

**POLICY: Responsible Gambling Code of Conduct**

<b>Current From:</b>	November 2021	<b>For Review:</b>	April 2023
<b>Version:</b>	2.0	<b>Replaces (last version):</b>	April 2021
<b>Custodian:</b>	Level 3 - Board	<b>File/Lifesaving Unit</b>	Corporate Services

**1. Availability of the Responsible Gambling Code of Conduct**

The Code is available on the Royal Life Saving WA website at <https://royallifesavingwa.com.au/> or by request to Allan Godfrey, Chief Marketing Officer on 1300 132 770

**2. Responsible Gambling Message**

The Royal Life Saving Society WA Inc (RLSSWA) are committed to selling raffle tickets responsibly to support community and charitable organisations.

This message will be displayed on RLSSWA website and on material developed by RLSSWA for the promotion and conduct of raffles on behalf of community and charitable organisations.

A responsible gambling message is available to any customers on request during a customer engagement.

**3. Responsible Gambling Information**

Information about the following is also available on the Royal Life Saving WA website at <https://royallifesavingwa.com.au/> or by request to Allan Godfrey, Chief Marketing Officer on 1300 132 770

- 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 Royal Life Saving Society WA for the purposes of purchasing raffle tickets.

**4. 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 Royal Life Saving WA website at <https://royallifesavingwa.com.au/> or by request to Allan Godfrey, Chief Marketing Officer on 1300 132 770

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

RLSSWA run an opt-in “do not call” list for raffle related telephone calls. Once a customer has elected not to be called for a specific charities raffle, they will not be called for any subsequent raffle campaign for that charity.

**5. Customer Loyalty Scheme Information**

Royal Life Saving Society WA offer a Customer Loyalty Scheme for RLSSWA members only, with a monthly limit of \$100/month.

## **6. Engagement with Customers**

RLSSWA fundraising 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.

- Where tickets are sold in excess of \$500, a verification call will be made to confirm the supporters capacity to make the purchase.
- We will limit ticket sales to \$2500 for any individual in any 3 month period, unless expressly authorized by CMO.

In addition, for customers who have indicated that they have a gambling problem or where a fundraiser forms the view from the customer that a customer may be overextending themselves financially:

- Telephone fundraisers will offer to end the call/call back later if the customer wishes to continue with their ticket purchase
- Provide a telephone number whereby credit card purchasers could amend or cancel their order (subject to relevant state regulations)
- 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
- Where tickets sold by mail an upper limit of 5 books (\$200) will be issued to an individual to purchase/sell at any one time.

Fundraising staff will ensure that interaction with customers occurs in a manner that respects the customer's right to privacy.

## **7. Interaction with Staff**

RLSSWA Senior Management, Executives, Directors and all fundraising staff directly involved in the conduct of running a raffle campaign are not to purchase raffle tickets being sold by RLSSWA.

A nominated manager/supervisor of RLSSWA 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 the above information and assistance.

## **8. Interaction with Problem Gambling Support Services**

The Chief Marketing Officer (CMO) or a senior staff member of RLSSWA 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 fundraising staff and made available for use with customers, as soon as practicable after it is received.

## **9. Customer Complaints**

Complaints may be made by telephone to 08 9383 8200 or by letter sent to:

Chief Marketing Officer  
PO Box 28  
Floreat Forum WA 6014

The details of each gambling complaint are entered into the Complaint Register with a record of the outcome of each complaint.

When complaints are received by telephone, they are referred to the Marketing & Fundraising Officer. The Marketing & Fundraising Officer will endeavor to resolve the issue at this time.

When complaints are received by mail, RLSSWA will aim to respond to these letters within two business days of receipt. If RLSSWA needs to investigate the issue further, the aim will be to resolve it within five business days.

While the issue is being investigated, RLSSWA will provide updates on resolution progress.

If a customer is not satisfied with the resolution or the investigation of the issue, it will be escalated to the CMO. The CMO will review the issue and the resolutions that have been offered.

If RLSSWA remains unable to resolve the complaint to the customer's satisfaction, the matter will be referred to an independent mediator, such as the Institute of Arbitrators and Mediators ([www.iama.org.au](http://www.iama.org.au)) and costs will be equally shared between both parties.

Records of gambling complaints and decisions will be made available upon request to the relevant state regulator.

## **10. Compliance with the prohibition on gambling by minors**

RLSSWA will not target a promotion or sales campaign at minors and will not knowingly sell raffle tickets to minors. In addition, fundraising staff will take reasonable steps to ascertain the age of the customer prior to the purchase of raffle tickets, if there is any reason to suspect that the customer may be a minor.

## **11. The Gambling Environment**

RLSSWA will discourage repeatedly excessive purchase of tickets by customers.

To achieve this RLSSWA will:

- Set a limit on the quantum or value of tickets to be sold to an individual customer
- Check the database of regular ticket purchasers to detect a pattern of excessive purchases
- Not engage in hard/pressure sales techniques.

## **12. Financial Transactions**

RLSSWA will not extend credit to customers to purchase raffle tickets

### **13. Responsible Advertising Promotions**

Any advertising and promotions undertaken by RLSSWA in relation to a raffle will:

- Comply with the fundraising code of ethics adopted by the Fundraising Institute of Australia
- 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.

RLSSWA will incorporate the above standards into its advertising checklist and will assess all proposed advertising against these standards.

### **14. Processes and Structures to Support the Ongoing Implementation of the Code.**

1. Responsible Gambling matters will be a standing item for Senior Management meetings and staff meetings.
2. A Responsible Gambling Officer will be identified from among senior staff to:
  - a. Handle more difficult customer contacts
  - 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
  - d. Handle responsible gambling issues raised by staff
  - e. Identify staff worthy of reward and recognition for their responsible gambling efforts

### **15. Code Review Process**

1. A review of the operation and effectiveness of this Code will occur in June each year.
2. Input will be obtained from management and staff and a sample of customers about the operation and effectiveness of the Code.

A report of the review will be made available to each state regulator by 30<sup>th</sup> June each year.