

# Contact Centres Australia Pty Ltd

## Responsible Gambling Code of Conduct

2009

## 1. RESPONSIBLE GAMBLING MESSAGE

Contact Centres Australia Pty Ltd ('CCA') is committed to responsible service of gambling and will display the following gambling message on premises and make it available on CCA's relevant website for all customers.

*CCA foster a commitment to provide a responsible gambling framework and endeavour to provide services in a responsible manner. An integral part of this commitment is the Code of Conduct that CCA has adopted, designed to assist CCA to provide gambling in an enjoyable and responsible manner to support charitable organisations.*

## 2. AVAILABILITY OF THE CODE OF CONDUCT

CCA's code of conduct is available online on CCA's website. Please refer to [www.contactcentres.com.au](http://www.contactcentres.com.au). A copy of CCA's code of conduct will be made readily available upon request to the nominated person, Peter Thomson, Director of CCA who is responsible for the operation of the code of conduct. The code will be sent to the customer in an agreed format, either via mail, email or fax.

A message will be displayed in the call centre informing all call centre staff that a code is available upon request. CCA's code of conduct is available on the company's intranet website for current and new staff.

## 3. RESPONSIBLE GAMBLING INFORMATION

CCA will comply with regulatory requirements regarding the display of responsible gambling information for all call centre staff. A message will be displayed in the call centre at all times. The following information about responsible gambling will be made available to customers and employees:

- a) How to gamble responsibly; [www.betsafe.com.au](http://www.betsafe.com.au)
- b) How to make and keep pre-commitment decisions
- c) Access to the Commonwealth Government's website, Understanding Money; [www.understandingmoney.gov.au](http://www.understandingmoney.gov.au)
- d) Access to gambling support services
- e) Access to the state government's problem gambling support website: [www.problemgambling.vic.gov.au](http://www.problemgambling.vic.gov.au)
- f) Restrictions on the provision of credit for gambling

At the conclusion of every telephone conversation where a customer has bought tickets in the draw, the customer is supplied with a telephone number where they can:

- a) Request more information about the Raffle

- b) Cancel or amend a ticket order (until the day before draw)
- c) Change their entries in raffle to a donation

Contact Centres Australia runs an opt-in do not call list for Raffle related telephone calls. Once a customer has elected to not be called for Raffles they will not be called for all subsequent campaigns.

#### **4. GAMBLING PRODUCT INFORMATION**

Information relating to the odds of winning the stated prizes will be made available to customers upon request. Customers are able to request for this information at the time of their call, or alternatively call our Raffle Enquiry Line.

Information relating to raffle entry terms and conditions will be made available to customers by call centre staff. Call centre staff are trained to disclose terms and conditions of entry at all times during a call. It is at this point where customers are able to accept or refuse the offer to participate in any raffle.

#### **5. INTERACTION WITH CUSTOMERS**

CCA focus on preparing adequately trained staff in their call centre operations to ensure the best quality of interaction with donors. Call centre staff will be trained to assist those who display any indicators of distress which may be related to a gambling problem. Calls of this nature will be escalated to the nominated person, who will assess the situation and make arrangements as appropriate. In any situation the following may occur:

- a) Provide information relating to access to help services, including self exclusion and financial advice.
- b) Provide referral details to Gamblers' Help services

In addition to those who indicate a gambling problem, call centre staff will be trained to observe those who seem to overextend themselves financially. In accordance with providing a responsible service of gambling, call centre staff will be trained to do either of the following:

- a) Offer a call back date if the customer wishes to purchase raffle entries
- b) Provide the Raffle Enquiry Line number whereby purchasers are able to amend or cancel their pledge.
- c) Not engage in pressure techniques
- d) Encourage pre-commitment decisions

The nominated person will in any event, ensure that interaction with customers occurs in a manner that respects the customer's right to privacy.

The QA department work with call centre supervisors and team leaders to ensure that call centre operators conduct calls in accordance with strict rules and guidelines imposed.

## 6. INTERACTION WITH STAFF

CCA value their employees and are concerned with the service of responsible gambling. CCA policy does not allow for any employees to participate in raffles conducted by Contact Centres Australia Pty Ltd.

Employees who request information about help with a gambling problem, or who show any indicators of a gambling problem, not confined to raffle purchases, will be assisted by the nominated person. The nominated person will provide the employee with referral details to a Gambler's Help Service and/or Gambler's Help Service material. If further assistance is deemed necessary, the nominated person will ensure that reasonable steps are taken to address the situation appropriately. This will be conducted in a confidential manner in a way to protect staff privacy but will be recorded in employee files.

Supervisors and Quality Assurance who monitor employees on a daily basis will also be trained to observe any indicators of stress related to a gambling problem and will escalate these situations to the nominated person for review.

## 7. INTERACTION WITH PROBLEM GAMBLING SUPPORT SERVICES

The nominated person of CCA will maintain regular contact Gambler's Help services to remain updated with publications and to ensure contact details are updated on a regular basis. The nominated person will also enquire about any specific training programs available. The relevant information will be communicated to staff and customers immediately.

## 8. CUSTOMER COMPLAINTS

Complaints received regarding CCA's Responsible Gambling Code of Conduct will be recorded and complainants may be asked to record their complaint in written form, directed to CCA's Nominated Person.

CCA's Nominated Person will investigate the complaint in a confidential manner within a reasonable time frame, usually 2 weeks after receipt of complaint. CCA's Nominated person will implement a reasonable resolution and log the action taken. If the matter is resolved, no further action will be taken. A letter of acknowledgement will be sent to the complainant expressing appreciation for their interests and will be informed of the appropriate action taken.

For complainants who request for an independent review of a complaint, the matter will be referred to independent mediators ([www.iama.org.au](http://www.iama.org.au)), and costs will be shared equally between both parties.

Information which is received will be collected and recorded in CCA's Complaints Register and retained in the Responsible Gambling Folder. Records of complaints and decisions will be stored and will be made available upon request of VCGR.

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

Although Victorian legislation does not prohibit gambling by minors, CCA do not engage in any sales campaigns specifically targeted to minors, or knowingly sell raffle entries to minors. Selling raffle entries to minors is prohibited at all times. Call centre operators are adequately trained in this field to ensure this does not occur. CCA's Quality Assurance department coupled with team leaders and supervisors are able to monitor and verify that all sales are executed in accordance with any guidelines relevant to any raffle campaign.

## **11. THE GAMBLING ENVIRONMENT**

To ensure a responsible gambling environment, CCA do not engage in any forms of lotteries which encourage continuous play, or are targeted for minors. CCA also discourages excessive raffle ticket purchases by customers.

CCA regularly check customer database for history of excessive purchases. In circumstances where a gambling problem is made known by the customer, please refer to section 6. It is common practice for CCA to verify all transactions made over \$100. CCA also impose a maximum limit of tickets purchased in one transaction, in any case it is \$500.

Reasonable sales techniques are used by call centre operators to ensure no pressure sales techniques are employed. The Quality Assurance Department coupled with supervisors also ensure that call centre operators adhere to strict guidelines imposed.

## **12. FINANCIAL TRANSACTIONS**

CCA do not engage in extending credit or cashing cheques for the purpose of purchasing raffle tickets at any time. Customers who request such a service will be notified of CCA policy and procedure relating to financial transactions and therefore are not able to acquire credit.

Customers who request such services will be made known to the nominated person, who will assess the situation and take the appropriate steps to ensure the particular customer is assisted in such a way to ensure engagement in responsible gambling.

Incongruous laws across exist between the States and Territories in Australia regarding prize distribution. Prizes for raffles conducted in Victoria are strictly non cash prizes; the only exception is when the winner specifies the choice of a holiday, 10% of which is a cash prize. Prizes for other various raffles conducted in New South Wales comprise of a cash prize, however in compliance with legal requirements, i.e. Cash value up to \$25,000.

### **13. RESPONSIBLE ADVERTISING AND PROMOTIONS**

#### **Responsible Advertising**

To ensure engagement in responsible advertising of information relating to gambling undertaken, CCA will:

- a) Comply with advertising code of ethics adopted by the Australian Association of National Advertisers (AANA)
- b) Not engage in false, misleading or deceptive advertising
- c) Ensure advertisements are not to be offensive or indecent in nature
- d) Not create an impression that entering a raffle is a reasonable strategy for financial betterment.
- e) Not include false, misleading, or deceptive advertising about odds or prizes or chances of winning
- f) Not publish any form of advertisement which identifies customers who have won a prize without prior consent.

Prior to publishing, all advertising material is checked and signed off by the relevant department, in particular the nominated person. Future publications will be assessed against the abovementioned standards will be added into the current advertising checklist.

### **14. REVIEW PROCESS**

#### **Employee Feedback**

The focal point at which the code of conduct is introduced to new staff is at induction. The code of conduct will be made available in the induction manual distributed to each new current staff member to ensure they are informed about the responsible gambling measures employed by CCA.

Any feedback or issues raised by CCA staff at weekly meetings is addressed by senior management to ensure the implementation of the code of conduct in all relevant departments and operations.

### **15. REVIEW OF THE CODE**

Annual Review of the code will occur on the anniversary of its commencement. CCA also encourage any input or feedback from relevant staff, management or customers to ensure that the code of conduct remains operational and effective in achieving its purpose.



