstel.com.au (fill in your club's website address)
- www.clubsvic.org

3.2. The club will make available a printed copy of the code to members and visitors who request it.

3.3. The club will make available information to members and visitors about how to obtain a copy of the code.

3.4. The club will ensure that the responsible gambling incident register is available to VCGR inspectors upon request.

4. Responsible Gambling Information

4.1. The club will comply with all regulatory requirements regarding displaying of responsible gambling information and will make available to members and visitors the following information about responsible gambling:

4.1.1. how to access the Commonwealth Government's website Understanding Money www.understandingmoney.gov.au ;

4.1.2. how gamblers and their families or friends can access gambling support services and self exclusion programs and the state government's problem gambling support website www.problemgambling,vic.gov.au ;

4.1.3. information produced by Gamblers Help and other relevant local gambling support services;

4.1.4. how to make and keep pre-commitment decisions

4.1.5. 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 gambling will be made available to members and visitors. In addition, for gaming machines, by way of PID screens on the machine.

5.2. Information on how to access the PID screens will be displayed and/or will be explained by a club employee.

6. Member &/or visitor loyalty scheme information

6.1. This clause only applies if the club conducts a loyalty scheme which:

6.1.1. tracks a member's or visitor's expenditure on gambling products ***and***

6.1.2. rewards that expenditure.

6.2. At the time the member or visitor joins the loyalty scheme or shortly after, the club will provide the member or visitor with written information that sets out:

6.2.1. the rules of the scheme ***and***

6.2.2. how rewards are accrued, expire and are redeemed.

6.3. The club will comply with all regulations governing the conduct of a loyalty scheme.

6.4. The regulations and rules in relation to the club's loyalty scheme will be made available.

6.5. At least once a year the club will provide participating members and visitors in writing with a statement that sets out what rewards the member or visitor has accrued as part of the loyalty scheme.

6.6. The club will not allow self-excluded members or visitors to join or remain in any loyalty scheme.

6.7. All written communications to members and visitors relating to the loyalty scheme shall 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 club's employees if you are having problems with your gambling including setting and maintaining limits"

7. Pre-commitment Strategy

7.1. The club encourages members and visitors to set limits on the amount of money and time that they spend on gambling. The limits should be suitable for the individual members' and visitors' circumstances.

7.2. In order to assist members and visitors to set and comply with the limits, the club will display appropriate information which recommends that members and visitors set limits and do not exceed those limits.

7.3. The club will also make available information advising members and visitors how to access help in setting and keeping limits, and also how to identify the triggers that lead to overspending on gambling.

7.4. The club will make available to members and visitors and their families or friends information about how to access gambling support services and the state government's problem gambling support website: www.problemgambling,vic.gov.au

7.5. All gaming machines at the club's premises enable a member or visitor 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. The club will comply with all regulations relating to pre-commitment with respect to the playing of gaming machines.

8. Interaction with members and visitors

8.1. The club will ensure that there is a person responsible for providing information about the code and responsible gambling to members and visitors during all times that the club is delivering gambling products – "the nominated person".

8.2. Usually the nominated person will be the duty manager for the shift.

8.3. The club will ensure that the nominated person is aware of these responsibilities and how to perform them.

8.4. The employees will be made aware of who is the nominated person for each shift.

8.5. An employee will alert the nominated person if that he/she observes a member or visitor doing one or more of the following:

8.5.1. approaching an employee and asking for information about problem gambling services;

8.5.2. telling an employee that he/she has a problem with his/her gambling;

8.5.3. displaying signs of distress or unacceptable behaviour;

8.5.4. acting aggressively or in an overtly anti-social or emotional manner including physically attacking gaming machines or crying after losing money;

8.5.5. gambling every day over an extended period of time and having difficulty leaving at closing times;

8.5.6. gambling for excessively long periods of time without a break

8.5.7. makes requests to borrow money from employees;

8.5.8. 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:

8.6.1. suggest that the member or visitor leave the area;

8.6.2. suggest that member or visitor take refreshments in a different area;

8.6.3. offer to call a taxi to take the member or visitor home;

8.6.4. offer to contact a friend;

8.6.5. offer the member or visitor the use of the club's telephone;

8.6.6. offer to provide the member or visitor with some refreshment (eg coffee);

8.6.7. approach the member or visitor and attempt to engage the member or visitor in social interaction;

8.6.8. provide the member or visitor with all the relevant information about accessing help services, including self exclusion and financial advice;

8.6.9. provide the member or visitor with some other appropriate assistance;

8.6.10. nothing, if, in the reasonable opinion of the nominated person, any interaction with the member or visitor is not warranted.

8.7. The nominated person will make every attempt to be discreet when approaching a member or visitor, and to draw as little attention as possible to the situation and to the member or visitor.

8.8. If that the nominated person considers that interaction with a member or visitor is warranted, the nominated person will record the incident in the

responsible gambling incident register and include the action taken by the nominated person.

8.9. Inclusions in the *responsible gambling incident register* may be subject to the Privacy Act and the nominated person will ensure compliance with the National Privacy Principles.

8.10. The club will provide training for all employees who carry out the duties of the nominated person duties. Nominated persons will be trained to know the indicators of problem gambling and the appropriate responses to problematic behaviour, and also with the requirements of the National Privacy Principles.

8.11. The club will comply with the laws regarding the responsible service of alcohol.

9. Interaction with employees

9.1. The club is concerned to ensure the safety of its employees and the perceived integrity of the gambling products sold by the club.

9.2. Gaming room employees are, by law, not permitted to play gaming machines during their shifts, including during breaks in their shifts.

9.3. The club will adopt a policy regarding employees purchasing gambling products (including playing gaming machines) and a copy of the policy will be included in the staff hand-book and attached to any copy of the code that is distributed.

9.4. Unless the club determines otherwise the policy is the following:

- *Employees are not permitted to purchase any gambling product while on duty (including playing gaming machines 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 club ID badge*

- *The ban on employees purchasing gambling products covers all employees, not only those employees who deliver gambling products.*

9.5. If the club adopts a different policy to that set out in 9.4 the club must advise the VCGR in writing of the policy and must await approval of the club's policy prior to implementing the policy. Clubs are encouraged to discuss with the code office any change to the policy set out in 9.4.

9.6. Responsible gambling professional development sessions for employees will be held on an annual basis in conjunction with the local Gambler's Help Service or such other appropriate organisation as the club determines.

9.7. 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 with the club.

9.8. The club will provide all employees who are employed with the club at the time of subscription to the code with information about responsible gambling and problem gambling support services.

9.9. If an employee tells another employee that the first employee has a gambling problem, or is observed by another employee exhibiting any of the behaviours set out in clause 8.5 above, the matter will be referred to the manager of the club or a board member who will respond in accordance with clause 8.6 above.

9.10. If an employee is having problems with gambling, and the club's operations can accommodate the particular employee being set duties which do not involve working with gambling products, the employee and the club may agree to change the employee's duties.

9.11. In determining what action is appropriate in any situation involving an employee, the club will ensure that every attempt is made to be discreet,

and to draw as little attention as possible to the situation and to the employee.

9.12. Action taken in accordance with this clause will be recorded on the employee's employment file, **and not** on the *responsible gambling incident 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. The club will maintain regular contact with the local Gamblers Help Service and/or other relevant problem gambling support services.

10.2. At least annually the club will invite the local Gamblers Help Service personnel and/or other relevant problem gambling support services personnel to meet with senior staff and/or board members at the club's premises.

10.3. The club will record details of all contact with the Gamblers Help Service and/or other relevant problem gambling support services in its responsible gambling incidents register.

10.4. The club will make available to members, visitors and employees publications and contact details of the local Gamblers Help Service and/or other relevant problem gambling support services.

11. Complaints about the code

11.1. The club will subscribe to the ICRP administered by the ICRP office.

11.2. The ICRP complies with all legislative requirements, relevant ministerial directions and has been approved by the VCGR.

11.3. The club will make available to members and guests information about the ICRP including:

11.3.1. how to make a complaint;

11.3.2. the process for resolution of a complaint;

11.3.3. the independent review of decisions made by the club about member or visitor complaints;

11.3.4. how information about complaints will be collected and retained;

11.3.5. how the VCGR will be assisted to monitor compliance with the complaints process.

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. The club will ensure that signs are located at every entrance to the gaming room prohibiting minors from entering the gaming room.

12.3. The club will ensure that all employees ask for verification of age when they are uncertain whether a member or visitor is at least 18 years of age.

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

- Proof of age card
- Drivers licence
- Victorian learners' permit
- Passport
- Key card

12.5. If relevant verification cannot be produced, the member or visitor 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 members and visitors to be aware of the passage of time, the club will place clocks around the club's premises.

13.2. The club will ensure that regular announcements which include the time of day are made in the gaming room. These announcements could be made at coffee break times and/or meal times.

13.3. If the announcement referred to in the above clause 13.2 is not made by an automated system the nominated person will record the time that the announcement will be made.

13.4. An employee will alert the nominated person if the employee notices a member or visitor gambling for an extended period of time and having difficulty leaving at closing time, and the nominated person will act in accordance with clause 8.6.

14. Financial transactions

14.1. The club will not cash members' and visitors' cheques unless the member or visitor has made prior arrangements with the management of the club for cashing of his/her cheques.

14.2. Even if prior arrangements have been made for the cashing of cheques, the club can not by law cash cheques for any one member or visitor for more than $400 per day.

14.3. By law, winnings or accumulated credits of $1,000 or more from gaming machines must be paid in full by cheque, which cheque must not be made payable to cash.

14.4. Members and visitors 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. The club will comply with such a request.

14.5. The club will maintain a *prize payment register* to record the payment of significant prizes on gambling products, including, but not limited to,

cheques payments of over $1,000. The prize payment register will be made available to VCGR inspectors upon request.

14.6. Entries in the *prize payment register* may be subject to the Privacy Act and the club will comply with the National Privacy Principles with respect to the *prize payment register*.

14.7. The provision of gaming machines and wagering is subject to the Anti Money Laundering and Counter Terrorism Financing Act. The club has adopted The ClubsVIC AML/CTF Program and the club will ensure that all financial transactions comply with the ClubsVIC AML/CTF Program and the AML/CTF Act.

14.8. The club will provide information about:

14.8.1. The club's policy on the cashing of cheques and

14.8.2. how members and visitors may have winnings paid by cheque.

15. Advertising and promotions

15.1. The club will ensure that all advertising and promotions relating to gambling undertaken by or on behalf of the club:

15.1.1. 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 ;

15.1.2. are not false, misleading or deceptive about the odds, prizes or the chances of winning;

15.1.3. have the consent of any person identified as winning a prize prior to publication;

15.1.4. are not to be offensive or indecent in nature;

15.1.5. do not create an impression that gambling is a reasonable strategy for financial betterment;

15.1.6. do not promote the consumption of alcohol while purchasing gambling products;

15.1.7. 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.

15.2. Prior to publishing, the club will assess all advertising and promotion of gambling products against the AANA's code of ethics and this clause.

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 club may refer the advertisement to the code office for its opinion.

15.4. Notwithstanding that the club will comply with the AANA's code of ethics, any complaint regarding the club's advertising and promotions will be handled in accordance with the ICRP (see clause 11) and **not** by the Advertising Standards Complaints Board.

16. Review Process

16.1. Employee feedback

16.1.1. The club will ensure that a code *employee feedback form* is available with the *responsible gambling incident register*.

16.1.2. The club's induction package/staff handbook provided to all employees on commencement of employment with the club will include advice on how the employees can provide feedback to the operation of the code by completing the employee feedback form that is available with the r*esponsible gambling incident register*.

16.1.3. The club will provide all employees who are employed with the club at the time of subscription to the code with information about how the employees can provide feedback to the operation of the code by completing the employee feedback

form that is available with the r*esponsible gambling incident register*.

16.1.4. At the end of each shift the nominated person will collect any completed employee feedback forms and deliver them to the club management.

16.1.5. The club management will consider the completed employee feedback form and:

16.1.5.1. if that the matter can be dealt with at the club level, management will take appropriate action, file the completed form with the r*esponsible gambling incident register* and attach copies of any completed forms to the annual review form;

16.1.5.2. if that the matter involves a systemic issue in relation to the code, the matter will be referred to the code office for its consideration and appropriate action, which may include applying to the VCGR for an alteration of the code.

16.1.6. All completed employee feedback forms will be maintained by the club management and made available to VCGR inspectors upon request.

16.2. Member feedback

16.2.1. Each year prior to 28 February the club will send to members a member feedback form for members to complete and return to the club.

16.2.2. The code office may, upon application, grant an extension of time for distribution of the member feedback form.

16.2.3. The club management will consider the completed member feedback form and:

16.2.3.1. if that the matter can be dealt with at the club level, management will take appropriate action and file the completed form with the r*esponsible gambling incident register* and attach copies of any completed forms to the annual review form;

16.2.3.2. if that the matter involves a systemic issue in relation to the code, the matter will be referred to the code office for its consideration and appropriate action, which may include applying to the VCGR for a alteration of the code.

16.2.4. All completed member feedback forms will be maintained by the club management and made available to VCGR inspectors upon request.

16.3. Club feedback

16.3.1. The club will complete the "code review form" prior to 31 March in each year.

16.3.2. The code office may, upon application, grant an extension of time for completion of the code review form.

16.3.3. The completed code review form will be kept by the club at the club's premises together with any member or employee feed back forms that were received through the preceding year.

16.4. Support Services Feedback

16.4.1. Each year prior to 31 March the code office will send to the Council of Gamblers Help Services a support services feedback form for completion and return to the code office by 15 April.

16.4.2. Prior to 30 April each year the code office will conduct a survey of clubs' completed forms and a general appraisal of

the code (including consideration of complaints received) to assess the code's operation and effectiveness.

16.4.3. The code office will make any appropriate changes to the code and will seek approval of those changes by the VCGR.

16.4.4. Upon approval of the changes, the code office will advise the club and provide the club with the appropriate documentation.

17. Training & employee incentives

17.1. All employees of the club who are involved in the delivery of gambling products will receive adequate training in the content and operation of the code.

17.2. The training may be delivered in any one or more of the following ways:

17.2.1. in respect to gaming employees, the employee shall complete a responsible service of gaming course (or refresher course) which course includes a component on the operation of the code and is endorsed by the code office;

17.2.2. briefings at staff meetings;

17.2.3. employees attending at code training sessions conducted by the code office;

17.2.4. employee training sessions conducted on the club's premises and endorsed by the code office.

17.3. 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.

17.4. 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 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.

18. How to subscribe to the code

18.1. The club will present the code to the committee/board of the club and the committee/board will resolve formally to subscribe to the code.

18.2. The club will apply to the code office for subscription to the code.

18.3. The code office will assess the application and determine whether to approve or reject the application and advise the club promptly of its determination.

18.4. If that the code office determines to reject the application, the code office will provide the club with reasons for the rejection.

18.5. The club will be at liberty to apply again for subscription to the code.

18.6. If that the code office approves the application, the club will advise the VCGR that the club has subscribed to the code.

18.7. The code office may, at any time, determine that the club is not a suitable club to subscribe to the code and, after providing the club with adequate opportunity to address the issues, the code office may expel the club from inclusion in the code subscription.

18.8. If a club is expelled from the code, the code office will notify the club and VCGR.