

# Responsible Gambling Code of Conduct

## Northern Territory



October 2016



Australia's Official Lotteries



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## Introduction

Tattersalls 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 4,000 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.

## Objectives

- a) To ensure that lotteries remain a socially responsible, fun and entertaining experience.
- b) To provide a framework for Tatts and its retailer network for the continued responsible delivery, marketing and sale of its lottery products.
- c) To continue to demonstrate Tatts 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.

**Golden Casket** means Golden Casket Lottery Corporation Limited.

**Outlet** means the place of business of a Golden Casket or Tatts Retailer.

**Retailer** means the person(s) who has been granted a Tatts or Golden Casket Franchise and for the purpose of this Code, includes the website **www.thelott.com**.

**Tatts** means Tatts NT Lotteries Pty Ltd.

**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.

**Websites** means the Tatts and Golden Casket website **www.thelott.com**.

## 2. Commitment to Responsible Gambling

Tatts and Golden Casket and their 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 - Northern Territory (this document) describes how we demonstrate this commitment in the Northern Territory.

### **3. Availability of the Code**

A sign indicating the availability of the Code is on display in all Outlets.

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 all responsible gambling materials.

### **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 'Have Fun & Play Responsibly' sign is on display in all Outlets and on the Website. This sign includes information on -
  - i. the prohibition of the sale of lottery products to minors and to intoxicated people;
  - ii. the availability of gambling support services;
  - iii. the Complaints Handling Charter;
  - iv. the responsible gambling financial transaction policy including the restrictions that apply to the payment of winnings, the cashing of cheques, the provision of credit or the lending of money for the purposes of gambling; and
  - v. the availability of the Rules of Authorised Lotteries (NT) and the *Lotteries Rule 2010* (QLD) (**Game Rules**) for inspection in the Outlet.

- c) The Game Rules which are available for inspection in all Outlets and on the Website.
- 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 Games Rules available on request.
- e) 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.
- f) 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.
- g) Tatts online player self-exclusion information is provided on both the Website and App. This information directs online players who wish to self-exclude, to submit an online self-exclusion request or call the Responsible Play Liaison Officers (**RPLOs**) to suspend their online accounts for a minimum of 180 days. The self-exclusion page directs customers where to get help.
- h) 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 – Northern Territory; the 'Have Fun & Play Responsibly' sign; the 'Have Fun & Play Responsibly' brochure; the Game Rules; odds information and the 'How to Play' information for each game; Gambling Help Online; a link to the Northern Territory Government Sports bookmaker self-exclusion notice and information on the Players 1st Program.
- i) All self- exclusions and Responsible Play Queries handled by the RPLOs are recorded in the head office Gambling Incident Register. Self-excluded online customers will not be able to access their funds for gambling on lottery products during the exclusion period.
- j) Contact information for counselling services is available on the self-exclusion pages of the website, and is also provided to online customers who call or email Tatts or Golden Casket with a concern about problem gambling or self-exclusion. All online customers who self-exclude are removed from the promotional database to ensure that promotional letters or offers are not sent to the player during the exclusion period.
- k) A link to self-assessment tools on appropriate gambling help support sites is provided to players via the Responsible Play Program page on the Tatts and Golden Casket Websites to assist customers to manage their gambling activities.
- l) A record of online activity is available to online lottery customers in their account section on the Website.
- m) Terms and conditions for online players and for Winner's Circle and Tatts NT card program members are easily accessed on the Websites with a link from every page on the Website.

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

Membership is not available to minors or excluded players.

Tatts 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, Tatts will communicate about upcoming events or offer members the ability to enter a second chance draw by using their Tatts Card to purchase particular lottery products. The winners of any promotions conducted for Tatts Card members are contacted by Tatts.

Responsible Gambling messages are incorporated and prominently displayed in all program documentation.

Should Tatts 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.

Tatts, Golden Casket and/or their Retailers may conduct local area marketing, an example of which may include offering customers a purchase incentive which may be linked to a purchase of a certain entry type. Local Area Marketing may also include second chance draw promotions which may be based on a purchase of a certain entry type. These promotions may or may not involve the use of the Tatts Card.

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 Tatts holds about them.

## **8. Pre-commitment Strategy**

Tatts and Golden Casket encourage 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 setup. 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. Retailer and Staff Training

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

Outlet staff engaged in the provision of lottery products must complete the Tatts and Golden Casket self-paced training within three months of the commencement of their employment.

Refresher training for both Retailers and staff is conducted every two years using **the Lott** self-paced Responsible Gambling Program training materials. A training register is maintained by Retailers in their Outlet as a record of theirs and their staff training and provided to the Director General on request. Tatts and Golden Casket provide regular updates on responsible gambling to Retailers and staff in retailer newsletters or at network meetings from time to time and on Retailers Web.

Tatts and Golden Casket provide responsible gambling training and materials on induction to all key head office staff members who interact with customers or are active in the development and provision of gambling services or of advertising and promotion. Refresher Responsible Gambling training is conducted biannually for key staff members. Tatts and Golden Casket maintain a register of training for these head office staff training sessions.

## 10. Interaction with Customers

Tatts and Golden Casket have 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**.

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 will be referred to the **National Gambling Helpline on 1800 858 858**, be provided with the Gambling Help Online details and be offered assistance by the Retailer or RPLO.

On request, the RPLOs can:

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

After deactivating their Tatts Card membership, no correspondence or promotional material is to be personally mailed to self-excluded players.

Retailers in NT maintain a Responsible Gambling Incident Register at the Outlet. The RPLOs maintain a Responsible Gambling Incident Register of any telephone calls or emails received by customers experiencing a gambling problem.

Players who are noticeably distressed from gambling will be provided with information detailing gambling support services.

For interpreter services regarding Responsible Play, customers will be advised to contact the RPLOs for further information. If required, the Retailer will assist the customer by contacting the RPLOs on the customer's behalf.

Tatts and Golden Casket and their Retailers value the protection of customers' privacy and all interaction with customers will be done with due respect for their privacy.

Tatts and Golden Casket, their Retailers and their staff, must not encourage a person to gamble beyond their means.

## **11. Staff Gambling Policy**

Tatts and Golden Casket do not place restrictions on its staff or Retailers participating in the purchase of lottery products.

If a staff member from Tatts or Golden Casket, 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 and also directed to the RPLO for assistance, with due respect for the privacy of the staff member or Retailer.

Tatts 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.

## **12. Problem Gambling Support Services**

Tatts and Golden Casket are committed to maintaining strong linkages with problem gambling support services. The Group Social Responsibility Manager, 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 in various jurisdictions.

## **13. Customer Complaints**

Tatts and Golden Casket both have 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' sign and brochure, which are on display and available at all Outlets, advertise the location of the Charter on the Website.

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

#### CONTACT DETAILS - TATTS

**Phone:** 131 868  
**Email:** [support@tattersalls.com.au](mailto:support@tattersalls.com.au)  
**Fax:** (07) 3877 1140  
**Mail:** Complaints at Tatts  
Locked Bag 7  
COORPAROO DC QLD 4151  
**Visit:** Level 1,  
411 Collins Street,  
Melbourne VIC 8003

#### CONTACT DETAILS - GOLDEN CASKET

**Phone:** 131 868  
**Email:** [playersupport@goldencasket.com](mailto:playersupport@goldencasket.com)  
**Fax:** (07) 3877 1140  
**Mail:** Complaints at Golden Casket  
Locked Bag 7  
COORPAROO DC QLD 4151  
**Visit:** Golden Casket  
87 Ipswich Rd,  
Woolloongabba QLD 4102

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; and
- b) discussions 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 Tatts or Golden Casket 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 Tatts or Golden Casket and the complainant.

#### Players 1st Program

In addition to the Complaint Handling Charter, Tatts and Golden Casket have 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 a Tatts Card 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 Tatts and Golden Casket.

#### 14. 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 purchase or Tatts Card 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.

In the Northern Territory, minors are also discouraged from selling lottery products. Retailers must not run activities for minors close to the lotteries purchasing area or writing desk and any activities for minors must not promote any aspect of gambling. No activities on the Website or App will be aimed at minors whether the activity involves gambling or not.

Tatts 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, Tatts requires that the player verifies this information. Verification must be provided within 45 days otherwise the online account will be suspended. If the verification process reveals that the Tatts online player is not over 18 years of age, the account will be closed immediately and any deposited funds will be returned. Tatts and Golden Casket do not employ minors in roles which would involve interaction with customers about gambling products.

## **15. The Gambling Environment**

Tatts and Golden Casket and their Retailers provide a safe environment and discourage customers from engaging in extended gambling.

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

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

Retailers and their employees are not to verbally urge non-gambling customers to buy gambling products.

## **16. Financial Transactions**

Tatts and Golden Casket 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.

Tatts Retailers do not accept cheques from customers as payment for lottery purchases. Golden Casket Retailers may accept cheques as payment for lottery purchases but this practice is not encouraged and is done so at their own risk.

Tatts and Golden Casket Retailers do not cash cheques, including prize cheques in their capacity as a Tatts or Golden Casket Retailer.

Retailers must pay any prize winnings \$4,000 and over by an approved method other than cash. Approved methods include cheque, direct deposit and EFT.

For prizes under \$4,000, options of payment are via cash, cheque, direct deposit and EFT.

Information on the financial transaction policy is on display in all Outlets on the 'Have Fun & Play Responsibly' sign and in the brochure.

## 17. Responsible Advertising and Promotions

Tatts and Golden Casket ensure that their advertising and promotions for the Northern Territory:

- a) comply with the advertising Code of Ethics adopted by the Australian Association of National Advertisers and any television advertising and promotions comply with the Federation of Commercial Television Stations (FACTS) Code of Practice;
- 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 and all terms and conditions associated with promotions, bonus offers or competitions are clearly defined and accessible;
- 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 including players who have opted out of receiving promotional material or correspondence and including 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;
- 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. Notice of individual winnings paid should only be displayed within a Retailer's premises;
- 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;
- p) include rules and conditions of promotions or information stating where such information can be inspected;

Tatts and Golden Casket also incorporate **the Lott** Responsible Play Program tagline, 'Have Fun & Play Responsibly' into all advertising and promotional material. Responsible Gambling checklist is used by Tatts and Golden Casket in the preparation of marketing material to assist staff compliance for lottery generated promotional material.

Retailers are also obliged to ensure their own advertising and promotional materials, where they relate to Tatts or Golden Casket, 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 Tatts and Golden Casket; and
- b) incorporate **the Lott** Responsible Play Program tagline, 'Have Fun & Play Responsibly'.

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

Tatts monitors Retailers' compliance with the Code 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.

## **19. Review of the Code**

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

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.

## **20. Responsible Gambling Records**

Retailers in the Northern Territory maintain a Gambling Incidents Register together with a Record of Staff Training at each Outlet. These registers are maintained by the Retailer and stored in the Responsible Play Program folder for inspection on request.

A head office training register is maintained for key personnel trained in Responsible Gambling.

## **21. Privacy Policy**

Tatts and Golden Casket are committed to maintaining the privacy of player information collected in accordance with its Privacy Policy and takes such steps as are reasonable to protect from unauthorised or inappropriate disclosure of personal information. Full details of the Privacy Policy can be found on the Website.