Clements Group P/L T’as “The BIG Raffle”

Commercial Raffle Organiser (CRO) Responsible Gambling Code of Conduct

1. Availability of the Responsible Gambling Code of Conduct
   The Code is available on the BIG Raffle website www.thebigraffle.com.au or by request to Richard Clements, Director: admin@thebigraffle.com.au

2. Responsible Gambling Message
   Clements Group P/L is committed to selling raffle tickets responsibly to support community and charitable organisations. This message will be displayed on The BIG Raffle website and on material developed by Clements Group P/L for the promotion and conduct of raffles on behalf of community and charitable organisations.

3. Responsible Gambling Information
   Information about the following is available The BIG Raffle website at www.thebigraffle.com.au or by request to Richard Clements: admin@thebigraffle.com.au
   - 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 Clements Group P/L 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 website at www.thebigraffle.com.au or by request to: Richard Clements: admin@thebigraffle.com.au
   This information will include how to enter and the odds of winning the stated prizes based on the total possible ticket sales.

5. Customer Loyalty Scheme Information - no scheme is currently available.

6. Interaction with Customers
   Clements Group P/L telephone 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. In addition for customers who have indicated that they have a gambling problem or where a canvasser forms the view from the caller that a caller may be overextending themselves financially:
   - Telephone canvassers will offer to end the call/call back later if the customer wishes to continue with their ticket purchase (cooling off period)
   - Provide a telephone number whereby credit card purchasers could amend or cancel their order (cooling off period)
   - 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 [cooling off period]
   - Where tickets sold by mail an upper limit of 2 books will be issued to a customer to purchase/sell at any one time.

7. Interaction with Staff
   Staff are not permitted to purchase raffle tickets being sold by Clements Group P/L.
   A nominated manager/ supervisor of Clements Group P/L 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 Manager or a senior staff member of Clements Group P/L 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 staff, and made available for use with customers, as soon as practicable after it is received.

9. Customer Complaints
Specify/describe Clements Group P/L usual complaints handling process for use for complaints against the Code. Identify an independent process for handling complaints unable to be settled by the regular process.

10. Compliance with the prohibition on gambling by minors
Raffle tickets may be sold to persons under 18 years of age except where prizes are products that cannot be legally purchased by minors such as alcohol, gambling products etc. The terms and conditions of the raffle will state that prizes of a type which could not legally be purchased by a minor (such as alcohol) will be awarded to a parent or guardian.
Clements Group P/L will not target a promotion or sales campaign at minors and will not knowingly sell raffle tickets to minors.

11. The Gambling Environment
Clements Group P/L will discourage repeatedly excessive purchase of tickets by customers. To achieve this Clements Group P/L will:
- Set a limit on the quantum or value of tickets to be sold to an individual
- Check database of regular ticket purchasers to detect a pattern of excessive purchase
- Not engage in hard/pressure sales techniques

12. Financial Transactions
Clements Group P/L will not cash customer’s cheques or extend credit to customers to purchase raffle tickets. Customers will be advised of this at the time if they request such a service. Prizes of cash are not permitted in Victoria by law except that cash may form up to 10 percent of a travel prize.

13. Responsible Advertising Promotions
Any advertising and promotions undertaken by Clements Group P/L in relation to a raffle will:
- Comply with the advertising code of ethics adopted by the Australian Association of National Advertisers
- 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.
Clements Group P/L will incorporate the above standards into its advertising checklist and will assess all proposed advertising against these standards.

Processes and Structures to Support the Ongoing Implementation of the Code.
1. Responsible Gambling matters will be a standing item for Board 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

Code Review Process
1. Clements Group P/L code will be reviewed each year on the anniversary of its commencement.
2. Input will be obtained from management and staff and a sample of patrons about the operation and effectiveness of the Code.
A report of the review will be provided to the VCGLR by 30 June each year.