

# Responsible Gambling Code of Conduct

South Australia



October 2016



Australia's Official Lotteries



## Introduction

Tattersall's Sweeps Pty Ltd, Tatts NT Lotteries Pty Ltd, New South Wales Lotteries Corporation Pty Ltd, Golden Casket Lotteries Corporation Limited and Tatts Lotteries SA Pty Ltd (collectively known as **the Lott**) conduct world class lottery operations across multiple jurisdictions within Australia under the Tatts, NSW Lotteries, Golden Casket and SA Lotteries brands and are committed to Responsible Play throughout the states and territories in which they operate. Our games are available through an extensive network of over 4000 Retailers, who are committed to providing games in a safe, secure and friendly environment.

For most people, playing lottery games is fun and entertaining. Lottery play is rarely associated with causing problem gambling. Notwithstanding this, we have developed Responsible Gambling Codes of Conduct (**Codes**) for each state and territory in which we operate as the cornerstones of **the Lott** Responsible Play Program.

The Responsible Gambling Codes of Conduct act as guides for the responsible service delivery and unfaltering commitment that the community can expect from us and our retail network. The Codes are developed to comply with local legislation and in this case, the South Australia Gambling Codes of Practice Notice 2013 Version No. 008 as at 1 July 2016.

## Objectives

- a) To ensure that lotteries remain a socially responsible, fun and entertaining experience.
- b) To provide a framework for SA Lotteries and its retailer network for the continued responsible delivery, marketing and sale of its lottery products.
- c) To continue to demonstrate SA Lotteries unwavering commitment to responsible business practices and community support.

## 1. Definitions

**App** means **the Lott** mobile application.

**Autoplay** means the automatic purchasing of a specific entry in a lottery based on the settings requested by a customer at the time it is set up.

**Outlet** means the place of business of a Retailer.

**Regulator** means the Lotteries Commission of South Australia.

**Retailer** means the person(s) who has been granted a SA Lotteries Franchise and for the purpose of this Code, includes the website **thelott.com**.

**SA Lotteries** means Tatts Lotteries SA Pty Ltd acting as master agent for the Lotteries Commission of South Australia.

**The Lott** means Tattersall's Sweeps Pty Ltd (ABN 99 081 925 662); Tatts NT Lotteries Pty Ltd (ABN 18 146 244 984); Golden Casket Lottery Corporation Limited (ABN 27 078 785 449); New South Wales Lotteries Corporation Pty Ltd (ABN 27 410 374 474) and Tatts Lotteries SA Pty Ltd (ABN 41 146 245 009) of 87 Ipswich Road, Woolloongabba, Queensland, 4102.

**Website** means the SA Lotteries website **thelott.com**.

## 2. Commitment to Responsible Gambling

SA Lotteries and its Retailers are committed to providing the highest standards of customer care and responsible gambling. We support and encourage the responsible play of our lottery games and are committed to **the Lott Responsible Play Program (Program)**. The Responsible Gambling Codes of Conduct for each jurisdiction form part of this Program. In general, we do not offer games that would –

- a) create any continuous forms of play;
- b) have a strong appeal to minors; or
- c) be offensive or contrary to the public interest.

The Responsible Gambling Code of Conduct – South Australia (this document) describes how we demonstrate this commitment in South Australia.

## 3. Availability of the Code

A responsible gambling brochure, 'Have Fun & Play Responsibly', indicating the availability of the Codes for each jurisdiction and providing a high level summary of the main tenets of all of the Codes in major community languages, is available for all customers in all Outlets.

A full copy of the Code is available for inspection in all Outlets upon request and also on the Website.

## 4. Responsible Gambling Message

The Lott Responsible Play Program uses a responsible gambling message, "**HAVE FUN & PLAY RESPONSIBLY**", which is displayed on the 'Have Fun & Play Responsibly' brochure. All other SA Lotteries advertising and promotion materials use the Mandatory Warning Messages specified by the South Australia Gambling Codes of Practice Notice 2013.

## 5. Responsible Gambling Information

All retail Outlets and the Website have responsible gambling information on display in a range of forms, including brochures and posters. Materials are subject to change but current examples of responsible gambling materials include:

- a) The 'Have Fun & Play Responsibly' brochure which is on display and available for customers in all Outlets and on the Website. This brochure provides information on –
  - i. how to gamble responsibly;
  - ii. how to make and keep a pre-commitment decision;
  - iii. the availability of gambling support services;
  - iv. the odds of winning; and
  - v. how to lodge a complaint for a suspected sale of lottery products to minors or for any other responsible play complaint.
- b) The SA Lotteries 'Gamble Responsibly' poster is on display in all Outlets and on the Website. This poster includes information on –
  - i. the prohibition of the sale of lottery products to minors;
  - ii. the availability of gambling support services;
  - iii. the fact that gambling operations are governed by a Code of Practice; and
  - iv. the availability of the South Australia Gambling Codes of Practice Notice 2013; and

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- v. a warning message to all players to 'gamble responsibly' in English and five foreign languages.
- c) The Lotteries Rules are made available to Retailers and customers on the Website, which may be printed by Retailers for customer viewing should a customer request to see them.
- d) The 'How to Play' brochures are on display and available to customers in all Outlets and on the Website. The 'How to Play' brochures provide information on the games. This information is also contained in the Lotteries Rules on request.
- e) The South Australia Gambling Codes of Practice Notice 2013 is stored in the Responsible Gambling Folder in the Outlet and available on the Website for players to view on request.
- f) 'Gambling Helpline' stickers are displayed on the terminal for customers to be aware of help support services and how they may be contacted if required.
- g) 'Gambling Helpline' cards are displayed at any EFTPOS/ATM machines, and at other places in the gambling area for customers to be aware of help support services and how they may be contacted if required.
- h) The Complaint Handling Charter explains the process and roles and how to make a complaint in relation to Responsible Gambling or any other matter and is available on the Website.
- i) Responsible Gambling Customer Screen Messages containing a responsible gambling message and contact information details for problem gambling support services will be electronically displayed on screens in most Outlets from time to time.
- j) SA Lotteries online player barring information is provided on both the Website and App. This information directs online players who wish to bar themselves, to submit an online barring request or call the Responsible Play Liaison Officers (**RPLOs**) to suspend their online accounts for a period of three months. The barring page directs customers where to get help. There is also a link from the barring web page to the Responsible Play Program webpage on the Website and App.
- k) The Responsible Play Program webpages display the National Gambling Helpline number of 1800 858 858 as well as links to: the Responsible Gambling Code of Conduct – South Australia; the 'Gamble Responsibly' poster; the 'Have Fun & Play Responsibly' brochure; the Lotteries Rules; odds information and the 'How to Play' information for each game; information on the Players 1st Program; and a link to [www.gamblinghelponline.org.au](http://www.gamblinghelponline.org.au).
- l) The Responsible Gambling Complaints & Incidents Register in which staff need to record the details of suspected problem gamblers and record details of any incidents or complaints is stored in the Responsible Gambling Folder. Managers review the Responsible Gambling Complaints & Incidents Register every two weeks and sign the register to identify this has been done.
- m) The Gambling Help Services Contact List is on display in the back of house area and a copy is stored in the Responsible Gambling Folder. The list, which is updated quarterly is reviewed by all staff so that they are aware of the contact details of the service closest to them, including the location and manager's name (where possible) so as to be able to direct players who have a problem.
- n) SA Lotteries clocks are displayed in the gambling area so that customers may be aware of the passage of time.
- o) Easisplay Club change of details coupons are on display for cancellation of membership if required (e.g. self-exclusion).
- p) SA Lotteries Request for Barring Order – Lotteries Outlets is a form that is stored in the Responsible Gambling Folder and is used by a senior staff member(s) to initiate the barring process if agreed to by the customer.
- q) A link to self-assessment and self-management tools on appropriate gambling help support sites is provided to players via the Responsible Play Program page on the Website to assist customers to manage their gambling activities.

## **6. Gambling Product Information**

Information on all gambling products must be available and accessible for customers on request in all Outlets. This information includes the odds of winning and player information for each game.

The Lotteries Rules are available and accessible for customers on request in all Outlets or on the Website. They include information on the games and the percentage return to players. Outlets also have the 'How to Play' brochure on display and available for customers which include information on how to play the games, and the odds of winning a Division 1 prize or the odds of winning a prize.

Outlets also have the 'Have Fun and Play Responsibly' brochures on display and available to customers which include information on the odds of winning a first division or top prize or the odds of winning a prize.

## **7. Customer Loyalty Scheme**

The Easiplay Club is a membership scheme which adds security to members' lotto purchases (not Instant Scratch-Its) and where customers can choose to store their favourite numbers. Tickets purchased by the cardholder are registered to their Easiplay Club Card. SA Lotteries stores the customer's contact information against the Easiplay Club Card and pays their prizes if not claimed within a defined period. Detailed information including the terms and conditions about the operation of the Easiplay Club program is made available at the time of joining.

Membership is not available to minors or excluded players.

SA Lotteries does not actively have a schedule of defined rewards which are linked to expenditure, however the database system storing customer information has the ability to extend to these methods. Occasionally, SA Lotteries will communicate about upcoming events or offer members the ability to enter a second chance draw by using their Easiplay Club Card to purchase particular lottery products. The winners of any promotions conducted for Easiplay Club members are contacted by SA Lotteries.

Responsible Gambling messages are incorporated and prominently displayed in all program documentation and pre-commitment is promoted.

Should SA Lotteries decide to operate a customer loyalty scheme by offering a scheme of defined rewards based on purchases, all information regarding this customer loyalty scheme will be made available on the Website.

There is a membership program for Instant Scratch-Its, called the Scratch eClub which allows members access to exclusive promotions, offers and activities. Members will be able to access from time to time, second chance draws and promotional offers on certain Instant Scratch-Its tickets bought in retail Outlets via an online Scratch eClub. The membership scheme does not have a schedule of defined rewards and is not linked to expenditure on Instant Scratch-Its.

Detailed information including the terms and conditions about the operation of the Scratch eClub program are made available at the time of joining.

Membership is not available to minors or excluded players. As the program is not linked to expenditure, a tally on Instant Scratch-Its expenditure is not able to be provided to a player in an activity statement. Program members can access any Scratch eClub information that SA Lotteries holds about them.

## 8. Pre-Commitment Strategy

SA Lotteries encourages customers to set a limit according to their individual circumstances. Printed information is available in Outlets to assist a customer to make a pre-commitment decision. Online customers are able to set themselves play limits which are also effective in the Autoplay set up. If a customer wishes to increase their play limit a 7-day waiting period is required for the increase to take effect. If a customer wishes to decrease their play limit the change will take effect immediately.

## 9. Interaction with Customers

SA Lotteries has designated RPLOs who are available during business hours (approximately 5.00am until 8.00pm Monday to Saturday and 5.00am until 2.30pm on Sunday, but subject to change).

The RPLOs can be contacted on the **Responsible Play phone number 1300 138 132**.

Retail Territory Managers (**RTMs**) and Retailers are trained in the service of responsible gambling. Each Retailer receives comprehensive responsible gambling training prior to their commencement at an Outlet. SA Lotteries also produces responsible gambling training materials for the Retailer for the purposes of on-training their staff members.

A person who approaches a staff member in an Outlet and asks for information about problem gambling services or indicates a problem with their gambling or seems distressed about their gambling will be referred to the **National Gambling Helpline on 1800 858 858** and be offered barring.

A senior staff member(s) will initiate the barring process if agreed to by the customer using the 'SA Lotteries Request for Barring Order – Lotteries Outlets' form. Staff will ensure that all enquires relating to barring are responded to in an informative and timely manner, by aiming to deal with a telephone enquiry in one call, and an in-store or in-venue approach while the customer is in the Outlet. Staff will ensure that the use of an interpreter service is offered to customers who may require assistance. The RPLOs can be contacted on 1300 138 132 to connect the customer to an interpreter service. If required, the Retailer will assist the customer by contacting the RPLOs on the customer's behalf.

On request, the RPLOs can:

- a) provide further information and contact details for gambling related support services;
- b) remove players from the Easiplay Club program and/or stop promotional letters or offers from personally being mailed to the player; or
- c) offer online barring.

After deactivating their Easiplay Club Card membership, no correspondence or promotional material is to be personally mailed to barred players.

The RPLOs maintain a Gambling Incidents Register of any telephone calls or emails received by customers experiencing a gambling problem.

Retailers also maintain a Responsible Gambling Complaint & Incidents Register in their Outlets. Staff record the details of suspected problem gamblers and record details of any incidents or complaints in the register. The register is stored in the Responsible Gambling Folder. Managers review the Responsible Gambling Complaints & Incidents Register every two weeks and sign the register to identify this has been done.

SA Lotteries and its Retailers value the protection of customers' privacy and all interaction with customers will be done with due respect for their privacy.

SA Lotteries, their Retailers and their staff must not encourage a person to gamble beyond their means.

## **10. Staff Gambling Policy**

SA Lotteries has no restrictions on its staff or Retailers participating in the purchase of lottery products.

If a staff member from SA Lotteries, a Retailer or a member of their staff asks for information about problem gambling services or indicates a problem with their gambling, they will be referred to the National Gambling Helpline, offered barring and also directed to the RPLO for assistance, with due respect for the privacy of the staff member or Retailer.

SA Lotteries provides responsible gambling training and material to all staff members and new Retailers at its induction training and provides updates on responsible gambling at Retailer network meetings, or in Retailer newsletters and on Retailers Web and in refresher training every two years.

## **11. Problem Gambling Support Services**

SA Lotteries is committed to maintaining strong linkages with problem gambling support services. The Social Responsibility Manager, Tatts Group, with the assistance of a senior Retail Manager, are responsible for maintaining those relationships through meetings or interactions with the local Gamblers Help support services from time to time.

## **12. Customer Complaints**

SA Lotteries has a Complaint Handling Charter (**Charter**) dealing with complaints about the operation of, or compliance with, the Code. The Charter details the process for customer complaints. This Charter is available on the Website.

The 'Have Fun & Play Responsibly' brochure, which is on display and available at all Outlets, advertises the location of the Charter on the Website.

A member of the public can make a complaint to SA Lotteries in person, by telephone, letter, fax or email.

### **Contact Details – SA Lotteries**

**Phone:** 131 868

**Email:** customersupport@salotteries.com.au

**Fax:** (07) 3877 1140

**Mail:** Complaints at SA Lotteries  
Locked Bag 7  
COORPAROO DC, QLD 4151

**Visit:** 188 Richmond Road  
Marleston SA 5033

If a complaint is made in person or by telephone, the complainant may be asked to submit details of the complaint in writing.

The incident or complaint will be investigated within a reasonable timeframe and for written complaints, within 21 days.

The Incident Management Team investigates, determines and implements a resolution, informs the complainant and the subject of the complaint (if applicable) of the conclusion in relation to the complaint and the reason for that conclusion and also logs the details of the complaint and the outcome. If the matter is resolved, no further action is taken.

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

- a) All material in relation to the complaint is examined.
- b) A discussion may be held with the complainant, the subject of the complaint, and/or staff involved with the management of the complaint.

If the complainant requests a review of the internal decision, the matter is referred by SA Lotteries to a member of a panel of independent mediators, for either a determination based on submitted paperwork or to arrange mediation if necessary. Costs of this process will be shared equally by SA Lotteries and the complainant.

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 Regulator on request.

### **Players 1st Program**

In addition to the Complaint Handling Charter, SA Lotteries has a Players 1st Program which is designed to ensure security of lottery purchases and prize claims. Measures that are covered in the program include: registering as an Easisplay Club member; ticket security hints and tips; retailer integrity procedures; Players 1st Hotline and email; prize claim procedures; customer service standards; and reminders to players to check tickets carefully at time of purchase.

In particular, the **Players 1st Hotline of 1300 PLAYER (1300 752 937)** is promoted to players for use if there is doubt about what to do with a major prize win or if the player has concerns about the way a lottery transaction has been handled. Any complaints received through this hotline will be investigated by SA Lotteries.

### **13. Minors**

Legislation prohibits persons under 18 years of age from purchasing lottery products. Retailers are required to ask for verification of age where they are uncertain whether a customer is at least 18 years of age for lottery purchases or Easisplay Club applications. If relevant verification cannot be produced, service must be refused. Retailers are also not permitted to pay prizes to minors or allow them to collect prizes on behalf of their parents, guardians or other adults.

SA Lotteries online players are required to undergo an identification process to confirm their identity and that they are over 18 years of age. Before a player's first withdrawal can be processed, SA Lotteries requires that the player verifies the information they provided during registration. Only verified customers are allowed to access and use the Autoplay facility.



## **14. The Gambling Environment**

SA Lotteries and their Retailers provide a safe environment and discourage customers from engaging in extended gambling. Clocks are on display to show customers the passage of time.

Customers who are intoxicated by alcohol or some other substance are not permitted to buy lottery entries.

Staff working in Outlets, or at SA Lotteries or any other related bodies corporate, are not to encourage lottery players to provide them with gifts or gratuities.

## **15. Financial Transactions**

SA Lotteries and their Retailers do not provide credit or lend money for the purchase of lottery products. The purchase of lottery entries via credit cards and/or EFTPOS is an acceptable retail practice.

SA Lotteries Retailers may accept cheques as payment for lottery purchases, but this practice is not encouraged and is done so at their own risk. SA Lotteries Retailers do not cash cheques, including prize cheques in their capacity as an SA Lotteries Retailer.

Retailers must pay any prize winnings of \$5,000 and over by a means other than cash. Approved methods include cheque, direct deposit and EFT. For prizes under \$5,000, options of payment include cash, cheque, direct deposit and EFT. Information on the financial transaction policy is on display in all Outlets in the 'Have Fun & Play Responsibly' brochure.

## **16. Responsible Advertising and Promotions**

SA Lotteries ensures that its advertising and promotions for South Australia:

- a) comply with the advertising Code of Ethics adopted by the Australian Association of National Advertisers;
- b) do not represent an irresponsible trading practice or portray actions that may seem socially irresponsible;
- c) are not directed or likely to appeal (whether in terms of style, tone, content, medium, location or any other factors) primarily to persons under 18 years of age. No suggestion should be made in any advertising that anyone under the age of 18 can participate in lotteries;
- d) are not false, misleading or deceptive or in contravention of a requirement of lotteries regulations;
- e) do not implicitly or explicitly misrepresent the probability of winning a prize or suggest that winning will be a definite outcome of participation in a lottery;
- f) do not include misleading statements about odds or prizes;
- g) do not give the impression that buying lottery tickets is a reasonable strategy for financial attainment or will definitely improve a person's financial prospects;
- h) do not offend prevailing community standards and are in accordance with decency, dignity and good taste and in accordance with the Commercial Television Industry Code of Practice as in force at the time the lottery advertising is published;
- i) are not discriminatory nor appear to be patronising to any particular group;
- j) are not targeted at vulnerable or disadvantaged groups where people may not have a capacity to fully understand the information, such as refugees or people with intellectual disabilities. Are not

directed at or provided to excluded persons or anyone who has opted out of receiving promotional material;

- k) do not publish or cause to be published anything which identifies customers who have won a prize without prior consent. Do not violate the confidentiality of information relating to, or the privacy of, players without the consent of the player;
- l) do not depict or promote the consumption of alcohol while buying a lottery product;
- m) do not encourage anyone to contravene a gaming law or any law;
- n) do not suggest that skill can influence games that are games of chance; and
- o) do not encourage excessive or reckless playing.

SA Lotteries also incorporates other requirements and the Mandatory Warning Messages into its advertising and promotional material as directed by the provisions of the South Australia Gambling Codes of Practice Notice 2013. A Responsible Gambling checklist is used by SA Lotteries in the preparation of marketing material to assist staff compliance for lottery generated promotional material.

Retailers are obliged to ensure their own advertising and promotional materials, where such materials relate to SA Lotteries, comply with the same requirements as above. These requirements are advised to all Retailers in training. Retailers are also obliged to ensure their own advertising and promotional materials –

- a) are approved by SA Lotteries; and
- b) incorporate the appropriate Mandatory Warning Message as required by the South Australia Gambling Codes of Practice Notice 2013.

## **17. Retail Compliance with the Code**

SA Lotteries monitors Retailers' compliance with the Code and the requirements of the South Australia Gambling Codes of Practice Notice 2013 through regular site surveys. The site surveys are conducted by an external third party on a continuous basis moving through the network throughout the course of the year. The site survey is recorded in a report. In addition to the survey, as part of the normal call activities by RTMs to Outlets, a check is undertaken of compliance with a range of responsible gambling measures including display of all required signs and information.

## **18. Review of the Code**

The Code is a dynamic document and will be reviewed annually to ensure it complies with legislation.

The results of the site surveys together with feedback from Gamblers Help, RTMs and trainers and through information received from telephone interviews with a representative sample of Retailers and players will be used to inform the review. Areas needing improvement will be highlighted in a review report and put into an action plan for the following financial year by the Group Social Responsibility Manager.