

POLICY: Responsible Fundraising Gaming Code of Conduct

Current From:	March 2025	For Review:	March 2028
Version:	3.0	Replaces (last version):	April 2023
Custodian:	Level 3 - Board	File/Lifesaving Unit	Corporate Services

1. Availability of the Responsible Fundraising Gaming Code of Conduct

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

2. Responsible Gaming Message

The Royal Life Saving Society WA Inc is committed to promoting gaming-based fundraising campaigns responsibly to support community and charitable organisations.

The above message will be displayed on RLSSWA's website and on material developed by RLSSWA for the promotion and conduct of gaming-based fundraising on behalf of community and charitable organisations.

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

3. Responsible Gaming and Gambling Information

Information about the following is also available on the RLSSWA website at <https://royallifesavingwa.com.au/> or by request to 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 RLSSWA for the purposes of supporting gaming-based fundraising campaigns.

4. Gaming Product Information

The terms and conditions for conducting a gaming-based fundraising campaign will be printed on resources designed to promote the campaign, and/or links to publicly accessible campaign webpages and/or by request to the 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 terms and conditions of the fundraising campaign.

RLSSWA run an opt-in "do not call" list for gaming-related telephone calls. Once a customer has elected not to be called for a specific charity's fundraising campaign, they will not be called for any subsequent campaigns for that charity.

5. Customer Loyalty Scheme Information

Royal Life Saving Society WA offers a Loyalty Scheme for RLSSWA supporters only, with a monthly limit of \$200/month.

6. Engagement with Customers

RLSSWA fundraising staff will assist customers who request it with information about help with a gaming or gambling problem.

This information will include referral details to a Gambling Help telephone service and/or information materials prepared by Gambling Help services.

- Where gaming-based fundraising products are sold in excess of \$1,000 (in a single transaction), a verification call will be made to confirm the supporter's capacity to make the purchase.
- We will limit gaming-based fundraising product sales to \$2,500 for any individual in any three-month period, unless expressly authorised by the Chief Marketing Officer.

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

- Telephone fundraisers will offer to end the call/call back later if the customer wishes to continue with their purchase.
- Provide a telephone number whereby credit card purchasers could amend or cancel their order (subject to relevant state regulations).
- Where products are sold in person, suggest that the purchaser take a moment to reflect on whether they wish to purchase the product.
- Where products are sold by mail an upper limit of \$1,000 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 gaming-based fundraising campaign are not to purchase gaming-based products being sold by RLSSWA.

A nominated manager/supervisor of RLSSWA will assist any staff member who requests it with information about help with a gambling problem. This information will include referral details to a Gambling Help telephone service and/or information materials prepared by Gambling 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 gaming-based fundraising purchases) will be offered the above information and assistance.

8. Interaction with Problem Gambling Support Services

The Chief Marketing Officer or a senior staff member of RLSSWA will contact Gambling 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 1300 132 770 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 Chief Marketing Officer. The Chief Marketing Officer 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.iaama.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 gaming-based fundraising products to minors. In addition, fundraising staff will take reasonable steps to ascertain the age of the customer prior to the purchase of gaming-based fundraising products, 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 gaming-based fundraising products by customers.

To achieve this RLSSWA will:

- Set a limit on the quantum or value of gaming-based fundraising products to be sold to an individual customer.
- Check the database of regular 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 gaming-based fundraising products.

13. Responsible Advertising Promotions

Any advertising and promotions undertaken by RLSSWA in relation to a gaming-based fundraising products will:

- Comply with the fundraising code of ethics adopted by the Fundraising Institute Australia.
- Not be false, 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 gaming-based fundraising campaign is a reasonable strategy for financial betterment.
- Not promote the consumption of alcohol while promoting gaming-based fundraising products.

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 Gaming Officer will be identified from among senior staff to:
 - a. Handle more difficult customer contacts.
 - b. Liaise with Gambling 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 gaming and gambling issues and the Code.
 - d. Handle responsible gaming and gambling issues raised by staff.
 - e. Identify staff worthy of reward and recognition for their responsible gaming and 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.
3. A report of the review will be made available to each state regulator by 30th June each year.